



# CODE OF ETHICS

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## INDEX

4	<b>1</b>	<b><u>PRELIMINARY PROVISIONS</u></b>
5	1.1	Foreword
6	1.2	Definitions
7	1.3	Scope and field of application of the Code
7	1.4	Applicability of this Code of Ethics to Employees, Independent Contractors, Managers and Corporate Representatives
7	1.5	Applicability of the Code of Ethics to third parties
7	1.6	Disciplinary system and procedures for applying penalties and fines
8	<b>2</b>	<b><u>GENERAL ETHICAL PRINCIPLES</u></b>
8	2.1	Legality
8	2.2	Morality
8	2.3	Dignity and Equality
8	2.4	Professionalism
9	<b>3</b>	<b><u>SPECIFIC ETHICAL PRINCIPLES AND BEHAVIOURAL STANDARDS</u></b>
9	3.1	External relations
12	3.2	Human resources
14	3.3	Conflict of Interest
14	3.4	System of powers and proxies, accounting, and internal audits
15	3.5	Corporate policies
17	3.6	Information and confidentiality
18	<b>4</b>	<b><u>ENFORCEMENT AND CONTROL PROVISIONS</u></b>
18	4.1	Overview
18	4.2	Code of Ethics and reports of misconduct or violations (known as 'Whistleblowing')

# INTRODUCTION



This Code of Ethics (hereinafter also the “Code”) expresses the desire of Forgital Group (hereinafter also the “Company”) to clarify the values of Legality, Morality, Dignity, Equality and Professionalism that have always characterised the Company’s way of doing business and that the Company in turn expects its Employees and Independent Contractors to uphold.

This document, therefore, must serve as a constant reminder for those working with and on behalf of Forgital Group and, more specifically, must guide the conduct of the Company’s daily activities in the relations between its Employees, Independent Contractors, Customers, Suppliers and the Public Administration as well as, more generally, in the relations with all those persons who, for various reasons, find themselves interacting with the Company.

Forgital Group is inspired in its business activities by the principles in the Code of Ethics and strives not to undertake or pursue any relations with whosoever should manifest any intention not to share in its content and spirit.

This Code of Ethics outlines the obligations and the responsibilities of the Company towards its stakeholders so that they may recognise in it the fulfilment of their expectations. Moreover, through the statement of abstracts and general principles and rules of conduct, it makes it possible to recognise unethical behaviours and indicate the correct methods of performing duties required of different positions and the powers attributed to each one.

The codification of the ethical principles of reference and basic rules of conduct to which all the stakeholders, both internal (shareholders, management, employees) and external (clients, suppliers, financial institutions, creditors, public institutions, and the community) must abide, constitutes the express declaration of the serious and effective commitment of Forgital Group to guarantee the legality of its own business, with particular reference to the prevention of wrongdoing.

Moreover, the Code of Ethics, by imposing the observance of the principles and rules contained therein, contributes to the development of an ethical awareness and reinforces the reputation of the Company and the relationship of trust it cultivates with its stakeholders.

Similarly, the observance of these principles and the regulations of the Code of Ethics reflects on the reputation of the entire management organisation and the employees, as well as the relationship of reciprocal trust between them and the Company to which they belong.

This Code of Ethics is divided into:

## **PRELIMINARY PROVISIONS**

which define who receives the Code of Ethics, the obligations of the Company and of its personnel and the significance to be attributed to the Code in dealing with third parties and, in particular, its contractual value;

## **GENERAL ETHICAL PRINCIPLES**

which define the values of reference in the Company's business;

## **SPECIFIC AND STANDARD ETHICAL PRINCIPLES OF CONDUCT**

which define the guidelines that must orient, based on ethical principles and beyond the mere observance of the laws, the behaviour of all the Company's personnel;

## **ENFORCEMENT AND CONTROL PROVISIONS**

which describe the mechanisms and bodies in charge of implementing, monitoring, and spreading respect for and conformity to the Code of Ethics and guarantee its constant updating.

## **1.1 FOREWORD**

Forgital Group, (including the parent company Forgital Italy S.p.A and its subsidiaries, hereinafter also the "Company") deals in the

- production, thermal treatment and processing of heat laminated rings in steel and other alloys
- machining, finishing and assembling of aerospace components
- materials and engineering testing.

In particular, the corporate purpose of Forgital Group is the processing and sale of steel, nickel alloys, aluminium alloys, titanium alloys, copper alloys and other metals. Forgital Group clientele are the main companies involved in Aerospace, Transmissions, Oil and Gas, General Mechanics, and Power Generation (including persons who are registered - according to the case - as public subjects under existing legislation). The main objective of Forgital Group is the quality of the product and the service, achieved in respect of regulations, the environment, and the health and safety of the company's own employees and collaborators as well as the community.

In light of the above, Forgital Group recognises the importance of implementing a system that can ensure that the values of legality, fairness, honesty and integrity, good faith and respect for the environment, safety in the workplace, and public health, that inspire its organization are diligently and consistently enforced over time, and that the Company's staff abide by them as they daily go about carrying out their job tasks.

To this view, the Company has prepared this Code, the observance of which by its employees, independent contractors and corporate representatives, as well as on the part of all third parties with whom Forgital Group entertains business ties, is essential for the Company to pursue its purpose of business.

The Code of Ethics adopted and approved by the Company expresses the values and behavioural principles that Forgital Group recognises as its own, to which all the recipients must make reference to and observe as it constitutes the primary instrument for preventing every crime.

Any violation of the provisions of the Code of Ethics is therefore defined as wrongdoing of a disciplinary nature and, as such, will be prosecuted and sanctioned by the Company.

Concerning the Independent Contractors, Suppliers, Consultants, Partners or other subjects in contractual relations with Forgital Group, the undersigning of this Code of Ethics or an extract of the same or, in any case, observance of the provisions and principles herein represent a sine qua non condition of the stipulation of contracts of any nature between the Company and said subjects. The provisions undersigned as such or, in any case, approved, even by conduct, constitutes an integral part of the contracts themselves. Given the description above, the violation of specific provisions of the Code of Ethics by any of these subjects, depending on the seriousness of the violation, may warrant the application of the relative provisions of the Company's Disciplinary System.

## 1.2 DEFINITIONS

In this Code, the following expressions shall have the meanings indicated below:

### **CLIENTS**

means subjects who have stipulated with Forgital Group a contract for the supply of goods or services;

### **CODE**

means this Code of Ethics and any attachments, as supplemented or amended from time to time;

### **INDEPENDENT CONTRACTORS**

means those persons who maintain relations with Forgital Group, as agents, representatives, sales distributors, or who have established other forms of coordinated and ongoing business collaboration with the Company, primarily personal in nature and without any form of direct employment (including but not limited to project-based work, temporary employment contracts signed through recruitment agencies; staff induction; orientation summer internships);

### **CONSULTANTS**

means external consultants charged to assist Forgital Group in carrying out its own business, on a continuative or occasional basis;

### **RECIPIENTS**

means the subjects to whom the provision of this Code apply and, in particular, the Employees, Independent Contractors, Managers, Corporate Representatives as well as, in cases in particular reference to them in this Code, Clients, Suppliers, Consultants, and Partners;

### **EMPLOYEES**

means all persons who maintain with Forgital Group an employment contract (including directors and Managers of various corporate offices), including home workers and workers hired on a fixed-term or part-time contract;

### **CORPORATE REPRESENTATIVES**

means the Chairman of the Board of Directors, the Managing Director, members of the Board of Directors and Board of Auditors, members of the Executive Committee (if one has been formed) and General Managers, as well as the members of other corporate boards of Forgital Group, as well as any other person who is a corporate executive of the Company, which signifies that they are formally called upon to legally represent, administer or manage Forgital Group or one of its units or divisions;

### **SUPPLIERS**

means subjects who have stipulated with Forgital Group a contract for the tender of construction or works or, also, for the supply of goods or services for the Company;

### **SUPERVISORY BODY**

or "Body", means the Supervisory Body of Forgital Group, equipped with autonomous powers of initiative and control;

### **PARTNER**

means third party subjects who are parties to contractual relations with Forgital Group For mid- to long-term periods (which is to say for a duration equal to or longer than 18 months, also taking into account contract renewals) like, by way of example, suppliers (also in outsourcing contracts), subcontractors or sponsored or agreed upon subjects, companies participating in any potential temporary business associations with Forgital Group or other subjects expressly identified as business partners by Forgital Group in one or more transactions; to avoid doubts, it is hereby clarified that the subjects falling under one of the other categories of Recipients (in particular, that of Clients, Suppliers, or Independent Contractors) do not fall, for the same reason, under the category of Partners;

### **MANAGERS**

means every manager of one or more divisions of Forgital Group, in accordance with the Organisation Chart of Forgital Group applicable from time to time;

### **COMPANY**

means "Forgital Group".

### 1.3 SCOPE AND FIELD OF APPLICATION OF THE CODE

The provisions of this Code apply to its Recipients, except as otherwise provided by the Code and in any case, without prejudice to the application of the mandatory rules of law and of the employment contract (including the collective national and local labour agreements and the employment contract signed with the Company) that are applicable from time to time to the Recipients' relationship with the Company.

This Code shall also apply to third parties with which the Company entertains relations, in accordance with the law or with the agreements signed with such third parties, and within the limits established by this Code.

### 1.4 APPLICABILITY OF THIS CODE OF ETHICS TO EMPLOYEES, INDEPENDENT CONTRACTORS, MANAGERS AND CORPORATE REPRESENTATIVES

Compliance with this Code is an integral part of the contractual obligations of Employees.

Any violation of this Code may constitute a breach of contract and/or a disciplinary offence and, where appropriate, may entitle the Company to seek compensation for any damage caused thereto by such violation, in compliance with the current legislation and collective labour agreements applicable from time to time. Recipients are required to observe the provisions of this Code, both in relations between them (so-called internal relations) and in those with third parties (so-called external relations). More specifically:

- **Corporate Representatives**, as part of their administrative and executive roles, are inspired by the principles of this Code;
- **Managers** base their conduct on the principles established in this Code and shall require compliance therewith by Employees and Independent Contractors. With that end in mind, the conduct of Managers serves as an example to follow. For the purposes of this Code, each Manager is responsible for the workers who are under his management, control and coordination, and each Manager monitors their conduct to prevent violations of this Code. More specifically, Managers shall:
  1. carefully select their Collaborators based on their personal and professional aptitudes, including for the purpose of ensuring compliance with this Code;
  2. inform their Collaborators in a clear, precise and complete manner about the obligations to be fulfilled and more specifically, about the obligation to comply with the rules of law and of this Code;
  3. inform their Collaborators unequivocally that, in addition to disapproving of any and all violations of this Code, the latter may constitute a breach of contract and/or disciplinary offence, in accordance with the applicable laws, and are therefore punishable;
  4. report promptly to their supervisor their observations and any news reported to her/him by his Collaborators about potential or actual violations of this Code by any Employee or Collaborator;
  5. as part of the roles attributed to them, enforce or promote the adoption of appropriate measures to avoid protraction of violations and prevent retaliation against their Collaborators or any other Employee or Independent Contractor.
- **Employees and Independent Contractors** base their conduct on the principles established in this Code and on the communications of their Managers.

To the extent necessary, the Company promotes the application of this Code to the Recipients also by insertion in their respective contracts with the same specific clauses requiring compliance with the provisions of this Code.

### 1.5 APPLICABILITY OF THE CODE OF ETHICS TO THIRD PARTIES

Recipients who, in the performance of their duties, find themselves interacting with third parties (including customers and suppliers) are required to:

- inform the third party in question, as necessary, of the obligations under the Company's Code of Ethics;
- demand compliance with the obligations arising from this Code that directly affect the third party's activity;
- an Employee or Collaborator or Manager has to report any conduct of a third party in violation of this Code or otherwise likely to cause the Recipient to commit violations of this Code.

The Company promotes the application of the fundamental principles set out in this Code on behalf of the third parties with whom Forgital Group entertains relations, also by means of insertion, in the respective contractual models and templates between them and the Company, of special clauses imposing an obligation for those third parties to observe, as part of their own activities and organisation, the provisions of this Code.

### 1.6 DISCIPLINARY SYSTEM AND PROCEDURES FOR APPLYING PENALTIES AND FINES

The observance of the rules of this Code must be considered an essential part of the contractual obligations of Employees. Violations of the rules of Code of Ethics may constitute a breach of the primary obligations of employment or a disciplinary offence, with all the resulting legal consequences and also with regard to the preservation of employment, and may result in the Company demanding compensation for the damages deriving from them.

Compliance with the Code is understood as an essential part of the contractual obligations undertaken by Independent Contractors and/or persons who entertain business ties with the Company. Any violation of the rules of the Code may constitute a breach of the contractual obligations, with all the resulting legal consequences, including as regards the termination of the contract and/or assignment, and may lead to the Company seeking compensation for the damages resulting therefrom.

The Company is committed to applying and imposing penalties in a manner that is consistent, impartial and fair, and proportionately to the given violation of the Code. Such penalties shall also comply with the terms of the perpetrator's employment contract.

# GENERAL ETHICAL PRINCIPLES

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## 2.1 LEGALITY

Respect for the law and codes of conduct adopted by trade associations or national or international bodies (including No-Profit organisations) formally endorsed by the Company, as well as compliance with the provisions of its By-laws, are a basic and unquestionable principle for the Company itself.

As part of their job tasks, Recipients are required to abide by the rules of the legal system (national, transnational or foreign) in which they operate and must in any case refrain from violating the laws, regardless of whether the latter involve imprisonment, fines or administrative sanctions or of other nature.

To that end, Recipients agree to apply all due diligence in order to acquire the necessary knowledge of the laws governing the performance of their job tasks and that are applicable from time to time. If they should have any doubts about how to behave in a given situation, Recipients are responsible for informing the Company thereof, which shall make sure they are given adequate information about the current legislation.

Recipients are also expected to observe, the rules of conduct described in the collective labour agreements applicable to them.

## 2.2 MORALITY

The quality and efficient management of the Company, as well as its reputation and public image, are an invaluable asset and are substantially determined by the conduct of each Recipient. The Company therefore expects the conduct of each Recipient to contribute to the preservation of this invaluable asset and, in particular, of its reputation and public image, both in the workplace and outside its premises. More specifically, in carrying out their job tasks, the conduct of each Recipient must be inspired by a sense of moral integrity, taking into account the various social, economic, political and cultural frameworks of reference and, in particular, by the following values:

- honesty, fairness and good faith, taking full responsibility for the way Recipients perform their job tasks;
- transparency, treating the information available to them promptly and implementing information and communication processes that are based on clarity, thoroughness, accuracy and sharing between workers.

## 2.3 DIGNITY AND EQUALITY

Each Recipient acknowledges and respects the personal dignity, privacy and freedom of expression of every individual. Each Recipient works with women and men of different nationalities, cultures, religions and races. The Company does not tolerate any form of discrimination, harassment or sexual or personal offences, or of any other kind.

## 2.4 PROFESSIONALISM

Recipients carry out their job tasks with the professionalism required by the nature of the tasks and duties performed, making every effort possible to achieve the goals assigned to them and carefully dealing with any research and updating activities.



# SPECIFIC ETHICAL PRINCIPLES AND BEHAVIOURAL STANDARDS

## 3.1 EXTERNAL RELATIONS

### **3.1.1 DONATIONS, BENEFITS OR OTHER BESTOWAL OF ASSETS**

In the performance of their job tasks and in observance of the Company's "Anti-corruption Policy" (see point § 3.5.8), it is forbidden for Recipients to offer or grant third parties (or their spouses, relatives or kin up to the fourth degree) and to accept or receive from third parties, either directly or indirectly and including during holidays, gifts, benefits or other types of assets (also in the form of money, goods or services of various kinds, or in any case advantages that may be objectively appreciable, even if not necessarily in economic terms), except for gifts of modest value, that is, not worth more than Euro 75, that can be considered appropriate to normal relations of business courtesy and in any case, such as not to give the impression to the counterpart or to an unrelated and unbiased third party that such gifts are aimed at obtaining or granting undue advantages or, in other words, such as to give them the impression of being illegal or immoral.

In those countries where it is customary to offer gifts to clients or others, such gifts can be accepted if they are appropriate in nature and of reasonable value, but always respecting the law. However, gifts should never be interpreted as an attempt to obtain special favours or treatment.

In any case, in order to control the flow of such donations, the purchase of such gifts should be centralised and made and approved by the Purchasing Department. In addition to ensuring the traceability of gifts, a copy of the relevant documents (such as waybills, etc.) must be kept on file. It is also prohibited for all the Recipients to accept a promise or receive cash or other assets, for him/herself or for others, to perform or omit acts in violation of the obligations inherent to their corporate position or the obligations of loyalty, also causing damage to the Company.

The Recipient who receives gifts or offers of gifts that are not in compliance with the instructions above shall immediately inform, the Manager, or Company Representative, in order to adopt the appropriate measures.

At any rate, it is prohibited for the Recipient to prompt the offer/granting or the acceptance/receipt of gifts of any kind, even if of low value.

Any Recipient who, in performing his/her job tasks, signs agreements with third parties, must ensure that such agreements do not involve or imply gifts in violation of this Code.

### **3.1.2 RELATIONS WITH CUSTOMERS**

Customers are considered an integral part of the Company's business assets.

The Company entertains business ties with customers who respect its basic principles and, in light of their legal, social, economic and cultural framework of reference, the provisions of this Code.

To consolidate the respect and, hence, the loyalty of the Company's customers, Recipients who are involved in relations with them must behave according to criteria of legality and morality, while respecting the principles of professionalism and integrity.

To that end, Recipients are required to engage in relations with customers with all due skill, precision, caution, wisdom, dedication and efficiency, as well as with honesty, loyalty, openness and transparency.

More specifically, Recipients are expected to:

- follow the procedures established by the Company insofar as pertains to relations with customers;
- provide accurate, precise and exhaustive information to customers about the services offered by the Company.

### 3.1.3 RELATIONS WITH SUPPLIERS

The Company entertains relationships with suppliers who respect its basic principles and, in light of their legal, social, economic and cultural framework of reference, the provisions of this Code. The Company is actively committed to acting fairly and impartially in the process of selecting its suppliers. Recipients must follow the procedures for the selection, qualification, and awarding of contracts to Suppliers and other existing precautionary protocols put in place by the Company. Except for agreements made by virtue of *intuitus personae* (based on the acknowledgement of personal qualities and personal trust) and to be evaluated in practice, Recipients are expected to observe the following rules in all contracted work negotiations, manpower supply agreements and the procurement or supply of goods and services to the Company:

1. each Employee or Collaborator or each Chief or Company Representative must inform of any personal interest in the discharge of their functions, which might lead to a conflict of interest;
2. in case of competing offers, Suppliers must not be favoured or hampered and must, in any case, be compared in a correct and fair manner, by adopting appropriate objectives and transparent evaluation and selection criteria. Consequently, the Recipient must not preclude to bidding suppliers in possession of the qualifications required by the Company from time to time the opportunity of competing for the task assignment or contract award;
3. Recipients are allowed to accept invitations from counterparts only if the reason and scope of those invitations are appropriate and any refusal would be contrary to the duty of common courtesy;
4. no Recipient is allowed to give individuals with whom he/she entertains professional relationships personal orders that would grant them undue advantages. This especially hold true when the Recipient may influence (directly or indirectly) the assignment of a task to a Supplier by the Company.

Contractual relations for the procurement and, in general, supply of goods and/or services must:

1. follow the internal procedures for the selection and management of relations with Suppliers;
2. not preclude any supplier company, holding the required prerequisites, the possibility of competing for any of the Company's supply contract, adopting the selection criteria of objective evaluation, according to the declared and transparent methods;
3. fulfil the contractual conditions stipulated;
4. work in compliance with laws and regulations currently in force;
5. in work and/or services and/or temporary work contracts, it is necessary to verify that the Supplier respects current laws concerning the employment of foreign workers (prohibition to hire foreign workers without a residence permit, prohibition to stipulate contracts with duration beyond the expiration of the resident permit, etc...). This obligation is extended also in the case of subcontracting within the limits in which the relation in question is allowed in the contractual agreements;
6. inform the competent corporate divisions about significant problems that may arise with a Supplier, in order to be able to evaluate the consequences;
7. promptly notify one's supervisor of any Supplier behaviour that appears to contradict the principles and provisions established in this Code.

### 3.1.4 RELATIONS WITH GOVERNMENTS AND PUBLIC INSTITUTIONS

Relations with public institutions and other legal entities governed by public law are kept by the Company's Corporate Representatives who have been formally authorised to that effect or by their delegates, in accordance with the rules of this Code and the Company's By-laws and special laws, especially with regard to principles of transparency and efficiency.

### 3.1.5 RELATIONS WITH BODIES GOVERNED BY PUBLIC LAW

Relations with public administrations, public officials or public service operators, public economic organisations and of other kind, as well as private individuals qualifying as legal entities governed by public law under the legislation in force from time to time (hereinafter referred to collectively as "Bodies governed by public law") are maintained by the Company's Corporate Representatives who have been formally authorised to that effect or by their delegates, in accordance with the rules of this Code and the Company's By-laws and special laws, especially with regard to principles of transparency and efficiency.

During any business negotiation, request or relationship with Bodies governed by Public Law, the Company's staff involved should not attempt to improperly influence the decisions of the other party, including those of officials who are involved in the negotiations and have the power to make decisions on behalf of the Bodies governed by Public Law.

In the specific case of a call for tenders issued by Bodies governed by Public Law, the Company's Corporate Representatives must operate in accordance with the law and proper business practice. The Corporate Representatives' personal conduct must reflect the utmost transparency, clarity, fairness, and impartiality, so as not to induce any subject belonging to Bodies governed by Public Law with whom any type of relations are entertained with biased, false, ambiguous, and misleading interpretations.

If "non-employees" are representing the Company in relations with Bodies governed by Public Law (e.g. Independent Contractors, including external consultants or agents), they are expected to apply the same procedures and directives that apply to Employees.

In any case, in the course of any business negotiation, request or relationship with Bodies governed by Public Law, the persons involved (whether directly or indirectly) should not:

- consider or offer employment and/or business opportunities that may give employees of the Bodies governed by Public Law advantages on a personal level;
- offer or in any case supply gifts that are not of modest value, or favours or sales practices or conduct that are not imbued with total transparency, fairness, and loyalty and, in any case, that are not in compliance with current applicable legislation;
- solicit or obtain confidential information that may compromise the integrity or the reputation of both parties or that in any case violates the equal opportunity policies and the procedures for awarding public contracts activated by the Bodies governed by Public Law;
- take any action aimed at inducing the Bodies governed by Public Law to make or promise to do something in violation of the laws of the legal system under which they operate.

Moreover, the Company is actively committed to complying with ethical or imperative rules aimed at prohibiting the hiring of former Public Administration employees (and their relatives) who have participated personally and actively in business negotiations, or to the endorsement of requests made by the Company to the Public Administration.

If the Company needs to rely on the professional services of employees of the Public Administration as consultants (e.g. physicians who are employees of a Local Health Authority and who, as trainers, instruct the

Company's employees on how to provide a particular service), full compliance with the applicable laws and regulations is required.

If, finally, the Company wants to make donations in cash or in equipment, it must follow a specific procedure whose main steps are described below:

- the Company must prepare and submit a letter to the Public Administration in which it expresses the intention to donate a sum of money or a particular equipment item;
- the Public Administration that is the beneficiary shall follow the laws and regulations applicable for the purposes of making the donation;
- the Company, once it has received formal acceptance of the counterpart, will provide the full details of the donation and will fulfil all legal obligations.

With regard to the supply of materials sold on approval, on consignment or granted on free loan for use, the Company shall prepare a set of internal procedures that, taking into account the applicable laws and regulations, will properly govern such supplies.

### **3.1.6 RELATIONS WITH POLITICAL ORGANISATIONS AND TRADE UNIONS**

Relations with political organisations and trade unions are kept by the Company's Corporate Representatives who have been formally authorised to that effect or by their delegates, in accordance with the rules of this Code and the Company's By-laws and special laws, especially with regard to principles of impartiality and independence.

The Company has the right to contribute to the funding of political parties, committees, public organisations or the campaigns of political candidates, provided that it does so in compliance with the applicable laws and regulations.

### **3.1.7 RELATIONS WITH THE MEDIA**

Relations with the press, television and more generally, with the mass media, both national and foreign, are kept exclusively by the Company's Corporate Representatives who have been formally authorised to that effect or by their delegates.

All external communication must be previously authorised, in accordance with the corporate policies applicable from time to time.

### **3.1.8 COMPETITION**

Each Recipient shall comply with the applicable laws and regulations on fair competition and anti-trust.

In order to prevent a breach of that legislation, Employees and Collaborators and Manager and Company Representatives are required to report any conduct which has as its object or effect the prevention of fair market competition, such as - by way of example but not exhaustive - the establishment of relationships with competitors of the Company to reach agreements on prices for the purchase or sale, for the quantity or other conditions of contracts, agreements or even verbal agreements not to compete with competitors of the Company, agreements for participation in tenders or to the allocation of markets or supply sources (also with reference to customers, programs or production areas), the adoption of measures to influence the resale prices charged by Company retailers, to impose a prohibition on the export or import or otherwise prevent or limit production, markets or market access, investment, technical development or technological progress.

### **3.1.9 CONTRIBUTIONS AND SUBSIDIES**

It is forbidden to use contributions, grants, subsidies or funding received from the State or any other public entity or from the European Communities, even of low value and/or amount, for purposes other than those for which they were specifically granted.

The Company condemns any form of conduct aimed at obtaining any kind of contribution, funding, loan or other provision of the same kind from the State, European Communities or any other public entity, by means of altered or falsified statements and/or documents, or by relying on omitted information or, more generically, through the use of artifices or deception, including by means of a computer or telecommunications system designed to mislead the grantor.

## **3.2 HUMAN RESOURCES**

### **3.2.1 SELECTION, FURTHERING AND TRAINING OF NEW STAFF MEMBERS**

The Company is fully aware that human resources are an indispensable element in the success of any business. The commitment and professionalism of the employees are values and conditions that make a difference in attaining the objectives of Forgital Group. In selecting and managing personnel, the Company adopts criteria of merit, competence and evaluation of their individual skills and potential. It is prohibited to hire people belonging to the Reference List issued by the Public Authority on fighting organised crime, terrorism, and money laundering or who are part of the organisations present in the same.

The evaluation of personnel to be hired is performed by comparing the profiles of candidates with those required by the Company and with its business needs, in a spirit of promoting equal opportunities for all stakeholders. The information requested is closely linked to a review of the professional skills and psychological aptitude required of the candidate, while respecting the candidate's privacy and personal opinions.

The HR Department adopts the appropriate measures to avoid any forms of cronyism during the selection and hiring of new staff members (for example, by ensuring that the person screening candidates has no family ties with the given candidate).

New staff members are hired on the basis of a legally valid employment contract; no form of unlawful employment is tolerated. It is expressly prohibited to hire foreign workers without a residence permit or with a residence permit that is expired, has been revoked, or annulled.

Upon the establishment of employment, each collaborator receives accurate information concerning: characteristic of the divisions and the tasks to be carried out; regulatory and pay system elements, as regulated by the national collective bargaining agreements; precautionary regulations, procedures and protocols to be followed and implemented in order to avoid potential health and safety risks associate with working activities; the general principles and corporate provisions as outlined in this Code. This information is presented to the new staff member so as to ensure that he/she may accept the job assignment based on a real understanding of all that it entails.

The Company values and seeks to foster the development of the skills and capabilities of each Recipient, including through the organisation of professional training and refresher courses. Each Recipient carries out the above-mentioned activities with all due diligence and reports the need for additional or specific activities, in order to allow the Company to take the necessary actions to ensure their organisation and provision.

The personnel management policies are made available to all employees and collaborators by means of business communication media (intranet, corporate notice board, organizing documents and communications from managers).

### **3.2.2 CHILD LABOUR AND YOUNG WORKERS**

Forgital Group operates in compliance with current national and international laws on child labour.

The Company does not practice child labour: indeed, the company hires only workers (both men and women) who are at least 18 years of age (with the exception of the training activities finalised at the youth employment orientation project), considering this a form of exemption from scholastic obligations.

Upon hiring, the following preventive controls are conducted:

- examination of the photographic identity document;
- in the case of personnel belonging to ethnic groups whose age cannot be easily confirmed, the verification is conducted through the organisations in charge of controlling immigration and the instruments they have available.

If however, in spite of the controls described above having been carried out, it should occur that the presence of a minor labourer is confirmed, the Company will act by organising an improvement plan that intervenes by immediately resolving the problem at hand and eliminating the roots of the problem in general, all with a view to guaranteeing the health and protecting the interests of the minor involved.

For a Supplier, one of the the basic conditions for maintaining a contractual relation with Forgital Group is that said Supplier must not use child labour. If a Supplier should refuse to eliminate the presence of minor workers, the same Supplier will be immediately excluded from the list of Forgital Group suppliers.

If the Company should accept to host youthful labourers, of less than 18 years of age, as part of the employment orientation project agreed upon in collaboration with scholastic institutes (by way of example but not limited to, internships or training apprenticeships, or "School – Work" initiatives), this will take place only through the stipulation of a legal contract and safeguarding the worker in terms of work schedules and his/her destination, with particular reference to aspects linked to the protection of health and safety in the workplace. In any case, inclusion in activities that may be considered hazardous for a worker's health or potentially compromise his/her scholastic performance will be denied.

### **3.2.3 EQUAL OPPORTUNITIES**

One of the Company's goals is to create a working environment where there is no racial, sexual, physical, cultural, ideological, moral, religious or any other form of discrimination between staff members and to offer Recipients equal opportunities on equal terms.

All Recipients are expected to cooperate with the aim of achieving that goal.

### **3.2.4 WORKING ENVIRONMENT**

Recipients work together in achieving shared results and strive to create a peaceful, challenging and rewarding working environment.

Recipients are expected to adopt a conduct within the working environment that is based on seriousness, order and decorum.

The Company demands that no form of harassment or intolerance occur between employees in their work relations.



### **3.2.5 SIDE ACTIVITIES**

Recipients are entitled to engage in side activities, as long as they do not jeopardise the efficient performance of their job tasks within the Company.

Recipients must refrain from engaging in activities (including unpaid activities) that clearly conflict with the obligations they have undertaken with respect to the Company.

### **3.2.6 USE OF THE COMPANY'S EQUIPMENT AND FACILITIES**

The Company's assets and, more specifically, the plants/systems and equipment located in the workplace are used for service reasons, in accordance with the applicable legislation and in compliance with internal procedures and directives.

Under no circumstances are employees allowed to use the Company's assets and, more specifically, computer resources and networks for purposes contrary to the mandatory provisions of law, public order or decency, or to commit or encourage the commission of offences or to promote racial hatred, the exaltation of violence or the violation of basic human rights.

No Recipient is allowed to create audio-visual, electronic, printed or photographic recordings or reproductions of business documents, except in cases where such activities fall within the normal performance of the job tasks assigned to him/her.

It is forbidden to engage in any form of conduct involving the alteration of the operation of a computer or telecommunications system or the unauthorised access to data, information or programmes contained therein with the aim of obtaining an illegal profit for the Company to the detriment of the State.

### **3.2.7 ALCOHOL, DRUGS, AND TOBACCO**

It is forbidden to consume any kind of drugs.

It is also forbidden to drink alcohol in the workplace and Recipients whose job involves risks for their own safety and that of others must under all circumstances access the workplace and Company premises with a blood alcohol level of 0 (zero).

It is forbidden to smoke cigarettes on the premises and in the areas where smoking is prohibited.

### **3.2.8 LABOUR RELATIONS WITH EMPLOYEES OF THE PUBLIC ADMINISTRATION**

It is forbidden for Recipients to entertain working relations with employees of the Public Administration or to hire former employees of the Italian or foreign Public Administration or their relatives who participate or have participated personally and actively in business negotiations or who have endorsed requests made by the Company to the Italian or foreign Public Administration, except if the opportunity to establish such relationships has not been preliminarily and adequately assessed by the competent corporate boards, in accordance with the internal procedures in force from time to time within the Company.

## **3.3 CONFLICT OF INTEREST**

In performing their job tasks, Recipients are expected to avoid situations of conflict of interest.

Situations that may be construed as conflicts of interest include but are not limited to:

- accepting corporate offices or carrying out work of any kind at the premises of customers or suppliers;
- acquiring economic and financial interests of the Recipient or his family in activities of Suppliers or Customers (including but not limited to direct or indirect acquisition of qualified shareholdings in the share capital of such entities).

Each situation potentially capable of generating a conflict of interest, or affecting the ability of the Recipient to make decisions in the best interests of the Company, shall be immediately communicated and determines, for the Recipient itself, the obligation to refrain from any act associated with or relating to this situation.

The foregoing is without prejudice to the applicable laws on conflicts of interest involving members of the Board of Directors and Board of Auditors.

## **3.4 SYSTEM OF POWERS AND PROXIES, ACCOUNTING, AND INTERNAL AUDITS**

### **3.4.1 ACCOUNTING RECORDS**

Forgital Group condemns any conduct aimed at altering the accounting and corporate information and data that may be communicated both inside and outside the Company.

The transparency of corporate accounts and the keeping of accounting records in accordance with principles of truth, completeness, clarity, precision and accuracy and compliance with the laws and regulations in force are an essential prerequisite for an efficient accounting control.

Each transaction must be appropriately documented and kept on file, so as to facilitate the accounting record and entry of the transaction, and in order to trace the transaction's origin and identify any responsibilities involved.

Each Recipient is expected to contribute to the correct and timely recording in the corporate accounts of every management-related transaction.

The presentation of suitable supporting documents shall also apply to the Recipients in filling out expense reports for which they are requesting a refund.

It is forbidden to engage in any form of conduct aimed at altering the correctness and accuracy of the data and information contained in the financial statements, board of directors' reports or other communications required by law and intended for the shareholders, the public and those hired to legally audit the corporate accounts.

All Recipients involved in drafting the above-mentioned documents are required to verify, applying all due diligence, the correctness of the data and information that will then be used in preparing the financial statements or Board reports/corporate communications.

All balance sheet entries and items whose calculation and quantification require discretionary evaluations by the Functions/Departments in charge must be supported by legitimate choices and, as a general rule, by appropriate documentation.

### **3.4.2 INTERNAL AUDITS**

The functionality and efficiency of a complex organisation such as that of Forgital Group necessarily calls for the organisation to function properly at all levels. In order to guarantee quality performance, the Company has developed a system of internal audits designed to check and guide the Company's organisational structure.

Each Recipient, within the limits of his/her functions and the job tasks assigned to him/her, is responsible for the definition and proper functioning of the internal auditing system.

### **3.4.3 INTERNAL INFORMATION FLOWS**

The flow of information must be managed according to criteria of truth, accuracy and timeliness. For this purpose, information flows within the Company (colleagues, independent contractors, shareholders) and external information flows (clients, suppliers, institutional stakeholders) should take place applying all due diligence and in accordance with those principles.

The Company is also committed to fulfilling its legal obligations, including those relating to communications to the competent authorities, especially with regard to the supervisory and monitoring authorities, and to cooperating with said authorities in carrying out their duties in accordance with the applicable laws and regulations.

### **3.4.4 PROXIES AND POWERS OF ATTORNEY**

Corporate boards, their members and the Company's Employees, as well as Consultants, Independent Contractors, interns, agents, attorneys, promoters, brokers, trustees and third parties who act on behalf of the Company by virtue of proxies or powers of attorney must do so within the limits of the same.

It is forbidden for persons who are not formally authorised by a proxy or power of attorney to bind the Forgital Group or mislead counterparts into believing they have power to legally bind the Forgital Group as they go about carrying out their assignments or job tasks, outside of the above-mentioned limits.

## 3.5 CORPORATE POLICIES

### 3.5.1 ENVIRONMENTAL PROTECTION

Environmental protection and the preservation of natural resources as well as compliance with environmental legislation are among the Company's highest priorities. The Company contributes to the promotion of scientific and technological development in the appropriate contexts that is aimed at protecting the environment and safeguarding resources.

The Company's objectives in environmental protection also include:

1. adopting measures aimed at limiting and -if possible - eliminating the negative impact of the economic activities on the environment not only when the risk of hazardous or dangerous events is evident (preventive action principle), but also when it is uncertain "if" and "to what extent" the business activity exposes the environment to risks (precaution principle). In the identification and adoption of said measures, the Company also evaluates the impact that the economic activity has or may have on public health, believing that the latter constitutes, for all intents and purposes, a component of environmental protection;
2. favour the adoption of measures aimed at preventing potential harm or detriment to the environment and public health, rather than waiting for when the time comes to repair damage that has already been done;
3. plan an accurate and constant monitoring of the scientific progress and legislative developments in environmental and public health sectors;
4. promote the values of training and sharing of the principles of this Code among all the subjects operating in the Company, whether upper management or workers, so that they embrace the ethical principles established, particularly when decisions must be made and, successively, when the same decisions must be actuated.

Forgital Group, also through its own Environmental Policy and Environmental Management System implemented by the same, hereby agrees to spread and consolidate a culture of prevention and protection of both public health and the environment, by promoting responsible behaviour by all Recipients, so as to prevent wrongdoings in these settings, operating to preserve, above all with preventive actions, the "environmental" resources, intended not only as conventional biotic components (air, water, soil, mineral resources) but also non-biotic components like flora and fauna that characterise an ecosystem or biodiversity (also agriculture). Each Recipient, in the performance of his/her functions and job tasks, should contribute to the achievement of exemplary results in the field of environmental protection.

### 3.5.2 OCCUPATIONAL HEALTH AND SAFETY IN THE WORKPLACE

Each Recipient's responsibility towards his/her co-workers and colleagues requires extreme care to avoid risks of injury. To that end, the technical planning of workplaces, equipment and processes must be guided by the highest level of compliance with the applicable laws and regulations regarding occupational health and safety.

The principles and the fundamental criteria that the Company applies when making decisions of any type and any level concerning health and safety in the workplace can be summarised as follows:

1. reduce risks at the source;
2. eliminate risks and, wherever this is not possible, reduce them to minimum in relation to the knowledge acquired based on technological progress and the development of techniques, selecting the materials and substances that are best suited and less hazardous;

3. evaluate all the risks that cannot be eliminated at the source, identifying the appropriate measures of prevention and protection, both collective and individual;
4. respect human engineering and health protection principles in the workplace, in the working organisation, in the conception of jobs and in the selection of tools and equipment, as well as in the definition of the work and production methods, in order to reduce the effects on health due to monotonous and repetitive tasks;
5. replace whatever is hazardous with what is not dangerous or is less dangerous;
6. plan measures deemed to be opportune in guaranteeing the long-term improvement of safety levels, also through the adoption of codes of conduct and best practices;
7. give priority to collective safety measures over individual safety measures;
8. give workers adequate instructions;
9. guarantee Recipients complete information and training that is updated and specific to the jobs carried out;
10. make compliance with workplace health legislation in force a priority.

Each Recipient must be extremely careful in carrying out his/her job tasks, strictly observing all safety precautions and forms of prevention established by the Company in order to avoid any possible risk for themselves and their co-workers and colleagues.

In view of the above, the Company hereby agrees - therefore - to spread and consolidate a culture oriented toward the safeguarding of health and safety in the workplace, developing an awareness of risks and promoting responsible behaviours among all the Recipients of this Code. Moreover, the Company will strive to preserve, above all with preventive actions, the health and safety of workers. To this view, a widespread internal structure, attentive to the evolution of scenarios of reference and to the resulting change of risks, carries out intervention of both a technical and organisation nature through: (i) the effective implementation of a worker health and safety Management System; (ii) a continuous analysis of risk and criticality of processes and resources to be protected; (iii) the adoption of the best technologies; (iv) control and updating of work methodologies and (v) the carrying out of training and communication interventions.

### 3.5.3 SOCIAL RESPONSIBILITY

The social responsibility of businesses operating both in Italy and abroad is recognised and shared by the Company.

The Company pursues business in respect of its social obligations and seeks to thereby contribute to the enrichment of the economic, intellectual and social heritage of each country and community in which it operates.

### 3.5.4 REPRESSION OF COUNTERFEITING OF CURRENCY AND REVENUE STAMPS, MONEY LAUNDERING, HANDLING OF STOLEN GOODS

It is expressly forbidden for Recipients who carry out transactions on behalf of the Company involving the handling of money to: a) counterfeit and alter currencies; b) spend or introduce in the State counterfeit money, after or without concert; c) spend counterfeit money received in good faith; d) counterfeit revenue stamps and introduce in the State the purchase, possession or circulation of counterfeit revenue stamps; e) use counterfeit or altered revenue stamps; f) counterfeit watermarked paper for the manufacture of public credit documents or revenue stamps; g) manufacture or possess watermark or instruments used for the counterfeiting of coins, revenue stamps or watermarked paper.

Collection of credit and payments must be made by direct bank transfer and/or bank cheques, subject to compliance with the obligations arising from the applicable laws and regulations and, more specifically, from the applicable money laundering laws and regulations. Cash receipts and payments are generally prohibited, with certain exceptions and within the limits established by the Company's internal procedures for the management of cash and cash equivalents, which in any case need to be duly documented and, within the maximum limits established by current laws in force.

The purchase of capital goods is carried out according to criteria and procedures that can ensure the lawful origin of such goods.

### **3.5.5 SUPPRESSION OF TERRORIST CRIMES, SUBVERSION OF THE DEMOCRATIC ORDER AND CROSS-BORDER CRIMES**

The Company condemns the use of its resources to fund or carry out any activity that has terrorist aims or that aims at the subversion of the democratic order.

Recipients, as part of their job tasks, are actively involved in the process of risk prevention, environmental protection and public safety, for themselves, their colleagues and third parties. To that end, Recipients:

1. are required to abide by the freezing measures adopted by the competent authorities to suppress and combat the funding of terrorism and the subversion of the public order;
2. are forbidden to promote, establish, organise, manage or fund, including indirectly, associations whose aim, abroad or in any case against a foreign State, an institution or international bodies, is to exercise acts of violence against persons or property for the purpose of terrorism;
3. are forbidden to give shelter or offer hospitality, transportation vehicles and communication tools to people who participate in subversive associations or for the purpose of terrorism and subversion of the public order.

More specifically, it is forbidden to entertain relations with the persons mentioned in the reference lists issued by the authorities competent in fighting organised crime, terrorism, and money laundering or to dispose of assets and, in particular, of registered goods and property for any reason in order to favour persons included in said reference lists. It is also forbidden to give assets to persons belonging to the Reference Lists or to organisations included in the list.

### **3.5.6 SUPPRESSION OF UNLAWFUL ACTS AGAINST INDIVIDUALS**

It is forbidden to commit or engage in any form of conduct that consciously accepts the risk that crimes be committed against the individual, such as:

- enslavement of a person or similar freedom-depriving conditions;
- trafficking and trade in slaves or persons in conditions similar to slavery;
- sale and purchase of even a single person enslaved;
- persuasion of a child to perform sexual acts in exchange for money (child prostitution);
- forms of conduct that facilitate the exercise of child prostitution or that involve the exploitation of those who trade their own body for a profit;
- exploitation of minors to exhibit or produce pornographic material, as well as the trade, sale, disclosure and transmission, including free of charge, of such material (even if "virtual");
- supply or possession of pornographic material produced through the sexual exploitation of children;

- organisation or promotion of trips whose purpose, although not exclusively, is the fruition of child prostitution activities.

### **3.5.7 PREVENTION AND REPRESSION OF FRAUDULENT ACTIVITIES**

The Company adopts a zero-tolerance policy towards any form of fraudulent activity, including deceit, trickery, sharp practice, or breach of confidence, intentionally perpetrated for profit or to gain some unfair or dishonest advantage. In particular, the following fraudulent behaviors are expressly prohibited, listed here by way of example and not exhaustively:

- Deliberate omission of processing step (not performed);
- Deliberate omission of inspection (NDT) or test (intermediate or final test);
- Deliberate falsification of test results;
- Deliberate falsification of processing records;
- Deliberate misuse or falsification of personnel certification, qualification, authorization (e.g. fraudulent use of stamps, electronic signatures, unauthorized computer access using the credentials of others and/or communication of proper credentials to other users).

### **3.5.8 CORPORATE COMMUNICATIONS AND TRANSACTIONS**

The Company drafts the financial statements and other corporate communications in accordance with the applicable laws and regulations.

The Directors, Division/Unit Managers and Employees are expected to behave in a manner that is correct and transparent as they go about performing their job tasks, especially in connection with any request made by the shareholders, the Board of Auditors, and other corporate boards in the exercise of their respective corporate roles.

It is forbidden for Directors to engage in any form of conduct that is meant to cause harm to the integrity of the Company's assets.

Directors should not carry out any corporate transaction that is likely to cause, even potentially, damage to creditors.

It is forbidden to carry out any act, simulated or fraudulent, that is meant to influence the will of the participants of the shareholders' meeting in order to irregularly form a majority and/or pass a different resolution. During audits and inspections by the competent public authorities, the corporate boards and their members, Employees, Consultants and Independent Contractors and any other third party who may act on behalf of the Company must display a cooperative and helpful attitude towards the inspection and control bodies. It is forbidden to obstruct in any way the functions of public supervisory authorities that come into contact with the Company while carrying out their institutional duties.



### 3.5.9 ANTI-CORRUPTION POLICY

Forgital Group adopts an unwavering approach and absolute prohibition to any form of corruption. To this view, Company activities and actions are always in keeping with the values and principles contained in this Code of Ethics, in the conviction that business and ethics must go hand in hand.

Hence the Company refuses to resort to illegal or in any case dishonest behaviours and, in particular, condemns corrupt practices, in any form whatsoever, implemented in order to reach its own economic objectives. Forgital Group therefore strives to conduct commercial and business dealing in such a way as to avoid being involved in any type of corruption and, in any case, not to facilitate or risk involvement in illegal activities in relations with either Bodies governed by Public Law or Private Parties (see above § 3.1.1 and the following ones).

The company gives its "Anti-corruption Policy" maximum visibility and diffusion among personnel involved through the delivery of this Code of Ethics and ensures that the same is understood and implemented at all levels.

## 3.6 INFORMATION AND CONFIDENTIALITY

### 3.6.1 COMPANY-RELATED INFORMATION

Recipients are in no way authorised to use confidential information concerning the Company that has been acquired or handled by them as part of their relationship with the Company or to disclose it to third parties or disseminate it for purposes other than those for which such information is intended. Confidential information includes all data, knowledge, information, documents, reports, notes, studies, drawings, photographs and any other material concerning the Company and its corporate assets, production methods, commercial and financial transactions and research and development, as well as administrative and judicial proceedings involving the Company.

The obligation of confidentiality shall remain in force even after termination of the Recipient's relationship with the Company, in accordance with the applicable laws and regulations.

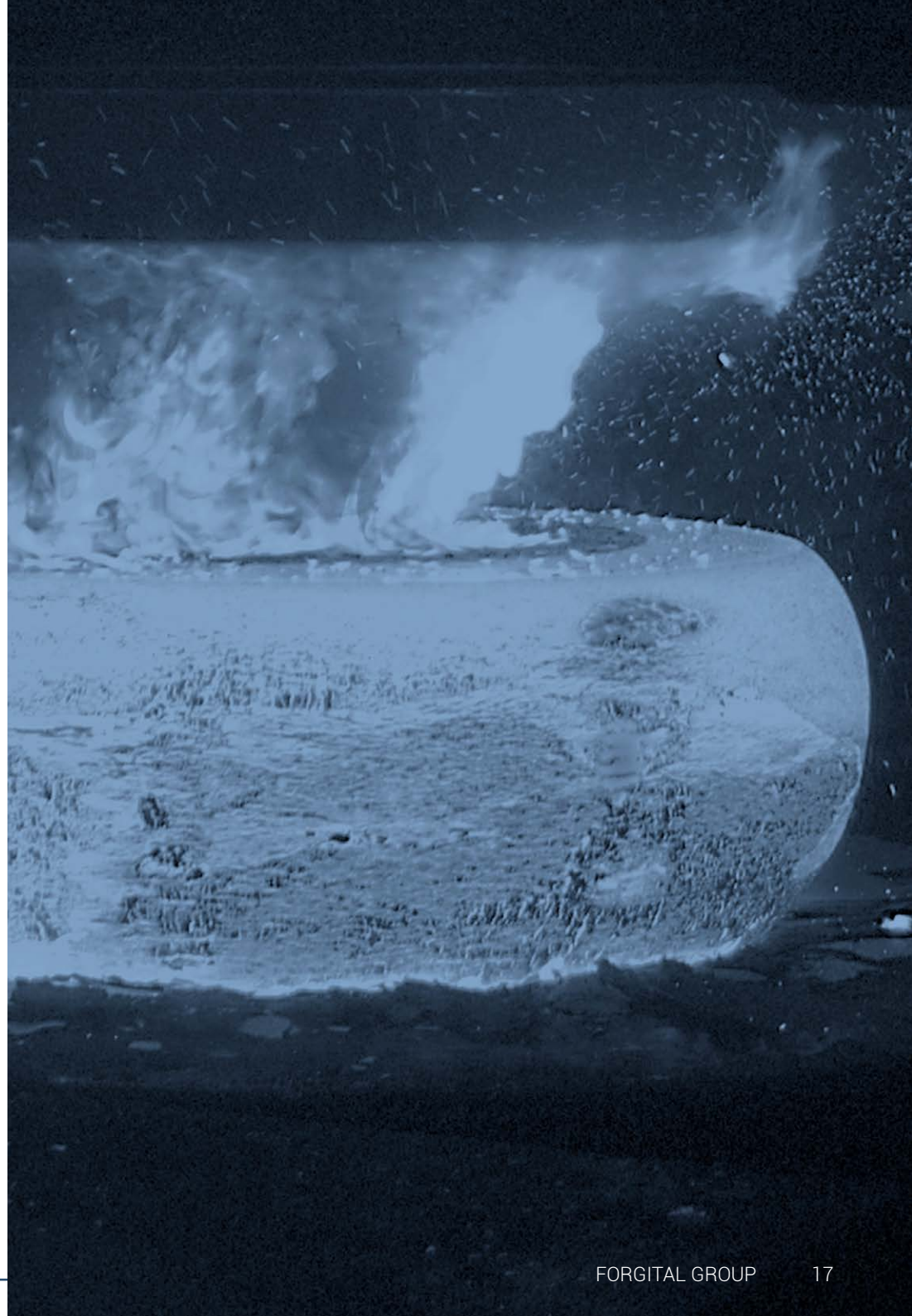
All confidential information must be stored in places that are inaccessible to unauthorised persons.

In any case, Recipients are forbidden to use information or news acquired as part of their office or job for their own profit or for the profit of others.

### 3.6.2 PERSONAL DATA PROTECTION

In carrying out its activities, the Company processes the personal data of Recipients and third parties.

The Company is actively committed to and requires that Recipients commit themselves, as part of their respective roles and job tasks, to ensuring that the personal data processed are treated in accordance with the laws and regulations in force from time to time. To that end, personal data processing is restricted to authorised personnel only and must be carried out in accordance with the Company's internal rules and procedures established in accordance with the applicable laws and regulations.



# ENFORCEMENT AND CONTROL PROVISIONS

## 4.1 OVERVIEW

In order to ensure compliance with the principles laid down in this Code, the Company guarantees:

1. the widest possible dissemination and disclosure of this Code;
2. the interpretation and uniform implementation of this Code;
3. the performance of audits to investigate reports of violations of this Code and the application of penalties for infringements thereof in accordance with the applicable laws and regulations;
4. the prevention and repression of any form of retaliation against those who contribute to the enforcement of this Code;
5. the regular updating of this Code based on the needs that manifest themselves from time to time and also in light of the activities mentioned above.

Without prejudice to the powers assigned to the Company in accordance with law, all Employees are required to implement and cooperate with the implementation of the Code, within the limits of their powers and functions.

## 4.2 CODE OF ETHICS AND REPORTS OF MISCONDUCT OR VIOLATIONS (KNOWN AS "WHISTLEBLOWING")

Forgital GROUP, aware of the importance of activating appropriate reporting channels in order to protect the integrity of the Group and to ensure compliance with the principles of legality, fairness and transparency, also vis-à-vis third parties, in the conduct of its corporate activities, as expressly referred to in this Code of Ethics, has implemented dedicated corporate reporting channels in compliance with Italian Legislative Decree 24/2023, transposing EU Directive 2019/1937 on "whistleblowing".

For this reason, Forgital Group has set up several reporting channels for its employees and contractors. These include a software application that can be accessed by third parties via the Internet. In accordance with Italian Leg. Decree No. 24/2023, the software application guarantees the protection of the identity of the whistleblower, of the person involved in the breach and of any other person mentioned in the report, as well as the confidentiality of the contents of the report and the related documentation.

Reports must be detailed, made in good faith and be based on accurate and consistent facts, also in order to avoid compromising the effectiveness of the instrument provided. Disciplinary action may be taken against anyone who intentionally or through gross negligence makes a report that is later found to be unfounded.

Clear information on the reporting channels activated by Forgital Group, on the procedures to be followed and on the conditions for making such reports (both internal and external), can be found in the " Whistleblowing Policy" published in the dedicated section on the Forgital Group's website at [www.forgital.com](http://www.forgital.com) and is, in any case, available to all employees for consultation on the company intranet.



Via G. Spezzapria, 1  
36010 Velo d'Astico  
località Seghe (VI), Italy

Tel +39 0445 731 313  
Fax +39 0445 731 490

[forgital@forgital.com](mailto:forgital@forgital.com)

