Code of Ethics

Contents

DEFINITIONS **4**

4.1 ETHICS IN BUSINESS MANAGEMENT 14

4.1.1 Corporate administration *14*

4.1.2 Conflicts of interest *15*

4.1.3 Tutela Personal data protection and information security *15*

4.1.4 Sponsorships and contributions *16*

4.1.5 Gifts and benefits *16*

4.2 STAKEHOLDER MAP 17

4.3 PERSONNEL 17

4.4 MEMBERS AND SHAREHOLDERS 18

4.5 CUSTOMERS 19

4.6 SUPPLIERS OF GOODS AND SERVICES 20

4.7 RESPONSIBLE PROCUREMENT 21

4.8 PUBLIC ADMINISTRATIONS 21

4.9 TRADE ASSOCIATIONS 23

4.10 LOCAL COMMUNITIES 23

5. HUMAN RIGHTS AND DUE DILIGENCE **23**

6. GENDER DIVERSITY AND WOMEN'S EMPOWERMENT **24**

7. DISCRIMINATION AND HARASSMENT **25**

8. CONFLICT-AFFECTED AND HIGH-RISK AREAS **26**

9. MODERN SLAVERY ACT: FORMS OF MODERN SLAVERY **27**

10. CHILD LABOUR **27**

11. FORCED AND COMPULSORY LABOUR **29**

12. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING **30**

13. JUST AND FAVOURABLE WORKING CONDITIONS **30**

14. BIODIVERSITY **31**

15. IMPLEMENTATION OF THE CODE OF ETHICS AND CONDUCT **31**

16. WHISTLEBLOWING **32**

REV04_17112026 ..... **34**

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY

UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Definitions

- Code: the Code of Ethics and Conduct of Radiatori 2000 S.p.A.
- Company: Radiatori 2000 S.p.A., or simply “Radiatori 2000”
- Legislative Decree 231/2001 or Decree: Legislative Decree No. 231 of 8 June 2001, as subsequently amended or supplemented. The Decree introduced into Italian law a separate and autonomous system of administrative liability for legal entities where individuals holding representative, administrative or management positions, or persons subject to their supervision and control, commit one or more of the predicate offences specified in the Decree in the interest of and/or for the benefit of the entity itself.
- Model: the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001.
- Personnel: Directors, Managers and Employees.
- Stakeholders: internal and external individuals and groups, as well as the organisations and institutions representing them, whose interests are affected by the direct and indirect effects of the Company’s activities.
- Corporate bodies: Board of Directors, Board of Statutory Auditors and external audit firm.
- Supervisory Body or OdV: the body provided for under Article 6 of Legislative Decree 231/2001, responsible for verifying the operation of and compliance with the Model and the Code.
- Parent Company: FECS Partecipazioni S.p.A., with its registered office at Via Gramsci No. 20, Verdellino (BG).
- Applicable regulatory references (Corporate Social Responsibility):

REFERENCE	DATE	TITLE
ILO Convention 14	1921	Weekly Rest
ILO Convention 19	1925	Equality of Treatment (Accident Compensation)
ILO Convention 29	1930	Forced Labour
ILO Conventions 77 and 78	1946	Medical Examination of Young Persons
ILO Convention 81	1947	Labour Inspection
ILO Convention 87	1948	Freedom of Association and Protection of the Right to Organise
ILO Convention 95	1949	Protection of Wages
ILO Convention 98	1949	Right to Organise and Collective Bargaining
ILO Convention 100	1951	Equal Remuneration
ILO Convention 102	1952	Social Security

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM CQY CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell’art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

ILO Convention 103	1952	Maternity Protection
ILO Convention 105	1957	Abolition of Forced Labour
ILO Convention 111	1958	Discrimination (Employment and Occupation)
ILO Convention 118	1962	Equality of Treatment
ILO Convention 119	1963	Guarding of Machinery
ILO Convention 120	1964	Hygiene (Commerce and Offices)
ILO Convention 131	1970	Minimum Wage Fixing
ILO Convention 132	1970	Holidays with Pay
ILO Convention 135	1971	Workers' Representatives Convention
ILO Convention 138	1973	Minimum Age
ILO Convention 142	1975	Human Resources Development
ILO Convention 148	1977	Working Environment Protection
ILO Convention 154	1981	Collective Bargaining
ILO Convention 155	1981	Occupational Safety and Health
ILO Convention 158	1982	Termination of Employment
ILO Convention 159	1983	Vocational Rehabilitation and Employment of Persons with Disabilities
ILO Convention 161	1985	Occupational Health Services
ILO Convention 167	1988	Safety and Health in Construction
ILO Convention 171	1990	Night Work
ILO Convention 175	1994	Part-Time Work
ILO Convention 177	2000	Home Work
ILO Convention 182	1999	Worst Forms of Child Labour
ILO Convention 183	2000	Maternity Protection
ILO Convention 187	2006	Promotional Framework for Occupational Safety and Health
ILO Protocol 29	2014	To the Forced Labour Convention, 1930
ILO Protocol 155	2002	To the Occupational Safety and Health Convention, 1981
ILO Recommendation 35	1930	Indirect Compulsion to Labour
ILO Recommendation 85	1949	Protection of Wages
ILO Recommendation 90	1951	Equal Remuneration

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

ILO Recommendation 99	1955	Vocational Rehabilitation of Persons with Disabilities
ILO Recommendation 102	1956	Welfare Facilities
ILO Recommendation 111	1958	Discrimination
ILO Recommendation 134	1969	Medical Care and Sickness Benefits
ILO Recommendation 146	1973	Minimum Age
ILO Recommendation 164	1981	Occupational Safety and Health
ILO Recommendation 178	1990	Night Work
ILO Recommendation 190	1999	Worst Forms of Child Labour
ILO Recommendation 191	2000	Maternity Protection
ILO Recommendation 197	2006	Promotional Framework for Occupational Safety and Health
ILO Recommendation 203	2014	Forced Labour
-	1948	Universal Declaration of Human Rights
CEDAW	1979	United Nations Convention on the Elimination of All Forms of Discrimination against Women
-	1989	United Nations Convention on the Rights of the Child
-	1990	Convention on the Rights of the Child — Child Protection
-	1976	International Covenant on Economic, Social and Cultural Rights
-	1976	International Covenant on Civil and Political Rights
-	2000	Charter of Fundamental Rights of the European Union
	1948	Italian Constitution
L. 300/70	20/05/70	Workers' Statute
L. 108/90	11/5/1990	Individual Dismissals
L 977/1967	17/10/1967	Protection of Children and Young Persons at Work
L. 863/84	19/12/1984	Wage Guarantee Fund
L.157/81	10/04/1981	Ratification and implementation of Conventions Nos. 74, 109, 129, 132, 134, 135, 136, 137, 138 and 139 of the International Labour Organization

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

L176/91	1991	Ratification and implementation of the Convention on the Rights of the Child, adopted in New York on 20 November 1989.
L 148/2000	2000	Ratification and implementation of Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, together with Recommendation No. 190 on the same subject, adopted by the General Conference of the International Labour Organization at its eighty-seventh session, held in Geneva on 17 June 1999.
L. 236/93	1993	Employment Placement — Labour Market
Directive 2000/43/CE	29/06/2000	Principle of equal treatment between persons irrespective of racial or ethnic origin
Directive 2000/78/CE	27/11/2000	General framework for equal treatment in employment and occupation
D.lgs 345/99	1999	Protection of young people at work.
D.lgs. 198/2006	2006	Code of Equal Opportunities between Men and Women, pursuant to Article 6 of Law No. 246 of 28 November 2005.
D.lgs. 15 April 2005 n. 77	2005	Definition of general provisions on school–work alternation, pursuant to Article 4 of Law No. 53 of 28 March 2003
D.lgs. 4 August 199 n. 345	1999	Implementation of Directive 94/33/EC on the protection of young people at work
D.Lgs 18 August 2000 n. 262	2000	Provisions supplementing and amending Legislative Decree No. 345 of 4 August 1999 on the protection of young people at work, pursuant to Article 1(4) of Law No. 128 of 24 April 1998
D.Lgs 8 April 2003, n. 66	2003	Implementation of Directives 93/104/EC and 2000/34/EC concerning certain aspects of the organisation of working time
D.Lgs 30 March 2001, n. 165	2001	General provisions governing employment in public administrations.
Law No. 4 of 15 January 2021, published in the	2021	Amendment of International Labour Convention No. 190 on the elimination of violence and harassment

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Official Gazette		at work.
UNI/PdR 125:2022	2022	Guidelines on the gender equality management system, providing for the adoption of specific KPIs relating to gender equality policies in organisations
Sustainability and Human Rights Due Diligence	February 2022	At the end of February 2022, the European Commission published the long-awaited proposal for a Directive on Corporate Sustainability Due Diligence to address human rights and environmental impacts in global value chains (HRDD).

The Company applies the NATIONAL COLLECTIVE LABOUR AGREEMENT FOR THE PRIVATE METALWORKING INDUSTRY. A copy of the agreement is available for consultation at the Human Resources office.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

1. Introduction

Radiatori 2000 is a leading company in the recovery, treatment and marketing of ferrous and non-ferrous metals obtained from scrap. It is one of the few businesses in Europe able to manage the shredding and metal separation stages as an integrated process within the same production site, using equipment with linear motors and specific-gravity flotation systems.

Through its commitment, Radiatori 2000 has obtained several certifications and holds the following authorisations:
ISO 9001:2015 – Quality certification
ISO 14001:2015 – Environmental management
ISO 45001:2023 – Occupational health and safety management systems
National Register of Environmental Managers – Bergamo (BG) Section – Categories 4F and 8F
Certificate for the recovery of iron, steel and aluminium scrap (Article 6 of EU Regulation 333/2011)

Legality Rating

Radiatori 2000 recognises the sense of responsibility that comes with playing a leading role in the economic and social environments in which it operates. It therefore undertakes to maintain and develop the relationships of trust established with all its key counterparts (hereinafter also referred to as “stakeholders”).
The Company has chosen to formalise this Code of Ethics and Conduct to share and communicate its values, principles and rules of conduct to all its counterparts, with a view to building a transparent organisation committed to ethical standards appropriate to a mature civil society.
Radiatori 2000 is also part of the FECS Partecipazioni group, which holds interests in other companies operating in the metals treatment and marketing sector.
The Code of Ethics and Conduct also forms an integral part of the Organisation, Management and Control Model (hereinafter also referred to as the “Model”) adopted by the Company on 20/03/2013 pursuant to Legislative Decree 231/2001.

2. Recipients and document structure

The principal recipients of this Code of Ethics and Conduct are:

- Members of the Board of Directors, Managers and Employees, classified in accordance with the regulations and provisions applicable to their sector;
- All those who, in any capacity, act in the name of or on behalf of Radiatori 2000 (in its interest or for its benefit), irrespective of the legal classification of their relationship, whether they have an employment relationship (for example, temporary agency workers, project-based workers and staff supplied through a cooperative) or represent the Company in dealings with third parties (for example, consultants and agents).

Recipients of this Code must therefore comply with its principles and standards, allowing them to guide their day-to-day business conduct.

Radiatori 2000 favours counterparts and partners whose conduct complies with shared ethical principles consistent with those set out in this Code of Ethics and Conduct.

This Code of Ethics and Conduct is valid in Italy and abroad, being applied reasonably in relation to the different cultural, political, social, economic and commercial circumstances of the countries in which Radiatori 2000 operates.

The Code of Ethics and Conduct is divided into:

- General principles: these explain the purpose, values and fundamental principles underpinning Radiatori 2000's organisational culture;
- Standards of conduct: these set out the criteria for conduct consistent with Radiatori 2000's values and principles, highlighting ethical aspects of business management and the categories of counterparts and recipients to which they apply in practice.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

3. General principles

As an operator in the recycling supply chain, Radiatori 2000, like the other companies in the group, helps to affirm the value of business sustainability, since no business can look to the future without caring for the environment of which it forms part:

- **Ethics**

  Ethics (a term derived from Ancient Greek ἔθος (or ἦθος), èthos, “character”, “behaviour”, “custom”, “habit”) is a branch of philosophy that has studied and continues to study the rational foundations that enable human behaviour to be distinguished as good, just and lawful, as opposed to behaviour considered unjust, unlawful, inappropriate or bad according to an ideal model of conduct. (Socrates, the Greek philosopher, is the founding father of ethics.) Ethics is therefore both a set of values defining human behaviour in relation to others and a criterion enabling people to judge their own conduct and that of others in terms of good and evil. In this economic and business context, with its constant search for balance, it should be emphasised that there has so far been a significant separation between economics and ethics, since economics has not addressed, and does not address, ends, but only the means of achieving them. This document seeks to highlight the need for the means used to achieve the Company’s objectives to result from ethical conduct; hence the need for those in senior positions to understand this philosophy, make it their own and take the lead in sharing it with every stakeholder.

- **Our vision**

  To safeguard the ecosystem through industrial recycling activities that save energy and natural resources and reduce their dissipation compared with the extraction of metals from the ground.

- **Our mission**

  To reduce the risk factors that threaten the ecosystem through the recovery and recycling of natural resources.

In pursuing its vision, mission and objectives, Radiatori 2000 adopts the following general ethical principles, shared throughout the organisation.

3.1 Legality

To comply with the laws and regulations in force in the countries in which the Company operates and to observe the Code of Ethics and Conduct and internal company rules, applying them with integrity and fairness. Radiatori 2000 complies with the laws of the countries in which it operates, and all personnel, employees and stakeholders must work with

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell’art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

the Company to achieve this objective.

3.2 Integrity and fairness

To keep one's word and honour commitments with a sense of responsibility, applying the principle of good faith in every activity or decision.

3.3 Honesty and transparency

To provide complete, consistent and timely information, without breaching confidentiality rules, so that the legitimate expectations of the various stakeholders can be met, avoiding conduct that directly or indirectly takes undue advantage of their vulnerability or lack of knowledge.

3.4 Quality

To ensure that the Company's products meet market requirements, needs and expectations through the continuous improvement of its work, thereby contributing to the success of the business and stakeholder satisfaction.

3.5 Respect for human dignity

To respect people's fundamental rights, protect their moral integrity and guarantee equal opportunities. In both internal and external relations, conduct arising from discrimination based on political or trade union opinions, religion, race, nationality, age, sex, sexual orientation, state of health or any other personal characteristic is not permitted.

3.6 Team spirit

To promote team spirit and cooperation in achieving shared objectives, recognising that the Company's reputation and success are founded on the value and synergies created by those who work within it.

3.7 Protection of health and safety at work

To contribute proactively and personally to maintaining and strengthening a culture of health and safety at work, setting an example through everyday actions, refraining from conduct that could endanger oneself or others, suggesting initiatives for continuous improvement and duly reporting any potential or actual risk.

3.8 Environmental protection and the development of recycling awareness

To support and develop recycling awareness, including through the Company's activities, by

making optimum use of resources and recovering them, and to safeguard the environment by promoting and demonstrating in practice the possibility of a business and a wider system that are mutually sustainable.

3.9 Anti-corruption and bribery

Radiatori 2000 adopts a zero-tolerance policy towards all forms of corruption and bribery, whether direct or indirect, public or private. Offering, promising, granting, soliciting or accepting, directly or through third parties, money or other benefits of any kind as an inducement to obtain or retain an unfair advantage, influence decisions, break the law, betray the trust of third parties or act contrary to the principles enshrined in this Code of Ethics and Conduct is strictly prohibited.

This prohibition applies to all commercial and institutional relationships, both in Italy and abroad, and covers every employee, member of personnel, supplier, consultant, representative and any third party acting on behalf of Radiatori 2000.

The Company's commitment is reflected in the following principles and qualitative objectives:

Integrity in dealings with public administrations, customers, suppliers and business partners, based on transparency, fairness and legality.

Active prevention of corruption risks through internal procedures for control, monitoring and reporting suspicious or unlawful conduct.

Radiatori 2000 actively encourages the reporting of any actual or suspected breach, guaranteeing the reporting person's confidentiality and protection against retaliation, including through dedicated whistleblowing channels. Every report will be treated with the utmost seriousness, investigated impartially and, where necessary, followed by appropriate corrective and disciplinary action.

3.10 Corporate social responsibility

Radiatori 2000 carries out activities that benefit environmental sustainability and has always taken account of the impact of its industrial structure and activities on the social environment. Radiatori 2000 will continue to pursue these objectives.

3.11 Fraud

Radiatori 2000 firmly condemns all forms of fraud, in whatever context they occur. We regard as fraudulent any conduct intended deliberately to deceive a person, organisation or public body in order to obtain an unfair or unlawful advantage, whether financial or otherwise.

Such conduct, in addition to constituting an offence punishable by law, fundamentally breaches the principles of honesty, integrity and fairness that guide all Radiatori 2000's

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

activities. All fraudulent acts are therefore strictly prohibited and subject to sanctions, including, by way of example and without limitation:

- Falsifying or altering documents, accounting data, declarations or certificates;
- Intentionally omitting relevant information in order to mislead third parties;
- Knowingly submitting false information to obtain contracts, funding, concessions or benefits;
- Misusing funds, company resources or confidential data for personal or unauthorised purposes.

Radiatori 2000 undertakes to prevent and combat all forms of fraud. Every member of Personnel has a duty to act with the utmost integrity, promptly report any irregularities and help build a working environment based on trust, transparency and legality.

3.12 Money laundering

Radiatori 2000 is firmly committed to preventing and combating all forms of money laundering, namely concealing, substituting or transferring illicitly sourced funds, assets or resources in order to make them appear legitimate by introducing them into the regular economic and financial system.

Carrying out, facilitating or tolerating activities that may even potentially be associated with any of the following operations is strictly prohibited:

Concealing or disguising the origin, ownership, nature or destination of illicitly sourced funds;

Using illegally obtained financial resources in company activities, contracts or transactions that are ostensibly lawful;

Artificially structuring economic transactions to make assets, money or other benefits acquired dishonestly or unlawfully appear legal.

Radiatori 2000 adopts a preventive and rigorous approach to ensure that its organisation, services and partners are not involved, even unwittingly, in money laundering practices. In particular, it checks the identity and reliability of customers, suppliers, consultants and other business partners through preventive internal procedures, paying particular attention to international or high-risk transactions, and refuses any payment, financing or transaction that is not clearly traceable or consistent with the nature of the economic operation.

4. Standards of conduct

4.1 Ethics in business management

4.1.1 Corporate administration

Personnel, particularly Directors, Managers and Employees, must act fairly and transparently in performing their duties, especially in relation to any request made by Shareholders, the Board of Directors, the Board of Statutory Auditors, the external audit firm

or any other state supervisory body in the exercise of their respective institutional functions. The utmost willingness to assist and cooperate with these parties is guaranteed.
Personnel are required to guarantee the truthfulness, authenticity and completeness of the documentation and information provided in carrying out the activities for which they are responsible.
Radiatori 2000 condemns any conduct intended to compromise the accuracy and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law and addressed to Shareholders, the Board of Statutory Auditors and the public. All those involved in preparing these documents must exercise due diligence in verifying the accuracy of the data and information provided.

4.1.2 Conflicts of interest

All Personnel must ensure that every decision is taken exclusively in the interests of Radiatori 2000 and with the highest degree of impartiality. They must therefore avoid any situation, including a potential one, in which an individual or the entity for which they work may face a choice between the duties and requirements of their position and their private interests, or any choice that could compromise or even merely influence their independence of judgement and decision-making.
By way of example and without limitation, the following may constitute conflicts of interest:

- Having economic or financial interests, including indirectly through family members, involving Customers, Suppliers or persons belonging to public administrations;
- Undertaking work, personally or through family members, for Customers, Suppliers or public bodies that may conflict with the Company's interests;
- Accepting money, gifts, benefits or favours of any kind from individuals, companies or bodies that have, or wish to establish, business dealings with the Company;
- Using one's position at Radiatori 2000, or confidential information obtained in the course of one's duties, to obtain a personal advantage or harm the Company's interests.

Radiatori 2000 actively undertakes to prevent, identify and manage conflicts of interest, believing that transparency of conduct and the absence of conflicts of interest are fundamental conditions for maintaining a climate of trust, professionalism and responsibility within and outside the organisation.

4.1.3 Tutela Personal data protection and information security

"Personal data" means any information relating to an identified or identifiable natural or legal person, body or association, including where identification is possible indirectly by reference to any other information, including a personal identification number.

The personal data concerned therefore relate both to those working within and for Radiatori 2000 and to all categories of counterparts interacting with the Company.
Radiatori 2000 recognises that personal data protection is closely linked to the broader concept of information security, understood as the set of measures intended to ensure the confidentiality, integrity and availability of both personal and business information.
To ensure personal data protection and information security, Radiatori 2000, through its Personnel, undertakes to ensure that data are collected, processed and stored in compliance with applicable regulations and the principles of transparency, lawfulness, data minimisation, proportionality, quality, security and fairness.
Radiatori 2000 regards personal data protection and information security as fundamental elements of its ethical and legal responsibility, as well as essential to strengthening the long-term trust of customers, suppliers and partners.

4.1.4 Sponsorships and contributions

Radiatori 2000 does not make direct or indirect contributions to political or trade union parties, movements, committees or organisations, or to their officials, agents or representatives, either in Italy or abroad. It does not fund or sponsor congresses or events whose sole purpose is political propaganda. Radiatori 2000 refrains from exerting any direct or indirect pressure on political figures.
Radiatori 2000 may support initiatives organised by bodies, associations and sports organisations that are expressly non-profit-making, assessing their reliability, standing and consistency with the values set out in this Code of Ethics and Conduct.
Strictly institutional forms of cooperation are also possible, aimed at supporting events such as studies, research, conferences, seminars or similar activities. Any contributions paid to these bodies must comply with and be consistent with applicable laws and must be accurately documented.

4.1.5 Gifts and benefits

Radiatori 2000 prohibits its Personnel, including when subject to unlawful pressure, from promising or offering gifts and/or benefits (for example, money, items, services, favours or other advantages) to third parties (for example, public administrations, Customers or Suppliers) to obtain an undue advantage for themselves or the Company.
Likewise, Radiatori 2000 prohibits its Personnel, including when subject to unlawful pressure, from receiving gifts and/or benefits from third parties intended to influence potential or existing relationships with the Company.

Any gift that could influence the parties' independence of judgement is returned to the sender. Gifts of modest value are donated to charity or made available to all the Company's Personnel.
Acts of courtesy and hospitality towards third parties are permitted where their scale and value do not compromise either party's integrity or reputation and could not be interpreted by an impartial observer as being intended to obtain improper advantages.

4.2 Stakeholder map

Radiatori 2000 has identified the following stakeholder categories:

- Personnel — employees
- Members and shareholders
- Customers
- Suppliers of goods and services
- Public administrations
- Trade associations
- Local communities

Rules and standards of conduct apply to these groups, translating the Company's values and principles into practical behaviour.

4.3 Personnel

Radiatori 2000 requires all its Personnel to act fairly and transparently in performing their duties, helping to establish and enhance the Company's reputation and protect its value. Reputation is regarded as an intangible asset of great importance, as it enables relationships based on trust to be created and nurtured with all counterparts. Radiatori 2000 therefore expects everyone acting on its behalf or in its interests to represent its approach in the best possible way, avoiding conduct of questionable moral standing.
Radiatori 2000 expects its Personnel to demonstrate professionalism and a willingness to contribute to management activities and the resolution of any difficulties. Each person is responsible for the activities within their remit and must maintain a proactive attitude, making a constructive contribution to finding effective solutions.
Every member of Personnel must act diligently to protect the Company's assets through responsible conduct in accordance with internal guidelines. To this end, each member of Personnel is responsible for safeguarding, preserving and protecting the Company's assets and resources entrusted to them in the course of their work, and must use them in the Company's interests, preventing any improper use that could cause damage, reduce

effectiveness or efficiency, or otherwise conflict with Radiatori 2000's image. Likewise, every member of Personnel undertakes to comply with copyright and intellectual property laws and regulations. Copyright-protected software and databases used by staff in performing their duties must not be reproduced or duplicated, whether for business or personal purposes. Installing and/or using unauthorised software or databases on the Company's computers is prohibited.

Accordingly, Radiatori 2000 recognises the central importance of human resources, believing that the principal factor in any company's success is the human and professional contribution of the people working within it, in a framework of loyalty and mutual trust. During recruitment, hiring and career progression, Personnel are therefore assessed solely on the basis of the match with the required profiles and objective, transparent and verifiable merit-based considerations, rejecting all forms of discrimination and favouritism. Corruption, unlawful favours and collusive behaviour are unacceptable and therefore prohibited. Soliciting personal or career advantages for oneself or others in the Company, including through third parties, is likewise prohibited.

People joining Radiatori 2000 are supported by more experienced colleagues who can provide appropriate guidance within the organisation, identify the objectives to be pursued and communicate the applicable contractual terms clearly and transparently.

The management of employment and working relationships is aimed at developing each person's abilities and skills, in accordance with a policy of merit and equal opportunities.

Radiatori 2000 guarantees a working environment that complies with applicable health and safety regulations by monitoring, managing and preventing the risks associated with professional activities. It also undertakes to maintain a calm, stimulating and constructive working environment attentive to everyone's needs, so that every member of Personnel is treated with due respect and protected from any unlawful pressure, distress or prejudice. Relationships between managers and those reporting to them, irrespective of their Function and/or Department, are based on the utmost fairness and respect for every aspect of the individual.

4.4 Members and shareholders

The Company's primary objective is to create sustainable value over time, providing a return on entrepreneurial risk through a policy that also carefully safeguards its financial soundness.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN ISO 9001:2015
UNI EN ISO 14001:2015
UNI EN ISO 45001:2023

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Radiatori 2000 makes available all information that enables members and shareholders to make informed and considered investment decisions, guaranteeing the accuracy and clarity of information and equal access to it.

In accordance with these principles, the following are prohibited, by way of example and without limitation:

- engaging in any conduct intended to impair the integrity of the Company's assets;
- carrying out any sham or fraudulent act intended to influence the will of the Members in order to secure the improper formation of a majority and/or a resolution different from the one that would otherwise have been adopted;
- undertaking corporate transactions liable to harm creditors.

Intra-group relationships are governed by contracts and based on transparency and loyalty. Consideration for intra-group transactions is justified and determined in line with market values so as not to place an undue burden on the counterparty

4.5 Customers

Radiatori 2000's success is based above all on its ability to meet its Customers' expectations while maintaining high levels of quality, performance and reliability. To this end, identifying Customers' needs is a priority, seeking to make the best use of resources and synergies in a fair, honest, professional and transparent manner.

Accurate and comprehensive information is provided on the products and services offered so that Customers can make informed decisions. The Company also ensures appropriate channels for dialogue and listening, undertaking always to respond to suggestions and complaints in order to strengthen long-term relationships.

Radiatori 2000 negotiates and structures contracts with its Customers in accordance with the principles of fairness, completeness and transparency, seeking to anticipate circumstances that could significantly affect the relationship. When unexpected events or situations arise, Radiatori 2000 takes care to respect Customers' expectations, performing contracts fairly and without exploiting any vulnerability or lack of knowledge on the counterparty's part.

The management of credit extended to Customers is aimed at protecting both parties' economic, financial and asset-related interests, seeking to resolve friction arising from conflicting positions and reaffirm the value and benefits of harmonious commercial relationships.

Provisions in a Customer's Code of Ethics and Conduct with which the counterparty requests compliance will be observed provided that they do not conflict with Radiatori 2000's provisions. If the Customer's Code of Ethics and Conduct, in the sections concerning the

relationships in question, appears less stringent than Radiatori 2000's document, Radiatori 2000's Personnel will be guided by the principles laid down in the latter.

4.6 Suppliers of goods and services

Suppliers play a fundamental role in improving Radiatori 2000's overall competitiveness. Their cooperation helps ensure that Radiatori 2000's Customers' requirements in terms of quality, costs and services are consistently met to a standard at least equal to their expectations.

Radiatori 2000 therefore bases its relationships with Suppliers on compliance with applicable regulations and the promotion of honest, diligent, transparent and cooperative conduct. At the same time, Radiatori 2000 encourages its Suppliers to apply the same criteria, with the aim of mutually benefiting from the positive effects that only a stable relationship founded on trust can produce.

Radiatori 2000's communications regarding the products and services it requires are accurate and comprehensive, enabling Suppliers to prepare informed and considered offers. Complaints and reports of discrepancies in supplies must be truthful and must not be used to obtain an undue advantage for Radiatori 2000.

Suppliers are selected and qualified using appropriate and objective methods, based on their ability to supply and the principles of impartiality, fairness and quality. In all cases, Radiatori 2000 balances the need to obtain favourable commercial terms with the need to maintain quality standards in the supply of goods and services. These selection requirements are stated and verifiable, ensuring that negotiations are characterised by frank and open dialogue. Suppliers are also promptly informed of any significant changes to qualification requirements so that they can take appropriate action in the interests of maintaining their relationships with Radiatori 2000.

Checks, site visits and all other activities undertaken by Radiatori 2000's Personnel at Suppliers' premises are guided by compliance with this Code and the instructions and procedures received, ensuring that their respective conduct does not give rise to liability for Suppliers or Radiatori 2000.

Radiatori 2000 negotiates and structures contracts with its Suppliers fairly, comprehensively and transparently, seeking to anticipate circumstances that could significantly affect the relationship. When unexpected events or situations arise, Radiatori 2000 undertakes not to exploit any vulnerability or lack of knowledge on the counterparty's part.

The findings of checks on goods and services received and on Suppliers' overall performance are shared with them with a view to supporting their progressive improvement in the common interest.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Payments to Suppliers must relate exclusively to the services and terms specified in the contract. Payments may not be made to a person or in a country other than those of the contracting parties, except in duly justified cases (for example, a specific request for payment to the parent company of the Supplier's group under a cash-pooling arrangement).

4.7 Responsible procurement

At Radiatori 2000, we believe that corporate social responsibility should not be limited to our own activities, but should extend throughout the supply chain. Promoting good practice across the entire value chain means making a practical contribution to sustainable development. We therefore adopt a **sustainable procurement** approach, systematically incorporating environmental, social and ethical criteria into supplier selection and **assessment**, alongside traditional considerations of price, quality and reliability.

Our strategy is founded on building strong, lasting relationships with suppliers based on trust, respect and mutual commitment. We undertake regular **environmental and social assessments** of our suppliers, paying particular attention to the management of environmental risks along the supply chain. We promote the adoption of certified environmental management systems (e.g. ISO 14001) and encourage suppliers to improve their performance through jointly agreed improvement plans.

We have set **qualitative objectives**, such as systematically incorporating ESG criteria into procurement decision-making, and **quantitative targets**, including increasing the number of suppliers undergoing **sustainability assessments**. The aim is to develop a resilient, responsible and transparent supply chain capable of progressively reducing the environmental impact of the products and services procured.

If a supplier fails to meet the required standards, we undertake to strengthen the partnership to address the issues identified and support its progress towards sustainability.

4.8 Public administrations

Public administrations means all private and public-law entities performing a "public function" or providing a "public service". A "public function" means activities governed by public law relating to legislative, administrative and judicial functions. A "public service" means activities involving the production of goods and services of general interest subject to supervision by a Public Authority, and activities intended to guarantee individuals' rights to life, health and freedom of communication, including under concession and/or contractual arrangements.

Radiatori 2000 bases and aligns its conduct on respect for the principles of impartiality and proper administration required of public administrations.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN ISO 9001:2015
UNI EN ISO 14001:2015
UNI EN ISO 45001:2023

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Radiatori 2000 may not be represented in dealings with public administrations by Personnel and/or third parties where a conflict of interest could arise, even in purely theoretical terms.
Any conduct by anyone acting on the Company's behalf or in its interests that involves directly or indirectly promising or offering money or other benefits to Italian or foreign Public Officials or Persons Entrusted with a Public Service, or their relatives and family members, from which the Company may derive an interest or advantage, is condemned. Such conduct is considered corruption whether carried out directly by Radiatori 2000 or through persons acting on its behalf or in its interests, for example consultants, project-based workers, agents, attorneys-in-fact and third parties connected to the Company by similar or equivalent relationships.
Persons appointed by Radiatori 2000 to handle any business negotiation, application or institutional relationship with Italian, EU or foreign public administrations must not, for any reason, seek improperly to influence, by action or omission, decisions taken by Public Officials or Persons Entrusted with a Public Service on behalf of the public administration.
Entering into employment relationships with public administration employees, or hiring former public administration employees or their relatives or family members who personally and actively participate or have participated in business negotiations or endorsed applications made by Radiatori 2000 to public administrations, is prohibited, unless the specific circumstances of the employment relationship are considered to rule out any connection between the functions performed in the public administration and the employment relationship concerned.
Where a public administration is a customer or supplier of Radiatori 2000, the Company must act in strict compliance with the laws and regulations governing the relationship.
Any conduct intended to obtain any contribution, funding, subsidised loan or similar disbursement from the State, the European Union or another national or foreign public body through altered or falsified declarations and/or documents, omitted information or, more generally, deceptive practices intended to mislead the disbursing body is condemned.
Contributions, grants or funding obtained from the State, Regions, another public body or the European Union, even of modest value and/or amount, must not be used for purposes other than those for which they were granted.
Those responsible for managing financial activities, investments and/or funding received from national or foreign public administrations must act in accordance with the principles of fairness and transparency and comply with the applicable disclosure obligations.
Inducing any person belonging to the Company or connected to it through a working relationship not to make statements, or to make false statements, before the Judicial

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Authority through violence, threats, offers or promises of money or other benefits constitutes a breach of this Code and the Model, as well as of the law.

4.9 Trade associations

Radiatori 2000 undertakes to provide national, EU and foreign trade associations with the utmost cooperation and assistance.

4.10 Local communities

Radiatori 2000 is committed to contributing to the long-term development and wellbeing of the communities in which it operates, ensuring that the cultures and traditions of each country are observed and respected.
Radiatori 2000 promotes and undertakes to establish fair relationships with other organisations and bodies, enhancing the synergies that may arise from them.
Where possible, Radiatori 2000 supports social and cultural initiatives that promote the Company's values and principles and are aimed at furthering the social, economic and environmental development of the communities in which it operates.
Radiatori 2000 promuove e si impegna a stabilire con altre organizzazioni ed enti rapporti di correttezza atti a valorizzare le sinergie che da questi possono derivare.
Radiatori 2000 contribuisce, per quanto possibile, al sostegno di iniziative sociali e culturali che consentano di promuovere i valori e i principi della Società e che siano finalizzati alla promozione dello sviluppo sociale, economico e ambientale delle comunità in cui opera.

5. Human rights and due diligence

Radiatori 2000 respects human rights and observes the United Nations Guiding Principles on Business and Human Rights. The Company has incorporated these principles into its Integrated Policy as primary objectives and undertakes to update the policy at least every 5 years, or following changes in activities that may alter human rights risks, or where monitoring identifies a shortcoming.
The Integrated Policy is displayed within the organisation, given to all workers when they are hired and published on the Company's website so that it is readily accessible to all stakeholders.
The Company has also sent the information notice and the Integrated Policy to all suppliers.
Radiatori 2000 undertakes to assess and responsibly manage the indirect impacts that its activities and decisions may have on the human rights of external stakeholders, including

suppliers, subcontractors, customers and local communities, promoting consistent standards of respect, fairness and inclusion throughout the value chain.
If a failure to meet ethical requirements is reported, whether internally or by stakeholders, the report will be analysed and handled by the designated personnel through a due diligence process structured around three main stages:
Identifying areas of activity presenting potential risks of human rights violations (within company activities, the supply chain and relationships with associated companies and business partners);
Mapping measures to mitigate the risk of human rights violations in the areas identified at the previous stage;
Assessing the adequacy of mitigation measures to identify areas where they may be insufficient to contain risk at an acceptable level, and arranging corrective action where necessary.
Through this approach, Radiatori 2000 aims to strengthen its corporate social responsibility, promoting a sustainable, transparent management model that respects human rights at every stage of its activities and relationships with stakeholders.

6. Gender diversity and women's empowerment

Radiatori 2000 believes that diversity is an asset and is committed to valuing all forms of diversity and creating an open, inclusive working environment that promotes everyone's wellbeing. The importance of a culture of diversity that inclusively values all differences (including gender and gender identity, age, sexual orientation, ethnic origin, nationality, language, social background, religious faith, personal beliefs, marital status, experience, education, cognitive and motor abilities, health conditions and any other category protected by law) as drivers of added value and innovation is based on recognising each person's dignity and unique worth. The aim is to build a corporate community in which everyone feels they belong and can contribute, recognising that every person is unique and that respect for diversity is fundamental to living and working together. Radiatori 2000 rejects any form of discrimination based on ethnicity, skin colour, gender, age, disability, sexual orientation, religion, political opinions, nationality or social origin, promoting inclusion and enabling everyone to perform their duties. Radiatori 2000 undertakes to maintain a working environment free from all forms of violence or harassment, in which every difference can be welcomed and valued, promoting people's wellbeing and recognising their contribution,

whatever their personal characteristics, and preventing and combating obstacles to this aim through practical action:

- incorporating the principle of equal treatment into the processes governing every stage of professional life and the recognition of human resources, so that decisions on recruitment, training and career progression are based exclusively on people's abilities, experience and professional potential;
- eliminating causes and/or shortcomings in work organisation that could, even unintentionally, create discrimination;
- condemning persecution, harassment and moral or psychological abuse carried out with the intention of causing distress and for discriminatory reasons;

To fulfil the above commitments, Radiatori 2000 undertakes to ensure:

- that payslip components do not reveal discrepancies between people performing comparable duties;
- that women performing the same company roles and duties receive the same pay, allowances and benefits as men;
- that no discriminatory criteria are applied when recruiting staff;
- that there is no discrimination in pay, promotion or training;
- that accounting records demonstrate that workers' treatment is consistent with their length of service, duties and professional skills;
- that workers of the same gender performing the same company roles and duties are offered the same training opportunities;
- that the payment of statutory maternity/paternity leave allowances to female and male workers is recorded;
- that working mothers are granted rest breaks or time off during their child's first year of life.

The Company has implemented a programme promoting gender equity and women's empowerment.

7. Discrimination and harassment

Radiatori 2000 promotes a working environment based on respect for human dignity, inclusion and fairness, actively undertaking to prevent all forms of discrimination, harassment and physical, psychological or verbal abuse against its Personnel at every level of the organisation.

Any form of conduct that may be discriminatory or undermine individual dignity on the grounds of sex, gender, sexual orientation, ethnicity, nationality, religion, disability, age, marital status, personal opinions, political or trade union affiliation, state of health or any other personal or

social condition is expressly prohibited and will not be tolerated. Everyone must be enabled to perform their duties, including through accessible infrastructure or specific adaptation training programmes.

Radiatori 2000 also firmly condemns:

any harassing conduct (verbal, non-verbal, physical or digital) that creates a hostile, intimidating, degrading or humiliating environment;

any abuse of hierarchical position or power intended to exert undue pressure on, or behave intrusively towards, other Personnel;

any form of violence, threats, intentional isolation or workplace bullying that compromises people's psychological and physical wellbeing at work.

The Company's commitment is put into practice particularly, but not exclusively, during recruitment and promotion and in development processes.

8. Conflict-affected and high-risk areas

To avoid involvement in armed conflict or human rights abuses, Radiatori 2000 exercises risk-based due diligence on its aluminium supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), in a manner appropriate to our size and circumstances. At Radiatori 2000, we believe that our corporate social responsibility is not confined to our own individual activities, but extends throughout the value chain. We therefore regard sustainable procurement not only as ethically right and necessary, but also as a powerful means of promoting responsible behaviour throughout the supply chain. The principal element of this philosophy is building strong, lasting partnerships with our suppliers, based on trust, respect and mutual commitment, that lead to responsible conduct. Sustainability is an essential element of our supplier management model. Where a high-risk area is involved, due diligence must be undertaken as follows:

a. Establish strong management systems, including a supply chain policy, responsibilities and resources, information gathering and supplier engagement;
b. Identify and assess risks in the supply chain;
c. Design and implement a strategy to respond to identified risks;
d. Undergo an audit of due diligence practices;
e. Report annually on supply chain due diligence.

9. Modern Slavery Act: forms of modern slavery

The term modern slavery refers to all situations of exploitation in which an individual cannot refuse or leave because of threats, violence, coercion, deception or abuse of power. The most alarming forms of modern slavery include debt bondage, the exploitation of child labour and the trafficking of children for prostitution and pornography, illegal adoption or organ transplantation; domestic violence against women and children; and the sexual enslavement of women, whether through forced prostitution or systematic rape in wartime. The definition of modern slavery under the Modern Slavery Act can encompass forced labour and work performed not voluntarily or for remuneration, but under threats or physical coercion. This grim category also includes prostitution, human trafficking and sexual slavery. Radiatori 2000 has received no sanctions in this area; Radiatori 2000 declares that no cases of modern slavery have been discovered in its supply chain. Radiatori 2000 undertakes, in every way and by every means, to challenge and combat all forms of modern slavery; to this end, it undertakes to comply with all recommendations and actions required by the ILO globally. The persistence of labour exploitation has led the ILO to intensify its efforts to develop a multidimensional reference framework encompassing all forms of labour exploitation within unacceptable forms of work: conditions that deny individuals the effective exercise of fundamental labour rights and endanger workers' lives, health, freedom, human dignity and safety. This framework is based on the body of over 400 international standards adopted by the ILO — the only United Nations agency with a standard-setting mandate — many of which contain provisions on preventing and combating exploitation and work that is not freely chosen, including specific economic sectors (e.g. agriculture) or groups of workers (e.g. migrants and domestic workers), with the aim of protecting workers from labour exploitation and promoting decent work. Radiatori 2000 complies with all ILO standards with the aim of contributing, locally and globally, to reducing modern slavery, promoting fair and ethical recruitment and providing greater support to women, girls and the most vulnerable people.

10. Child labour

Radiatori 2000 rejects all forms of child labour and the employment of anyone below the minimum age prescribed by applicable law. Radiatori 2000 adopts specific procedures for selecting and hiring workers. These procedures specify the documentation that workers must produce for recruitment purposes; checking this documentation helps prevent child labour. Radiatori 2000 undertakes to:

- hire only people who have reached 18 years of age, verifying their age;

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

- comply with collective labour agreements and all legislation on the employment of minors and young people in the Company;
- comply with legislation protecting the needs of working students;
- establish cooperation with schools and universities to promote training placements (company internships) aimed at helping young people enter employment.

When selecting a new candidate, the relevant department manager and the Human Resources manager specify to the appointed recruitment agency or in the job advertisement that having reached 18 years of age is a mandatory and essential requirement for any future employment. Following selection, during recruitment, the Personnel Administration Office verifies personal details by requesting copies of identity documents, residence permits (for non-EU citizens) and the documents required by the National Collective Labour Agreement. Radiatori 2000 requires its suppliers to undertake not to use or support child labour and to verify that this requirement is also met by their subcontractors, and monitors compliance with this commitment. Before entering into any new supply relationship, Radiatori 2000 checks that suppliers do not use child labour and undertake in writing to respect this principle by signing a Code of Ethics and completing a targeted questionnaire. Compliance with this requirement is considered fundamental to a lasting commercial relationship.

Where the use of a child by suppliers or subcontractors is confirmed, Radiatori 2000, with support from bodies with which it works on Social Responsibility (certification bodies, NGOs and public/private institutions), will inform and raise awareness among the supplier or subcontractor regarding Italian legislation, continuing to monitor their conduct and awaiting compliance. With the support of these bodies, Radiatori 2000 undertakes to safeguard the child's future protection by following their subsequent employment/education pathway. With regard to young workers, Radiatori 2000 will seek to encourage the supplier employing them to:

- provide the minor with light, safe work;
- allow them to undertake or complete their education where necessary;
- support the minor and their family in meeting their living needs.

Any instances of the employment of minors identified will be treated and managed as major non-conformities affecting the supplier's qualification status. Where Radiatori 2000's influence over the supplier makes the success of such an initiative unlikely, a more appropriate channel for engaging the supplier will be sought (for example, awareness-raising through NGOs). Anyone who directly identifies a case of child labour or becomes aware of the possible use of child labour within Radiatori 2000 or at suppliers/subcontractors must immediately inform the Company and the HR Manager/Ethics Officer. Upon receiving the report, the Ethics Officer/ASI initiates an investigation into the facts and/or circumstances,

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

working with Human Resources Management and the company personnel responsible for overseeing the relevant business processes and/or service/facility. If a situation of child labour is identified, the Ethics Officer/ASI and Human Resources Management take the necessary steps to remove the child from that situation immediately. Once the child has been removed from the child labour situation, the Ethics Officer/ASI is responsible for initiating the remedial action necessary to ensure the child's safety, health, education and development:

- immediately notify the competent authorities;
- develop, in cooperation with the competent statutory bodies and the parents, a child support plan covering:
    a) financial support for the child;
    b) the opportunity for the child to return to school or continue their education;
    c) where necessary, payment of school fees and provision of learning materials to ensure continuity of education;
    d) appropriate arrangements to ensure an alternative means of support for the child's family, potentially including the employment of a family member;
    e) measures to ensure continuous monitoring of the child's situation and the effectiveness of the action taken.

Alongside the action described above, the Ethics Officer/ASI carefully assesses the causes of the identified child labour situation, working with and involving the company personnel responsible for overseeing the relevant processes. The Ethics Officer/ASI opens a Corrective Action with the aim of planning and implementing the measures needed to resolve the non-conformity and prevent further problems. The Ethics Officer/ASI records the event, the action taken to address the problems identified, the monitoring measures established, the Corrective Actions opened, the results of the measures and the closure of the issues. The Ethics Officer/ASI also monitors the child's situation and the outcome of the agreed measures, recording the results.

11. Forced and compulsory labour

Radiatori 2000 rejects the use of forced or compulsory labour and guarantees working conditions that comply with applicable laws and regulations. Both regular work and overtime are a free expression of workers' wishes and are free from any form of physical and/or psychological coercion. To this end, the Company undertakes to:

- Comply with the Workers' Statute;
- Refrain from requiring staff to surrender deposits and/or original identity documents;

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN ISO 9001:2015
UNI EN ISO 14001:2015
UNI EN ISO 45001:2023

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

- Refrain from requiring staff to lodge financial deposits at the start of employment that could restrict their freedom;
- Demonstrate the voluntary nature of employment through a signed individual contract;
- not oblige workers to incur debts with the Company and, where a worker requests a loan, ensure that the terms applied are the same as or better than market terms;
- not compel workers to undertake compulsory and/or unpaid overtime;
- ensure payment for any training programmes undertaken by workers that are essential to their work;
- guarantee all workers a decent wage;
- ensure that salaries are paid on time using payment methods that do not deprive workers of their right to terminate employment;
- ensure that employees can obtain clarification of any unclear items through discussions with the Personnel Office;
- explain the applicable National Collective Labour Agreement and how to read a payslip at the time of hiring, so that workers can understand every item and verify the legitimacy of deductions;
- Ensure that, where prisoners are employed inside or outside prison, they have permission to work for private employers and that their contractual terms and conditions are the same as those of workers who are not in prison.

12. Freedom of association and collective bargaining

Radiatori 2000 recognises its employees' right to associate to defend and promote their interests and to be represented by trade unions or other forms of representation, in accordance with the legislation and practices in force in the countries where they are employed. Collective bargaining is recognised as the preferred means of determining employees' contractual rules and conditions and of regulating relationships between the Company and trade unions. Radiatori 2000 undertakes to ensure that employee representatives are not penalised or subjected to retaliation in any way.

13. Just and favourable working conditions

Radiatori 2000 believes that pay policies, benefits and working conditions must ensure an adequate standard of living for all workers. It therefore promotes a working environment in which all employees receive fair and equitable pay and benefits according to the work performed, their contractual classification and the country in which they are employed. At

Radiatori 2000, employees' minimum pay is no lower than that established by collective agreements and the legislation in force in the countries where the Company operates.

14. Biodiversity

Radiatori 2000 recognises that biodiversity is a fundamental resource for the wellbeing of the planet and the resilience of natural systems, as well as a key element in the long-term sustainability of economic activities. Safeguarding ecosystems and species is therefore an integral part of our environmental responsibility strategy.

The Company actively undertakes to prevent, reduce and, where possible, offset the negative direct and indirect impacts of its operations on biodiversity, paying particular attention to the responsible use of land, water resources and raw materials and to the management of waste and emissions.

Radiatori 2000 adopts a precautionary and integrated approach, promoting:

- the prior assessment of biodiversity impacts arising from production, logistics and procurement activities;
- the adoption of operating practices compatible with ecosystem conservation, minimising land take, pollution and habitat fragmentation;
- the responsible and sustainable use of natural resources, with particular attention to the origin of purchased materials;
- Radiatori 2000 regards biodiversity protection as a shared responsibility throughout the value chain. It therefore undertakes to communicate this vision to its suppliers, business partners and stakeholders, incorporating criteria that take account of the protection and enhancement of ecosystems into procurement and assessment practices.

15. Implementation of the Code of Ethics and Conduct

Radiatori 2000 has chosen to formalise this Code of Ethics and Conduct to share and communicate its values, principles and rules of conduct to all personnel and stakeholders, with a view to building a transparent organisation committed to ethical standards appropriate to a mature civil society.

All recipients of this document must comply with the regulations in force in every country in which Radiatori 2000 operates, guiding their actions and conduct by the principles, objectives and commitments set out in the Code of Ethics and Conduct. Where regulations do not clearly define the conduct to be followed, the instructions in this Code will provide guidance for its recipients.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

Under no circumstances can the pursuit of Radiatori 2000's interests justify conduct contrary to applicable laws or the rules of this Code. The Code of Ethics and Conduct serves as an instrument of assurance and reliability, protecting Radiatori 2000's assets and reputation.

All Personnel are committed to observing the principles of the Code and ensuring that these rules are properly applied both within Radiatori 2000 and, more generally, by all its counterparts. Directors and Managers also have a duty to lead by example in ensuring consistency between the principles of the Code of Ethics and Conduct and everyday behaviour. The rules in this Code of Ethics and Conduct supplement the standards of behaviour that Employees are required to observe, including the ordinary duty of care imposed on workers under the relevant legislation.

Compliance with the Code of Ethics and Conduct must be regarded as an essential part of obligations towards Radiatori 2000, pursuant to and for the purposes of applicable provisions. Breaching the principles of this Code undermines the relationship of trust established with the Company and may lead to disciplinary action. In the most serious cases, a breach may result in termination of employment or the contractual relationship.

The body responsible for monitoring the application of the Code of Ethics and Conduct is the Supervisory Body, established in accordance with the Organisation, Management and Control Model for the prevention of offences under Legislative Decree 231/2001 and related provisions. It coordinates appropriately with the competent bodies and functions to ensure proper implementation and adequate oversight.

Radiatori 2000 encourages Personnel to contact the Supervisory Body if they are unsure of the most appropriate conduct in specific circumstances. All requests for clarification will receive a prompt response.

All recipients of the Code of Ethics and Conduct may communicate directly with the Supervisory Body through the dedicated email address:

mailto:odv@radiatori2000.it

Radiatori 2000 undertakes to disseminate this Code of Ethics and Conduct to all Personnel by appropriate means and methods, so that its values and principles are applied in everyday decisions and conduct.

16. Whistleblowing

With regard to reports of breaches or suspected breaches of the rules contained in the Code of Ethics and Conduct and the Organisational Model, it should be noted that Legislative Decree 24/2023, "Implementation of Directive (EU) 2019/1937 of the European Parliament

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN ISO 9001:2015
UNI EN ISO 14001:2015
UNI EN ISO 45001:2023

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

and of the Council of 23 October 2019 on the protection of persons who report breaches of national legal provisions", was published on 10.03.2023. Under this legislation, the Organisational Model must provide for internal reporting channels, a prohibition on retaliation and a disciplinary system.

Reports, which may also be made anonymously, must be precise and detailed. They may concern unlawful conduct of criminal relevance or administrative breaches, as well as breaches of provisions in the procedures adopted by the Entity through internal regulations or various Models or Codes, committed by managers, members/employees, external operators or consultants acting in the name of and on behalf of Radiatori 2000 S.p.A.

Such Reports may concern any area of the Company, not only matters relevant to the application of Legislative Decree 231/2001 and the current Model, including breaches of the Model relating to health and safety at work.

Specifically, in compliance with the above legislation, all Recipients may report to the designated person, through the channels provided for in the policy adopted and, in particular, using the form available on the Company's website, any unlawful conduct of criminal relevance and/or conduct contrary to internal regulations, as well as harmful situations involving a breach, including a suspected breach, of the Code of Ethics and Conduct and the Organisational Model.

To implement the changes introduced by Legislative Decree 24/2023 and ensure an effective whistleblowing system, the Company has strengthened its report management system to protect the reporting person's identity and right to confidentiality. Radiatori 2000 has therefore established and approved a specific procedure for reports by recipients of the Model, who have been informed of dedicated communication channels for submitting reports based on precise and consistent factual evidence. These channels guarantee, including through electronic means, the confidentiality of the reporting person's identity and the protection of the personal data of the person concerned and third parties, subject to statutory obligations.

To facilitate the Supervisory Body's access to as much information as possible, Radiatori 2000 guarantees protection for every reporting person against any form of retaliation, discrimination or penalisation, subject to statutory obligations and the protection of the rights of the Company and of persons accused mistakenly and/or in bad faith.

The Supervisory Body will assess Reports received on the basis of their admissibility, determined directly by the completeness and consistency of the communication's content, before deciding whether to undertake subsequent verification and reporting activities, providing appropriate feedback to the reporting person within the statutory time limits.

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.

This Code of Ethics and Conduct was adopted by resolution of the Board of Directors of Radiatori 2000 S.p.A. on 30/06/2026, with immediate effect from that date. Any update, amendment or revision to this Code of Ethics and Conduct must be approved by the Board of Directors of Radiatori 2000 S.p.A.

Rev04_17112026

Sede Legale e Unità Produttiva
Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax
T. +39 035 4810174
F. +39 035 4821852

Email e PEC
radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it

CERTIFIED QUALITY MANAGEMENT SYSTEM
CERTIQUALITY
UNI EN **ISO 9001:2015**
UNI EN **ISO 14001:2015**
UNI EN **ISO 45001:2023**

Radiatori 2000 S.p.A. Registro imprese di Bergamo 03554100176 - REA BG-345232
C.F. e P.IVA IT 03554100176 - Registro Nazionale AEE IT15070000008942
Capitale Sociale € 6.020.000 i.v. - Società soggetta ad altrui attività di direzione e coordinamento ai sensi dell'art. 2497 bis c.c. FECS PARTECIPAZIONI S.p.A.