# *Code of Ethics*
# *Lincotek Group*

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## INTRODUCTION

The Lincotek Group (hereinafter also referred to as the “Group” or “Lincotek”) is a global provider of industrial solutions for the industrial gas turbine, aerospace and medical device sectors. It operates through three business divisions—**Surface Solutions, Medical and Equipment**—offering high value-added integrated services, including additive manufacturing, advanced heat and surface treatments, as well as the design and manufacture of industrial coating equipment.

The Group’s companies operate in an **international environment**, sharing expertise and collaborating with the leading players in their respective industries. In carrying out its business activities, the Group has always been committed to achieving the highest standards of integrity and compliance with applicable laws and regulations.

The adoption of this **Code of Ethics** (hereinafter also referred to as the “Code”) is intended to promote and maintain ethical conduct over time by all individuals working within the Group’s companies, as well as by all those who maintain business relationships with the Group in the performance of their activities.

## 1 PURPOSE AND ROLE OF THE CODE OF ETHICS

The **Code of Ethics** defines the values that form the **foundation of the Company's ethical standards**, as well as the **guiding principles** and **fundamental rules** that shall govern the activities and conduct of the Code’s recipients, within the scope of their respective responsibilities and roles within the Company.

The Code serves as the reference framework for the Company's **policies, procedures and internal rules**. It also constitutes a **key instrument for mitigating the risk** of **criminal offences** under Italian **Legislative Decree No. 231/2001**, while not forming an integral part thereof.

The Code is approved by the **governing bodies** of the companies belonging to the Lincotek Group.

The **competent corporate functions** and **supervisory bodies**, within the scope of their respective responsibilities, monitor the effective implementation of the Code and may propose any amendments or updates to the governing bodies.

The Group is committed to ensuring the **dissemination** and **understanding** of the Code of Ethics, **verifying its adequacy** for the purpose of keeping it up to date, and promoting its full implementation.

## 2 SCOPE OF APPLICATION

The principles and provisions of this Code of Ethics apply to the following **Recipients**:

- the **governing** and **supervisory bodies** of the Group's companies;
- the **employees** and **collaborators** of the Group's companies with whom contractual relationships have been established, in any capacity, including occasional and/or temporary arrangements;
- any **third party** maintaining any type of relationship with the Group's companies, whether for consideration or free of charge.

The conduct and relationships of all Recipients—both within and outside the Company—must be based on **transparency, fairness and mutual respect**. In this context, **directors** and **managers** are required to set an example through their own conduct for all human resources, promoting the dissemination of ethical principles and providing guidance and clarification whenever necessary.

## 3 GROUP VISION AND MISSION

The contents of this Code of Ethics are consistent with the Group's **Vision**, **Mission** and **Values**, which serve as the reference framework both for its **strategic direction** and for the **conduct** expected in the performance of business activities.

***Vision***

**Shape a future together** with our clients where complexity becomes **impactful solutions for people's lives.**

***Mission***

Be the ***specialist*** that offers ***distinctive solutions*** through competencies, ***innovation*** and trusted ***commitment***.

## 4 CORPORATE VALUES AND ETHICAL PRINCIPLES

The Lincotek Group conducts its business activities in accordance with a set of fundamental values that guide its conduct and relationships.

Lincotek recognizes the following **values** as its guiding principles:

**COMMITMENT**

**Preserving our family spirit**

We are rooted in a strong **sense of belonging**, which shapes the way we work with passion and **responsibility** toward our people. Our customers' success is ours, and **excellence** drives everything we do.

**RELIABILITY & TRUST**

**Valuing integrity**

We act with **transparency** and respect. Our word is our bond. We face issues with **honesty** and earn **trust** through consistent, dependable **actions**.

**INNOVATION**

**Staying one step ahead**

We are **inspired** by **what's next**, constantly shaping the future of our businesses. By embracing **cutting-edge technologies** and processes, we **anticipate** tomorrow's needs and lead the way in setting **new** industry **standards**.

**SUSTAINABLE GROWTH**

**Innovating responsibly**

We pursue growth with a long-term vision, doing it **responsibly**, driving progress that respects the **planet**, empowers **communities**, and builds a better, lasting **future**.

**TEAMWORK**

**Turning collaboration into impactful solutions.**

We believe our **people** are **our greatest strength**, powering everything we do. We're committed to working **side by side** with each other, and our clients, to **achieve lasting results**.

**Ethical Principles**

In carrying out its business activities, Lincotek is also guided by the following fundamental ethical principles:

- **Respect for and enhancement of people**: the Group recognizes the central role of people and is committed to protecting their dignity, rights and integrity, while fostering an inclusive, safe working

environment that supports professional growth;

- **Legality and regulatory compliance:** Lincotek operates in full compliance with the laws and regulations applicable in all the countries in which it operates, adopting conduct based on the highest standards of fairness and integrity;
- **Fairness, integrity and transparency:** all of the Group's relationships and business activities are conducted in accordance with the principles of loyalty, transparency and fairness, with the aim of preserving the trust of its Stakeholders and the Company's reputation;
- **Responsibility and professionalism:** the Group acts with a sense of responsibility and due diligence, ensuring high quality standards and promoting conduct consistent with the Company's values;
- **Protection of health, safety and the environment:** Lincotek is committed to providing safe and healthy working conditions and to conducting its business in an environmentally responsible manner, thereby contributing to sustainable development;
- **Confidentiality and protection of information:** the Group ensures the protection of corporate information and personal data, guaranteeing their proper use in compliance with applicable laws and regulations;
- **Impartiality and prevention of conflicts of interest**: Lincotek promotes objective and transparent decision-making, preventing situations involving conflicts of interest and opposing any form of unethical or improper conduct;
- **Responsible innovation:** the Group promotes the informed adoption of innovation and emerging technologies, including Artificial Intelligence, ensuring their ethical, secure and transparent use in a manner consistent with its values, while respecting individuals, fundamental rights and the interests of its *Stakeholders*.

## 5 RULES OF CONDUCT IN RELATIONS WITH STAKEHOLDERS

The Lincotek Group recognizes that the creation of sustainable value and the preservation of its reputation depend on the way **relationships with all Stakeholders** are managed.

### *5.1 Relations with Employees*

Lincotek recognizes its people as a fundamental asset for the Group's growth and success. It promotes a working environment based on **respect, integrity, collaboration and the enhancement of individual skills and competencies**.

The Group ensures **equal employment** and **professional development opportunities**, **rejecting** all forms of **discrimination** in accordance with the Italian Constitution, the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization (ILO).

In particular Lincotek is committed to:

- protecting the **health and safety** of its employees and promoting appropriate working conditions;
- safeguarding the **dignity, moral integrity** and **well-being** of individuals by preventing all forms of **discrimination, harassment, abuse** or **workplace bullying**;
- promoting **training**, **professional development** and an **inclusive** and **collaborative culture**;
- ensuring the **confidentiality** and proper management of personal data;
- requiring managers to act consistently with the Company's values, fostering a **respectful, fair** and **intimidation-free** working environment.

In line with the principles set out in **ILO Convention No. 190 and ILO Recommendation No. 206 on**

**violence and harassment**, the Group recognizes the right of everyone to a **work environment free from violence and harassment** and is committed to **preventing and combating** any form of violence or harassment, including gender-based violence and harassment and sexual harassment. The Group **does not tolerate** unacceptable behaviours and practices, or threats thereof, whether occurring as a single occurrence or repeatedly, that are **intended to cause**, **result in**, or **are likely to result in** physical, psychological, sexual or economic harm, where such behaviours occur in the course of, in connection with, or arise out of work.

Employees are required to perform their duties with **professionalism**, **fairness** and **responsibility**, in compliance with applicable laws, Company procedures and the principles set out in this Code. In particular, they must:

- **avoid** situations involving **conflicts of interest**;
- **protect Company assets** and refrain from any improper use thereof;
- **maintain the confidentiality** of information acquired in the course of their duties;
- **neither solicit nor accept undue benefits**, **gifts** or **preferential treatment** that could compromise their independence of judgment;
- **contribute** to **protecting** their own **health and safety** and that of others.

Employees are encouraged to **promptly report** any conduct that is inconsistent with the law, internal procedures or this Code through the available reporting channels, including the Whistleblowing platform.

For the general principles, reference should be made to Chapter 6.

### *5.2 Relations with Customers*

Lincotek recognizes that the **quality of its relationships with customers** is essential to its growth and to **safeguarding** the Group's **reputation**. To this end, it is committed to **providing safe, reliable and high-quality products and services**, acting in accordance with the principles of transparency, fairness and professionalism.

Relationships with customers must be conducted **in compliance with applicable laws**, **free from any undue influence**, and with **full protection of the legitimate interests** of all parties.

When establishing and managing business relationships, the **Group avoids engaging with entities** that:

- **are involved in unlawful activities** or **do not meet appropriate standards** of reliability and integrity;
- **operate in violation of fundamental human rights,** including through child labour or forced labour;
- **may give rise to situations of dependency** or **exploitation** resulting in undue advantages.

In carrying out their activities, employees must act **independently, fairly and impartially**, safeguarding the **information acquired** and **preventing conflicts of interest** or **conduct that is inconsistent** with applicable laws or the principles of this Code (for the general principles, reference should be made to Chapter 6).

### *5.3 Relations with Suppliers*

Lincotek recognizes its suppliers as strategic partners in creating **sustainable value** and contributing to the Group's **success**. **Procurement processes** are aimed at obtaining the **best market conditions** while ensuring **impartiality and equal opportunities** in the supplier selection process.

The **selection** and **evaluation** of suppliers are based on **objective criteria of quality**, **reliability**, **competitiveness** and **sustainability**, while seeking, wherever possible, to prevent situations of economic or operational dependency. The Group also integrates **environmental, social and governance** (**ESG**) **criteria** into its procurement processes, favouring business partners that share its commitment to:

- **environmental protection** and the responsible management of natural resources;
- **respect for human rights** and fair working conditions, including the prevention of all forms of child labour and forced labour;
- the protection of **workers' health and safety**;
- the **adoption of ethical**, **transparent and legally compliant** business practices, including compliance with anti-corruption laws.

Lincotek promotes relationships based on **collaboration, integrity and responsibility**, requiring its suppliers to **operate in accordance with the principles set out in this Code** throughout their **own supply chains**.

**Contractual relationships** are based on **clarity** and **transparency** and **may include specific provisions** relating to **sustainability, corporate social responsibility** and **compliance with the Group's ethical principles**. The General Terms and Conditions of Purchase must be formally accepted by suppliers.

**Failure to comply** with the principles set out in this **Code** and with **applicable laws and regulations** may result in the adoption of **appropriate measures**, including the susp**ension or termination of the business relationship**.

### *5.4 Relations with Public Authorities*

Lincotek manages its **relations with Public Authorities** and **public institutions** in accordance with the principles of **legality, integrity and transparency**, safeguarding both its **own reputation** and that of the institutional **counterparties**.

Such **relations** are **reserved exclusively for duly authorized individuals**, who act in compliance with applicable laws and regulations, internal procedures and the principles set out in this Code.

The **Group pays particular attention to the management of sensitive activities**, such as participation in public tenders, the negotiation and management of contracts, applications for authorizations and permits, the obtaining and use of public funding, as well as relations with supervisory and regulatory authorities.

It is strictly prohibited to **promise, offer** or **grant**, directly or indirectly, **money or any other undue benefit** to **public officials** or **persons entrusted with a public service** for the purpose of influencing their decisions or obtaining advantages for the Group (for the general principles, reference should be made to Sections 6.4 and 6.5).

Lincotek is committed to **cooperating fully and transparently with the competent authorities**, including judicial authorities, and shall **refrain from any conduct that could hinder the performance of their official duties**.

Any request for or solicitation of undue benefits must be **reported immediately** to the relevant Company managers or to the Supervisory Body.

### *5.5 Relations with Shareholders and Corporate Bodies*

Lincotek recognizes the importance of managing relations with shareholders and corporate bodies in a

**transparent** and **fair manner**, as a fundamental element in safeguarding the Group's value.

The Group ensures that **corporate communications are clear**, **complete and timely**, guaranteeing **fair access** to relevant information.

Lincotek promotes a **constructive dialogue** between the corporate bodies and shareholders by ensuring appropriate **information flows** and reliable **periodic reporting**.

The **governing bodies** operate **in compliance with applicable laws** and **regulations** and the **principles set out in this Code**, preventing conflicts of interest and ensuring that decisions are taken in the best interests of the Group and all its shareholders.

Impartial and transparent management is also governed by the general principles set out in Chapter 6.

### *5.6 Relations with the Community and Environmental Protection*

Lincotek operates in full awareness of its **social responsibility** towards the **community and the environment** in which it conducts its business, promoting **sustainable development** and a **balance** between **economic growth** and **environmental protection** in the **interests of present and future Stakeholders**.

The Group is committed to **minimizing the environmental impact** of its activities through the adoption of sustainable technologies and practices, the reduction of emissions and energy consumption, and the promotion of environmental awareness among its personnel.

Lincotek **actively participates in sustainable development initiatives**, fosters cooperation with the competent authorities and promotes transparent communication with the community, in accordance with the values set out in this Code and with applicable laws and regulations.

The general environmental and social principles are set out in Chapter 6.

### *5.7 Relations with Political and Trade Union Organizations*

Lincotek neither favors nor discriminates against **political or trade union organizations**.

Employees are **free to join such organizations**, in accordance with democratic principles and the right to collective bargaining.

The Group **promotes fair and transparent relations based on constructive dialogue with trade union representatives**, fostering balanced industrial development and preventing conflicts between management, shareholders and employees.

### *5.8 Press and Media*

Lincotek believes that all **external communications** must be **truthful, accurate, clear**, **transparent** and **consistent** with the Company's policies and programs, thereby saf**eguarding the image and reputation** of the Group.

**Relations** with the **press** and **other media** are the **exclusive responsibility** of **personnel expressly authorized** by the Governing Bodies.

Any request for information received from the media must be **promptly referred** to the department responsible for external communications before any response is provided or any data or information is disclosed.

## 6 GENERAL PRINCIPLES

Lincotek conducts its business on the basis of **shared ethical values**, ensuring that all decisions are guided by legality, integrity, responsibility and sustainability.

### *6.1 Conduct in Relations with Private Parties*

Lincotek refrains from entering into direct or indirect relationships with **individuals or entities known**, or **reasonably suspected**, **to be involved in criminal activities**, including organized crime, child labour exploitation, illicit trafficking in weapons or narcotics, and terrorist activities[1].

Company resources may not be used to obtain **undue advantages** to the **detriment of third parties** or to **improperly influence decisions** for the **benefit of the Group or related parties**.

**Bribery, indiscriminate favours** and any **direct or indirect solicitation** that could compromise the integrity of Lincotek or its Stakeholders are strictly prohibited.

### *6.2 Conflicts of Interest*

All **Recipients** of this Code are required to **avoid any situation**, including potential situations, that **could interfere** with their **ability to make impartial and objective decisions in the best interests of the Group**.

Examples of **conflicts of interest** may include:

- **direct or indirect ownership** interests in companies that compete with, are customers of, or are suppliers to the Group;
- **external employment or consulting activities** that interfere with duties owed to Lincotek;
- **family relationships or close personal relationships** with individuals or entities having business relationships with the Group;
- **the personal use of confidential information or business opportunities acquired** in the performance of one's duties.

Recipients are required to act with the **utmost transparency**, avoiding not only actual conflicts of interest but also situations that could give rise to the mere appearance of impaired impartiality.

All **Recipients** are required to promptly disclose, through the Company's designated reporting channels, **any actual, potential or perceived conflict of interest** that **may interfere with the impartial performance of their duties or with the interests of the Group**. The **mere existence** of a **conflict of interest does not in itself constitute a breach** of this Code, p**rovided that it is promptly disclosed and managed in a transparent and appropriate manner in accordance with the applicable Company procedures**.

Where an actual or potential conflict of interest is identified, the individual concerned shall **refrain from participating in decision-making processes, evaluation activities or transactions** in which their personal interest could influence, or appear to influence, their objectivity and independence of judgment.

### *6.3 Use of Artificial Intelligence*

Lincotek recognizes the **value of Artificial Intelligence (AI)** as a **tool for innovation**, **development and improving operational efficiency**, and promotes its use in a **manner consistent** with its values, business objectives and the principles of responsibility, integrity and sustainability.

The Group adopts a **conscious and responsible approach** to the use of Artificial Intelligence technologies, **in compliance with applicable laws and regulations**, the p**rotection of individuals' rights**, the **safeguarding of personal data** and **Company information**, **intellectual property rights**, and **cybersecurity principles**.

[1] For the purposes of this Code, terrorist activities shall mean acts capable of causing serious harm to a State or to an international organization, committed with the aim of intimidating the population, compelling public authorities or an international organization to perform or refrain from performing a specific act, or destabilizing or destroying the fundamental constitutional, economic or political and social structures of a State or an international organization.

The Recipients of this Code are required to use Artificial Intelligence tools **exclusively for lawful purposes connected with their professional activities**, exercising the necessary **diligence in assessing the accuracy**, reliability and appropriateness of the results generated. Recipients are also required **to use only those Artificial Intelligence tools that have been authorized by the Group, in compliance with the Company's policies, procedures and security measures**. The use of such tools does not, under any circumstances, exempt users from their professional responsibilities in relation to the activities performed and the decisions taken. **Outputs generated by Artificial Intelligence must be subject to appropriate verification and critical assessment before being used in the Company's operational, decision-making or communication processes.**

Lincotek is committed to **preventing any use of Artificial Intelligence that may result in discriminatory or unfair outcomes**, **infringe fundamental human rights**, or otherwise conflict with the Group's ethical principles.

When using **Artificial Intelligence** tools, **Recipients are required to safeguard the confidentiality of Company information by avoiding the input or disclosure of confidential, proprietary or otherwise protected data and information**.

Artificial Intelligence shall be regarded as a **support tool for business activities** a**nd shall not replace human judgment**, **expertise or responsibility**. Accordingly, significant business decisions must remain subject to **appropriate human oversight and under the responsibility of the competent individuals**.

The Group promotes the use of **Artificial Intelligence** in accordance with the **principles of transparency and accountability**, **ensuring that the contribution of AI tools to business activities can always be identified and that appropriate human oversight is maintained**.

The operational use of Artificial Intelligence tools is governed by the Company's applicable policies and procedures.

### *6.4 Confidentiality and Information Management*

The **confidentiality of information** is a key **corporate asset that must be protected,** including through the conduct of the Group's employees. Protecting information contributes to safeguarding the Group's competitiveness, reputation, and the trust of customers, suppliers and business partners in all geographical areas in which the Group operates.

All **Recipients** must:

- protect **data, documents, know-how, business operations** and, more generally, **any information acquired** in the course of performing their duties, including information relating to the Group's customers and suppliers;
- **prevent unauthorized disclosure**, **improper access to**, or **inappropriate use** of information;
- **comply with local and international laws** governing the protection of personal data and trade secrets, including, where applicable, Regulation (EU) 2016/679 (GDPR), Italian Legislative Decree No. 196/2003, and the privacy laws in force in the non-EU countries where the Group operates;
- **use digital tools and emerging technologies, including Artificial Intelligence systems, responsibly and consciously**, in compliance with Company procedures, information confidentiality requirements, personal data protection rules, and the principles of transparency, security and human oversight;
- **comply with the Company's internal procedures and guidelines** governing the secure management and sharing of information.

Confidential information **may only be disclosed to authorized persons** and only to the extent **permitted by applicable laws and regulations**, **contractual agreements** and the **Group's internal procedures**, regardless of the jurisdiction concerned.

### *6.5 Gifts and Gratuities*

Lincotek expressly **prohibits** the **acceptance, offering** or **promising**, whether directly or indirectly, of **money, gifts, services or any other benefit** that does not fall within the scope of normal business courtesies in dealings with public officials, persons entrusted with a public service, private individuals or third parties that may have business relationships with the Group's companies.

**Promotional gifts** and **customary business courtesies** are **permitted**, provided that they are of such a nature as to **avoid any misunderstanding** and do not create the impression that the recipient is under an obligation to perform or refrain from performing any act as a result of accepting the gift.

### *6.6 Donations and Sponsorships*

Lincotek may support **initiatives, projects and organizations pursuing social, cultural, educational, scientific, environmental** or **other purposes consistent with the Group's values and principles**.

**Donations, contributions** and **sponsorships** shall be made exclusively fo**r lawful and transparent purposes**, in compliance with **applicable laws and regulations** and with the principles of **fairness, impartiality** and **responsibility** that guide the Group's activities.

Such activities must not be used, directly or indirectly, to obtain undue advantages, improperly influence decisions made by public or private parties, circumvent legal or regulatory requirements, or pursue interests that conflict with those of the Group.

Lincotek ensures that donations and sponsorships are assessed and managed on the basis of **objective, documented criteria consistent with its values**, while ensuring **appropriate levels of transparency, traceability and control**.

### *6.7 Information Relating to Scientific Activities*

In order to promote the **advancement of scientific and technological research**, the Group establishes **collaborations and/or partnerships with public and private universities, research institutions and educational organizations** located in the geographical areas in which the Group's companies operate.

Any **information relating** to such activities may be **disclosed** only **after** appropriate **intellectual property protection measures** have been put in place. The Group respects the prerogatives and academic traditions of its partners, as well as researchers' need to publish the results of their research activities.

### *6.8 Health and Safety in the Workplace*

Lincotek is committed to creating a working environment that ensures la**wful conditions of health, safety and personal dignity** for all Recipients, employees and collaborators at every level and in all Group locations, regardless of the jurisdiction in which they operate.

The Group promotes full co**mpliance with local and international occupational health and safety laws and regulations** and adopts all necessary measures to ensure high standards of safety, hygiene and employee protection.

All **direct and indirect collaborators** are required to **cooperate** in **ensuring health and safety in the workplace** by using the protective equipment provided and reporting any circumstances that may

contribute to improving working conditions.

Lincotek considers the protection of health and safety to be a fundamental value and an integral part of its corporate management system, assigning specific responsibilities at every level of the organization for risk prevention and the promotion of a safety culture.

The Group reaffirms its commitment to the **continuous improvement** of the performance of its health and safety management system, including through appropriate investments, the ongoing maintenance of its facilities, and the promotion of key health and safety messages throughout the organization.

### *6.9 Privacy*

Lincotek operates in full compliance with the **applicable personal data protection laws and regulations in all countries where it conducts its business**. All Recipients must ensure that the personal data of employees, customers, suppliers and other external parties are processed lawfully, fairly and transparently, preventing any unauthorized use, access or disclosure. Internal procedures and Company guidelines must be followed to ensure the secure and compliant processing of personal data.

### *6.10 Accounting Records*

**Accounting records** shall be maintained in accordance with the **principles of accuracy**, **completeness and timeliness**, in compliance with the Company's procedures, and shall provide a true and fair representation of the Group's financial position, assets and liabilities, and results of operations.

Employees involved in the preparation, updating and management of accounting records must ensure the **highest level of cooperation** by providing **clear** and **complete** information.

Any explanations, data and documentation requested by the Supervisory Body, public authorities or other competent institutions in the performance of their respective duties must be provided **promptly** and in a **complete manner**.

### *6.11 Impartiality and Non-Discrimination*

In all decisions and activities involving its Stakeholders (including customers, shareholders, suppliers, business partners, local communities and institutional representatives), Lincotek is committed to ensuring **equal treatment**, **impartiality** and **respect for diversity**.

The Company **strictly prohibits any form of direct or indirect discrimination** based on gender, age, disability, nationality, ethnic origin, race, religion or belief, sexual orientation, gender identity, political opinion, trade union membership or any other personal characteristic protected under applicable law.

Lincotek **promotes an inclusive and equitable working environment** in which diversity is regarded as a source of value and innovation. All **business, financial** and **institutional relationships** are managed according to **objective, transparent and merit-based criteria**, ensuring that decisions are made fairly and impartially.

Through this commitment, Lincotek aims to foster **trust, long-term partnerships** and the re**sponsible creation** of value throughout **its Stakeholder ecosystem**.

### *6.12 Human Rights and Fundamental Freedoms*

Lincotek **recognizes and respects human rights** as **fundamental and universal principles**, in accordance with applicable national and international standards. The Group is committed to conducting its business in accordance with internationally recognized human rights frameworks, including the **United Nations Guiding Principles on Business and Human Rights** and the fundamental conventions of the **International Labour Organization (ILO)**.

Lincotek guarantees **respect for the dignity, freedom, equality, and physical and moral integrity** of all individuals, both within the organization and in its business and professional relationships. The Group **rejects all forms of forced or compulsory labour, child labour, human trafficking, exploitation,** or **any practice that violates fundamental human rights**.

The Company **recognizes and respects the right to freedom of association and collective** bargaining, in accordance with applicable law and international standards.

Lincotek promotes **fair working conditions**, **equal opportunities and non-discrimination**, and is committed to preventing, identifying and addressing any adverse human rights impacts arising from its activities or business relationships.

The Group requires its employees, suppliers and business partners to observe equivalent standards and may implement monitoring and assessment measures to ensure compliance with these principles.

### *6.13 People and Development*

Lincotek considers its **people** to be a **strategic asset** and a **key driver of sustainable value creation** in an economic and technological environment that is continuously evolving. The Company is committed to attracting, developing and retaining talent by fostering a culture of continuous learning, professional growth and skills development.

In this context, Lincotek promotes **structured training programmes**, **skills development initiatives**, **professional reskilling opportunities** and **equal development opportunities**, with the aim of strengthening employees' competencies, enhancing their long-term employability and supporting internal mobility. Training is regarded as a strategic investment to support innovation, operational excellence and the responsible transformation of the business.

Lincotek ensures that all organizational decisions respect the **dignity, autonomy and individuality** of every person, promoting **merit-based development processes**, **fair evaluation systems** and **working conditions** that foster a **sustainable balance** between **professional responsibilities** and **personal life**.

### *6.14 Environmental Protection*

Lincotek recognizes **environmental protection** as a **fundamental principle** and **integrates environmental considerations into its decisions and activities**, committing to preventing and reducing environmental impacts in compliance with applicable laws and international standards.

The Group promotes the **responsible use of resources**, the **continuous improvement** of environmental performance and **sustainable development** in the communities where it operates.

The principles set out above apply to all activities and relationships with Stakeholders, as provided for in Chapter 5.

### *6.15 Responsibility Towards the Community*

Lincotek recognizes its **social responsibility towards the communities** in which it operates and is committed to contributing to their **sustainable development** while respecting local rights, cultures and needs.

The Group promotes **initiatives of social, cultural and economic value** that are consistent with its values and ethical principles.

The operational principles governing relations with the community are set out in Chapter 5.

## 7 INTRA-GROUP RELATIONS

### *7.1 Intra-Group Cooperation and Transactions*

This **Code of Ethics applies** to **all companies within the Lincotek Group**.

The companies of the Lincotek Group are required to **cooperate in a fair and transparent manner**, in accordance with the principles set out in this Code of Ethics and with applicable laws and regulations. Such cooperation shall be achieved through the **identification** and **enhancement** of **synergies among the Group's companies**, with the objective of **pursuing common goals** and **creating sustainable value** for the Group as a whole.

**Intra-group transactions** shall be managed in accordance with the **principles of fairness**, **effectiveness and the protection of relevant interests**, with particular attention to market conditions. **Economic and administrative relationships** among the Group's companies shall be **appropriately documented**, ensuring **transparency, traceability** and **compliance** with internal procedures and applicable laws and regulations.

### *7.2 Intra-Group Communication*

Within the Lincotek Group, **communication** among the Group's companies shall be based on **truthfulness, fairness, integrity, completeness** and **clarity**.

The exchange of information shall respect the **autonomy of each company** and its **respective areas of activity**, ensuring that shared information is accu**rate, relevant and used exclusively for business purposes consistent with the Group's objectives**. Transparency and fairness in communication foster **intra-group cooperation**, the **effective management** of business activities and the creation of **sustainable value** for the Group as a whole.

## 8 COMMUNICATION, MONITORING AND REPORTING

### *8.1 Communication and Dissemination of the Code of Ethics*

In order to ensure the widest possible awareness and dissemination of this Code of Ethics, a copy thereof shall be **provided** to each newly appointed **director, manager, employee, consultant** and **statutory auditor** upon their appointment, hiring or commencement of their engagement with the Company.

### *8.2 The Supervisory Body*

Responsibility for **monitoring compliance** with, and the **proper interpretation** of, the rules set out in this Code of Ethics is entrusted to the **Supervisory Body** of each company within the Group.

In particular, the Supervisory Body shall:

- promote initiatives aimed at disseminating knowledge of the Code of Ethics and clarifying its meaning and methods of application, including through the issuance of opinions and guidance;
- verify the development of Company standards and procedures suitable for implementing the principles of the Code of Ethics;
- promote the periodic review of the Code of Ethics and its implementation mechanisms;
- participate in defining the sanctions to be applied in the event of violations of the Code; members of the bodies that participated in the preliminary investigation or proposal shall abstain from voting on the relevant resolutions;
- receive and assess reports of alleged violations of the Code of Ethics and, where necessary, carry out further investigations and audit activities;
- report periodically to the Board of Directors and the Board of Statutory Auditors on its activities and on matters relating to the implementation of the Code of Ethics;

- verify the application of and compliance with the Code of Ethics through periodic monitoring activities.

### *8.3 Reporting Violations*

The companies of the Lincotek Group provide **Recipients** with a structured system for reporting unlawful conduct or conduct that is inconsistent with this Code of Ethics through the **Whistleblowing** platform, which is accessible to all employees, collaborators and relevant third parties.

Reports may concern:

- actual or alleged violations of the Code of Ethics;
- conduct that is inconsistent with laws, regulations or internal procedures;
- conflicts of interest that have not been appropriately managed.

The **Whistleblowing** platform ensures:

- the full **confidentiality of the reporting person's identity**;
- the possibility of submitting reports anonymously or by name;
- protection against any form of retaliation or discrimination.

The **Reports Manager** receives reports through the **Whistleblowing** platform, analyses them and **determines the necessary actions**, including, where appropriate, further **investigations** or **audit** activities. In cases of particular significance, the **Reports Manager** shall inform the Board of Directors and/or the Board of Statutory Auditors, facilitating the application of proportionate sanctions in accordance with the established disciplinary system.

All employees and collaborators are encouraged to use the Whistleblowing platform to report improper conduct, thereby actively contributing to an ethical, safe and transparent working environment.

### *8.4 Disciplinary System*

The Board of Directors shall establish the **disciplinary system** applicable to **violations of this Code** of Ethics, regardless of whether judicial proceedings have been initiated by the competent Judicial Authority or of the outcome of such proceedings.

Any breach of the **provisions of the Code of Ethics** shall be addressed by the Company **promptly** and effectively through the adoption of appropriate and proportionate disciplinary measures, pursuant to Article 2106 of the Italian Civil Code.

The identification and application of disciplinary measures shall take into account the **principles of proportionality** and appropriateness in relation to the violation concerned, in compliance, where applicable, with Article 7 of Law No. 300 of 20 May 1970 (Workers' Statute), the applicable collective bargaining agreements, individual employment contracts and the relevant National Collective Bargaining Agreements (CCNLs).

Likewise, in order to protect its reputation and safeguard its resources, the Company reserves the right not to enter into or maintain relationships with parties that are unwilling to comply fully with applicable laws and regulations and/or refuse to adhere to the values and principles set out in this Code of Ethics.

The disciplinary measures applicable in the event of violations of the Code of Ethics are defined in the **Organization, Management and Control Models** adopted by each Group company pursuant to Italian Legislative Decree No. 231/2001.