

The background is a solid teal color. It features a large, faint graphic of concentric circles and overlapping geometric shapes, creating a sense of depth and movement. The text 'Code of Ethics' is positioned in the lower right quadrant of the page.

# **Code of Ethics**

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## Definitions

- **Code:** *the Code of Ethics of Radiatori 2000 S.p.A.*
- **Company:** *Radiatori 2000 S.p.A.*
- **Decree:** *Legislative Decree No. 231 of June 8, 2001, and subsequent amendments or integrations. The Decree introduced a system of administrative liability distinct and independent of legal entities in cases where individuals—holding representative, administrative, and managerial roles, or subjects under their supervision and control—commit one or more of the so-called predicate offenses outlined in the Decree, to the interest and/or advantage of the entity itself.*
- **Model:** *the Organization, Management, and Control Model pursuant to Legislative Decree 231/2001.*
- **Stakeholder:** *internal and external individuals or groups, as well as organizations and institutions representing them, whose interests are influenced by the direct and indirect effects of the Company's activities.*
- **Supervisory Body or OdV:** *the body established by Article 6 of the Decree, responsible for overseeing the functioning and compliance of the Model and the Code.*
- **Parent Company:** *FECS Partecipazioni S.p.A., a company based at Viale Antonio Gramsci, 20, 24040 Verdellino (BG).*

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## 1. Introduction

Radiatori 2000 S.p.A. is an Italian company established in 2003 that designs, manufactures, and sells die-cast and extruded aluminum radiators both in Italy and abroad. It also produces semi-finished metal products and is characterized by cutting-edge production processes and the latest manufacturing technologies, capable of producing highly qualitative products accessible to all. Radiatori 2000 S.p.A. holds the following certifications:

- UNI EN ISO 9001 – Quality Management System
- UNI EN ISO 14001 – Environmental Management System
- ISO 45001:2018 – Occupational Health and Safety Management System
- Certificate for the recovery of scrap iron, steel, and aluminum (Art. 6 of EU Regulation 333-2011)
- Radiatori 2000 S.p.A. is also authorized by the management determination No. 2766 of 22.12.2020 by the Province of Bergamo.

Radiatori 2000 S.p.A. shares the sense of responsibility that comes from being a key player in the economic and social scenarios in which it operates. For this reason, Radiatori 2000 S.p.A. is committed to maintaining and developing the trust-based relationship established with all relevant stakeholders. Radiatori 2000 S.p.A. has chosen to formalize this Code of Ethics to share and communicate values, principles, and rules of conduct to all stakeholders, with the aim of creating a transparent reality oriented towards compliance with ethical standards typical of a mature civil context. Radiatori 2000 S.p.A. is part of the Fecs Participations group; the parent company holds shares in other companies operating in the metal treatment and commercialization sector; our company and the subsidiary Ridea S.r.l. are the only entities in the group that produce and market radiators.

The Code of Ethics is also an integral part of the Organization, Management, and Control Model (hereinafter also referred to as the "Model") pursuant to Legislative Decree 231/2001.

## 2. Recipients and structure of the document

The collaborators of Radiatori 2000 S.p.A. are the main recipients of this Code of Ethics. They must therefore adhere to the principles and standards outlined herein, guiding their daily business behaviors.

The collaborators are:

- Members of the Board of Directors, Executives, and Employees, classified according to the regulations and provisions of the respective sector;
- All those who, in any capacity, act in the name or on behalf of and in the interest or benefit of Radiatori 2000 S.p.A., regardless of the legal classification of the relationship, whether

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they have an employment relationship involving subordination to the discretionary authority of the Company (e.g., temporary workers or project workers), or whether they represent the Company to third parties (e.g., consultants, agents).

Radiatori 2000 S.p.A. prefers interlocutors and collaborators who align their behavior with ethical principles that are shareable and consistent with those expressed in this Code of Ethics.

This Code of Ethics is valid both in Italy and abroad, and its application is reasonably adjusted to the cultural, political, social, economic, and commercial realities of the various countries in which Radiatori 2000 S.p.A. operates.

The Code of Ethics is structured as follows:

- General principles: These outline the purpose, values, and fundamental principles of Radiatori 2000 S.p.A.'s organizational culture;
- Standards of conduct: These highlight the conduct criteria to be followed in compliance with Radiatori 2000 S.p.A.'s values and principles, emphasizing ethical aspects in business management and the categories of interlocutors and recipients to whom they are practically applicable.

### 3. General principles

As an operator contributing to the use of materials derived from waste, Radiatori 2000 S.p.A., like the other companies in the group, helps affirm the value of business sustainability.

#### Ethics

Ethics (a term derived from the Ancient Greek ἦθος (or ἥθος), ēthos, meaning "character," "behavior," "custom," or "habit") is a branch of philosophy that studies the rational foundations that allow the distinction of human behaviors as good, just, and lawful, in contrast to behaviors deemed unjust, unlawful, inappropriate, or bad according to an ideal behavioral model. (Socrates, the Greek philosopher, is the founding father of ethics).

Ethics is thus both a set of values that define human behavior in relation to others and a criterion that enables individuals to judge behaviors—both their own and others'—with respect to good and evil.

In this economic-business context, constantly seeking balance, it is important to highlight that there has historically been a significant separation between economics and ethics, as economics has not debated goals but only the means to achieve those goals.

With this document, we aim to highlight the need for the means used to achieve the company's goals to be the result of ethical behavior. Hence, the necessity for those in leadership positions to understand this philosophy, adopt it as their own, and be the first to spread it to all stakeholders.

#### Vision

The company considers the following factors to be formative elements of its vision: environmental

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responsibility, production efficiency, product and process innovation.

Environmental responsibility is a natural part of the people who lead the company, as they have always been environmental operators.

Production efficiency is the factor that motivated the formation of the company and remains a core element of the future vision.

Product and process innovation is pursued to offer the customer the best product.

## **Mission**

The company seeks to continue its mission of recovering waste and producing finished domestic products with Italian design.

In pursuing its vision, mission, and objectives, Radiatori 2000 S.p.A. adopts the following general ethical principles, shared by the entire organization.

### **3.1 Legality**

Respect the laws and regulations in force in the countries where the Company operates and adhere to the Code of Ethics and internal company regulations, applying them with integrity and fairness. Radiatori 2000 S.p.A. complies with the laws of the countries in which it operates, and all collaborators, employees, and stakeholders must cooperate with the Company to achieve this objective.

### **3.2 Integrity and fairness**

Be faithful to one's word, act in accordance with the commitments made, with a sense of responsibility in applying the principle of good faith in every activity or decision.

### **3.3 Honesty and transparency**

Provide complete, consistent, and timely information, without violating confidentiality rules, so that the legitimate expectations of various Stakeholders can be met, avoiding behaviors that could directly or indirectly gain undue advantage from their positions of weakness or lack of knowledge.

### **3.4 Quality**

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

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### 3.5 Respect for the dignity of individuals

Respect the fundamental rights of individuals, protect moral integrity, and ensure equal opportunities. In both internal and external relationships, behaviors originating from discrimination based on political and union views, religion, race, nationality, age, gender, sexual orientation, health status, or any other characteristic of the individual are not permitted.

### 3.6 Team spirit

Promote teamwork and collaboration in achieving common goals, knowing that the reputation and success of the Company are based on the value and synergies created by those who work within it.

### 3.7 Protection of Health and Safety in the Workplace

Proactively and personally contribute to maintaining and strengthening the culture of health and safety in the workplace, setting an example through daily actions, refraining from behaviors that may pose a danger to oneself or others, suggesting initiatives for continuous improvement, and properly reporting any potential or real risks.

### 3.8 Environmental Protection and Development of Recycling Awareness

Support and develop, even through business activities, a greater environmental awareness by optimally utilizing resources, recovering them, and safeguarding the environment, valuing and concretely demonstrating the possibility of a mutually sustainable business and system.

The company, with a circular economy perspective, believes in growth that does not rely on the extraction and consumption of Earth's resources, without wasting energy to the detriment of the environment; a path to be pursued as a group.

### 3.9 Anti-corruption

Radiatori 2000 S.p.A. does not tolerate any form of corruption, complies with the applicable anti-corruption laws, and requires all Stakeholders to align with the Company's choices.

### 3.10 CSR

Radiatori 2000 S.p.A. engages in environmental recovery activities and has always considered the impact of its operations on the social organization resulting from its industrial structure. Radiatori 2000 S.p.A. will continue to pursue these objectives.

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## 4. Standard of conduct

### 4.1 Business ethics

#### 4.1.1 Corporate governance

The collaborators, with particular reference to the CEO, Managers, and Employees, must maintain correct and transparent conduct in the performance of their duties, especially with regard to any requests made by Shareholders, the Board of Directors, the Board of Statutory Auditors, the Audit Firm, and any other state control bodies, in the exercise of their respective institutional functions. Maximum availability and collaboration are guaranteed in relation to such parties.

Collaborators are required to ensure the truthfulness, authenticity, and completeness of the documentation and information provided in the performance of their duties.

Radiatori 2000 S.p.A. condemns any behavior aimed at altering the correctness and truthfulness of data and information contained in financial statements, reports, or other legally required corporate communications directed to Shareholders, the Board of Statutory Auditors, and the public. All individuals involved in the preparation of such documents must verify, with due diligence, the accuracy of the data and information provided.

#### 4.1.2. Conflict of interest

All collaborators must ensure that every decision is made in the interest of Radiatori 2000 S.p.A. They must, therefore, avoid any situation of conflict of interest between personal or family economic activities and their duties within the Company, which could compromise their independence of judgment and decision-making.

By way of example and not limited to, the following situations may create a conflict of interest:

- having economic and financial interests, even through family members, with clients, suppliers, or the Public Administration;
- engaging in work activities, even if performed by family members, for clients, suppliers, or the Public Administration;
- accepting money, gifts, or favors of any kind from individuals, companies, or entities that are, or intend to engage, in business relations with the Company;
- using one's position at Radiatori 2000 S.p.A. or the information acquired in their work in a way that creates a conflict between personal interests and those of the Company.

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### 4.1.3. Protection of Personal Data

A "personal data" is any information relating to a natural or legal person, entity, or association, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number.

The personal data in question thus refers to both those who operate in and for Radiatori 2000 S.p.A., as well as all categories of stakeholders interacting with the Company (e.g., clients, suppliers).

In order to ensure the protection of personal data, Radiatori 2000 S.p.A., through its collaborators, is committed to processing such data in compliance with the relevant regulations, particularly according to the principles of transparency, lawfulness, data quality, and accuracy.

Radiatori 2000 S.p.A. ensures that the processing of data is relevant to the declared and pursued purposes, meaning that personal data will not be used for secondary purposes without the consent of the data subject.

### 4.1.4. Sponsorships and contributions

Radiatori 2000 S.p.A. does not make direct or indirect contributions to political parties, movements, committees, or trade unions, nor to their officials, agents, or representatives, either in Italy or abroad. It does not finance or sponsor congresses or events whose sole purpose is political propaganda.

Radiatori 2000 S.p.A. refrains from any direct or indirect pressure on political representatives. Radiatori 2000 S.p.A. may support initiatives for non-profit entities, associations, and sports organizations, evaluating their reliability, stature, and alignment with the values expressed in this Code of Ethics.

Collaborations of a strictly institutional nature are also possible, aimed at contributing to the realization of events such as studies, research, conferences, seminars, or similar activities. Any contributions made to these entities must comply with applicable laws and be properly documented.

### 4.1.5 Gifts and Benefits

Radiatori 2000 S.p.A. prohibits its collaborators, even under illegal pressure, from promising or offering gifts and/or benefits (such as money, goods, services, favors, or other utilities) to third parties (such as Public Administration, customers, suppliers), in order to gain undue advantage for themselves or the Company.

Similarly, Radiatori 2000 S.p.A. prohibits its collaborators, even under illegal pressure, from receiving gifts and/or benefits from third parties to influence potential or actual relationships with the Company.

Any form of gift that could influence the independence of judgment of the parties is returned to the sender. Modest value gifts are donated to charity or made available to all

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collaborators of the Company.

Acts of courtesy and hospitality towards third parties are permitted when they are of such nature, size, and value as not to compromise the integrity and reputation of both parties and not to be perceived, by an impartial observer, as aimed at acquiring improper advantages.

## 4.2 The map of Stakeholders and interested parties

Radiatori 2000 S.p.A. has identified the following categories of stakeholders:

- Collaborators – Employees
- Partners and shareholders
- Customers
- Suppliers of goods and services
- Public Administration
- Trade Associations
- Local communities

For each of them, rules and standards of behavior are defined and applied, representing the translation of values and principles into concrete actions.

## 4.3 Collaborators

Radiatori 2000 S.p.A. requires all its collaborators to maintain a correct and transparent conduct in the performance of their duties, contributing to the affirmation and improvement of the company's reputation, which is considered a valuable intangible asset. Reputation enables the creation and cultivation of relationships based on trust with all stakeholders. Therefore, Radiatori 2000 S.p.A. expects all those acting on its behalf or in its interest to represent the company in the best possible way, avoiding behavior that could be morally questionable.

Radiatori 2000 S.p.A. expects its collaborators to demonstrate professionalism and willingness to contribute to the management of activities and in solving any critical issues. Each individual is responsible for their specific tasks and must maintain a dynamic attitude, offering constructive input in the search for valid solutions.

Every collaborator must act diligently to protect the company's assets by following internal guidelines. Each collaborator is responsible for safeguarding, preserving, and defending the assets and resources entrusted to them in the course of their duties and must use them in accordance with the company's interests, avoiding any improper use that could result in harm or reduce effectiveness, efficiency, or damage the company's image. Likewise, each collaborator is committed to respecting laws and regulations related to copyright and intellectual property. Software and databases protected by copyright and used by staff for their activities may not be reproduced or duplicated, neither for business purposes nor for personal use. The installation

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and/or use of unauthorized software or databases on the company's computers is prohibited.

In line with these principles, Radiatori 2000 S.p.A. recognizes the centrality of human resources, believing that the key factor for the success of any company is the human and professional contribution of its people, in an environment of loyalty and mutual trust. Therefore, in the selection, hiring, and career advancement phases, evaluations are based solely on the alignment between the expected profiles and objective, transparent, and verifiable merit-based criteria, avoiding any form of discrimination or clientelism. Corruption, illegal favors, and collusive behavior are unacceptable and prohibited. The solicitation of personal or career benefits for oneself or others in the company, even through third parties, is equally prohibited.

New members of Radiatori 2000 S.p.A. are paired with more experienced colleagues who provide the necessary guidance within the structure, outline the objectives to be achieved, and clearly communicate the contractual terms.

The management of work and collaboration relationships is focused on developing each individual's skills and competencies, following a merit-based policy and ensuring equal opportunities.

Radiatori 2000 S.p.A. guarantees a work environment that complies with current safety and health regulations, through monitoring, management, and prevention of risks associated with professional activities. Additionally, the company is committed to maintaining a serene, stimulating, proactive work environment that takes into account everyone's needs, ensuring that each collaborator is treated with respect and protected from any unlawful influence, discomfort, or prejudice. Relationships between supervisors and subordinates, regardless of function or department, are based on maximum fairness and respect for the personality in all its aspects.

## 4.4 Shareholders and Investors

The primary objective of the Company is the creation of sustainable value over time, meaning that it remunerates entrepreneurial risk through a policy that also ensures its financial stability.

Radiatori 2000 S.p.A. makes available all the information that allows shareholders to make informed and conscious investment decisions, ensuring the correctness, clarity, and equal access to information.

In relation to these principles, and by way of example but not limited to, the following are prohibited:

- Engaging in any behavior that could harm the integrity of the company's assets;
- Committing any simulated or fraudulent act aimed at influencing the will of the shareholders to irregularly form a majority and/or adopt a resolution different from the one that would have been reached;
- Carrying out corporate transactions likely to cause harm to creditors.

Intra-group relationships are governed by contracts and based on principles of transparency and fairness. The compensation for intra-group transactions is justified and determined in line with market values, in order to avoid unduly burdening the counterparty.

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## 4.5 Clients

The success of Radiatori 2000 S.p.A. is primarily based on its ability to meet the expectations of its clients, maintaining high levels of quality, performance, and reliability. To this end, it is a priority to identify the clients' needs, making the best use of resources and synergies, in a correct, honest, professional, and transparent manner.

Accurate and comprehensive information is provided about the products and services offered, enabling clients to make informed decisions. Additionally, Radiatori 2000 S.p.A. ensures appropriate communication and listening methods, always committing to respond to suggestions and complaints, in order to strengthen the long-term relationship.

Radiatori 2000 S.p.A. negotiates and structures contracts with its clients according to principles of fairness, completeness, and transparency, seeking to anticipate circumstances that may significantly affect the established relationship. In the event of unforeseen events or situations, Radiatori 2000 S.p.A. takes care of the clients' expectations, executing contracts with fairness, without taking advantage of any weaknesses or ignorance on the part of the counterparty.

The management of credit towards clients is aimed at safeguarding mutual economic, financial, and property interests, in the context of resolving tensions arising from opposing positions, reaffirming the value and convenience of harmonious business relationships.

The provisions in the client's Code of Ethics, for which the counterparty may request adherence, will be followed if they do not conflict with those of Radiatori 2000 S.p.A. In the event that the client's Code of Ethics, in the sections concerning the relationships in question, appears less stringent than Radiatori 2000 S.p.A.'s document, the behavior of Radiatori 2000 S.p.A.'s collaborators will be guided by the principles outlined in Radiatori 2000 S.p.A.'s Code of Ethics.

## 4.6 Suppliers

Suppliers play a crucial role in improving the overall competitiveness of Radiatori 2000 S.p.A. The collaboration of suppliers ensures the constant satisfaction of Radiatori 2000 S.p.A.'s client needs, in terms of quality, cost, and services, at least meeting their expectations.

Therefore, Radiatori 2000 S.p.A. directs its relationships with suppliers to comply with current regulations and promote honest, diligent, transparent, and cooperative behaviors. At the same time, Radiatori 2000 S.p.A. encourages its suppliers to adopt the same criteria, with the aim of mutually benefiting from the positive effects that only a stable relationship, built on trust, can produce.

Radiatori 2000 S.p.A.'s communication regarding the products and services requested is accurate and comprehensive, so that suppliers can prepare informed and conscious offers. Complaints and reports of inconsistencies in the supplies must be truthful and not manipulative in order to unduly benefit Radiatori 2000 S.p.A.

Suppliers are selected and qualified using appropriate and objective methods, based on their ability to deliver and according to principles of impartiality, fairness, and quality. In any case, Radiatori 2000 S.p.A. balances the need to obtain favorable economic conditions with the

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necessity of maintaining quality standards in the supply of goods and services. These selection criteria are clearly stated and verifiable, ensuring that negotiations are characterized by open and honest dialogue. Additionally, significant changes to qualification requirements are promptly communicated to suppliers, allowing them to take appropriate action in the interest and continuity of the relationship with Radiatori 2000 S.p.A.

The inspections, visits, and any other type of intervention carried out by Radiatori 2000's collaborators at supplier facilities are focused on ensuring compliance with this Code, the instructions, and the procedures received, avoiding any behavior that could result in liabilities for the suppliers or Radiatori 2000 S.p.A.

Radiatori 2000 S.p.A. negotiates and structures contracts with its suppliers in a correct, complete, and transparent manner, seeking to anticipate circumstances that could significantly affect the established relationship. In the event of unforeseen events or situations, Radiatori 2000 S.p.A. commits to not taking advantage of any weaknesses or ignorance on the part of the counterparty.

The results of the activities of controlling the goods and services received and the overall performance of the suppliers are shared with them, with the aim of facilitating their continuous improvement in the common interest.

The compensation to be paid to suppliers must be exclusively commensurate with the services and conditions indicated in the contract, and payments cannot be made to a party in a country different from that of the contracting party, except in properly justified cases (for example, a specific request to make the payment to the parent company of the Supplier due to cash pooling systems).

## 4.7 Public Administration

For "Public Administration" refers to all those subjects, both private and public entities, that perform a "public function" or "public service." A "public function" refers to activities regulated by public law that relate to legislative, administrative, and judicial functions. A "public service" refers to activities that produce goods and services of general interest, subject to the supervision of a Public Authority, as well as activities aimed at guaranteeing individuals' rights to life, health, and freedom of communication, even under a concession or agreement.

Radiatori 2000 S.p.A. bases its conduct on the principles of impartiality and proper management that it is required to uphold.

Radiatori 2000 S.p.A. will not be represented in dealings with the Public Administration by collaborators or third parties when there may be, even hypothetically, a conflict of interest.

Any behavior that involves promising or offering, directly or indirectly, money or other benefits to Public Officials or Public Service Officers, whether Italian or foreign, or their relatives and family members, from which an interest or advantage to the Company may arise, is condemned. Such behaviors are considered acts of corruption, whether carried out directly by Radiatori 2000 S.p.A. or through individuals acting on its behalf, such as: Consultants, Project collaborators, Agents, Attorneys, and Third Parties with relationships similar or equivalent to the Company.

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Those assigned by Radiatori 2000 S.p.A. to follow any business negotiation, request, or institutional relationship with the Italian, European, or foreign Public Administration, must never seek to improperly influence, through actions or omissions, the decisions that Public Officials and Public Service Officers make on behalf of the Public Administration.

It is forbidden to maintain working relationships with Public Administration employees or hire former Public Administration employees, their relatives, or family members, who have personally and actively participated in business negotiations or endorsed requests made by Radiatori 2000 S.p.A. to the Public Administration, unless, given the specific circumstances and the nature of the employment relationship, no link is considered to exist between the functions carried out within the Public Administration and the employment relationship in question.

If a Public Administration is a customer or supplier of Radiatori 2000 S.p.A., the latter must operate in strict compliance with the laws and regulations governing the relationship.

Any behavior aimed at obtaining from the State, the European Union, or any other national or foreign public entity, any type of contribution, financing, subsidized loan, or similar disbursement through altered or falsified declarations and/or documents, or through omitted information or, more generally, through tricks or deceit intended to mislead the issuing entity, is condemned.

Contributions, grants, or financing obtained from the State, Regions, other public entities, or the European Union, even if of modest value and/or amount, cannot be used for purposes other than those for which they were granted.

Individuals responsible for managing financial activities or investments and/or financing received from national or foreign Public Administration must conduct their work based on principles of fairness and transparency, also observing the information obligations required.

It is considered a violation, not only of the law but also of this Code and the Model, to induce any individual within the Company, or affiliated with it through collaboration agreements, to not make statements or to make false statements before the Judicial Authority, through violence, threats, or the offering or promise of money or other benefits.

## 4.8 Trade Associations

With reference to national, community, and foreign Trade Associations, Radiatori 2000 S.p.A. is committed to ensuring maximum collaboration and availability towards them.

## 4.9 Local communities

Radiatori 2000 S.p.A. is committed to contributing to the long-term development and well-being of the communities in which it operates, ensuring that the cultures and traditions of each country are observed and respected.

Radiatori 2000 S.p.A. promotes and strives to establish relationships of fairness with other organizations and entities, aimed at enhancing the synergies that can arise from these collaborations.

Radiatori 2000 S.p.A. contributes, as much as possible, to supporting social and cultural

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initiatives that promote the values and principles of the company, and that are aimed at fostering the social, economic, and environmental development of the communities in which it operates.

## 5. Implementation guidelines of the Code of Ethics

Radiatori 2000 S.p.A. has chosen to formalize this Code of Ethics in order to share and communicate the values, principles, and rules of conduct to all collaborators and stakeholders, with the aim of building a transparent reality focused on respecting ethical standards, typical of a mature civil context.

All recipients of this document must comply with the laws in force in all the countries where Radiatori 2000 S.p.A. operates, guiding their actions and behaviors according to the principles, objectives, and commitments outlined in the Code of Ethics. In cases where the regulations are insufficient to clearly outline the behaviors to be followed, the instructions provided in this Code will serve as guidelines for its recipients.

In no case can the pursuit of Radiatori 2000 S.p.A. 's interests justify behavior contrary to the applicable laws and the rules of this Code.

The Code of Ethics, in fact, serves as a tool of guarantee and reliability, protecting the assets and reputation of Radiatori 2000 S.p.A.

All collaborators are committed to observing the principles of the Code and to ensuring that these rules are appropriately applied both within Radiatori 2000 S.p.A. and, in general, by all of its stakeholders. The CEO and Managers also have the duty to lead by example, demonstrating consistency between the principles of the Code of Ethics and daily behaviors. The rules contained in this Code of Ethics complement the behavior that Employees are required to follow, also in accordance with the ordinary diligence standards to which workers are subject, as defined by applicable regulations.

Compliance with the rules of the Code of Ethics is considered an essential part of the obligations toward Radiatori 2000 S.p.A. under the provisions of applicable laws. Violating the principles of this Code undermines the trust established with the Company and may lead to disciplinary actions. In the most serious cases, the violation may result in the termination of the employment contract or the resolution of the contractual relationship.

The entity responsible for monitoring the application of the Code of Ethics is the Supervisory Body, established in accordance with the Organization, Management, and Control Model for the prevention of crimes under Legislative Decree 231/2001 and related regulations, which appropriately coordinates with the competent bodies and functions for its correct implementation and adequate control.

Radiatori 2000 S.p.A. encourages collaborators to contact the Supervisory Body in case of doubt about the most appropriate behavior to adopt in specific circumstances. A prompt response will be given to all requests for clarification.

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radiatori@radiatori2000.it  
PEC pec@pec.radiatori2000.it

All recipients of the Code of Ethics can communicate directly with the Supervisory Body via the dedicated email address: [odv@radiatori2000.it](mailto:odv@radiatori2000.it)

Radiatori 2000 S.p.A. commits to disseminating this Code of Ethics through appropriate means and methods to all collaborators, so that the values and principles contained therein are applied in everyday decisions and behaviors.

## 6. Whistleblowing

With regard to reports of violations, or suspected violations, of the rules contained in the Code of Ethics and the Organizational Model, it should be noted that on March 10, 2023, Legislative Decree No. 24/2023 was published, "Implementation of Directive (EU) 2019/1937 of the European Parliament and the Council, of October 23, 2019, concerning the protection of persons who report breaches of national law provisions." According to this regulation, the Organizational Model must include internal reporting channels, a ban on retaliation, and a disciplinary system.

Reports, which may also be made anonymously, must be precise and detailed, and may concern criminally relevant unlawful conduct or administrative violations, as well as violations of provisions set forth by the procedures adopted by the organization through internal regulations or various types of Models or Codes, carried out by executives, shareholders/employees, external operators, and consultants acting on behalf of Radiatori 2000 S.p.A.

It is specified that such reports may concern any area of the business, not only those relevant to the application of Legislative Decree No. 231/2001 and the current Model, including violations of the Model relevant to health and safety at work.

Specifically, and in compliance with the aforementioned regulation, all recipients are allowed to report to the designated person through the channels provided by the policy adopted, and in particular by using the form available on the company website, the occurrence of unlawful, criminally relevant conduct and/or violations of internal regulations, as well as situations that are harmful due to violations, even if suspected, of the Code of Ethics and the Organizational Model.

To implement the updates introduced by Legislative Decree No. 24/2023 and ensure the effectiveness of the "Whistleblowing" system, the company has strengthened its reporting management system to ensure the protection of the identity of the whistleblower and the corresponding right to confidentiality. Radiatori 2000 S.p.A. has therefore defined and approved a specific procedure for reports made by recipients of the Model, who have been made aware of the existence of specific communication channels allowing them to submit any reports based on precise and consistent factual elements, guaranteeing, even through electronic means, the confidentiality of the whistleblower's identity, as well as the protection of the reported person's data and that of third parties, subject to legal obligations.

Radiatori 2000 S.p.A., in order to facilitate access by the Supervisory Body (OdV) to the greatest possible amount of information, guarantees the protection of any whistleblower against all forms of retaliation, discrimination, or penalization, subject to legal obligations, as well as the protection of

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the rights of the company and persons wrongly and/or maliciously accused.

The OdV will be responsible for assessing the "Reports" received based on the so-called level of receptivity, which is a direct consequence of the level of completeness and consistency of the content of the communication, before deciding whether or not to proceed with subsequent verification and reporting activities, providing appropriate feedback to the whistleblower within the timeframes set by regulatory provisions.

This Code of Ethics is adopted by a resolution of the Board of Directors of Radiatori 2000 S.p.A. on June 5, 2024, with immediate effect from that date. Any updates, amendments, or revisions to this Code of Ethics must be approved by the Board of Directors of Radiatori 2000 S.p.A.

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