



Administrative Headquarters, Production Plant, Offices and Warehouses

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Tax Code and P.I. IT02557980014, Share Capital I.V. Euro 51480,00



SOLID CARBIDE PRECISION TOOLS

COMPANY POLICY

**ORGANISATIONAL MANAGEMENT AND CONTROL MODEL
PURSUANT TO LEGISLATIVE DECREE NO. 231/01**

Code of Ethics of Nuova C.U.M.E.T. S.r.l.

Purpose: The Code of Ethics aims to collect in a single document, easily shared with all the Recipients, the common principles and values to which all employees, collaborators and parties who conduct business with Nuova C.U.M.E.T. are invited to conform.

Validity All Nuova C.U.M.E.T. S.r.l. plants and offices

Review 0 – First Issue

Publication The only valid version of this document is the Italian version published on the company intranet and on the web page of Nuova C.U.M.E.T. S.r.l.

Date of approval 14.01.2025

Approved by Board of Directors

M. Padalino (*Chairman of the Board of Directors and Employer*)



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1. INTRODUCTION

NUOVA C.U.M.E.T. has adopted this Code of Ethics to summarize and underline the fundamental values on which its organization is based.

NUOVA C.U.M.E.T. relates to and has Customers and Suppliers in many countries around the world: the global size of the company and the multiplicity of cultures represent an asset and at the same time a challenge for us.

NUOVA C.U.M.E.T. is a multicultural and diversified company that intends to position itself, on a global level, as a global reality with a common identity based on a strong ethical approach.

This Code of Ethics represents the framework for establishing effective collaboration between all interested parties and for the establishment of common values to which all employees and collaborators of NUOVA C.U.M.E.T. are invited to conform: the way in which the objectives are achieved is as important to us as the achievement of the objectives themselves.

In the certainty that these values will never be abandoned, the Code will be kept constantly updated to make it suitable for developments in the business context and the world in which the company lives.

In the document and in all linked documents, any reference to the male gender automatically designates the female gender and vice versa.

2. SCOPE

This Code of Ethics applies to all directors, managers and employees, without exception, and to all those who, directly or indirectly, establish relationships with NUOVA C.U.M.E.T., in all production sites, and with associated, subsidiary or investee companies (*collectively the "Company"*), permanently or even temporarily, as collaborators, consultants, economic operators, suppliers and anyone who operates in the name and on behalf of the companies (*hereinafter "Recipients"*).

The code also applies, in the ways possible and defined by each detailed document, to relations with third parties with whom NUOVA C.U.M.E.T. interacts, for which the latter will undertake to provide such parties with adequate information about the commitments and obligations imposed by this document (*hereinafter "Stakeholders"*).



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Those who occupy positions of responsibility are required to be an example for the resources managed, to direct them to compliance with the document and to promote compliance with the rules in general.

The Company's directors are required to be inspired by the principles of the document in setting objectives, as well as in any decision or action that has repercussions on the assets and management values and on the well-being of employees and the community.

In the same way, officers and employees must be inspired by the same principles in the exercise of their responsibilities, both in internal relations, thus strengthening cohesion and the spirit of mutual collaboration, and in relations with third parties with whom the Company has relations.

NUOVA C.U.M.E.T. strives to ensure that the principles of the Code are shared by any person who has stable business relations with it. In particular, NUOVA C.U.M.E.T. requires all associated companies to conduct themselves in line with the general principles of this Code.

The Company does not establish or continue business relationships with anyone who expressly refuses to comply with the principles of the Code and requires the main suppliers and business partners to adopt conduct in line with the general principles of this Code of Ethics.

All decisions and behaviours must therefore comply with the values contained in this Code: to this end, the dissemination of this Code to all interested parties is guaranteed, as is accessibility to it and related documents at all times.

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The Code of Ethics is assigned the following functions:

- legitimization of principles, duties and responsibilities;
- training and information of interested parties;
- prevention of actions contrary to corporate values;
- incentive to comply with the rules.

3. NEW C.U.M.E.T.

The collaboration within the company and the collaboration with all interested parties (*customers and suppliers by way of example*) are based on a system based on the Vision and Mission of NUOVA C.U.M.E.T. and on the values and principles of the Company which are set out below:

- Commitment to sustainability
- enhancement of human resources and loyal and respectful reciprocal relationships



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- respect for legality and democratic values
- integrity, impartiality and transparency
- Privacy Policy and Confidentiality
- protection of the corporate image
- individual responsibility
- responsible, sustainable and future-oriented actions and decisions
- social responsibility.

4. COMMITMENT TO SUSTAINABILITY

NUOVA C.U.M.E.T. makes sustainability one of the fundamental principles for the Company: social, environmental and ethical interests are integrated into the basic strategy and therefore into the company's activity.

Sustainable development means "*development capable of ensuring the satisfaction of the needs of the present generation without compromising the ability of future generations to achieve their own*".

In this definition, the concept of sustainability conforms to the three-pillar model that aims to make the development of economic activities, the quality of people's life and the protection of the environment compatible:

- environmental sustainability - ensuring the availability and quality of natural resources;
- social sustainability - ensuring quality of life, safety and services for people;
- economic sustainability - ensuring economic efficiency and income for the Company.

5. ENVIRONMENT

The environment is a primary asset that NUOVA C.U.M.E.T. is committed to safeguarding; To this end, it plans its activities by seeking a balance between economic initiatives and essential environmental needs, in consideration of the rights of future generations.

NUOVA C.U.M.E.T. is committed to improving the environmental impact of its activities, as well as to preventing risks to people and the environment not only in compliance with current legislation, but taking into account the development of scientific research and the best experiences in the field.

NUOVA C.U.M.E.T., moreover, as part of its global strategy and constant commitment to improvement, ensures long-term projects to reduce its environmental impact.



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6. HUMAN RESOURCES AND LABOR STANDARDS

In the management of human resources NUOVA C.U.M.E.T.:

- adopts personnel policies that are based on the enhancement of merit and the development of professionalism. In particular, the Company undertakes to adopt criteria of merit, competence and, in any case, strictly professional criteria for any decision relating to the employment relationship with its employees and external collaborators. Therefore, discriminatory practices in the selection, hiring, training, management and development, remuneration of staff, as well as any form of nepotism and favoritism are prohibited;
- it also undertakes to protect the moral integrity of the staff, preventing them from suffering unlawful conditioning or undue hardship. For this reason, it safeguards staff from acts of psychological violence and counteracts any discriminatory attitude or behavior or behavior that is harmful to the person, his beliefs and preferences. Sexual harassment or intimidating and hostile attitudes in internal or external work relationships are not tolerated, just as it is not tolerated, during work and in the workplace, to work under the influence of alcohol, drugs or similar substances or to consume or sell drugs. Finally, the Company undertakes to monitor compliance with the laws in force regarding the prohibition of smoking;
- it fully informs the newly hired employee or who has changed role on the characteristics of the duties and function, on regulatory and remuneration elements and requires compliance with the principles contained in this document. Guarantees adequate training for the position held or that the employee will cover;
- guarantees the clear and communicated definition of roles, responsibilities, delegations and in general the sharing of the necessary information so as to allow everyone to take the decisions that are their responsibility, in the interest of the Company;
- creates channels of communication with employees in order to make the relationship with them continuous and collaborative and in particular guarantees clear, precise and truthful internal communication on the company's policies and strategies;
- ensures the enhancement of opinions and proposals for innovation, respecting the limits of everyone's responsibilities;
- ensures the correct and confidential use of personal data;
- undertakes to provide workplaces suitable for the safety and health of those who use them;



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- requires the heads of the operating units and functions and all collaborators, each within their area of competence, to adopt behaviour consistent with the principles referred to in the previous points;
- it also demands the same respect from its trading partners.

6.1. EMPLOYMENT RELATIONSHIP

Employees are linked to NUOVA C.U.M.E.T. by an employment contract drawn up in compliance with the applicable law on the subject. Recourse to any activity or request for benefits that presupposes an imposition or any impediment to the expression of the individual's will is not permitted.

The employment contract will refer to the National Collective Agreement and any specific agreements related to the individual production sites.

The employment contract may be terminated by the worker in the manner and terms provided for by law without the worker being able to suffer damage.

Any disputes by the worker or the company will be handled, in the utmost honesty, according to the terms of the law.

Wages and salaries are paid in accordance with legal provisions and are aligned with the average values of the area in which the plant is located.

All workers are provided with clear information in writing about the conditions of the employment contract and remuneration before recruitment; The monthly payslip contains specific details on the individual period.

Working hours do not exceed the legal limits, guaranteeing maximum protection to the worker on the basis of current legislation and collective and site-specific agreements.

All overtime will be voluntary. Overtime will be used responsibly, taking into account the following: the amount, frequency and hours worked by individual workers and the workforce as a whole. It will not be used to replace regular employment. Overtime will always be remunerated in accordance with the provisions of the law and collective and site-specific agreements.

Overtime is allowed as an exception to the time limits only in proven cases of force majeure or particular emergency and always only on a voluntary basis.

A shift schedule of work performance and a planning of working periods consistent with the provisions of the law and collective agreements are guaranteed.

Child labour is not accepted under any circumstances and must be absolutely prevented.



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The company policy complies with the applicable standards dictated by the ILO (*International Labour Organization*).

Each manager is required to enhance the working time of collaborators by requesting services consistent with the performance of their duties.

It constitutes abuse of the position of authority to request services, favors or any behavior that constitutes a violation of this Code of Ethics.

6.2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

All employees and collaborators have the right to join a trade union or to create their own and to conduct collective bargaining.

No discrimination or favours must arise from membership of a specific trade union and workers' representatives have the right to carry out their representative functions in the workplace.

Everyone is also guaranteed the freedom to create free associations of any kind in compliance with legality, people and company rules.

6.3. SAFE WORKING CONDITIONS

NUOVA C.U.M.E.T. adopts all the necessary measures to ensure the safety of the workplace and works to ensure that the physical integrity of all workers is guaranteed, in full compliance with the relevant legislation and taking into account the specificities of each plant, the analysis of general and specific risks. To this end, NUOVA C.U.M.E.T. undertakes to take appropriate measures to prevent accidents and damage to health that derive from, are connected with, or occur in the course of work, reducing, as far as reasonably possible, the causes of risks inherent in the work environment. The adequacy of the measures will be constantly reassessed on the basis of technological and organisational innovation.

The Company maintains a Prevention and Protection Service, under the responsibility of a representative of the Management (*RSPP*) in accordance with the law.

NUOVA C.U.M.E.T. is committed to ensuring the continuous improvement of health and safety at work also through the definition of specific procedures and the control of correct implementation, the training and involvement of staff and the adoption of good working practices.



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6.4. SELECTION AND RECRUITMENT POLICY

NUOVA C.U.M.E.T. guarantees respect for the personality and dignity of each individual during the selection process.

NUOVA C.U.M.E.T., within the limits of available information, in order to safeguard the protection of privacy, adopts appropriate measures to avoid favoritism, clientelism or nepotism in the selection and hiring phase, which are not directly related to ability and merit. In the personnel selection process, NUOVA C.U.M.E.T. does not allow the employment of illegally staying third-country nationals. The selection and recruitment policy, in addition to assessing professional competence and specific experience in the field, gives priority above all to the candidate's predisposition to continuous learning and updating and assesses his ability to work in a team and the demonstration of interest in the specific activities of the company, the sharing of its values and principles.

Firmly convinced of the importance of feeling part of a united group and of operating in a serene and motivating working environment and for this reason, in order to facilitate integration, the new employee is given a training course on the company organization that helps him to fit in more quickly and take his first steps in the company more easily. The training includes this Code and all company policies.

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6.5. STAFF MANAGEMENT AND DEVELOPMENT

As part of the personnel management and development processes, the decisions adopted by NUOVA C.U.M.E.T. are based on the correspondence between expected profiles and objectives, profiles possessed and objectives achieved.

The evaluation of Collaborators involves the Heads of Departments to whom the evaluated refers.

6.6. INVOLVEMENT OF EMPLOYEES

Collaborators are involved in the performance of the company's work and activities also in moments of participation in meetings, meetings and discussions functional to the achievement of company objectives.

The collaborator must participate in these moments with a spirit of collaboration and independence of judgment. Listening to employees, compatibly with business needs, allows managers to act on decisions; the collaborator must in any case, even if of a different point of view, always contribute to the implementation of the established activities.



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6.7. REORGANIZATION OF WORK

In the case of work reorganization, NUOVA C.U.M.E.T. safeguards the value of its resources, providing, where necessary, also training and/or retraining interventions.

In the event of new and/or unforeseen events that impact the current organization, in line with the effective and efficient exercise of business activities, the collaborator may be assigned to tasks other than those carried out previously, taking care to safeguard his professional skills.

6.8. MUTUAL RESPECT

Relations within NUOVA C.U.M.E.T. and in relations with other interested parties are marked by the utmost mutual respect and tolerance: no social, cultural, sexual and religious discrimination is allowed. The recognition that the comparison between diversity generates value is one of the founding values of NUOVA C.U.M.E.T..

Decisions regarding employees or candidates should not be made on the basis of their nationality, religion, sexual orientation, cultural or political affiliation.

Physical abuse, sexual harassment, verbal abuse, mobbing or other forms of offensive or disrespectful behavior are not tolerated.

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6.9. DUTIES OF EMPLOYEES

In compliance with legal obligations and those deriving from collective agreements and company rules, NUOVA C.U.M.E.T.'s collaborators, in carrying out their service:

- base their conduct on compliance with the principles of protection and respect for the human person, on loyalty, on fairness in personal relationships and on operational logics based on integration and inter-functional collaboration, on the empowerment of people, on team spirit and on respect for hierarchical and functional relationships in order to pursue corporate objectives;
- promptly inform their direct superior of any conflicts of interest;
- they treat data, news and information in their possession with absolute confidentiality, avoiding their dissemination or use for their own speculative purposes or those of third parties, and in any case safeguarding the principles of loyalty, fairness and transparency. Information of a confidential nature may be disclosed, within the framework of NUOVA



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C.U.M.E.T., only to those who have an actual need to know it for work reasons and in absolute compliance with the law on privacy;

- in the event of receipt of documents not related to their personal position, they immediately deliver them to the Human Resources Manager;
- demonstrate, in their dealings with any interlocutor with whom they come into contact for work reasons, qualities of moral integrity, avoiding behaviour that could cast doubt on this quality;
- protect and safeguard the values and assets entrusted to them and contribute to the protection of the company's assets in general;
- refrain from requesting, directly or indirectly, recommendations and any other preferential treatment either for themselves or for the Company that is contrary to the principles set out in this document.

NUOVA C.U.M.E.T., moreover, expects and hopes that each collaborator, within the scope of their duties and within the scope of their skills, knows:

- increase one's preparation and professionalism by any means;
- to take advantage of the proposals for improvement coming from other colleagues;
- contribute to the professional growth of its employees;
- make decisions and take risks according to sound and prudent management, ensuring the economic and efficient use of resources in compliance with the law and company rules, including those of management systems and the Model;
- consider the company result as one's own responsibility, a reason for satisfaction and the result of teamwork.

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7. CONFLICTS OF INTEREST

The actions of all NUOVA C.U.M.E.T. collaborators must be oriented exclusively to the good and interest of the company.

All collaborators and Recipients must avoid conflicts of interest with the Company or situations in which personal interest interferes (*or appears to interfere*) with the interest of the Company, preventing the objective and effective performance of their functions, or in relation to the pursuit of



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improper personal benefits as a result of the position held within the Company. Behaviours that lead to negative publicity for them must also be avoided¹.

Examples of possible conflicts of interest are:

- activities or shareholdings in other companies that could limit the work performance of the Company and in particular competing companies;
- ownership of significant shareholdings in companies that are business partners of the Company;
- business relationships with companies or individuals with whom there are close family relationships or similar ties;
- secondary activities that may conflict with the interests of the Company;
- donations and sponsorships contrary to the principles of this Code and Company Policies;
- use of company facilities for private purposes.

In carrying out their professional activity, all employees and collaborators are required, upon the occurrence of an interest on their own behalf or on behalf of third parties, current or potential, from a given transaction of the Company, to promptly notify it through the whistleblowing channels, made available by the Company in accordance with the provisions and regulations of Legislative Decree 24/2023, or by direct communication to the Chairman of the Board of Directors and the Supervisory Body (SB) and, in the meantime, must refrain from carrying out any conduct attributable to the situation communicated.

The Company must also try to avoid situations characterized by a conflict between the interests of shareholders and directors and the interest of the Company. They are required to give notice, in accordance with the law, of any conflicting interest that, on their own behalf or on behalf of third parties, they have in certain transactions of the Company itself.

In the event of the assumption of positions or responsibilities in companies that are not part of NUOVA C.U.M.E.T., the employee concerned necessarily requires the prior and specific approval of the Company.

All Recipients are also required to refrain from personally taking advantage of business opportunities of which they have become aware in the performance of their duties.

¹ The employee must not deal with business, on his own behalf or on behalf of third parties, in competition with the entrepreneur, nor disclose information relating to the organization and production methods of the company or use them in such a way as to be detrimental to it (Article 2105 of the Italian Civil Code).



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It is the responsibility of individuals to assess situations of conflict of interest or incompatibility of functions, positions and positions outside as well as within the Company.

The commitments of loyalty and confidentiality undertaken by the Recipients during their relationship with the Company are binding on people even after the termination of the relationship itself.

8. ANTI-CORRUPTION

NUOVA C.U.M.E.T. recognizes itself in the principles of free and fair competition.

Adherence to these principles implies the rejection of any form of corruption: it is not allowed to offer, promise, grant, request or accept gifts, gifts or other benefits.

9. RELATIONS WITH POLITICAL ORGANIZATIONS

Everyone is free to participate in political activities in their free time and at their own expense, provided that this does not prevent them from carrying out their work for the Company and is not carried out on behalf of NUOVA C.U.M.E.T..

No assets, property or other corporate resources of NUOVA C.U.M.E.T. may be used to offer contributions or assets of value to candidates or political parties and party officials.

10. CHARITABLE ACTIVITIES AND DONATIONS

NUOVA C.U.M.E.T. is committed to supporting the communities in which it operates. For this reason, the Company may sponsor events and make donations to charitable organizations for educational or social purposes or for other legitimate activities.

However, it is important to ensure that the funds made available for these purposes are used for the intended purpose and not for any other purpose and that they reach the right recipient for the intended purpose.

Modest donations to renowned charitable organizations and sponsorship of events that cannot be considered corruption, support of illegal causes (*terrorism or antisocial ideals*), or that have been explicitly requested or solicited are therefore permitted, subject to the approval of the Board of Directors.



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10.1. GIFTS AND OTHER GIFTS

Under no circumstances, not even on the occasion of particular anniversaries, is it permitted to offer or pay, to third parties, undue compensation, gifts or preferential treatment of more than symbolic value and in any case extraneous to normal courtesy relations, with the intention of unlawfully favoring NUOVA C.U.M.E.T.

In the same way, all employees are prohibited from accepting, from third parties, compensation, gifts or preferential treatment of more than symbolic value, if this has the objective of illegally influencing the company's activities or risks even simply giving such an impression. By value more than symbolic is defined that value that goes beyond ordinary relations of courtesy.

Any director or collaborator of the Company who receives a gift or preferential treatment from persons in charge of the Public Administration, customers or suppliers, that goes beyond the ordinary courtesy relationships must refuse the gift or return it and immediately notify them: for employees to their direct superior, for Directors to the Chairman of the Board of Directors, for the Chairman of the Board of Directors to the SB and other control bodies.

Cash benefits for illegal activities that may damage the company's reputation - such as sexual services, adult entertainment and gambling - are always prohibited.

Benefits should never be granted or accepted in dealings with public officials.

They are never allowed even with regard to business partners, acquired or potential customers with the aim of influencing or encouraging their actions or decisions during the exercise of their official or professional functions.

The monetary value does not automatically define the benefit: the nature of the benefit must also be considered.

You must not offer benefits that may be considered inappropriate according to local custom or that are strictly personal (*e.g. jewellery or luxury goods*).

10.2. ENTERTAINMENT EXPENSES

Business lunches, meals, entertainment, catering services, gifts or other similar benefits are permitted but must be documented in a complete and correct manner. The expense report must then be forwarded to the accounting department, in accordance with current company practices.



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SOLID CARBIDE PRECISION TOOLS

11. CONFIDENTIALITY AND PROTECTION OF THE COMPANY'S INTELLECTUAL AND PHYSICAL PROPERTY

All employees and collaborators are bound to always treat with the utmost care the tangible and intangible assets of the Company entrusted to them or with which they come into contact in the performance of their functions: the use of the devices and data made available by the company is subject to the duty of diligence of each user.

Information or intellectual property means all financial and technical data, research, contracts and correspondence of the Company regardless of the form in which it is stored, processed or transmitted.

They must:

- use professional language free of elements that may offend the person and damage the corporate image;
- always report accurate and truthful data in written or verbal documents and reports;
- store all documents and data in accordance with company regulations and applicable laws;
- scrupulously maintain the bonds of secrecy in relation to the Company's information.

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Company data, managed in electronic form, must be correctly stored on the company server or in computer systems so as to be protected with backup.

Each password or credential must be protected and kept secret: access rights are strictly personal and non-transferable. It is expressly forbidden to communicate your credentials to third parties for any reason.

No confidential information, including company data and data relating to any Stakeholder (*including personal data*), must be communicated to third parties except for an express work necessity or legitimate interest.

Any communication, if outside the normal work flow and in derogation of the Privacy Policy, must be expressly authorized by the Management.

The bond of integrity and confidentiality remains valid even after the termination of the employment relationship.

In the event of a potential or present danger, the Recipient is obliged to immediately communicate the situation to his or her Manager, the Management and the Supervisory Body (*SB*).



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11.1 RELATIONS WITH THE PRESS AND EXTERNAL COMMUNICATIONS

Relations with the media and any opinion expressed on social media must be transparent and consistent with the Company's Code of Ethics in order to ensure maximum protection of the Company's reputation.

Relations with the media are maintained exclusively by the collaborator expressly appointed by the Management and all communication interventions must be authorized in advance.

Employees who attend meetings, meetings or public events are required to do so in an exclusively personal capacity and, in any case, may not use the name of the Company, unless authorised by the Chief Executive Officer.

12. PROTECTION OF SHARE CAPITAL, CREDITORS AND PUBLIC SUPERVISORY FUNCTIONS

The Recipients must behave correctly, transparently and collaboratively, in compliance with the law and company procedures, in all activities aimed at preparing the financial statements and other corporate communications required by law, in order to provide truthful and correct information on the Company's economic, equity and financial situation.

In addition, the Company:

- ensures the regular functioning of its corporate bodies, guaranteeing and facilitating all forms of control over the company's management provided for by law; therefore, strict compliance with the internal procedures set up for this purpose and/or, in any case, the adoption of conduct consistent with this principle is required;
- it does not allow activities or omissions to be carried out that may constitute an obstacle to the performance of the functions of the Public Supervisory and Regulatory Authorities in charge. To this end, corporate bodies, management, employees and external collaborators are required to carry out promptly, correctly and in good faith all the communications required by law and regulations to the Public Supervisory and Regulatory Authorities, not placing any obstacle in the way of the exercise of the functions they exercise.

In particular, *with reference to the preparation of the financial statements*, the Company considers the truthfulness, correctness and transparency of the accounts, financial statements, reports and other corporate communications required by law and addressed to shareholders, an essential principle in the conduct of business and a guarantee of fair competition. This requires that the validity, accuracy and completeness of the basic information for entries in the accounting process be



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thoroughly examined. Consequently, no concealment of information or any partial or misleading representation of the economic, equity and financial data of the Companies by the management and the persons subject to their management and control is permitted. Therefore, all internal and external collaborators involved in producing, processing and accounting for such information are responsible for the transparency of the Company's accounts and financial statements. Every transaction of economic, financial or equity significance must have an adequate record and for each record there must be adequate documentary support, in order to be able to proceed, at any time, to carry out checks that certify the characteristics and reasons for the operation.

13. ANTI-MONEY LAUNDERING, TERRORISM, ORGANIZED CRIME

The Company undertakes, also on behalf of each collaborator, to comply with all national or transnational regulations on money laundering, the fight against terrorism and organised crime.

Each collaborator undertakes to ensure that contracts or agreements are not entered into in clear violation of these rules or with Parties with suspicious conduct or relationships.

14. QUALITY OF PRODUCTS AND SERVICES AND CUSTOMER RELATIONS

Customers are fundamental *stakeholders* for the life of the Company and they must be guaranteed the quality of the products provided and the service, as well as maximum transparency and reliability in the management of every aspect of the relationship.

In relations with Clients, the constraints of confidentiality and secrecy in the management of the Client's corporate and personal data are respected with the same protections required for the Company's data.

Contracts are stipulated in strict compliance with the ethical principles of this Code and made explicit in the relevant Policies.

15. PRINCIPLES OF CONDUCT IN RELATIONS WITH SUPPLIERS

The Company bases its relations with Suppliers on the principles of transparency, fairness, loyalty and free competition as well as on mutual compliance with applicable contractual and legal obligations.



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Suppliers must be chosen from among companies that guarantee compliance with the ethical principles of this Code, the quality of supply and the greatest economic advantage. All suppliers, or potential suppliers, with the required characteristics must have equal opportunities of access to supply.

Companies with unclear relationships with criminal or subversive associations, companies from countries at risk or companies with criminal pasts will not be admitted to supply.

The supply contracts will comply with the Company's ethical principles brought to the attention of the supplier through the sharing of the Code of Ethics.

16. KNOWLEDGE OF THE CODE OF ETHICS

The Code of Ethics is kept available on the company server, is published on the company website and is kept in paper form at the Human Resources office.

New employees are informed and trained on the Code of Ethics and the MOG during the *onboarding phase*.

In case of doubts about the application of the rules contained therein, the Collaborator may refer to his Manager, the Administration Office and the SB.

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17. VIOLATION OF THE CODE OF ETHICS AND REPORTING

It is the obligation of everyone to observe and ensure compliance with the rules of the Code of Ethics: compliance with these rules are to be considered an integral part of the contractual obligations envisaged for Collaborators, bound to the Company by any form of work, in accordance with art. 2104 of the Italian Civil Code.

Violation of the rules will constitute a breach of the obligations of the employment or collaboration relationship and/or disciplinary offence and will be sanctioned as such. This Code establishes the mandatory nature of sanctions in the event of misconduct.

The Company undertakes to assess individual violations objectively and impartially and to implement sanctions in an appropriate and proportionate manner.

For employees, the penalties provided for will comply with the CCNL in accordance with current legislation.



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Violations of the Code of Ethics can be reported through the internal channels made available by NUOVA C.U.M.E.T. in accordance with Legislative Decree no. 24/2023, as illustrated in the MOG General Part.

The reports received will be handled confidentially, guaranteeing anonymity and ensuring the whistleblower protection against any retaliation or damage he or she may suffer as a result of the report made.

For example, the following situations should be reported:

- violations of national and EU law;
- violation of privacy;
- violations of company procedures, the MOG and the Code of Ethics;
- omissions, negligence or falsification in the keeping of accounts or in the storage of the documentation on which the accounting records are based;
- situations of current or potential danger to the health and safety of workers;
- irregularities or malfunctions in production processes;
- gifts of more than symbolic values (maximum amount € 50.00) or fees from subjects with whom it has business relationships;
- instructions received by oneself or others and deemed to be contrary to the law, internal regulations or this document;
- any other fact and conduct that in any case lends itself to being considered in violation of the law or the company system.

No retaliation will be carried out against the staff for reporting the above. The report can also be made anonymously. The anonymous report is in any case considered for the purposes of the related investigation.

In addition, compliance with the values and principles set out is also verified by the Supervisory and Control Body and by any independent third parties for specific sectors, during internal and external inspections and audits.

The results of this audit are documented in official reports which will be followed by appropriate corrective actions to maintain the effective and efficient application of the principles expressed in this document.



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