



Code of Ethics

Approved by the Epta S.p.A. Board of Directors in the meeting held on November 24, 2022
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Message from the President and CEO

Ever since my father, Luigi Nocivelli, made the first acquisitions in Italy and France in the late 1980s, our Group has grown both internally and externally, going on to become a “billion Euro company” (and more!). Today the Group has more than 6,000 employees. Thanks to our production facilities and technical and commercial offices, Epta is present in over 100 countries worldwide, offering production and assistance, research, marketing, sales and distribution of refrigeration systems for the retail, food & beverage and hospitality sectors.

We are very proud of these achievements. But at the same time, we are aware that we must adopt increasingly stringent standards if we are to continue on this successful path. The strategies, decisions and actions that distinguish our daily actions are based on the principles and values set out in this Code of Ethics. They are pursued by all of us here at Epta, and they must also be pursued by all those working with our Group, regardless of nationality, position or seniority. Our first Code of Ethics was adopted in 2008, and this new edition aims to reaffirm our ethical approach to business, based on respect for people and the environment, on responsibility and fairness of conduct, on integrity and respect for the rule of law and diversity in the countries in which the Group operates, whilst also focusing on research and innovation, sustainability and the quality of our solutions. What we sum up in two words: “Sustainable Innovation”.

We believe it is essential to continue to pursue these values and confirm them in this Code of Ethics, so that they become common assets within the Group. In fact, by ensuring our behavior and actions are guided by the Code of Ethics, I believe it will be possible to continue to satisfy our customers all over the world, and accordingly continue to create value for our Group, and all the stakeholders who work with us.

I have great confidence in your contribution, and I feel sure each of you will make this Code your own and apply it on a daily basis. For my part, there will always be a commitment to ensure the Group offers you the support and instruments needed to achieve this important goal.

I count on all of you.

Cav. Lav. Ing. **MARCO NOCIVELLI**
Chairman and CEO

Why have a code of ethics?

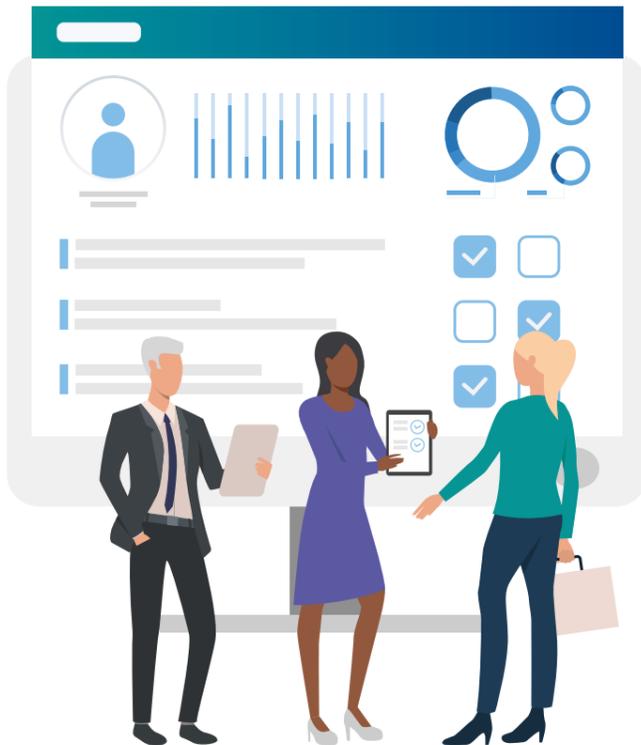
This Code of Ethics (the “Code” or “Code of Ethics”) lists the principles and rules of conduct that express the commitments and ethical responsibilities in conducting business and company activities by all those who have relationships of any kind with Epta S.p.A. (“Epta”) and/or with the companies of the Group (the “Group”)

The Group considers it appropriate and necessary to adopt a Code of Ethics that sets out the values with which all Recipients - internal and external - must comply by accepting its responsibilities and rules.

The Code of Ethics guides the Group’s actions towards cooperation and trust in its relations with internal and external stakeholders, in the firm belief that a good reputation and corporate credibility promote shareholder investments, relationships with institutions, customer loyalty, development of people and fairness and reliability of suppliers.

The Code of Ethics is inspired by the main regulations, guidelines and documents (at national and international level) on the subject of corporate social responsibility, corporate governance and human and environmental rights. These include the United Nations Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, the fair working standards set out in the ILO (International Labor Organization) conventions, and the Guidelines for Multinational Enterprises of the OECD (Organization for Economic Cooperation and Development).

The Code of Ethics also introduces and makes binding the principles and rules of conduct on crime prevention, as described in the Legislative Decree dated 8 June 2001, no. 231, governing the corporate liability of entities. The Code is fully integrated with the Organization, Management and Control Model adopted by Epta, pursuant to Legislative Decree 231/2001, of which it is a fundamental supporting part.



The recipients



The recipients of the Code of Ethics (hereinafter also the “Recipients”) are:

The shareholders

The members of the corporate bodies of the group

The employees (including those in executive management positions)

The contractual counterparties of each group company, including suppliers, sub-suppliers, contractors, sub-contractors, service providers, agents, consultants, external partners which, by way of example, are third parties with whom the group, for various reasons, has contractual relations

Co-workers, including temporary workers and interns

Anyone who establishes, directly or indirectly, permanently or temporarily, a relationship with the **Group**

Anyone acting in the name and/or on behalf of the Group or in its interest

All Recipients must familiarize themselves with the Code of Ethics and adopt the appropriate conduct within and/or on behalf of the Group, in line with the principles and rules set out by the Code.

General principles

In fulfilling its corporate *mission*, the conduct of all Recipients of the Code of Ethics must be inspired by the following principles:



Responsibility

we are aware of the consequences of our course of action, and of the impacts our business has on the society and territories in which the Group operates, and accordingly we make serious and responsible choices



Trust

: we trust in our own potential as well as that of others, and tackle future challenges with a positive and proactive approach



Loyalty

we operate with an approach of fairness and respect for our own dignity and that of others, while maintaining the commitments made



Honesty

our attitude is driven by moral rectitude and integrity, as well as by firm and constant compliance with the laws, regulations and standards that apply in all the countries where the Group operates



Transparency

we are committed to providing truthful, accurate and complete information both inside and outside the Group, guaranteeing full transparency of activities carried out for all our stakeholders



Fairness

we respect the rights of all the different parties involved in our working and professional activity. This also makes it necessary to eliminate any potential conflict of interest between employees and the Group, ensuring that the choices made and strategies adopted in the context of the company's operations are solely geared towards satisfying corporate interests



Efficiency

we aim to carry out every activity by and for the Group in accordance with our mission, in keeping with goals of economy, and managing resources effectively



Meritocracy

we promote a culture of acknowledging merit and fair treatment based on responsibilities and results



Relations with stakeholders



SECTION 1

- 1.1 Environment protection
- 1.2 Corporate social responsibility
- 1.3 Relations with the shareholders and the market
- 1.4 Relations with customers
- 1.5 Relations with suppliers
- 1.6 Relations with public authorities
- 1.7 Relations with political and trade union-related organizations
- 1.8 Protection of competition
- 1.9 Conflicts of interest
- 1.10 Counter-corruption measures
- 1.11 Countering money laundering and self-laundering
- 1.12 Contributions and sponsorships

1.1 Environment protection

The Group is aware of the impact its activities have on the quality of the environment in the areas in which it operates.

For this reason, the Group, in conducting its business (as well as targeted initiatives and projects), is committed to spreading a culture of respect for the environment, promoting responsible behavior within it, helping to safeguard the environment and sustainable development of the territory.

In accordance with the applicable environmental legislation, the Group regularly checks the impact of its activities on the environment based on the relevant values. It takes any steps needed to remedy negative effects and adjust its operating procedures and, in its procurement of goods and services, strives to promote improvements to its energy performance in its production sites and facilities, as well as in its business activities.

In particular, the Group is determined to contribute towards achieving the goal of reducing CO2 emissions as well as other applicable sustainable development goals, as established by the United Nations Agenda 2030, bearing in mind that companies have a decisive role to play in the climate change battle.

The Group's commitment also involves implementing the following actions:



Reduction of energy consumption as well as rational and efficient use of energy



Reduction of the use of fossil fuels and of the amount of CO₂ emitted by the production plants



Participation in research and innovation projects to improve manufacturing, and making products that are energetically efficient and environmentally friendly

1.2 Corporate social responsibility

The Group operates with the belief that, in a global scenario, economic performance and social development are the interdependent keys of the Group's competitiveness and sustainability.

The Group's commitment to corporate social responsibility includes a series of voluntary and charitable initiatives supporting research foundations, new business initiatives, local areas, communities or specific categories of individuals.

The Group also collaborates with universities and research centers in order to guarantee young people opportunities for training and access to employment.

The Group also pursues a policy of sourcing raw materials in compliance with socially responsible choices, in line with national and supranational legislation as well as applicable international standards.



1.3 Relations with the shareholders and the market

The Group is aware of the important role played by shareholders, and ensures they receive information that not only complies with applicable laws and regulations, but is also transparent, accurate, truthful and timely. The aim of this information is to enhance participation in corporate decisions, within the scope of their respective areas.

The Group provides the necessary information so that shareholder decisions can be based on a knowledge and understanding of corporate strategies and management trends.

The Group is committed to respecting and promoting the rights of its shareholders. This ensures a constant and open relationship, whilst protecting their investment and maximizing the company's value. Within this context, in compliance with EU and national regulations, best corporate governance practices are adopted. Maximum transparency and timeliness of shareholder dialogue are fostered, promoting shareholder input and creating the conditions for making informed choices.

1.4 Relations with customers

Customers represent an asset to be protected in the pursuit of the corporate *mission*.

The Group establishes a relationship with its customers based on professionalism, quality of the goods and services offered, availability, respect, loyalty, fairness, transparency and cooperation.

Accordingly, the Group strives to:

<p>Satisfy its customers in fulfilling its contractual obligations</p>	<p>Encourage interaction with customers through prompt management and resolution of any complaints</p>	<p>Ensure the required quality and safety standards are achieved</p>
<p>Communicate any information relating to changes in its contractual services promptly and in the most appropriate manner</p>	<p>Periodically monitor the quality of the service provided to customers (<i>customer satisfaction surveys</i>).</p>	

The Group will not maintain relations with customers in association to which legally questionable situations or conflicts of interest arise. The obligations aimed at preventing and repressing any form of corruption in its relations with customers remain valid, as stipulated in the paragraph dedicated to counter-corruption measures.

1.5 Relations with suppliers

Suppliers are defined as suppliers of goods or services, as well as sub-suppliers, contractors, sub-contractors, service providers, consultants, agents, intermediaries and any other third parties with whom the Group has contractual relations in various capacities or who act in the name of, on behalf of and/or in the interest of the Group.

The Group considers its suppliers as partners; for this reason, it fosters a relationship based on the utmost fairness and professionalism, by building solid and long-term relationships of trust in accordance with relevant company procedures and applicable laws and regulations.

The choice of the supplier must be made in keeping with objective criteria and principles, including:

- the principle of competition, objectivity and equality of the conditions of tenderers;
- objective assessments relating to competitiveness, technical and organizational capacity, reliability (including in financial terms), quality, usefulness, price of the supply, match between its offers and company needs, as well as full compliance with the Group's values and ethical standards.



Partners

The Group fosters fair and professional relations with its partners



Relations with suppliers are also subject to constant and careful monitoring, not least in terms of suitability of the services or goods supplied in respect of the agreed price.

The supplier's fulfillment of contractual obligations must also comply with the principles of equity, fairness, diligence, quality of services or goods offered and good faith, and must also comply with current legislation.

The Group will not entertain relations with suppliers in relation to which situations of conflict of interest or legally questionable situations arise, especially regarding suppliers suspected of belonging to or facilitating criminal organizations, who behave in a manner that does not comply with the applicable rules as well as with the established and shared principles of the Group. The obligations aimed at preventing and countering corruption in any form in the relations with suppliers remain valid, as set out in the paragraph dedicated to countering corruption.

1.6 Relations with public authorities

Relations with the Italian or foreign Public Authorities, as well as with public officials and public servants, are maintained exclusively by the specifically authorized persons, in compliance with the applicable internal procedures. Said persons must not be in a situation of conflict of interest with respect to the representatives of the Public Authority.

Relations with the Public Authorities must be based on the principles of fairness, loyalty, utmost cooperation, equity and transparency, and must comply with the applicable laws and regulations.

Recipients are required:

To avoid any behavior aimed at obtaining from the State, other public body or supranational organization, **any type of funding, loan, special-rate mortgage** or other similar disbursement **by means of declarations and/or documents which have been tampered with or falsified**, or by omitting information, including by means of a computerized or electronic system

To refrain from making any requests, interference or pressure where an employee, director or coworker is called as a **witness in legal proceedings involving the Group**

Not to solicit or obtain confidential information that could compromise the integrity or reputation of both parties, or that in any case violates equal treatment and public tender proceedings initiated by Public Authorities

Not to allocate contributions, subsidies or loans obtained from the State or other public body or supranational organization to any purposes other than those for which they were intended, even if of modest value and/or amount

To avoid reticent, omissive or obstructive behavior towards Public Authorities

To always guarantee the traceability and documentability of contacts between the Group and Public Authorities



If the Group's companies are represented by a third party in its relations with Public Authorities, the relevant internal procedures are applied to said **third party** and its staff.

The obligations aimed at preventing and countering corruption of any kind remain valid, as set out in the paragraph dedicated to countering corruption.

1.7 Relations with political and trade union-related organizations

The Group does not contribute in any way to funding for political and trade union parties, movements, committees and organizations, their representatives and candidates, except for the cases provided for by specific regulations.

1.8 Protection of competition

The Group ensures fairness and clarity in commercial negotiations and in bearing contractual obligations, as well as the faithful and diligent fulfillment of the same.

The Group considers compliance with competition regulations and free market protection in force at any given time as essential.

All Recipients are obliged to refrain from engaging in anti-competitive conduct prohibited by law such as, by way of example but not limited to: participation in agreements to limit competition, carrying out deeds that abuse a dominant position likely to damage the free market, or establishing price-fixing or market-sharing cartels, as well as the acquisition of trade secrets or other sensitive information through illicit means.

1.9 Conflicts of interest



Integrity

Employees, shareholders and directors must all maintain their own autonomy

In accordance with its values of honesty and transparency, and with the aim of preventing any potential illegal circumstances from arising, the Group undertakes to take all necessary measures to prevent conflicts of interest.

Employees, shareholders and directors must maintain independence and integrity in order to avoid making decisions or carrying out activities in situations, even if only apparent, of conflict of interest with respect to the Group's activities. In fact, any activity that conflicts with the proper fulfillment of duties, or which might damage the interests and image of the Group, must be avoided.

By way of non-exhaustive example, in conducting their business, employees, shareholders and directors may not:

- carry out work on behalf of competing companies;
- perform their professional activity on behalf of competitor companies as a consultant, coworker, member of the Board of Directors or the Board of Statutory Auditors or other corporate bodies, without the consent of the Group company concerned;
- represent, act and work on behalf of a supplier or customer of the Group's companies.

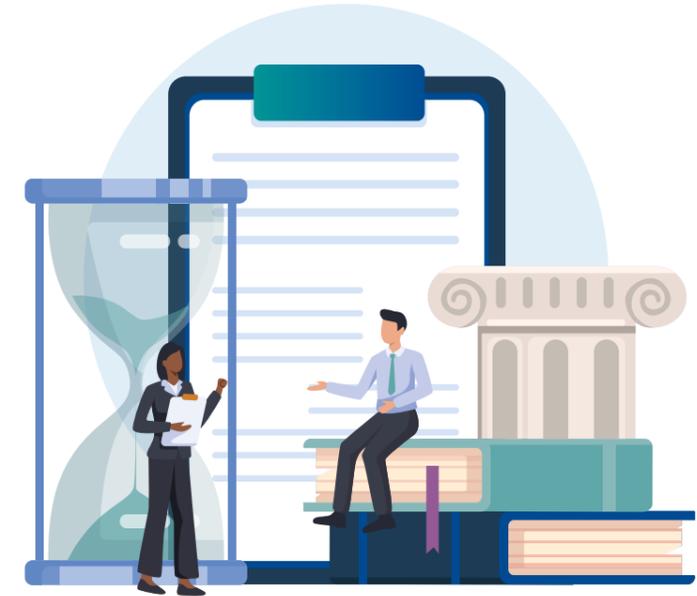


Any situation of conflict of interest (be it real, potential or apparent) must be promptly notified, in accordance with the procedures set out in the specific corporate guidelines.

1.10 Counter-corruption measures



The Group is firmly committed to **countering corruption in all its forms** (active, passive, in the public sector as well as in the private sector) **in all the countries in which it operates**, with the awareness that corruption constitutes a major obstacle to social wellbeing, competitiveness and sustainable development.



All employees must **refrain from any act or behavior that could constitute corruption**, both in their relations with public officials and with Public Authorities, and in the relations with individuals, paying particular attention to cases of cooperation with agents, consultants, intermediaries and in general with any third party acting in the name of, on behalf of and/or in the interests of the Group.



Commitment

The Group is committed to countering any form of corruption

In particular, it is forbidden to:

- give, offer, promise, receive, accept, solicit, directly or indirectly, including through third parties, to and/or from (i) individuals belonging to Public Authorities, including public officials and public servants; (ii) members political parties or the parties themselves and trade union organizations; (iii) customers, suppliers, consultants, agents, intermediaries, business partners; (iv) any other person or organization acting in the name of, on behalf of, in the interests of and/or for the benefit of the Group; (v) family members or individuals in any way connected to the above: money, gifts, services, complimentary handouts, hospitality and/or any other form of benefit, with the aim of influencing or improperly compensating the counterparty in order to obtain an undue advantage for themselves, for others and/or for the Group.
It is permitted to give, offer, promise, receive, accept gifts, hospitality and other benefits as long as they are of modest value, in accordance with normal commercial and courtesy practices, provided that they are not aimed at obtaining an undue advantage for oneself, for others and/or for the Group, and in any case subject to compliance with applicable legislation;
- directly or indirectly, the activity, or of compensating them for exercising their roles;
- give, offer, promise, receive, accept or solicit any money, gifts, services, complimentary handouts, hospitality and/or any other utility as remuneration for an illicit mediation activity conducted by a person - including those belonging to the same Group - who has existing or alleged relations with the Public Authority, a public official or a public servant;
- obtain or attempt to obtain false licenses and authorizations, or speed up the process;
- influence, avoid or hinder audits, including, by way of example, by altering or falsifying the information and documentation provided and/or by making such information and documentation available in an incomplete or untimely manner.



Under no circumstances may pursuit of the interest or advantage of the Group justify conduct in violation and/or breach of the provisions of the law or regulations in force.

1.11 Countering money laundering and self-laundering



The Group requires maximum transparency in business operations and in relations with third parties, in full compliance with national and international regulations regarding endeavors to counteract fencing, money laundering and the use of revenues, goods or benefits deriving from criminal activities in any form or manner. All financial transactions, including those with Group companies, are adequately justified in contractual relationships and are carried out using forms of payment that guarantee their traceability.

Consequently, the Recipients cannot enter into business relationships on behalf of the Group with customers, suppliers or any other third party which does not give guarantees of honorability, do not have a good reputation or whose name is associated with events related to money laundering.

1.12 Contributions and sponsorships

The Group only accepts requests for donations from *non-profit* organizations and associations, or organizations of cultural and social value, and in engaging in such initiatives it undertakes to pay particular attention to possible conflicts of interest and illegality.

Any such donations and sponsorships can be made once specific agreements have been drawn up and checks have been run to determine that the beneficiaries and the event/initiative promoted are honorable. It endeavors to avoid making donations and offering sponsorships to counterparties whose honorability, membership of criminal organizations or commission of crimes, including those relating to money laundering, is even suspected.

It is therefore mandatory to:

Assess the reliability of the beneficiaries and that they comply with the Group's values

Offer donations that comply and are coherent with the laws in force, also ensuring the activity carried out is documented

Employees and coworkers

SECTION 2

- 2.1 Respect of the person and of human rights
- 2.2 Non-discrimination and equal opportunities
- 2.3 Management and development of personnel
- 2.4 Health and safety at work



2.1 Respect of the person and of human rights

Respect for the person is mainly implemented by fostering a positive working environment in which everyone is given the opportunity to grow and develop skills and competencies.

The Group recognizes the importance of maintaining and promoting human rights and respecting workers' rights throughout the value chain. In this regard, the Group adopts the principles set out in the most relevant international conventions and declarations regarding respect for the person and the worker, including the Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, the UN Convention on the Rights of the Child and Adolescent, and the OECD Guidelines for Multinational Enterprises.



The Group expressly prohibits violations of current legislation on:

- immigration;
- forced labor;
- trafficking in persons;
- enslavement;
- exploitation of child labor;
- any other type of exploitation that takes advantage of the personal circumstances of a subject/ category of subjects, regardless of the consent of the subject being exploited.

The Group also rejects any kind of physical, verbal, sexual or psychological harassment, abuse, threats or intimidation in the workplace, thus guaranteeing fair working conditions in the countries where it operates. Any form of harassment in the workplace and any attitude in any way related to *mobbing* practices is therefore strictly forbidden.

Behavior is considered as such if it:



Guarantee
The Group guarantees dignified working conditions in the countries in which it operates



Creates an intimidating, hostile, isolating or in any case discriminatory working environment for individuals or groups of workers



Carries out **unjustified interference** with the performance of others' work



Hinders the job prospects of others for reasons purely linked to personal competitiveness or that of other employees



Renders **any decision of importance** to the recipient's working life subject to the acceptance of sexual favors



Induces employees to engage in sexual favors through the **influence exerted with his or her own role**



Proposes private interpersonal relationships despite the manifest or reasonably obvious displeasure of the receiving party

2.2 Non-discrimination and equal opportunities



The Group recognizes and promotes the **value of its human resources**, the protection of their physical and moral integrity, respect for their autonomy and the importance of their participation in its business, in the knowledge that human resources are one of the most invaluable assets that have enabled, and will continue to enable, the Group to continue its development

The Group is committed to **guaranteeing equal opportunities to all its human resources** and therefore to **preventing and avoiding any form of discrimination** based on age, gender, skin color, sexual orientation, marital status, religious belief, language, ethnic or national affiliation, health status and different physical or mental abilities, state of pregnancy, maternity or paternity, including adoptive, personal beliefs and opinions, political opinions, trade union affiliation or activity and any other form of diversity or any other personal status or characteristic.

The Group also aims to **create an inclusive work** environment capable of welcoming differences and enhancing them, in the belief that diversity is an asset for the development of the entire Group as well as a tool for meeting the challenges of the market.



2.3 Management and development of personnel



Development

The Group engages in developing and stimulating expertise and professional value

In keeping with general work efficiency requirements, forms of **flexibility in work organization** that facilitate the management of maternity, paternity and childcare are promoted, as well as any initiatives geared towards promoting the work-life balance in general.

The Group is also committed to **developing skills and stimulating the professional worth, capabilities and potential** of its employees so they can achieve their objectives in full. This also takes the form of special training activities such as *on-the-job training*, *on-line* and classroom training.



Within the framework of personnel management and development processes, decisions made are **based on the correspondence between expected results and employee profiles**, as well as on **considerations of objective performance assessment**, without any form of discrimination or favoritism.

The Group also guarantees a **remuneration and career system based on commitment, merit and the achievement of individual objectives** assigned.

2.4 Health and safety at work

The Group offers special training and information activities to raise awareness of and consolidate a culture of safety to protect the health of staff in the workplace. It does so by developing risk awareness and promoting responsible behavior by all employees and/or coworkers who come into contact with the company.

The fundamental principles and criteria, on the basis of which decisions on health and safety at work are made, can be summarized as follows:

Assess

Assess all risks by identifying solutions to reduce those risks that cannot be eliminated;

Prevent

Prevent risks related to health and safety in the workplace

Tackle

Tackle risks at their origin

Adapt

Adapt the work per person, paying particular attention to the working environment and, as far as possible and in line with the work performed, attempting to mitigate monotonous and repetitive work and reduce its effects on people's health

Plan

Plan preventive actions, drafting coherent procedures that combine technology with work organization, working conditions, social relations and the influence of working environment factors

Adapt

Adapt to the level of development of science and technology in the field

Give

Give clear and appropriate instructions to workers, ensuring they receive ongoing training

Replace

Replace what is dangerous with that which is not or is less so

Strict observance of occupational health and safety regulations is also required by all stakeholders.

Employees must use all work equipment and safety devices correctly and responsibly, promptly reporting any flaws in the above and taking direct action, in the event of an emergency, within the scope of their skills and possibilities, to eliminate or reduce such flaws or dangers.

Corporate information and data protection



SECTION 3

- 3.1 Protection of confidential information and of privacy
- 3.2 Protection of corporate assets
- 3.3 Protection of industrial and intellectual property
- 3.4 Financial statements, accounting and tax

3.1 Protection of confidential information and of privacy

The Group is committed to protecting any sensitive, confidential or reserved information, data or documents concerning the Group and/or third parties which the Group operates or has relations of any kind with.



Recipients are required to:



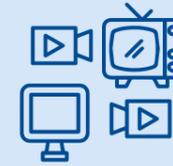
Keep strictly confidential, and under the exclusive property of the Group, any information, data or news of which they become aware or are in possession of in connection with their working or professional relations, in order to protect the company's assets



Ensure that a confidentiality agreement/clause has been signed by the parties before sharing the Group's confidential information with third parties



Comply with laws, regulations and company procedures with regard to any external communication of documents and information concerning the Group



Reserve relations of the Group's companies with the mass media exclusively to the appointed departments, in order to ensure all information is complete and consistent



Not disclose confidential and reserved information even after the post within the company has been terminated, or after the termination of the employment and/or collaboration contract



Store data in such a way as to prevent third parties from gaining knowledge of it



Communicate and disclose the data within the framework of the Group's established procedures, or with the prior authorization of the person delegated to do so

In compliance with applicable laws and regulations, the Group protects the personal data of the Recipients and consequently adopts specific technical and organizational measures to ensure their protection against any form of unlawful use, destruction, loss, unauthorized access or processing, as well as procedures aimed at adequately informing the persons concerned.

Recipients are therefore required to:

- process personal data in compliance with the processing principles laid down in the applicable legislation, in any case fairly and for a specific, clear and legitimate purpose;
- ensure that processing is only carried out by persons authorized to do so; and;
- keep processed personal data only as long as they are necessary for the purpose for which they were collected.

3.2 Protection of corporate assets

The Group makes assets (tangible and intangible), equipment and information systems available to employees and coworkers to fulfill their duties. The Group trusts they will be protected through responsible behavior and, in compliance with the laws in force, shall take the necessary measures to prevent possible misuse of its assets, equipment and information systems.

Each employee and coworker is directly and personally responsible for the protection and legitimate use of the assets, equipment and computer systems assigned to them or at their disposal.

Employees are also required to:



Use and keep the company's **goods**, equipment and information systems put at their disposal for work-related reasons with care



Not use them in a manner contrary to the appropriate company's procedures



Avoid any form, even attempted, of **undue intrusion or damage** to the computer systems of the company or other entities



3.3 Protection of industrial and intellectual property

Intellectual property, patents, trademarks, logos, copyrighted materials, inventions, trade secrets and other confidential internal information - including business plans and strategic projects, marketing, pricing and sales data, commercial and organizational details - are extremely valuable assets on which the Group's competitive strength is based.

The Group therefore acts in full respect of the industrial and intellectual property rights legitimately held by the Group and by third parties, as well as of the laws, regulations and international conventions protecting such rights.

The Group also favors and promotes the innovation and technological evolution of the products and processes made by its employees and third parties who work for the Group.

The Recipients are therefore required to:



Refrain from any conduct that may involve usurping industrial property rights, altering or counterfeiting distinctive signs of industrial products, or of patents, designs or industrial models, both domestic and foreign, or violation of intellectual works protected by copyright;



Refrain from importing, commercializing or otherwise using or circulating industrial products with distinctive signs that are counterfeit, mendacious or altered, or made by usurping the rights of third parties;



Not allow third parties to use the group's patents, trademarks or intellectual property without the necessary authorization and an approved license agreement;



Not allow third parties to use proprietary material and material with the group's logo without prior authorization;



Strive to safeguard intellectual property with the utmost care, disclosing it only when strictly necessary and with prior authorization, within the framework of confidentiality agreements.

3.4 Financial statements, accounting and tax

Truthfulness, accuracy, completeness and clarity of information represent the necessary conditions that allow transparent accounting, and are of key value for the Group, not least in order to guarantee third parties the possibility of having a clear picture of the enterprise's economic, equity and financial situation.



With reference to tax regulations, the Group complies with current tax regulations, also in the foreign countries in which it operates. It faithfully represents management events according to criteria of clarity, truthfulness and correctness, in compliance with internal procedures, and it undertakes to promptly communicate the information required by current regulations in order to ensure tax are correctly calculated, certified and settled.

The Group also undertakes to comply with current customs regulations, not least in order to ensure border duties due for import or export operations are calculated correctly, and that the obligations arising therefrom are defined properly.



It is therefore necessary to:



Keep **accurate and complete company accounts**, avoiding falsifying, omitting, misrepresenting, altering or concealing any information, encouraging or allowing anyone else to compromise the accuracy and integrity of the bookkeeping



Provide the **utmost cooperation** so that management facts are correctly and promptly represented in the company's accounts, financial statements and other corporate communications required by law



Keep **all supporting documentation**, so that it can be easily found and consulted by persons entitled to carry out checks

Contacts and violations

SECTION 4

- 4.1 Reports and contacts
- 4.2 Violations of the code of ethics



4.1 Reports and contacts

The Group is aware of the fact that respect for legality and adoption of ethical behavior are an essential key to success and to the wellbeing of the community.



All Recipients are invited to promptly report (including via anonymous means), in good faith and to the best of their direct knowledge, detailed circumstances based on precise and consistent factual elements, as well as on reasonable suspicions, acquired in the work context, which are or may reasonably be related to a breach of this Code. They must be reported through the confidential and secure reporting channel available at the following address:

<https://eptawhistleblowing.integrityline.com>



The Group is committed to protecting whistleblowers and will refrain from intimidation, discrimination and retaliation, in any form whatsoever, as well as actions and conduct that may cause reputational damage or unfavorable treatment to whistleblowers, as a result of reporting facts and other circumstantiated events provided in good faith and to the best of the whistleblower's direct knowledge, unless it is found that the whistleblower has knowingly and intentionally, or through gross negligence, made a false and/or defamatory and/or misleading report.

For any request for information or clarification on the Code as well as on compliance issues, however, you can contact the Group at the following e-mail address:

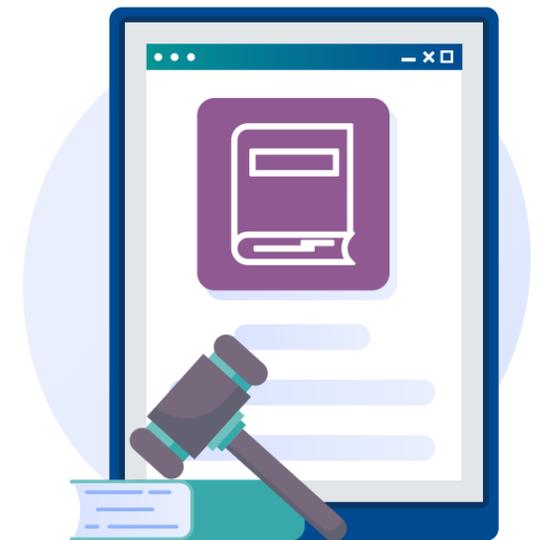
compliance@eptarefrigeration.com

4.2 Violations of the code of ethics

The provisions of the Code are binding, without exception, for all Recipients.



Any conduct in breach of the Code's provisions damages the relationship of trust established with the Group, and may lead to the adoption of disciplinary measures for employees, up to dismissal in the most serious cases, as well as the termination of the contractual relationship with the other Recipients, without prejudice to any claim for compensation if such conduct causes damage to the Group.



With reference to the penalties imposed, it should be noted that they shall be applied in compliance with local regulations, based on the relevance of the cases in question, and shall be proportionate to their severity.



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