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ZINTEK S.r.l.

ORGANISATION, MANAGEMENT, AND CONTROL MODEL pursuant to Italian Legislative Decree no. 231/01

ANNEX III

CODE OF ETHICS

Approved by the Sole Director with a resolution dated December 16,
2022

Introduction

The management model that ZINTEK proposes is that of a company that upholds moral values such as compliance with laws, respect for workers, and fair competition.

Therefore, the Sole Director of ZINTEK has adopted this Code of Ethics, which reflects the Company's commitment to:

- provide guidelines to personnel to help recognise and address ethical issues;
- contribute to maintaining a culture of integrity, honesty, and responsibility within the Company, focusing on risk management.

It contains the set of rights, duties, and responsibilities of internal and external stakeholders to the Company, beyond and independently of what is provided at the regulatory level.

Based on these choices, ZINTEK pursues respect for the values of democracy, equality, fairness, and solidarity and is committed to observing this Code of Ethics in all its internal or external actions. The violation of these principles is not compatible with the activities carried out in the Company, at any level.

A natural corollary of what is established in the Code is mutual respect within assigned roles, which leads to a collaboration among the parties characterised by politeness and a language that conforms to the attitude of good manners that must prevail within the structure and towards the outside world.

The values on which the Company bases its actions are:

- Trust: ZINTEK cannot be successful without the mutual trust of all parties who contribute their daily support, even in the presence of partially conflicting interests. Trust is based on the sharing of the mission and each individual's respect for the values and provisions of these principles.
- Human resources: the enhancement of human resources, respect

for their autonomy, and incentives based on their participation in the Company's decisions are fundamental principles for ZINTEK managers, who will prepare training and updating programs aimed at enhancing specific skills and preserving and increasing the acquired competencies during the collaboration.

- **Morality:** ZINTEK must ensure that its representatives and collaborators are aware of the ethical meaning of their actions and do not pursue personal or corporate gain at the expense of compliance with current laws and the rules outlined here. In particular, it must be avoided that undue advantages are granted to Customers and Suppliers.

ZINTEK must ensure that its representatives and collaborators do not operate in situations where they hold, on their own behalf or on behalf of third parties, interests in conflict with those of their contractual counterparts.

- **Transparency:** ZINTEK ensures that its representatives and collaborators clearly, correctly, and diligently reflect the Company's image in all its relationships and facilitate its understanding. To this end, the most complete and transparent information possible is ensured regarding the guidelines of the business activity.
- **Confidentiality:** ZINTEK undertakes to ensure that its representatives and collaborators protect the confidentiality of personal data contained in both databases and personal archives and that all the obligations provided for by current privacy regulations are observed. The processing to which the data collected with the specific company forms will be submitted is directed exclusively to the performance of ZINTEK's business activity-related purposes.
- **Impartiality:** ZINTEK must ensure that its representatives and collaborators do not behave discriminatorily and opportunistically. ZINTEK undertakes not to discriminate on the grounds of race, religion, gender, sexual preferences, political opinions, or physical disabilities.

- Safety and Health in the workplace: ZINTEK verifies that its representatives and collaborators adopt all the necessary safety measures required by technological evolution and works to ensure the physical integrity and moral personality of its workers.

All parties working towards achieving the Company's objectives, whether in senior positions or employees, are required to comply with this Code of Ethics in conducting business and company activities.

With particular regard to the obligation to report alleged violations of the Code of Ethics, the Company has provided and made available communication tools and channels, including through electronic means, suitable to ensure the confidentiality of the reporting party. For further information, please refer to the General Part of the Organisational Model.

The Company prohibits acts of retaliation or discrimination, direct or indirect, against the reporting party in good faith for reasons directly or indirectly related to the report, and the same protection is guaranteed to the reported party.

This Code also applies to collaborators and external consultants acting for ZINTEK in points of interest.

The Company, to protect its image and safeguard its resources, will terminate any relationship with the recipients of this Code who do not strictly comply with current regulations and ethical principles and rules of conduct contained therein.

1. General ethical principles

This Code of Ethics aims to clarify the ethical values of ZINTEK that are considered fundamental for any business activity:

Principle of legality

The recipients are required to comply with the law or acts equated to it.

This principle also applies to the national legislation of any country with which the Company has commercial relations.

Recipients are also required to comply with the Company's internal regulations, considering that they have the precise purpose of ensuring constant compliance with legal provisions.

Fairness

The recipients are required to comply with professional rules, with particular reference to the duties of diligence and expertise applicable to operations carried out for the Company.

Transparency

All activities carried out for ZINTEK are based on the principles of integrity and transparency and are conducted with loyalty and a sense of responsibility, fairness, and good faith. The Company is committed to ensuring correctness, completeness, accuracy, uniformity, and timeliness in the management and communication of corporate information, avoiding misleading behaviour from which undue advantage may be gained.

2. Human Resources

ZINTEK's human capital, consisting of employees and collaborators, is a value to be enhanced and protected to develop the wealth of experience and know-how collectively possessed by the Company.

ZINTEK protects and promotes the value and development of human resources, favouring their full professional realisation based on merit criteria.

No form of irregular work is tolerated, including the absence of regularisation of a relationship and any type of use of work performance that is not deducted in a contractual and regulatory framework consistent with Italian law.

Hiring, transfer, or promotion practices must not be influenced in any way by offers or promises of money, goods, benefits, facilitation, or any kind of performance.

The evaluation of personnel to be hired is based on the correspondence between the candidates' profiles and those expected and the Company's needs, in compliance with equal opportunities for all interested parties.

In managing hierarchical relationships, the Company requires that authority be exercised with fairness and correctness, prohibiting any behaviour that may be considered detrimental to the dignity and autonomy of the employee.

In the context of personnel management and development processes, decisions are based on the correspondence between expected and possessed profiles or on considerations strictly related to merit. Access to roles or positions is also established based on competencies and abilities.

Personnel management policies are communicated to all collaborators in the most appropriate ways.

The competent parties ensure that full valorisation is given to all the professional figures present in ZINTEK, communicating to employees and collaborators their respective strengths and weaknesses, enabling them to plan their professional growth in a targeted manner.

The privacy of the employee is protected in accordance with Legislative Decree no. 196/03.

The competent functions ensure that the work environment is not only suitable from the point of view of safety and personal health but also free from prejudices.

The manufacture, possession, distribution, sale, or use of alcohol, illegal drugs, and/or other substances not permitted by law by employees on the Company's premises is prohibited.

ZINTEK avoids any form of discrimination against its personnel, particularly any discrimination based on race, nationality, gender, age, physical and mental disabilities, sexual orientation, political or union opinions, philosophical beliefs or religious convictions.

Every individual must be treated with respect, without any intimidation, sexual harassment, physical or psychological harassment, and in respect of their moral personality, avoiding illicit conditioning, discomfort, offensive behaviour, or marginalisation within the work environment.

3. Protection of health and safety at work

ZINTEK draws inspiration from ethical principles and promotes the values of quality of life while respecting the environment and human beings. The Company promotes every action aimed at ensuring that its service delivery activities do not present significant risks to the health and safety at work of human resources.

Therefore, within this Policy and in the commitment to its formal pursuit, ZINTEK declares to:

- commit to operate in compliance with laws, regulations, directives (national and community) and corporate policies, including all requirements subscribed to by the Company with the stakeholders;
- make this safety document available to all employees and stakeholders;
- activate adequate communication channels internally and externally, particularly with stakeholders;
- introduce and maintain updated management and monitoring procedures for the constant control of the health and safety of personnel and for interventions to be carried out in case of non-conforming situations, anomalies, or emergencies;
- develop programs, objectives, and targets for their fulfilment;
- make available prepared, efficient, and sufficiently numerous human resources, as well as adequate material resources;
- enhance the training and information activity of all operators, making them aware of their individual obligations, the importance of their actions for achieving the expected results, and their responsibility for safety;
- promote and commit to implementing methodologies, interventions, and adjustments aimed at reducing accidents and occupational diseases;
- identify the hazards of activities and assess the risks for personnel for ongoing activities and for any new activity and/or process in order to adopt solutions capable of preventing accidents, occupational diseases, and, as far as technically possible, minimising the occurrence and extent of such events;

- raise awareness among suppliers and stakeholders about compliance with policies, laws, and commitments regarding health and safety at work;
- periodically review the Policy and management system for health and safety at work to verify and ensure their congruence, adequacy, effectiveness, and appropriateness towards the organisation in order to allow the definition of continuous improvement objectives;
- periodically review the risk assessment to verify its congruence with the Company's activities.

4. Duties of employees

The Code of Ethics serves as a guide for ZINTEK personnel in carrying out their functions and imposes specific duties on individuals.

ZINTEK personnel must understand and respect the ethical responsibilities established in this Code.

The Company does not tolerate behaviours that violate the Code of Ethics or that may appear non-compliant with it.

In carrying out their duties, each addressee;

- maintains conduct inspired by moral integrity and transparency, as well as values of honesty and good faith;
- recognises and respects personal dignity, private sphere, and individual rights of any person;
- rejects any discrimination based on race, culture, religion, sex, and political, union, and sexual orientation;
- does not cause personal harassment or offence of any nature.

Each addressee carries out their activities with the professionalism required by the nature of the tasks and functions performed, using their utmost efforts to achieve the assigned objectives and assuming the responsibilities that correspond to them according to their duties.

Each addressee diligently performs necessary activities of in-depth study and updating.

Mutual collaboration among all parties involved to any extent in the same project or business process is an essential principle for ZINTEK. Therefore, each addressee is required, through their conduct, to contribute to the safeguarding of this value.

Each addressee must keep adequate documentation of their activities carried out in order to allow traceability and verifiability.

5. Conflicts of interest

In conducting any activity, conflicts of interest must be avoided.

ZINTEK does not allow its personnel to work for a competitor or supplier if it is reasonably suspected that the interest or relationship is in conflict with the Company's commercial interests.

Potential conflicts of interest must be reported to one's hierarchical superior.

A conflict of interest may also arise when the Company does business with a supplier or customer in whose Company a ZINTEK employee or a member of their family has an investment or other financial interest.

The employee's ability to influence ZINTEK's action, the size of the employee's investment in relation to the Company's or the employee's own net worth, and the appearance of a lack of independence are all circumstances that affect the actual existence of a conflict of interest.

Each case of conflict of interest must, therefore, be known and evaluated by the Company.

ZINTEK personnel must also refrain from making any decision in a position of conflict of interest.

6. Use of computer systems

The Company strictly prohibits addressees from altering in any way the functioning of a computer or telematic system or intervening without right in any way on data, information, or programs contained in any of these systems.

In particular, addressees are required to exhibit correct and transparent behaviour in the use of any computer or telematic system and refrain from activities that may:

- determine the modification, deletion, or fraudulent creation of computer documents that could have probative value;
- cause damage or interruption of information, data, and programs;
- allow for abusive interception, impediment, or interruption of computer or telematic communications.

Furthermore, addressees must not:

- install equipment, devices, or computer programs intended to cause damage to computer and telematic systems or the interruption or damage of information, data, and programs;
- install equipment intended for intercepting, impeding, or interrupting computer or telematic communications;
- abuse, intercept, impede, or interrupt computer or telematic communications;
- unduly access computer or telematic networks and systems in order to appropriate, modify, or delete data, documents, and information;

- access sites unrelated to the performance of assigned tasks, not participate in forums for non-professional reasons, not use chat lines, electronic bulletin boards, and not register in guest books even using pseudonyms (or nicknames);
- disseminate their password and access code;
- make unauthorised copies of licensed programs for personal, corporate, or third-party use.

Finally, addressees must:

- always and only use their own password and access code. Both the identification code and password are strictly personal tools, the use of which is the responsibility of each user;
- observe, to the extent of their competence, the internal company procedures and regulations in force on the matter;
- respect all current legal provisions and the conditions of the licensing agreements signed by the Company.

7. Protection of Company Assets, Trademarks, and Industrial Property

ZINTEK's assets are the resources with which business is conducted. These assets include physical property and intangible assets such as confidential information, inventions, plans, and business ideas.

Intangible assets may be of greater value than physical assets and are usually more difficult to protect from theft and unauthorised use. Each addressee is responsible for protecting the Company's assets under their direct control.

All those who work for ZINTEK must operate in a way that safeguards patents, trademarks, copyrights, trade secrets, sales, prices, customers, suppliers, operational plant data, design information, strategic/operational plans, contracts, and other proprietary information. Everyone must pay attention to security procedures and

monitor situations that could lead to loss, theft, or misuse of Company assets.

The zintek® trademark is the identity of the Company. The trademark is synonymous with and guarantees the culture and actions of the Company. It embodies the promise of value created and rigorously delivered to the customer by the Company.

Support for the zintek® trademark is pursued through product consistency and quality of communication. Considering the market in which it operates and driven by the desire to be a secure reference point for customers, ZINTEK:

- oversees, optimises, and innovates the entire production chain;
- seeks qualified partners to create a specialised supply chain capable of offering a highly competitive value-cost ratio;
- ensures a system of internal procedures aimed at constant product quality verification;
- is committed to constantly pursuing eco-sustainability and energy-saving objectives.

At the same time, it is of fundamental interest for the Company to respect the established intellectual property rights of others. Unauthorised use of others' intellectual property can expose the Company and individual employees to legal actions and claims for damages, including significant financial penalties and criminal sanctions. A key factor in protecting the Company's intellectual property and, at the same time, protecting those who are part of it, is the timely and reasonable verification by ZINTEK of new products, services, processes, and software to check for possible inventions and trade secrets, as well as the absence of possible or actual violations of others' intellectual property rights.

Additionally, ZINTEK requests that all those who work with the Company respect the following behavioural principles:

Specific requirements:

- respect valid patents, copyrighted materials, and other protected intellectual property of other users;
- identify and protect ZINTEK's intellectual property;
- contact the Company's legal advisors regarding licenses or approvals required for the use of others' intellectual property;
- understand their responsibilities to the Company regarding new inventions and ideas that may be developed at ZINTEK;
- coordinate all commercial discussions with the designated Company spokesperson.

8. Protection of Fair Competition

Competitors are a positive stimulus and challenge to always strive for improvement. ZINTEK is driven by a strong and fair competitive spirit aimed at continuous improvement of what it does.

ZINTEK respects the rules of free competition as an essential element of the market and condemns any conduct that violates or circumvents these rules. ZINTEK intends to protect the value of fair competition by refraining from collusive and predatory behaviour.

Furthermore, as stated in point 6 of this Code of Ethics, the Company and its collaborators undertake not to violate third-party rights related to intellectual property and to respect the rules protecting distinctive signs of intellectual works or industrial products (trademarks, patents), implementing controls to ensure full compliance with the legislation protecting industrial property rights.

9. Confidentiality and Privacy

The information held by the addressees in relation to the employment and collaboration relationship is the property of ZINTEK.

The Company treats its information with full respect for the privacy of those concerned.

To this end, specific policies and procedures for information are applied and constantly updated.

Information owned by ZINTEK includes:

- personal data of addressees and third parties;
- confidential information, i.e., any information concerning the Company that is of a confidential nature and, if disclosed without authorisation or unintentionally, could cause damage to the Company. By way of example, knowledge of a project, proposal, initiative, negotiation, agreement, commitment, act or fact, even if future or uncertain, relating to the Company's business activities, which is not public knowledge, should be considered confidential.

The disclosure of confidential information outside the Company, especially to competitors, damages the Company's competitive position and its shareholders.

In accordance with legal provisions, ZINTEK guarantees the confidentiality of information in its possession, both its own and that of customers, suppliers, and collaborators, and requires all addressees to use it solely for purposes related to the exercise of their professional activities.

10. Corporate Administration

ZINTEK is required by law to maintain accounting records that accurately and objectively represent its activities and transactions. Each operation or transaction must be precise, verifiable, and legitimate.

All supporting documents, including agreements, invoices, check requests, and expense reports, must be truthful and accurate.

All issued invoices must accurately reflect the commercial transaction that occurred.

No false or misleading entries should be made in the Company's accounting books or records for any reason.

It is strictly prohibited to establish or maintain funds or accounts for a purpose that is not exhaustively documented.

It is prohibited to prevent or otherwise hinder the performance of legally assigned control activities by shareholders or other corporate bodies.

The activities and actions carried out by addressees in the course of their work must be documented in accordance with applicable legal provisions, through accurate, complete, and reliable documentation, and, if required by applicable legislation and accounting principles, they must be correctly and promptly represented in the accounts.

This documentation must be such as to allow, on the occasion of inspections, the identification of the characteristics and motivations of the operation as well as the subjects who have respectively authorised, executed, and/or detected the operation.

All addressees provide the highest and prompt cooperation to all internal and external control bodies of the Company for the best performance of their duties. To avoid giving or receiving undue payments and the like, addressees in all negotiations must respect the following principles regarding documentation and recording storage:

- all payments and other transfers made by or on behalf of ZINTEK must be accurately and fully recorded in the accounting books and mandatory records;
- all payments must be made only to recipients and for activities contractually formalised and/or approved by the Company;
- no false, incomplete, or misleading records should be created, and no hidden or unrecorded funds should be established, nor should funds be deposited into personal or non-Company accounts;
- no unauthorised use of the Company's funds or resources should be made.

All addressees must objectively record the information they become aware of in the course of their work activities.

11. Prohibition of Operations Aimed at Receiving, Laundering and Use of Money, Goods, or Benefits of Illicit Origin, as well as Self-Laundering.

ZINTEK conducts its business in full compliance with the current Anti-Money Laundering regulations and provisions issued by the competent authorities.

The Company's principle is maximum transparency in commercial transactions and prepares the most appropriate tools to counter the phenomena of receiving, laundering, and use of money, goods, or benefits of illicit origin.

Personnel should never engage in or be involved in activities that

imply the laundering (i.e., acceptance or processing) of proceeds from criminal activities in any form or manner.

The Sole Director, employees, and collaborators must verify the information available on commercial counterparts, consultants, and suppliers in advance to ascertain their moral integrity, respectability, and legitimacy of their activity before establishing business relationships with them. They are required to strictly observe laws and company procedures in any economic transaction in which they are involved, ensuring full traceability of incoming and outgoing financial flows and full compliance with applicable anti-money laundering laws.

Those who operate for ZINTEK must also not engage in operations that imply self-laundering, such as the use, replacement, or transfer of money, goods, or other benefits from another crime, or from illegal activities related to compliance with tax or tax legislation, in economic, financial, entrepreneurial, or speculative activities.

The personnel belonging to the Company must verify the available information (including financial information) on commercial counterparts, consultants, and suppliers in advance to ascertain their moral integrity, respectability, and legitimacy of their activity before establishing business relationships with them. They are required to strictly observe laws, policies, and company procedures in any economic transaction in which they are involved, ensuring full traceability of incoming and outgoing financial flows and full compliance with applicable anti-money laundering laws.

12. Management of Resources and Tax, Financial, and Fiscal Obligations

The Company recognises that the tax system must be based on a relationship of trust and collaboration between citizens and the tax authorities in a regime of transparency, greater balance, and effective reciprocity.

The management of financial resources must take place in compliance with the principles of transparency, lawfulness, and traceability of operations. Expenses to meet the Company's needs must be incurred in accordance with the annually prepared and approved budget, respecting the authorisation procedures expressly provided for even for out-of-budget expenses. In the selection and management of suppliers and in the purchase of goods or services, all addressees are required to adhere to internal procedures that identify the mechanisms for selecting and entrusting assignments or purchasing goods.

Social communications must be inspired by the criteria of immediate detectability and data control.

For each operation, adequate supporting documentation is kept on file to facilitate:

- easy accounting verification and reconstruction;
- accurate reconstruction of the transaction;
- identification of different levels of responsibility.

To avoid giving or receiving any undue payment, all employees and collaborators, in all their negotiations, respect the following principles regarding documentation and record-keeping:

- all currency payments and other transfers made by/from the Company, including those made abroad, must be accurately and fully recorded in the accounting books and mandatory records;

- all payments must be made only to recipients and for contractually formalised activities;
- no false, incomplete, or misleading records should be created, and no secret or unrecorded funds should be established, nor should funds be deposited into personal or non-Company accounts;
- no unauthorised use should be made of ZINTEK's funds, resources, or personnel.

13. Institutional Relations

Every relationship with State institutions, Public Administration, and Public Institutions (Ministries and their peripheral offices, entities and companies operating in the public services sector, territorial entities, local authorities, etc.) must be conducted in compliance with legal norms, the Company's Bylaws, and provisions set forth in this Code of Ethics, and in strict observance of the principles of correctness, transparency, and efficiency.

In order to guarantee maximum clarity in relations, contacts with institutional interlocutors take place exclusively through Company Representatives or authorised persons or persons delegated for this purpose.

In compliance with the above, it is specified, as a mere example and not exhaustive, that:

- it is prohibited to use contributions, financing, or other disbursements, granted by the State, a Public Entity, or the European Union for purposes other than those for which they were assigned;

- in the case of commercial relationships with the Public Administration, including participation in public tenders, it is necessary to always operate in compliance with the law and correct business practices;
- it is not permitted, either directly or indirectly, or through an intermediary, to offer or promise money, gifts, or compensation in any form, to exert illicit pressures, or to promise any object, service, performance, or favour to executives, officials, or employees of the Public Administration or to subjects entrusted with public service, or to their relatives or cohabitants for the purpose of inducing the performance of an official act or contrary to official duties, or to influence their activity in carrying out their duties;
- it is not allowed to engage in misleading conduct that may mislead the Public Administration. In particular, it is not allowed to use or present false statements or documents or attest to untrue things, or to omit information to obtain, for the benefit or in the interest of the Company, contributions, financing, or other disbursements, granted by the State, a Public Entity, or the European Union;
- it is prohibited to alter in any way the functioning of an information or telecommunications system of a Public Entity or to illegally intervene with any modality on the data, information, and programs contained or related to it, in order to obtain an unjust profit with harm to others.

The above prohibitions cannot be circumvented through different forms of contributions that, under the guise of entrusting professional assignments, consultations, advertising, or others, have the same purposes as those prohibited above.

The correct functioning of the Public Function, in particular the

Judicial Function, is guaranteed through the prohibition imposed on all subjects who must comply with this Code of Ethics, to undertake, directly or indirectly, any illicit activity that may favour or harm one of the parties involved in civil, criminal, or administrative proceedings.

In particular, it is prohibited to exert undue pressure (offers or promises of money or other benefits) or illicit coercion (violence or threats) in order to induce a person called to testify before the judicial authority to not make statements or to make false statements that can be used in a criminal proceeding, when that person has the right to remain silent.

14. Gifts and Contributions

The Sole Director, employees, and collaborators, insofar as they relate to services rendered for ZINTEK, do not request, for themselves or others, nor accept gifts or other benefits, except for those of modest value, from suppliers, contractors, or competing companies or other parties interested in the Company's supplies and contracts.

In particular, gifts should not be accepted if they entail an obligation, even just moral, to repay the donor by concluding business with the Company. Gifts include money and tangible property as well as services and discounts on purchases of goods and services. The Company has identified a maximum value of €100.00 for corporate gifts.

15. Anti-Corruption Policy

The Company adopts the following Policy aimed at ensuring maximum transparency and fairness in the management of commercial relationships both with public and private entities.

Corruption destroys the integrity and ethical foundations of all institutions: it is a crime. All forms of corruption are prohibited by the Company.

The Company adopts a "zero-tolerance" approach to corruption of any kind, whether committed by employees or third parties.

No Recipient may offer or provide a customer or public official with anything of value that could be perceived as a bribe. This includes not only money and gifts but also materials, equipment, services, and information.

During a business negotiation, administrative process (requests, applications), or commercial relationship with the Public Administration, the following actions should not be undertaken:

- examine or propose employment and/or commercial opportunities that may benefit employees of the Public Administration personally;
- offer or provide gifts;
- solicit or obtain confidential information that may compromise the integrity or reputation of both parties.

Any doubts about the legality of business gifts should be reported to the hierarchical superior or the Supervisory Body.

All those who operate for ZINTEK must act in accordance with the principle of reciprocity, based on which each commercial partner must contribute to the business relationship, creating benefits for both parties.

Therefore, it is prohibited for all those who belong to ZINTEK to promise or pay sums of money or goods in kind, as well as to grant any kind of benefits (promises of employment, etc.) to representatives of other companies in order to promote or favour the interests of ZINTEK itself.

Furthermore, it is prohibited to distribute gifts and favours outside of what is provided for by company policy, or in any case, with the aim of obtaining favourable treatment in the conduct of any business activity.

The threshold indicated in the previous point 14 also applies in this case.

Corporate gifts, entertainment activities, and other forms of hospitality must be lawful, reasonable, and permitted by the Company.

ZINTEK prohibits all recipients from requesting, for themselves or others, or accepting gifts or other benefits, except for those of modest value, from suppliers, contractors, competing companies, and in general from commercial partners or representatives of other companies.

It is also prohibited to enter into agreements or contracts that do not comply with current laws and to apply a pricing policy that does not allow for freedom of choice for the customer or supplier.

16. Suppliers, collaborators, consultants

The relationship with suppliers, collaborators, and consultants is based on principles of transparency, loyalty, integrity, confidentiality, diligence, professionalism, and objectivity of judgment.

The procurement processes are based on the pursuit of maximum competitive advantage for the Company, the granting of equal opportunities for each supplier, loyalty, and impartiality.

The selection of suppliers and the purchase of goods and services are carried out by the appropriate company functions based on objective evaluations regarding the legality, competencies, competitiveness, quality, correctness, respectability, reputation, and price.

In developing relationships with these parties, the Company:

establishes relationships only with individuals or entities that have a good reputation, are engaged only in lawful activities, and whose business ethics are comparable to those of ZINTEK. To this end, information on these parties will be verified in advance;

- ensures transparency of agreements and avoids the signing of secret agreements or pacts contrary to the law.

It is absolutely prohibited to promise or pay sums of money or goods in kind to any individual or entity belonging to other companies to promote or favour the interests of ZINTEK.

ZINTEK's suppliers and contractors must not be involved in illegal activities and must ensure that their employees work under conditions based on respect for fundamental human rights, international conventions, and applicable laws.

The Company recommends that its suppliers refrain from offering goods or services, particularly in the form of gifts, to Company employees that exceed normal courtesy practices. It also prohibits its employees from offering goods or services to personnel of other companies or entities to obtain confidential information or direct or indirect benefits for themselves or for the Company.

In the event of a violation of the principles of legality, correctness, transparency, confidentiality, and respect for human dignity, ZINTEK is authorised to take appropriate measures up to the termination of the relationship with the supplier.

17. Customers

ZINTEK attaches great importance to the quality and value of the products and services it produces and sells, also paying absolute attention to the quality management process and customer requests.

Therefore, relationships with customers must be based on full transparency, correctness, respect for the law, and independence

from any form of internal or external conditioning.

Therefore, contracts and communications to customers must be:

- clear and simple;
- in compliance with current regulations and inspired by the utmost correctness
- in compliance with the Company's commercial policies and the parameters defined therein;
- complete so as not to overlook any relevant element for the customer's decision.

In commercial relationships with customers, conduct that may damage consumer trust while prejudicing transparency and market security is prohibited.

18. Environmental protection

ZINTEK considers it essential to carry out its activities in compliance with the following principles:

1. periodically verifying the performance of suppliers and subcontractors in terms of compliance with the defined environmental contractual requirements (e.g., waste management on construction sites);
2. monitoring activities to ensure that they are managed with the aim of preventing environmental problems;
3. ensuring compliance with environmental laws in the workplace, identifying and observing compliance obligations;
4. promoting activities aimed at energy saving, waste separation, and environmental protection.

19. Relations with the media

The Company maintains relationships with the press and mass communication organs only through the corporate bodies and the Company functions delegated to do so. These relationships must be based on principles of correctness, availability, and transparency in compliance with the communication policy defined by the Company.

20. Compliance with the Code of Ethics

Compliance with this Code by employees and collaborators and their commitment to respecting the general duties of loyalty, correctness, and execution of the employment contract in good faith must be considered an essential part of the contractual obligations, also based on and for the effects referred to in art. 2104 of the Italian Civil Code. Violation of the rules of the Code of Ethics leads to disciplinary sanctions provided for by the current national collective bargaining agreement in the sector.

In the event of a violation of the Code of Ethics by the sole director, the Supervisory Body will inform the Sole Shareholder, who will take appropriate measures consistent with the gravity of the violation committed and in accordance with the powers provided by law and/or the Bylaws.

It is the responsibility of the Supervisory Body to monitor compliance with the Code by all parties and to adjust it from time to time to current legislation.

Compliance with the Code of ethics by third parties (suppliers, consultants, etc.) integrates the obligation to fulfill the duties of diligence and good faith in negotiations and in the execution of contracts with the Company.

Violations of the Code of Ethics are serious acts that damage the trust

relationship established with the Company and may result in disciplinary actions, warnings, suspensions, dismissals, and even civil actions for damages.

21. Dissemination and updating of the Code of Ethics

ZINTEK is committed to promoting and ensuring adequate knowledge of the Code of Ethics, and disseminating it to the addressees through appropriate and effective information and communication activities. The Company also undertakes to update the contents if needs dictated by the changing context, reference regulations, environment, or organisational structure make it necessary and appropriate.

The Company's Administrative Body is responsible for any modification and/or integration of this Code of Ethics.