



CODE OF ETHICS

Attachment A to the Organisation, Management and Control
Model pursuant to Legislative Decree 231/2001





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1. PREMISE

Silikoneurope S.r.l. is an Italian company founded in 1993. It is a leading manufacturer of technical articles moulded in liquid and solid silicone rubber (LSR-HTV) and a frontrunner in the design and construction of moulds.

Silikoneurope S.r.l. (from now on "*Silikoneurope*") has adopted the following Code of Ethics (from now on the "Code") to define clearly and transparently the values that guide its actions.

The Code contains the ethical principles and rules of conduct that the management of the company, its employees, consultants, collaborators, agents, suppliers, business partners and all those who operate in the name or on behalf of *Silikoneurope* (from now on the "Recipients") are required to comply with.

The principles and provisions of this Code outline the general obligations of diligence, integrity and loyalty that govern the performance of work duties and conduct in interactions with the community and in the workplace.

Compliance with the Code is an integral part of all employees' contractual obligations, also pursuant to and for the purposes of Article 2104 of the Italian Civil Code (employee diligence). Any violation by Recipients constitutes, depending on the case, a disciplinary offence (punishable in accordance with governing law) and/or a breach of contract. The value and importance of the Code of Ethics are reinforced by the provision of specific liability for Companies following the perpetration of crimes and administrative offences referred to in Legislative Decree N° 231 of 8th June 2001.



2. ETHICAL PRINCIPLES

2.1. Compliance with Laws and Regulations

All activities carried out on behalf of *Silikoneurope* must be conducted in full compliance with the laws and regulations in force in all countries in which it operates.

Each Recipient agrees to keep thoroughly up-to-date with their knowledge of the laws and regulations relevant to the performance of their duties.

2.2. Integrity

In carrying out their duties, each Recipient shall conduct themselves in accordance with moral integrity, transparency, honesty and good faith.

2.3. Dignity and Equality

Each Recipient recognises and respects the personal dignity, privacy and personality rights of every individual, both in internal and external relationships. Each Recipient works with women and men of different nationalities, cultures, religions, sexual orientations and ethnicities. Discrimination, harassment or sexual, personal or other offenses are not tolerated.

In managing hierarchical relationships, *Silikoneurope* requires that authority be exercised equitably, prohibiting any behaviour that could in any way undermine the personal dignity and professionalism of the employee.

Finally, *Silikoneurope* is committed to ensuring respect for privacy, especially with regard to information pertaining to the private sphere and opinions of each of its employees and, more generally, of all those who interact with it.

2.4. Business Ethics

Silikoneurope conducts its business according to principles of efficiency and market openness, preserving the value of fair competition with other operators. Competitive practices involving violence or threats will not be tolerated.

2.5. Professionalism and collaborative spirit

Each Recipient carries out their activities with the professionalism required by the nature of their duties and responsibilities, making every effort to achieve the objectives allotted to them and assuming the responsibilities assigned to them by virtue of their roles. Each Recipient diligently undergoes the necessary in-depth training and attends refresher courses.

Mutual collaboration between those involved in any capacity in the same project or business process is a fundamental principle for *Silikoneurope*. Each Recipient is therefore required, through their conduct, to contribute to the protection of such values, both in the workplace and elsewhere.

2.6. Workplace safety and worker health

Silikoneurope believes that safeguarding the health and safety of its workers is of primary importance. Its goal is not only to comply with specific regulations, but also to consistently improve working conditions.

Silikoneurope therefore complies with current regulations regarding workplace safety and hygiene. Each Recipient must exercise the utmost care in carrying out their activities, strictly observing all established safety and prevention measures to avoid any possible risk to themselves, their collaborators, colleagues and the community in general. In particular, all provisions of the Consolidated Law on Safety (Legislative Decree N° 81 of 9th April 2008) and any other legal provisions applicable to *Silikoneurope* must be observed. Each Recipient must follow the instructions and directives provided by those to whom *Silikoneurope* has delegated the fulfilment of its safety obligations.



To implement its workplace safety policy, Silikoneurope ensures ongoing training and awareness of all personnel regarding safety issues.

2.7. Traceability of activities carried out

Each Recipient must keep adequate documentation of each transaction carried out in order to allow - and be able to proceed at any time towards - the verification of the reasons and characteristics of the transaction during the authorisation, execution, registration and verification phases of the transaction itself.

2.8. Confidentiality and Privacy

All information obtained by Recipients in connection with their employment and collaboration relationships is the property of *Silikoneurope*.

Silikoneurope guarantees, in accordance with legal requirements, the confidentiality of the information in its possession and obliges all Recipients to use it exclusively for purposes related to the exercise of their professional activities.

Following the coming into force of Legislative Decree N° 101 of 10th August 2018, which adapted the Personal Data Protection Code (Legislative Decree N° 196 of 30th June 2003) to the provisions of Regulation (EU) 2016/679 – GDPR, *Silikoneurope* has standardised data management and all related activities, operating in compliance with the afore-mentioned legislation.

2.9. Transparency and completeness of information

The information disseminated by *Silikoneurope* is complete, transparent, understandable and accurate, allowing third parties to make informed decisions regarding their relationships with the company.

2.10. Conflicts of interest

In the execution of all activities, *Silikoneurope* strives to avoid actual or potential conflicts of interest.

Recipients pursue, in carrying out their collaboration, the objectives and general interests of *Silikoneurope*.

Each Recipient is required to inform promptly their superiors or contacts, taking into account the circumstances, of situations or activities in which they may have interests that conflict with those of *Silikoneurope* (or if they are close relatives of people with such interests) and in any other case where there may be significant suspicion that a conflict of interest might be present.

Recipients respect the decisions made by *Silikoneurope* in this regard.

2.11. Relations with the Public Administration and Supervisory Authorities

Silikoneurope bases its relationships with the Public Administration on the principles of transparency and loyal cooperation.

Silikoneurope fulfils its legal obligations towards Public Administration and appropriate authorities, guaranteeing the completeness and integrity of information, the objectivity of assessments and ensuring rapid replies to their requests.

2.12. Environmental protection

Silikoneurope is committed to protecting the environment. To this end, it guides its decisions to ensure compatibility between economic initiatives and environmental needs, not only in compliance with current legislation, but also taking into account the development of scientific research and the best practices in the field.

All environmental permits are obtained regularly, kept up to date and the relative provisions and requirements are systematically implemented.



The waste generated by *Silikoneurope*'s activities, industrial processes and production facilities is monitored, controlled and treated as required by relevant environmental regulations before its final transfer or disposal.

Finally, *Silikoneurope* requires all recipients of the Code of Ethics to respect the environment in which they operate, avoiding actions which could lead to the destruction, dispersion, deterioration, defacement, damage and illicit use of assets, whether private, cultural or landscape-related.

2.13. Tax obligations

Silikoneurope is committed to fulfilling all tax obligations required by current legislation in a complete and transparent manner and to cooperating fully with the tax authorities whenever they wish.

Silikoneurope embraces the principles according to which tax returns and tax payments are not only legally mandatory but also necessary as part of the company's corporate social responsibility.

3. RULES OF CONDUCT

3.1. Relationships with customers, suppliers, consultants and collaborators

Silikoneurope establishes relationships with customers, suppliers, consultants and collaborators exclusively based on criteria of trust, quality, professionalism and compliance.

When developing initiatives with them, we require the following:

- the establishment of relationships solely with parties with a respectable reputation, who participate only in lawful activities, and whose corporate ethical culture is comparable to that of *Silikoneurope*. To this end, Recipients involved in forming relationships with customers, suppliers, consultants and collaborators must first verify the available information about them;
- the assurance that agreements are transparent, steering clear of signing secret pacts or agreements that are contrary to the law.

In particular, regarding the selection of suppliers, consultants and collaborators, *Silikoneurope* ensures that that activity is guided exclusively by objective parameters of quality, convenience, price, capacity and efficiency, enabling a relationship of trust to be established with those parties. *Silikoneurope* will evaluate the choices made, structuring relationships based on full respect for the other party and the protection of its image.

3.2. Relations with institutions and public officials

Silikoneurope's relationships with national, EU, and international public institutions, as well as with public officials or public service representatives or bodies, representatives, agents, officers, members, employees, consultants, those in charge of public functions or services, public institutions, public administrations, public bodies, including economic bodies, public entities or companies, whether local, national or international (in short, Public Officials), must be conducted by each Recipient with the utmost transparency and integrity, avoiding behaviour that could create the impression of improperly influencing the other party's decisions or requesting preferential treatment.

Relations with the above-mentioned individuals are limited to designated and duly authorised functions, in strict compliance with legal and regulatory provisions, and may in no way compromise *Silikoneurope's* integrity and reputation.

To this end, Recipients undertake not to offer or promise, directly or through intermediaries, sums of money or other means of payment to public officials or public service representatives in order to influence their performance of their duties.

These provisions may not be circumvented by resorting to other forms of contributions that, under the guise of professional assignments, consultancy, advertising or otherwise, have the same purposes prohibited above.

Silikoneurope, if it deems appropriate, may support programmes of public entities aimed at achieving benefits for the community, as well as the activities of foundations and associations, always in compliance with applicable regulations and the principles of the Code.

3.3. Human Resources

Each Recipient must exercise the utmost care in carrying out their activities, strictly observing all established safety and prevention measures to avoid any possible risk to themselves and their collaborators and colleagues.

Each Recipient must comply with the instructions and directives provided by those to whom *Silikoneurope* has delegated the fulfilment of safety obligations.



Silikoneurope shall not adopt any practice that could allow or even facilitate, directly or through its suppliers, unlawful or otherwise unfair employment relationships, particularly child labour or forms of slavery, servitude or forced, indentured or otherwise compulsory labour.

Any form of harassment - psychological, physical or sexual - against employees, collaborators, suppliers or visitors is prohibited. Harassment means any form of intimidation or threat (including non-verbal or resulting from multiple intimidating behaviours, whether repeated over time or from different individuals) that hinders the proper performance of one's duties or the abuse of a superior's position of authority. Specifically, any form of mobbing is prohibited, in accordance with the concept developed periodically by prevailing Italian jurisprudence and/or in the country in which *Silikoneurope* operates.

The mere offer of salary increases, other benefits or career advancement as a reward for activities that violate the law, the Code, and internal rules and regulations, even with respect to competence, is prohibited.

Any act of retaliation against those who refuse to comply with, complain about or report the unpleasant events described above is prohibited.

The selection and hiring of personnel must be conducted in strict compliance with procedures and be guided by criteria of transparency, in assessing the requirements of competence and professionalism, individual capabilities and potential.

3.4. Corporate communications and accounting records

Silikoneurope believes that accounting transparency and the maintenance of accounting records according to the principles of truthfulness, completeness, clarity, precision, accuracy and compliance with relevant regulations are the fundamental prerequisites for effective cross-checking.

Adequate supporting documentation must be retained for each transaction, allowing for uncomplicated accounting records, reconstruction of the transaction and identification of any liability.

Similarly, *Silikoneurope* reiterates that the financial statements must provide a truthful, clear and complete representation of the company's economic and financial situation.

3.5. Anti-money laundering

Silikoneurope conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the appropriate Italian and foreign authorities. To this end, it undertakes to refuse to engage in suspicious transactions in terms of fairness and transparency.

Recipients are therefore required to verify in advance the available information about commercial counterparts, suppliers, partners, collaborators and consultants to ascertain their respectability and the legitimacy of their activities before establishing business relationships with those parties.

Recipients may use payment methods, such as credit and debit cards, duly issued by credit institutions and registered to *Silikoneurope*, in a transparent manner that can be reconstructed subsequently through appropriate supporting documentation (vouchers and receipts).

Silikoneurope does not use virtual currencies as an alternative method of collection and payment.

3.6. Use of company equipment, devices and facilities

Recipients are expressly prohibited from using company assets, including IT and network resources, for non-work-related purposes, for purposes contrary to the law, public order or morality or to commit or incite crimes or racial hatred, the glorification of violence or the violation of human and constitutional rights.

Specifically, with regard to company IT tools, it is expressly forbidden to engage in any conduct that could damage, alter, deteriorate or destroy IT or telematic systems, programmes or computer data. Each employee is personally responsible for maintaining the security of the above-mentioned company assets, preventing their fraudulent or improper use, and for preventing the disclosure, even to colleagues, of their user IDs and passwords.



The use of company assets must be exclusively functional to the performance of company activities or for purposes authorised by company managers. It is expressly prohibited to use company IT resources for consultation, access or, in general, for any activity involving sites containing illegal content, especially child pornography.



IMPLEMENTATION OF THE CODE

The task of overseeing the implementation and compliance with this Code is entrusted to the Supervisory Body, which has independent powers of initiative and control and is appointed by *Silikoneurope*'s Board of Directors pursuant to Legislative Decree 231/2001.

Silikoneurope's Supervisory Body, with regard to monitoring compliance with and implementation of the Code of Ethics, has the powers, duties and obligations set forth in the Organisational Model adopted pursuant to the above-mentioned legislation. Without prejudice to compliance with any protections provided by applicable regulations or collective bargaining agreements and without prejudice to legal obligations, the Supervisory Body is entitled to receive reports, requests for clarification, complaints or information regarding potential or actual violations of this Code.

In accordance with the provisions of Legislative Decree n° 231 of 10th March 10, 2023, n° 24, regarding the protection of persons reporting violations of national regulatory provisions (whistle-blowing), reports regarding violations (or attempted violations) of this Code may be made through the following confidential channel:

whistleblowing portal via the link: www.silikoneurope.com

Further details regarding whistleblowing regulations are contained in the "Whistleblowing Procedure/Information," to which express reference is made. That document identifies the recipients, the subject and content of reports, the methods of using the internal channel and the options for using the external channel, the safeguards for the whistle-blower and their responsibilities, applicable sanctions, the reporting process and the archiving of documentation relating to individual reports and produced during the reporting process.

Each Recipient is required to promptly report any behaviour that does not comply with the principles and rules of conduct set forth in this Code, as well as any violation of the Organisational Model adopted by *Silikoneurope* pursuant to Legislative Decree 231/2001.

Such reports may be submitted to the Supervisory Board through the following alternative channels specifically established for this purpose:

e-mails to the address: odv@silikoneurope.it

regular mail to the address: OdV *Silikoneurope* S.r.l., via Savena n. 13, 40050 Loiano (BO).

The information above will be handled with the utmost discretion, in accordance with applicable laws. Consequently the relevant authorities will ensure the confidentiality of the whistle-blower's identity, without prejudice to the requirements related to the fulfilment of the audit obligations and the duties of the Supervisory Body, as well as protecting the whistle-blower from retaliation, unlawful influence, discomfort and discrimination of any kind in the workplace based on the report.



SANCTIONS SYSTEM

3.7. Violations of the Code of Ethics

Compliance with the provisions of this Code must be considered an essential part of the contractual obligations established for *Silikoneurope* employees pursuant to Article 2104 of the Italian Civil Code; for consultants, collaborators and other third parties, compliance with the Code of Ethics is required in the relevant contracts.

3.8. Sanctions

Silikoneurope, through its designated bodies and functions, will impose sanctions proportionate to the respective violations of the Code and in compliance with current provisions governing employment relationships, in accordance with the principles of consistency, proportionality, impartiality and uniformity.

The sanctions for *Silikoneurope* employees will be consistent with the measures indicated in the relevant National Collective Bargaining Agreement, as detailed in the Organisation, Management and Control Model adopted by *Silikoneurope* pursuant to Legislative Decree 231/2001.

Any violation of the provisions of the Code of Ethics by consultants collaborators and other third parties must be promptly reported in writing to the Supervisory Board by anyone who becomes aware of them.

Such violations are sanctioned by the relevant bodies based on internal company rules and as expressly provided for in the pertinent contractual clauses, and in any case with the application of conventional penalties, which may also include automatic termination of the contract (pursuant to Article 1456 of the Italian Civil Code), without prejudice to compensation for damages.