

CODE OF ETHICS

ATLANTIC FLUID TECH S.R.L.

San Cesario sul Panaro (MO), December 2024

Article 1 – Premise

This Code of Ethics (hereinafter, the “Code”) constitutes the set of behavioral principles that ATLANTIC FLUID TECH S.R.L. (hereinafter, the “Company”) deems essential in carrying out the activities required to pursue its institutional goals—both within the corporate structure and in its dealings with external stakeholders (customers, suppliers, employees and/or collaborators, shareholders, institutions).

The ethical principles and values set out in the Code shall guide the activities of everyone operating in the Company, taking into account the importance of the roles, the complexity of the tasks, and the responsibilities entrusted to them in pursuit of the Company’s objectives. Specifically, by way of example but not limited to:

- Members of the corporate bodies shall be guided by the principles of the Code in setting corporate objectives;
- Individual managers shall give substance to the values and principles contained in the Code, by taking on responsibilities internally and externally, thereby reinforcing trust, cohesion, and team spirit;
- Employees and ongoing external collaborators shall, in compliance with applicable laws and regulations, align their actions and behavior with the principles, objectives, and commitments set forth in the Code.

This Code of Ethics aims to establish ethical standards of reference and behavioral rules to guide corporate decision-making processes and the conduct of the Company.

Compliance with this code of conduct is of fundamental importance to the proper functioning, reliability, and reputation of the Company.

In line with the goal of preventing unlawful acts pursued by this Code, the Company and, in particular, the Supervisory Body (hereinafter, the “OdV”), monitor the observance of the provisions contained herein, providing appropriate training and information tools, ensuring a constant effectiveness in controlling how activities are carried out, and taking corrective actions when necessary.

Article 2 – Recipients and Scope of Application

Employees, collaborators, shareholders, and Directors are the primary recipients of this Code of Ethics.

Accordingly, they must strictly adhere to the principles and standards of conduct set forth herein, inspiring their daily business conduct.

Under no circumstances may the pursuit of ATLANTIC FLUID TECH S.R.L.’s interests justify conduct that violates applicable laws or the rules of this Code.

Indeed, the Code of Ethics serves as a tool for ensuring reliability, safeguarding the Company’s assets and reputation.

All those who, in any capacity (by way of example but not limited to: joint venture partners, suppliers, customers, service providers, consultants, external collaborators, etc.), directly or indirectly, stably or

temporarily, work for the Company are also required to respect the provisions of this Code of Ethics in the parts applicable to them.

Furthermore, the Code of Ethics is an integral part and a constitutive element of the Organization, Management, and Control Model adopted by the Company pursuant to Legislative Decree No. 231/2001.

Compliance with the Code's provisions must also be considered an essential part of the contractual obligations of the Company's employees pursuant to and for the purposes of Articles 2104 et seq. of the Italian Civil Code.

Article 3 – Adoption and Updating

This Code of Ethics was adopted by decision of the Sole Director of ATLANTIC FLUID TECH S.R.L. on December 4, 2024.

This document must be considered an evolving instrument, subject to subsequent amendments and additions, which may be necessary depending on internal and external changes affecting the Company.

Article 4 – Reference Ethical Principles

4.1. General Principles

The Company adopts as an indispensable principle the concepts of loyalty, respect for the individual, transparency in operations, the rejection of corruption and unfair competition, and, in general, strict compliance with the laws and regulations in force in the territory in which it operates.

Consequently, every recipient of the Code is required to undertake to comply with these elements.

4.2. Honesty, Fairness, Integrity, and Transparency

The pursuit of the Company's interest can never justify behavior that is contrary to the principles of fairness, honesty, integrity, loyalty, and mutual respect, as well as the laws and regulations in force.

The directors, employees, the Sole Statutory Auditor, and collaborators of the Company shall carry out their activities in accordance with these principles of conduct.

It is forbidden to grant unlawful advantages in exchange for gifts or benefits that exceed normal courtesy practices in any type of negotiation or business transaction.

In performing any activity, the Company seeks to avoid actual or even potential conflicts of interest, following the principles of fairness and impartiality. In particular, the Company:

- Promotes the segregation of duties, as far as operational needs allow and in line with oversight responsibilities, with the dual objective of identifying the parties who have taken action and preventing potential conflicts of interest;
- Requires recipients to act correctly and transparently, avoiding illegitimate favoritism, collusive practices, or decisions that result in unlawful personal advantages for themselves or others;
- Undertakes strict compliance with current anti-money laundering regulations, in any event refusing to carry out any operation that appears questionable from the standpoint of fairness and transparency;

- Commits to disseminating truthful, complete, transparent, and understandable information, so as to enable recipients to make informed decisions regarding any relationships involving the Company;
- Undertakes to record each operation and transaction only if supported by appropriate documentation, so that it is always possible to conduct checks to ascertain its nature and purpose, and identify who authorized, executed, recorded, or reviewed the transaction itself.

ATLANTIC FLUID TECH S.R.L. conducts its activities with transparency—both internally in the management of corporate activities and in assigning tasks and responsibilities, and in its relationships with customers, suppliers, and external collaborators.

Therefore, the following are prohibited:

- In financial statements, reports, or other corporate communications required by law, presenting material facts that are not true, even if subject to valuation, or omitting information required by law regarding the Company's economic, equity, or financial situation, in such a way as to mislead the recipients of these communications about said situation, thereby potentially causing financial damage to shareholders or creditors, with the intention of deceiving shareholders or the public and to obtain an unjust profit for oneself or others;
- Concealing documents or preventing or otherwise hindering legally assigned control or audit activities by shareholders and/or other corporate bodies;
- Distributing profits or advances on profits not actually earned or required by law to be allocated to reserves, or distributing reserves—whether or not formed from profits—that by law cannot be distributed;
- In violation of the legal provisions protecting creditors, reducing the share capital in such a way as to harm creditors;
- Even partially, fictitiously forming or increasing the Company's share capital;
- Distributing the Company's assets among shareholders before paying corporate creditors or setting aside the necessary sums to satisfy them, causing damage to the creditors.

Those who become aware of omissions, falsifications, or negligence in the accounting records or the documentation on which they are based must report such facts to the Supervisory Body.

4.3. Confidentiality

The Company guarantees the confidentiality of the information and personal data it processes and protects information acquired in relation to the work performed, in accordance with the provisions on the protection of personal data set forth in Legislative Decree No. 196/2003, as subsequently amended, supplemented, and implemented, as well as in EU General Data Protection Regulation 2016/679.

The recipients of this Code of Ethics must scrupulously observe the obligation of confidentiality regarding corporate information they learn in the performance of their duties or collaboration.

4.4. Combating Corruption and Conflicts of Interest

Consistent with its values of honesty and transparency, the Company undertakes all necessary measures to prevent and avoid incidents of corruption and conflicts of interest.

A conflict of interest arises when an employee or collaborator directly or indirectly holds an interest that is in (even potential) conflict with that of the Company, regardless of whether he or she seeks to derive a “personal” benefit from any of the Company’s business opportunities.

There is also a conflict of interest when representatives of customers, suppliers, or public institutions act contrary to the fiduciary duties associated with their position. Consequently, the following are prohibited:

- Offering or merely promising money or any other benefit (purely by way of example: hiring personnel who do not meet the requirements and selection processes outlined in the Company’s procedures) to a public official or a person in charge of a public service in order to induce that individual to perform an act aimed at obtaining direct or indirect advantages for the Company;
- Engaging in other forms of corruption or granting gifts or favors to third parties or accepting gifts or favors from third parties in order to obtain direct or indirect advantages for the Company;
- In order to obtain a benefit or interest for ATLANTIC FLUID TECH S.R.L., offering or promising private individuals from other companies money, benefits, or anything else so as to induce them to carry out acts detrimental to the interests of or causing damage to the company for which such individuals work;
- Promising or giving a consultant of the Company sums of money as undue compensation to obtain a benefit for the Company (purely by way of example: approval of a public funding application), which the consultant guarantees to secure thanks to his or her actual or alleged acquaintance with a public official;
- Promising or unlawfully giving money or another benefit to an intermediary—who boasts or exploits existing relationships with a public official or a person in charge of a public service—so that the intermediary can pay the official to obtain a benefit for the Company (purely by way of example: to facilitate a favorable outcome in an administrative proceeding or to secure an administrative act).

If an actual or apparent conflict of interest arises, any Director, manager, or employee must inform the OdV and refrain from proceeding with the transaction in question.

4.5. Competition

The Company recognizes that competition is a fundamental element for economic and social development. To this end, in carrying out its activities, the Company ensures that all general conditions for free enterprise are observed, allowing economic operators to access the market and compete on an equal footing, and safeguards its customers, encouraging the containment of prices and improvements in service quality derived from free competition.

ATLANTIC FLUID TECH S.R.L. condemns the organization and participation in any initiative that violates current legislation on free competition, antitrust, or monopoly.

It is prohibited to enter into or take part in agreements—even informal ones—or commercial practices aimed in any way at altering free market competition in violation of national and EU antitrust laws.

4.6. Impartiality and Non-Discrimination

In its internal relationships and dealings with third parties, ATLANTIC FLUID TECH S.R.L. respects the principles of dignity and equality and refrains from any discrimination based on age, gender, health status, ethnicity, language, sexual orientation, personal beliefs, nationality, political opinions, religious beliefs, trade union membership or non-membership, or disabilities.

The Company also undertakes:

- Not to tolerate sexual harassment or physical or psychological abuse in any form or context;
- To condemn any conduct aiming to promote pornography, including child pornography;
- To condemn any conduct intended to facilitate illegal immigration, the illicit trafficking of narcotic and psychotropic substances, or tobacco smuggling;
- To condemn anyone who propagates ideas based on racial or ethnic superiority or hatred, or who incites discrimination on racial, ethnic, national, or religious grounds;
- To condemn anyone who incites or commits violence or incitement to violence for racial, ethnic, national, or religious reasons;
- To condemn any conduct entirely or partly founded on denial, gross minimization, or apology for the Holocaust (Shoah), or genocide, crimes against humanity, or war crimes, as defined in Articles 6, 7, and 8 of the Statute of the International Criminal Court.

4.7. Environment, Quality, Health, and Safety in the Workplace

Health and safety in the workplace, as well as environmental protection and quality assurance, are priorities for ATLANTIC FLUID TECH S.R.L. and play a central role in the development of the Company and its operations.

Health, safety, environment, and quality are organizational and personal responsibilities that must be effectively applied in strategic, organizational, management, and operational decisions, in a perspective of continuous improvement.

Under no circumstances may the adoption and observance of preventive measures be overridden by considerations of productivity, efficiency, or cost-saving.

Therefore, ATLANTIC FLUID TECH S.R.L. undertakes to comply with all legislative provisions aimed at safeguarding the health of workers in the workplace, through ongoing actions by specifically designated corporate functions.

Collaborators must strictly abide by internal Company regulations and, in any case, by the applicable laws on personal safety and health protection.

The Company adheres to the regulations on environmental protection.

Collaborators involved in operational processes that may have an environmental impact must perform their work conscientiously and in full compliance with the laws and regulations in force.

4.8. Protection of Minors

ATLANTIC FLUID TECH S.R.L. attaches primary importance to the protection of minors and the repression of any behavior that may constitute sexual offenses against minors.

To this end, in addition to prohibiting improper use of the Company's IT resources, it is also forbidden to bring any pornographic material in any form onto Company premises.

Any employee or collaborator who, in the performance of his or her duties, becomes aware of acts or behavior committed within and by the corporate organization that do not comply with the principles or violate the prohibitions set forth above must, subject to legal obligations, promptly notify his or her superiors and the OdV.

Article 5 – Rules of Conduct

5.1. Relations with Personnel

The Company protects and promotes the value of human resources—being indispensable to the existence and development of the enterprise—so as to enhance each employee’s professional skills and promote respect for their physical, moral, and cultural integrity.

Consequently, ATLANTIC FLUID TECH S.R.L. undertakes to:

- Adopt merit-based criteria and professional competence criteria for any decision relating to an employee;
- Actively involve employees in the Company’s decision-making, so as to allow them to express their personal skills and achieve professional fulfillment;
- Prevent employees from suffering unlawful pressures or discomfort in the workplace, taking steps to prevent insulting and defamatory behavior;
- Protect the moral integrity of its personnel, ensuring the right to working conditions that respect the dignity and potential of the individual. For this reason, the Company undertakes to protect workers from acts of psychological abuse or mobbing and opposes any discriminatory or harmful behavior relating to one’s person, beliefs, or inclinations;
- Ensure working conditions that respect individual dignity and safe working environments, in full compliance with applicable legislation and regulations.

ATLANTIC FLUID TECH S.R.L. prohibits any form of psychological, physical, or sexual harassment against managers, employees, collaborators, suppliers, customers, or visitors, where harassment is defined as any form of intimidation or threat undermining their ability to work serenely, or any abuse by a supervisor of his or her position of authority.

Retaliatory actions against an employee who refuses, complains about, or reports such incidents are strictly prohibited.

The Company undertakes to offer equal employment and career development opportunities to all employees, based on their skills and professional qualifications, with no discrimination or favoritism.

The Company hires personnel solely on the basis of valid employment contracts, and no form of irregular work is tolerated.

The Company complies with regulations on working hours, vacation, leave, and overtime pay.

Applicants shall be informed of all characteristics of the employment relationship.

When an employment relationship is formed, personnel shall receive clear and specific information on contractual and remuneration aspects.

The Company also undertakes to provide training to all employees and to encourage them to participate in continuing education and professional development programs.

The Company carries out annual internal climate surveys using anonymous forms to monitor interactions among colleagues, the working environment, employee motivation, or any search for alternative job opportunities, etc.

5.2. Obligations of Personnel

Personnel must work diligently and loyally, and specifically:

- Act with loyalty and in good faith, complying with the obligations set forth in their employment contract, ensuring the required performance while contributing ideas, proactiveness, and enthusiasm;
- Know and adhere to the ethical standards contained in this Code, conducting themselves with respect and cooperation;
- Use the Company's assets (e.g., premises, equipment) and information solely for Company business purposes;
- Not use IT systems in a manner that interferes with their own or others' productivity or to access sites unrelated to work activities;
- Comply with laws protecting intellectual property rights. Software and databases protected by copyright and used by employees for Company business may not be copied—except for backup purposes—nor reproduced for employees' personal use. The use of unauthorized software or databases or those for which usage licenses have not been duly obtained is forbidden;
- Avoid any situation or personal activity that might create even a potential conflict of interest;
- Not accept, even indirectly, money, gifts, goods, services, benefits, or favors in connection with relationships with any third party with whom the Company has an existing relationship, for the purpose of influencing their decisions to obtain more favorable treatment or illicit services or for any other purpose. Employees who receive or become aware of any offer or request for money, gifts, or favors of any kind must promptly inform their direct supervisor and the Supervisory Body;
- Cooperate with the Judicial Authority in investigations and trials it conducts.

5.3. Relations with the Public Administration

Relationships with the Public Administration (by way of example but not limited to: Ministries, the Data Protection Authority, the Italian Revenue Agency, Supervisory Authorities, local or national authorities), whether institutional or public, must adhere strictly to applicable laws and regulations, as well as the principles of fairness, loyalty, and internal procedures.

The Company also identifies and defines channels of communication with all Public Administration interlocutors.

Specifically, the assumption of commitments toward the Public Administration is reserved for the corporate functions authorized to do so, which shall discharge their duties with integrity, independence, and fairness.

ATLANTIC FLUID TECH S.R.L. condemns any behavior carried out by anyone on its behalf consisting in promising or offering, directly or indirectly, money or other benefits to representatives of the Public Administration or to their relatives or in-laws that might result in an interest or advantage for the Company, even if only potential.

ATLANTIC FLUID TECH S.R.L. also condemns any behavior carried out by anyone on its behalf consisting in promising or giving, directly or indirectly, money or other benefits to intermediaries as undue compensation to obtain a benefit for the Company, which they guarantee to secure based on their actual or alleged acquaintance with representatives of the Public Administration or their relatives or in-laws.

The Company shall not be represented in dealings with the Public Administration by third parties or internal personnel if a conflict of interest, even a theoretical one, could arise.

Third parties or internal staff acting on the Company's behalf must avoid relations with the Public Administration in all other circumstances where there are compelling reasons of expediency.

In the event of a conflict of interest, even if only potential, it is mandatory to promptly inform one's direct supervisor and the OdV.

When entering into a business negotiation, request, or institutional relationship with representatives of the Public Administration, one may not—directly or indirectly—undertake the following actions:

- Propose, in any way, any type of employment and/or commercial opportunity that could benefit, directly or indirectly, the representatives of the Public Administration on a personal basis;
- Solicit or obtain confidential information that may compromise the integrity or reputation of one or both parties;
- Perform any other act intended to induce representatives of the Public Administration to do or refrain from doing something in violation of the laws of their jurisdiction;
- Agree to any requests for contributions or sponsorships that might influence a segment of the Public Administration;
- Deny, conceal, or delay any information requested by Public Authorities or Supervisory Authorities and other regulatory bodies in the performance of their auditing functions; on the contrary, there is an obligation to actively cooperate in any investigative procedures.

It is also forbidden to use or present false statements or documents or statements attesting to untrue facts or to omit information required so as to unlawfully receive contributions, financing, subsidized loans, or other equivalent grants from the State, the European Community, or other public entities.

All recipients of the Code must ensure that any public grants, contributions, or subsidized funding awarded to the Company are used for carrying out the activities or implementing the initiatives for which they were granted.

Any use other than that for which they were awarded is prohibited.

5.4. Relations with Suppliers

The Company conducts its relationships with suppliers according to principles of transparency, equality, fairness, and free competition. In particular, employees must:

- Comply with applicable laws and the contract provisions in their dealings with suppliers;
- Rigorously observe internal procedures for selecting and managing supplier relationships;
- Adhere to the principles of transparency and completeness of information in all communications with suppliers;
- Avoid being subjected to any form of pressure by external parties in making decisions and/or performing acts related to their work activity.

Suppliers are encouraged to conduct their business in line with standards of behavior consistent with those set out in the Code. Specifically, suppliers must ensure seriousness in business, respect for workers' rights, investment in quality, and responsible management of environmental and social impacts.

With respect to suppliers, it is strictly prohibited for anyone with existing business relations to solicit gifts (not only in the form of sums of money but also goods), benefits, or other utilities aimed at favoring their position with the Company to the detriment of others and to the Company's disadvantage.

5.5. Relations with Customers

Customers must be adequately informed about the products offered and must be enabled to make informed choices based on real, verifiable information.

Under no circumstances is it permissible to engage in deceptive or misleading advertising of the Company's products or to provide information that prevents the customer from making evaluations based on objective and transparent elements in an attempt to obtain contracts (through non-truthful information or offers that cannot be fully honored later).

It is forbidden to unilaterally change contractual terms or the manner of providing products/services without prior written authorization from the function empowered to do so under corporate procedures.

ATLANTIC FLUID TECH S.R.L. undertakes to maintain full confidentiality regarding customers' confidential information, both with respect to strategic data of the customer's company and personal/technical data the customer provides. The Company shall only use such information for professional reasons and with prior written authorization.

Customers, in turn, shall maintain confidentiality regarding any information, documents, or personal data about the Company and its personnel.

When entering into new business relationships with customers or managing existing ones, based on the information available, the following must be avoided:

- Maintaining direct or indirect relationships with individuals known or suspected to be involved in illicit activities or with parties lacking the necessary requirements of seriousness and commercial reliability;
- Financing activities aimed at producing or marketing products that are highly polluting or dangerous for the environment and health.

It is absolutely prohibited to offer/receive—directly or indirectly—to/from customers any gifts and/or benefits (money, goods, services, performances, favors, or other utilities) that could be interpreted by an impartial observer as intended to obtain an interest or advantage, even if non-economic.

Acts of commercial courtesy, such as gifts or forms of hospitality, are allowed only if they comply with defined internal Company procedures.

It is also forbidden to instrumentalize or propose job opportunities for employees and/or any other kind of business opportunity that might unduly favor them, if not consistent with the normal treatment reserved for customers.

5.6. Relations with Competitors

The Company and its collaborators undertake to comply fully with legal provisions protecting free competition and the marketplace.

No collaborator may participate in initiatives or contacts with competitors (e.g., price-fixing agreements) that could constitute a violation of competition laws. The prices the Company applies must be determined independently by the Company alone.

5.7. Relations with External Collaborators and Consultants

In fulfilling a contract with the Company or performing tasks entrusted to them, collaborators and consultants of the Company shall conduct themselves with fairness, good faith, and loyalty, complying with,

insofar as they apply, the provisions of this Code, corporate regulations, and the instructions and guidelines issued by Company personnel.

The Company requires all agreements with collaborators and consultants to include provisions requiring them, for relevant parts, to comply with the Code and ensures that it is communicated to them.

Conduct contrary to the principles expressed in the Code may be regarded by the Company as a serious breach of the duties of fairness and good faith in contract performance, a violation of trust, and a justifiable cause for terminating contractual relationships or partnership agreements.

Counterparties must sign statements acknowledging the principles of this Code, committing not to engage in any conduct that in any way induces the Company or its directors, employees, or collaborators to violate the principles set out in it.

5.8. Relations with the Media

Personnel do not maintain relationships with the press or other media concerning the Company's activities, unless such activity is part of a specific mandate conferred by the Sole Director.

Information regarding ATLANTIC FLUID TECH S.R.L. and intended for the media may only be disclosed by the functions authorized to do so or with their authorization. Any external communication of data or information must be truthful and transparent.

Collaborators shall refrain from any behavior or statements that may in any way harm the public image of ATLANTIC FLUID TECH S.R.L.

5.9. Relations with Political Parties, Political, and Labor Organizations

The Company does not provide contributions of any kind, directly or indirectly, to political parties, movements, committees, or political or labor organizations, nor to their representatives or candidates, except for contributions owed based on specific legal requirements.

The Company refrains from any direct or indirect pressure on political or labor representatives, through its employees or collaborators.

Likewise, directors and employees may not engage in political activity during working hours or use the Company's assets or equipment for such purposes.

In relations with other interest associations (e.g., trade associations, environmental organizations, etc.), no director, employee, or collaborator shall promise or pay money, nor promise or grant benefits in kind or other personal benefits aimed at promoting or furthering the Company's interests.

5.10. Conduct by Corporate Bodies

Corporate bodies must abide by the provisions and principles of this Code of Ethics. In particular, their members must:

- Act with independence, autonomy, and fairness in their dealings with public institutions, private parties, economic associations, political forces, and any other national or international parties;
- Conduct themselves with integrity, loyalty, and a sense of responsibility;
- Ensure diligent, well-informed participation in corporate body meetings and activities;
- Evaluate situations that present a conflict of interest or incompatibility of duties, positions, or roles both inside and outside the Company, and refrain from taking action in such situations in the course of their duties;

- Maintain the confidentiality of information they learn in the course of their office, refraining from taking advantage of their position to obtain direct or indirect personal benefits.

Recipients of this Code of Ethics, especially Directors, are prohibited from:

- Returning, even through simulated transactions, contributions to shareholders or releasing them from the obligation to provide them, except in cases of lawful reduction in share capital;
- Distributing profits or advances on profits not actually earned or required by law to be allocated to reserves, as well as distributing reserves, including those not formed from profits, that cannot by law be distributed;
- Purchasing or subscribing shares in such a way as to damage share capital or legally non-distributable reserves, except in cases permitted by law;
- Even partially, fictitiously forming or increasing the Company's share capital by assigning shares for an amount lower than their par value, reciprocal subscription of shares, or significant overvaluation of assets in kind or credits, or overvaluation of the Company's assets in the event of transformation.

5.11. Relations with Persons Summoned to Make Statements before the Judicial Authority

The Company ensures and promotes fair, transparent, and cooperative behavior in its dealings with law enforcement agencies and the Judicial Authority.

It is forbidden to exert any form of pressure on anyone (employee, collaborator, or third party) summoned to make statements before the Judicial Authority, to be used in criminal proceedings.

5.12. Management of Documents and IT Systems

It is forbidden to:

- Falsify, in form or content, public or private IT documents;
- Use falsified documents in any way, as well as suppress, destroy, or conceal genuine documents;
- Obtain, produce, distribute, deliver, or otherwise make available to the Company or third parties any equipment, devices, or software designed to damage an IT or electronic system belonging to someone else or the information contained therein, or to alter, in any way, its operation;
- Intercept, impede, or interrupt communications relating to one or more IT or electronic systems, or disclose all or part of the content of intercepted information to third parties;
- Destroy, damage, delete, alter, or conceal IT or electronic systems and the information, data, or software contained therein, if privately owned or used by the State or another public entity, or otherwise in the public interest.

5.13. Anti-Money Laundering, Self-Laundering, and Anti-Terrorism

The Company undertakes to comply with all national and international laws and regulations aimed at preventing money laundering, self-laundering, and the financing of criminal activities. To this end, recipients of the Code shall:

- Immediately report any potentially suspicious situations of which they become aware, in order to facilitate the prevention and combat of money laundering;

- Carefully verify the information available about counterparties and refrain from entering into or maintaining commercial or financial relations if there is a reasonable suspicion that such counterparties may engage in conduct constituting money laundering;
- Make and accept cash payments only within the legal limits;
- Provide full cooperation to the competent authorities in preventing, detecting, and suppressing the counterfeiting and falsification of banknotes, coins, and any other means of payment.

In managing financial transactions, it is forbidden to tolerate irregularities which, under normal professional diligence, might give rise to suspicion about the legality or regularity of the source of funds received.

In all commercial relations established on behalf of the Company, recipients must ensure that partners, customers, suppliers, or third parties offer adequate guarantees of integrity and reliability.

The Company strictly observes all commercial sanctions and embargoes established by national and foreign laws and by United Nations resolutions.

Compliance with such regulations requires thorough checks, and sometimes prohibitions, on transactions involving certain countries, regimes, individuals, entities, ships, or aircraft (by way of example: terrorists, producers of weapons of mass destruction, and drug traffickers).

5.14. Protection of Industrial and Intellectual Property

Recipients of the Code act in full respect of third parties' legitimate industrial and intellectual property rights, and in compliance with the provisions contained in laws, regulations, and conventions protecting these rights.

To this end, all recipients are prohibited from:

- Engaging in any conduct that may amount to usurpation of industrial property titles;
- Altering or counterfeiting distinctive industrial product signs, or patents, designs, or industrial models—whether Italian or foreign—as well as importing, marketing, or otherwise using or circulating industrial products bearing counterfeit or altered distinctive signs, or made by usurping industrial property titles;
- Illegally and/or improperly using, for the benefit of the Company or third parties, works of intellectual property, or portions thereof, protected by copyright laws;
- Making use of others' business secrets;
- Engaging in conduct intended to hinder the normal operation of the business and commercial activities of companies in competition with ATLANTIC FLUID TECH S.R.L.;
- Reproducing unlawfully, imitating, tampering with trademarks, distinctive signs, patents, industrial designs, or models owned by third parties;
- Using, in industrial or commercial settings, trademarks, distinctive signs, patents, industrial designs, or models that have been counterfeited by third parties;
- Importing into the State, for trade purposes, possessing for sale, or marketing in any way industrial products bearing trademarks or distinctive signs that have been counterfeit or altered by third parties.

5.15. Accounting, Financial Reporting, and Management of Financial Flows

The Company acts in compliance with laws and regulations—including regulatory guidelines—governing bookkeeping and financial reporting.

Recipients, within the sphere of their competence and in relation to the tasks assigned to them, shall cooperate diligently to ensure that management transactions are recorded properly and promptly in the Company's accounts and that all supporting documentation is kept in such a way as to be easily traceable and accessible to authorized control parties. The Company has implemented administrative-accounting procedures aligned with these principles.

All financial operations and transactions, and all inflows and outflows of the Company's funds, must be carried out by duly authorized personnel, with prior authorization, and they must always be properly justified, traceable, and recorded.

Every operation and/or transaction—broadly understood—must be lawful, authorized, consistent, appropriate, documented, recorded, and subject to verification at any time, in accordance with Company procedures.

Furthermore:

- It must always be possible to check the characteristics of the transactions performed, the reasons behind them, and the authorizations for their execution;
- Anyone conducting operations and/or transactions involving monies, assets, or other economically valuable items belonging to ATLANTIC FLUID TECH S.R.L. must do so under specific authorization and provide, upon request, all valid evidence to allow verification at any time.

ATLANTIC FLUID TECH S.R.L. condemns any behavior intended to alter the accuracy and truthfulness of data and information in financial statements, reports, or other corporate communications required by law and addressed to shareholders.

All those involved in the preparation of these documents must diligently verify the accuracy of the data and information that will be included therein.

5.16. Sustainability Report

Beginning in 2024, ATLANTIC FLUID TECH S.R.L. has decided to voluntarily prepare a Sustainability Report.

This document contains information regarding environmental and social issues, as well as matters related to personnel and the respect for human rights, with a view to ensuring an understanding of the Company's activities, its performance, its results, and the impact they produce.

Within the Report, an initial assessment is provided in alignment with the UN 2030 Agenda's 17 SDGs (Sustainable Development Goals), serving as a starting point for addressing ESG aspects.

The Report also indicates the 2024 ESRS (European Sustainability Reporting Standards) objectives, i.e., material topics defined by European regulations concerning sustainability reporting (CSRD 2022/2464):

- Environmental
- Social
- Governance

Article 6 – Implementation and Control Procedures

6.1. Supervisory Body and Code of Ethics

All those who collaborate with ATLANTIC FLUID TECH S.R.L., without distinction or exception, whether in Italy or abroad, are obligated to ensure compliance with the principles of this Code.

No pursuit of the Company's interest or advantage can justify any conduct—whether by omission or in possible collusion with others—that violates legislation or these principles.

In particular, all collaborators must ensure that the rules of conduct laid out in this Code are properly applied both internally and, more generally, by all third parties interacting with the Company.

Corporate bodies and managers must also lead by example, demonstrating consistency between the principles of the Code and their day-to-day actions.

The control, implementation, and compliance with this Code of Ethics are entrusted to the Supervisory Body appointed under Articles 6 and 7 of Legislative Decree No. 231/2001.

In particular, without prejudice to what is provided in the specific document entitled “Regulation of the Supervisory Body,” the tasks of the OdV include:

- Monitoring compliance with the Code of Ethics, in order to reduce the risk of committing the offenses laid down in Legislative Decree No. 231/2001;
- Coordinating updates to the Code of Ethics, including submitting proposals for revision and/or updating;
- Issuing comments on alleged violations of the Code of Ethics brought to its attention and reporting any identified breaches to the relevant corporate bodies.

6.2. Dissemination of the Code of Ethics

The Code of Ethics and any updates are brought to the attention of all recipients (both internal and external) through appropriate communication and dissemination activities so that the values and principles it contains are known and observed, and so that individual initiatives do not lead to conduct inconsistent with the ethical profile the Company pursues.

The Code of Ethics is published on the Company's website, where it is accessible to everyone.

A copy of the Code is delivered to each director, auditor, employee, or collaborator upon their appointment, hiring, or commencement of their relationship with the Company.

6.3. Reporting Violations

All Company employees and collaborators, both internal and external, have an obligation to report any violation or suspected violation of the Code of Ethics to the OdV, which will analyze the report and may interview the person submitting it and the alleged offender. Failure to comply with this obligation to report is expressly subject to sanctions.

Employees and collaborators who are uncertain about whether a particular behavior is lawful, ethically questionable, or contrary to the Code may, in any event, consult the OdV for necessary clarifications.

All employees and collaborators must cooperate with the OdV, including by providing any corporate documentation needed for it to carry out its duties.

Any unlawful conduct or request for support in assessing potentially questionable behavior in light of the principles set out in this Code of Ethics must be reported in writing to the OdV via email (odvatlanticfluidtechsrl@gmail.com) or through a dedicated Whistleblowing portal.

The OdV shall also consider anonymous reports (which may be submitted via the Whistleblowing Portal), provided they are sufficiently detailed and supported by enough information to connect the alleged conduct to specific facts and contexts.

In all cases, the OdV and/or the Whistleblowing Case Manager will record anonymous reports and retain the documentation received.

Pursuant to the newly amended Article 6(2-bis) of Legislative Decree No. 231/2001, specific channels are in place for “well-founded reports of unlawful conduct, relevant under the Decree, based on precise and consistent factual evidence, or of violations of the Model, of which the reporting persons became aware by reason of their functions.”

These channels, which ensure the confidentiality of the reporter’s identity in handling the report, consist of:

- The OdV’s email address (odvatlanticfluidtechsrl@gmail.com) for 231/2001-related violations or risks;
- A dedicated portal (accessible at: <https://atlanticgroup.whistletech.online/#/>), which enables submissions in either written form (via IT methods) or oral form. For details on how to access and use the Portal, refer to the internal Company communication. This channel is designed to maintain the confidentiality of the identity of the reporter and of the persons involved (the reported, facilitators, any other third parties), as well as of the content of the report and relevant documentation. The reporter may also request, via the IT platform, a direct meeting with the whistleblowing case manager, which will take place within 15 days of the request.

Any report received shall be kept strictly confidential.

Moreover, the reporter benefits from specific forms of confidentiality protection, as described in the “Whistleblowing Reporting Procedure,” which is part of the Model and to which reference should be made. Except in cases of slander or defamation, an employee who made the report is protected by the Company from any form of retaliatory action.

Specifically, there is an explicit prohibition—under Article 6(2-bis) of Legislative Decree No. 231/2001—against any direct or indirect retaliatory or discriminatory measures against reporters, for reasons directly or indirectly linked to their report.

Any retaliatory or discriminatory actions adopted against reporters for filing reports under paragraph 2-bis may be reported to the National Labor Inspectorate for investigation, in addition to being reported by the whistleblower to the labor union he or she designates.

A retaliatory or discriminatory dismissal of a reporting person is null and void.

Likewise, any demotion pursuant to Article 2103 of the Italian Civil Code, as well as any other retaliatory or discriminatory measures taken against the reporter, shall be null and void.

In the event of disciplinary measures, demotions, dismissals, transfers, or any other organizational measure with negative (direct or indirect) effects on working conditions occurring after the submission of a report, the burden is on the employer to prove that such measures are based on reasons unrelated to the report itself.

However, the prohibition against willful or grossly negligent unfounded reports remains in place.

6.4. Disciplinary Measures for Violations of the Code of Ethics

Compliance with the Code of Ethics is an integral part of the contractual obligations of employees, collaborators, and, more generally, all recipients.

Violations may result in disciplinary and sanction measures by the Company, proportionate to the seriousness of the violation and within the limits of applicable laws.

For employees, non-compliance may lead to disciplinary proceedings, sanctions, and even termination of the employment relationship. For the Company's directors, this may include suspension or removal from office.

For external parties, non-compliance may result in the termination of the contract, mandate, or any relationship in effect with the Company, and—where applicable—claims for damages.

For further details on violations of the Code's provisions and principles, as well as possible penalties, please refer to the Disciplinary System (Sistema Sanzionatorio) issued by the Company, which forms an integral part of the Company's Organizational Model.

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