



**ORGANIZATIONAL, MANAGEMENT AND CONTROL
MODEL**

PURSUANT TO LEGISLATIVE DECREE 231/2001

Rev. 9

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**GENERAL PART
APPENDIX 1
CODE OF ETHICS**



CODE OF ETHICS

DATE	APPROVED BY
2024-10-01	ING. FULVIO GIORGI (CEO)

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1. FOREWORD

IMQ S.p.A. (hereinafter, "IMQ" or the "Company") is a Limited Company established in 1999 by the IMQ Association (a non-profit Association), whose corporate purpose is to provide conformity assessment services (laboratory tests, inspections, certifications) on products, materials, processes, facilities, buildings, personnel and management systems of organizations.

In November 2015, the IMQ's sole shareholder, IMQ Association, constituted a holding by contributing the 100% of the shares representing IMQ's equity. The holding, named IMQ Group, a Limited Liability Company, became therefore the Parent Company of the Group IMQ, to which the Company belongs.

To date, therefore, IMQ is 100% owned by the sole shareholder IMQ Group and is subject to its management and coordination, pursuant to art. 2497 et seq. of Civil Code.

Within the activities of the voluntary product certification, the Company issues certificates and grants marks that attest the conformity with national and international "good practice" standards.

In this context, IMQ adheres to multilateral agreements, both at European level (by way of example but not limited to: CCA, HAR, ENEC, LOVAG) and internationally (by way of example but not limited to: IECEE-CB, IECEX); these agreements provide for the mutual recognition of conformity assessment activities conducted by the adhering bodies.

In the mandatory field, the Company also operates as a notified body for several EU Directives / Regulations, including, but not limited to, Gas appliances, EMC (Electromagnetic Compatibility), Machines, Lifts, Medical Devices, Radio Equipment, Construction Products, ATEX (Equipment intended for use in potentially explosive atmospheres).

IMQ also operates as a body authorized to perform - *inter alia* - periodic checks of lift systems, electrical grounding systems and work equipment.

The Company also acts as a Certification Body for the certification of Management Systems of organizations, through the so-called "CSQ System" attesting the conformity to numerous standards including, but not limited to, the following: ISO 9001; ISO 14001; ISO 45001; ISO/IEC 27001, ISO 37001; ISO 50001, ISO 22000, ISO/IEC 20000, ISO 22301, ISO TS 22163, IATF 16949 and EMAS Regulation.

The services offered by IMQ include the certification of professional figures, the conduct of laboratory tests, the execution of calibrations and inspections, the assessment of the security of IT products and systems, the technical-regulatory assistance aimed at obtaining foreign certifications necessary for export, the provision of training courses.

For the supply of most services, the Company is accredited by ACCREDIA, the Italian National Accreditation Body, attesting the compliance with the requirements established for bodies conducting conformity assessment activities.

Furthermore, IMQ has obtained additional accreditations, acknowledgments and qualifications from other national and international bodies to operate in conformity assessment schemes that do not fall within ACCREDIA's competence.

With a view to continuous improvement of its performance in terms of environmental management and health and safety of workers, IMQ has also obtained the following certifications:



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- ISO 45001: 2018 - Occupational health and safety management systems - Requirements with guidance for use;
- ISO 14001:2015 - Environmental management systems - Requirements with guidance for use.

Furthermore, in carrying out its activities, the Company applies, respects and urges compliance with the ethical-behavioral principles expressed in this Code of Ethics, attached to the Organization and Management Model pursuant to Legislative Decree 231/01 (hereinafter, "MOG231") adopted.



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2. PURPOSE AND SCOPE OF APPLICATION

The following functions are attributed to this Code of Ethics:

- ❖ of **legitimacy**: the Code of Ethics sets out the duties and responsibilities of IMQ towards all those who come into contact with the Company and vice versa;
- ❖ **cognitive**: the Code of Ethics makes it possible to recognize unethical behaviors and to indicate the correct procedures for exercising the functions and powers attributed to each one;
- ❖ of **incentive**: the Code of Ethics contributes to the development of an ethical awareness and strengthens the reputation of IMQ and the relationship of trust with those who relate with IMQ itself.

The principles and provisions of this Code of Ethics are addressed to and shall be known by all company representatives, namely directors, auditors, liquidators, managers and employees of IMQ (hereinafter "**Recipients**"), and by part of all those who, for whatever reason, have relations with IMQ (by way of example, but not limited to, consultants, external collaborators - even occasional ones -, suppliers, customers, etc., hereinafter referred to as "**Third Parties**").

Therefore, the Code of Ethics is disseminated to all Recipients and made known to Third Parties: all those (Recipients and Third Parties) who have relations with IMQ, accept the provisions of this Code of Ethics and undertake to respect it.

All Recipients are obliged to:

- know and disclose the principles and values contained in this Code of Ethics by reporting to the Supervisory Body (hereinafter "**OdV**") any significant violations of the Code of Ethics or to their hierarchical superiors or to the Human Resources Department Manager;
- operate according to the ethical-behavioral rules identified by the Code of Ethics both in the exercise of their duties and in relations with the outside world, refraining from conduct contrary to them.

Third parties are obliged to respect the canons of legality, correctness and good faith in compliance with the ethical-behavioral rules of this Code of Ethics.

Each Third Party, upon conclusion or renewal of the contractual relationship with IMQ, declares to have read and accepted the Company's Code of Ethics, accessible to all through publication on the official website www.imq.it.



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3. APPROVAL AND UPDATING OF THE CODE OF ETHICS

This Code of Ethics is approved by the Board of Directors and is subject to review and update by the same.


For any clarification regarding the interpretation or application of the Code of Ethics, all Recipients are invited to contact the Compliance Area (e-mail address: compliance@imqgroup.it).

4. ETHICAL - CONDUCT PRINCIPLES

All the work activities of those who work for IMQ shall be carried out with professional commitment, moral rigor and fairness, also in order to protect the Company image.

All Recipients and Third Parties are required, in carrying out their activities, to comply with the following ethical-behavioral principles:

- ✓ Legality, or compliance with the laws, regulations, provisions in force in the Italian legal system and / or in force in the foreign countries where IMQ operates;
- ✓ Equality, or uniformity of treatment towards Recipients and Third Parties, regardless of differences in age, sex, race, language, religion, political opinions and personal, economic and social conditions;
- ✓ Honesty and Correctness, or respect for the principles of moral integrity, justice and righteousness, refraining from carrying out reprehensible actions, or which, according to the common sense of conscience, conflict with honesty;
- ✓ Impartiality, that is a way of operating and judging objective and equanimous, without favoritism for any of the parties involved, whether public or private, linked with the Recipients or Third Parties by relationships of friendship or enmity, kinship or affinity;
- ✓ Transparency, that is, full traceability and easy identification of each activity in all its steps, so that all relationships are understandable and the respective acts justifiable;
- ✓ Confidentiality, or scrupulous abstention from the disclosure of any corporate data (be it of a technical, logistical, strategic, economic) and personal nature, in compliance with current legislation on privacy;
- ✓ Diligence, or carrying out one's duties assiduously, precisely, attentively and accurately.
- ✓ Promotion of gender equality, i.e. commitment to enhance and protect diversity and equal opportunities, as well as support female empowerment through the supervision of all phases of the person's professional career, the development of a coherent and responsible communication process and prevention of all forms of physical, verbal, digital abuse (harassment) in the workplace;

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- ✓ Commitment to support career continuity of its personnel also returning from maternity leave.

5. ETHICAL - CONDUCT RULES

5.1 *Enhancement and protection of the person*

IMQ undertakes to enhance the abilities and skills of the Recipients, making suitable tools for training, updating and professional growth available to them.

IMQ ensures that the Recipients' selection, management and training processes are based on assessments of professionalism and merit, prohibiting any form of discrimination, direct or indirect, based on sex, language, race, religion, political opinions and personal and social conditions.

The Company guarantees:

- ✓ the payment of salaries in compliance with national or territorial collective agreements stipulated by the most representative trade union organizations at national level, and in any case proportionate with respect to the quantity and quality of the work performed;
- ✓ compliance with the regulations relating to working hours, rest periods, weekly rest periods, compulsory leave, holidays;
- ✓ the commitment to pursue gender equality, enhance and protect diversity and equal opportunities, as well as support female *empowerment* by overseeing all phases of the person's career path (selection and hiring, career management, salary equity, parenting and care, work-life balance), the development of a coherent and responsible communication process and the prevention of all forms of physical, verbal, digital abuse (harassment) in the workplace.


Any type of activity that may involve the exploitation or enslavement of any individual, as well as any form of exploitation of child labor is prohibited.

IMQ condemns the hiring and consequent use of workers from foreign countries with an invalid, revoked, canceled or expired residence permit.

All Recipients are therefore required to comply with local and international legislation as regards human rights, labor and trade union law.

5.2 *Protection of health and safety*

IMQ guarantees the best possible health and safety conditions in the workplace to protect the safety of all Recipients as well as Third Parties who frequent the company premises, conducting its business in compliance with the national and European legislation in force in the sector, recognizing

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the principles of protection of the person and of health and safety in the workplace, a pre-eminent role in the pursuit of the Company *Mission*.

For this purpose, IMQ disseminates and promotes the culture of health and safety among the Recipients and Third Parties, as well as Visitors and contractors, through training and information sessions, defines roles and competences and issues internal procedures for which it demands compliance.

Recipients are required to comply with the rules and obligations regarding prevention and protection at work, setting themselves objectives of excellence that go beyond the mere fulfillment of the law, in full awareness of the value represented by the protection of health, safety and well-being conditions. of the person.

IMQ has also equipped itself, for the purpose of constant improvement and monitoring of health and safety conditions in the workplace, with an occupational health and safety management system certified in accordance with the ISO 45001: 2018 standard.


5.3 Environmental Protection

IMQ implements an eco-responsible philosophy aimed at guaranteeing the best possible conditions of protection and respect for the environment, conducting its business in compliance with the national and European environmental legislation in force, recognizing a role to the principles of protection of the person and the environment preeminent in the pursuit of the Company *Mission*.

IMQ promotes respect for the environment among Recipients and Third Parties, as well as Visitors and contractors, as a primary asset and common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development, preventing all forms of pollution (eg. environmental, acoustic, water, etc.), evaluating the environmental impacts of each production process, limiting the environmental impact of its activities also through the use of means and technologies that do not damage the environment and its biodiversity, as well as defining roles and competences and by issuing internal procedures which it expects to be respected.

The culture of respect for the environment also passes through the appropriate training of the personnel concerned as regards the treatment of all kinds of waste (from differentiation to the treatment of pollutants) and through the constant monitoring of activities with an environmental impact.

Recipients are required to comply with the rules and obligations regarding environmental protection, separate waste collection and recycling of reusable material, setting themselves objectives of excellence that go beyond mere compliance with the law, in full awareness of the value represented by the protection of 'environment.

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IMQ has also equipped itself, for the purpose of improving and constantly monitoring environmental protection, with an environmental management system certified in accordance with the UNI EN ISO 14001: 2015 standard.

5.4 Anti-corruption Policy

IMQ maintains and manages relations with public and private entities in compliance with current legislation, the principles set out in this Code of Ethics and internal procedures.

Contacts with public and private subjects shall be kept with fairness and transparency in order to avoid any behavior aimed, even if only potentially, at influencing their decisions.

Donations, gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices of others or agreeing to that effect or even just to sensitize Third Parties, public or private, in a certain sense.

Only gifts, gratuities, benefits (both direct and indirect), gifts, acts of courtesy and hospitality of modest value made occasionally in the context of normal courtesy relations and in the context of local or international customs are allowed, provided they embrace the double requirement. of tenuousness (ie modest symbolic value) and equality (ie cost parity in the choice of the gift). In any case, gifts, presents and similar items of a value higher than, as an indication, 50 EUR cannot be made.

In any case, any donation made on a personal initiative or by drawing from social funds not previously used for this purpose is prohibited: only the Company has the power to allocate the related finances.

Likewise, it is forbidden for the Recipients to receive (or accept the promise) gifts, gratuities, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing their choices or even just to sensitize them in a certain sense. Exceptions are the so-called customary gifts - meaning with the binomial those gifts that practice requires to be exchanged on the occasion of particular holidays such as, for example, Christmas - and, more generally, gifts of modest value; in any case, gifts, presents and similar items of a value higher than EUR 50 can not be received.

IMQ refrains from making any contribution, direct or indirect, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except for what is admitted and envisaged by the laws and regulations in force. In particular, sponsorships of events, exhibitions, *meetings* and similar initiatives may be carried out only if they comply with the law and the principles of loyalty, correctness, transparency and verifiability, as well as the internal procedures adopted by the Company.

IMQ can recognize contributions and donations in favor of subjects with social, moral, scientific and cultural purposes, refraining if possible personal or corporate conflicts of interest are identified.



5.5 Policy for the fight against organized criminality

IMQ strongly condemns any form of organized crime, even of a mafia nature.

IMQ undertakes to verify the integrity and reliability requirements of commercial counterparties (suppliers, consultants, contractors, etc.) and customers, possibly also verifying the presence of companies in the reference *White list*.

In any case, no commercial relationship will be undertaken or continued with commercial counterparties whose membership or contiguity with criminal organizations is even suspected, or who are suspected of facilitating in any form, even occasional, the activity of criminal organizations.

5.6 Safeguarding of impartiality

IMQ is aware that impartiality represents one of the fundamental principles that shall be guaranteed by a Conformity Assessment Body, in order to develop an objective and fair action, without favoritism for any of the parties involved, whether public or private.

To this end, IMQ undertakes to comply with all the impartiality requirements defined by current legislation, as well as by other Regulations applicable to conformity assessment activities.


In particular, the Company undertakes that all the assessment activities carried out are based on the principles of impartiality, independence and objectivity and that the decisions taken are based on objective evidence of compliance (or non-compliance) and are not influenced by other interests, or by other parties involved.

IMQ also undertakes to make public its impartiality policy and related specific objectives, including the commitment to:

- identify, analyze, evaluate, treat, monitor and continuously document the risks to impartiality and proceed with their elimination or mitigation;
- have a mechanism for safeguarding impartiality, in which balanced representation of the significantly affected parties is guaranteed, without the prevalence of individual interests.

5.7 Conflict of interest

All Recipients and those working for IMQ shall refrain from any activity that could oppose a personal or third party interest to those of the Company or that could interfere and hinder the ability to make, impartially and objectively, decisions in the IMQ's interest.

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No Recipient may carry out activities in favor of competition, assume the qualification of consultant, member of the Board of Directors or of the Board of Statutory Auditors of a competing company or perform their professional activity in favor of competition, unless expressly authorized by the Company itself.

No Recipient may exploit their position to achieve interests that conflict with those of IMQ or use - for their own benefit or that of Third Parties - information acquired in carrying out their work in contrast with the interests of IMQ.

Furthermore, no Recipient may use company assets at work or in their free time or provide services offered by the Company, without being previously authorized by the competent company function or by the hierarchical Manager; no one may carry out, during their working hours, other activities that are not congruent with their duties or organizational responsibilities, nor use company assets other than the aforementioned tasks.

5.8 Data protection

Personal data means any information that identifies or makes identifiable, directly or indirectly, a natural person or other information relating to his characteristics, habits, lifestyle, personal relationships, state of health, economic situation, etc.

IMQ protects the personal data of all Recipients and all those who come into contact with it, avoiding any improper use of such information and respecting the regulatory provisions on privacy (Regulation (EU) 2016/679 and Legislative Decree 196/2003 and subsequent amendments) and those required by internal company procedures.

IMQ informs the interested parties about the purposes and methods of the processing, ensuring that the same takes place only for the purposes - determined, explicit and legitimate - indicated in full compliance with the criteria of lawfulness and correctness of the processing.

Therefore:

- in compliance with the principle of relevance and non-excess of the data processed, IMQ guarantees the collection and processing of data strictly necessary for the stated purpose ("data minimization");
- in compliance with the principle of confidentiality and data security, the Company implements adequate technical and organizational measures to guarantee a level of security appropriate to the risk.

In any case, the data of which IMQ becomes aware are kept only for the period of time strictly necessary for the purposes for which they were collected and / or subsequently processed and are kept by means of specific security measures suitable to minimize the risk of destruction, loss, unauthorized access and treatment that is not permitted or does not comply with the purposes of the collection.



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In particular, the personal data being processed are kept and controlled, also in relation to the knowledge acquired on the basis of technical progress, the nature of the data and the specific characteristics of the processing, in order to minimize the risks of destruction or loss. (even accidental) of the data itself, of unauthorized access or processing that is not permitted or does not comply with the purposes of the collection.

The Company protects the personal data of those who work in its favor, avoiding any improper use of such information in compliance with the regulatory provisions on privacy and internal procedures.

5.9 Internal relations

All Recipients are required to cooperate fully with each other, in order to pursue the corporate *Mission*.

All Recipients are required to exercise the powers conferred on them in a balanced, fair, prudent and non-discriminatory manner in compliance with their respective duties.

Top management shall not abuse their position and shall refrain from engaging in any vexatious and / or intimidating conduct towards employees.

Employees, for their part, are required to comply with the directives given to them by senior managers and to diligently execute them, provided that the orders themselves are not clearly in contrast with the laws in force and / or with the principles of this Code.


They shall also report any situations - which they might encounter - in contrast with the laws in force and / or with the principles of this Code.

5.10 Relations with customers

IMQ's activity is oriented towards the satisfaction and protection of customers, both by ensuring a rapid response to any complaints, and by acknowledging all their suggestions, aimed at promoting an improvement in the quality of the commercial offer.

Approaching customers can only and exclusively take place through the advertising channels approved and promoted by IMQ. In particular:

- all ambiguous, incorrect, deceptive or unfair practices, regardless of whether they violate specific laws and regulations, be they national or community or international;
- any form of customer hoarding that violates competition law and does not comply with the laws and regulations of the sector;
- any other surreptitious form of approaching customers that takes the form of illegal acts or acts contrary to the Code of Ethics,

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are forbidden.

Relations with customers shall be based on compliance with the principles of this Code of Ethics and all applicable laws and regulations.

5.11 *Relations with suppliers*

The selection of suppliers shall take place according to the principles of this Code of Ethics and internal procedures, in compliance with the hierarchical structure and using the written form.

The selection of suppliers shall take place exclusively on the basis of objective parameters such as quality, convenience, price, capacity, efficiency.

5.12 *Infra-group and service relations*

Intra-group relations mean all the factual and contractual relations between IMQ and the parent company IMQ Group S.r.l. and any of its subsidiaries and / or associates.

All intra-group relations shall be managed in full compliance with the Civil Code, the national and supranational legislation on the subject, the regulations in force, as well as in compliance with the principles set out in this Code of Ethics.

On the issue date of this Code of Ethics, the Company benefits from a series of services by virtue of a specific *service* contract stipulated with IMQ Group S.r.l.


The management of the *service* relationships shall take place in compliance with the contractual provisions, the principles laid down in the matter by the Civil Code , the criteria imposed by the laws and regulations in force, as well as in compliance with the principles set out in this Code of Ethics.

In order to ensure compliance with the provisions of this Code of Ethics, it has been envisaged to insert a specific contractual clause in the *service* contracts with IMQ Group Srl and in the various agreements between IMQ and the other companies of the Group IMQ, of IMQ Group S.r.l. and of the other companies of the Group IMQ, who have any commercial relations with the Company, in strict and punctual compliance with the principles contained in this Code of Ethics.

Relations between the companies shall be based on the principles of transparency and fairness, cohesion and opportunity, as implemented through compliance with the prevention protocols that integrate the MOG231.

IMQ and IMQ Group S.r.l.:

- exchange the information necessary for the implementation of the Group strategies and for the optimal implementation of the respective MOG231;

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- comply with the Group's strategy in terms of intra-company and extra-corporate relations, conforming to the Group's behavioral standards;
- mutually report any anomalies in the functioning of the MOG231 prepared, in order to perfect it and make it adhere to the principles of this Code of Ethics.

Again from a Group perspective, IMQ has adopted a MOG231 mirroring and similar to that adopted by the parent company IMQ Group S.r.l.

In order to ensure more effective supervision of compliance with the MOG231 and this Code of Ethics, the SB of IMQ collaborates and exchanges information with the appointed SBs of the other Group companies.

Relations between the SBs are governed by the specific procedure of the MOG231 (procedure 1 - Management of Relations with the Supervisory Body).

5.13 Relations with Public Institutions

The relationships that IMQ maintains with public officials or with persons in charge of a public service - who operate on behalf of the central and peripheral P.A., or of legislative bodies, European institutions, international public organizations and any foreign state - with Accreditation bodies, with the Ministries, with the European and international Standardization Committees and Organizations, with the Judiciary, with the Public Supervisory Authorities and with other independent Authorities, as well as with private partners concessionaires of a public service, shall be undertaken and managed in the absolute and rigorous compliance with the laws and regulations in force, the principles set out in this Code of Ethics and the internal procedures and protocols.

In particular, the Recipients are required to actively and fully cooperate with the aforementioned Authorities, avoiding any behavior aimed at hindering the exercise of public functions or omitting the necessary communications.

With particular reference to operations relating to tenders, contracts, authorizations, licenses, concessions, requests and / or management and use of public funding (regional, national and / or community), management of orders, relations with supervisory authorities or other independent authorities, social security institutions, bodies responsible for the collection of taxes, bodies for bankruptcy, civil, criminal or administrative procedures and the like, any contact with third parties shall take place by the corporate bodies and subjects expressly delegated to do so, in line with corporate strategies and in writing. The subjects delegated to carry out the operations listed above shall report to the delegating subject in accordance with the law or the internal organizational procedures.

Except as specified below, donations, gratuities, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices of the P.A. (and comparable subjects mentioned above) or even just to sensitize the members are prohibited.



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It is agreed that the so-called free gifts do not fall under this prohibition - meaning with the combination those gifts that the practice requires to be exchanged on the occasion of particular holidays such as, for example, Christmas - and, more generally, gifts of modest value; in any case, gifts, presents and similar items of a value higher than EUR 50, as an indication, cannot be made.

In any case, any gift made on a personal initiative or by drawing from own or social funds but not previously used for this purpose is prohibited: only the Company has the power to decide the corporate policy on the subject of gifts and allocate the related finances; it follows an essential duty of documentation of the expenses made and transparent reporting of the same.

5.14 *Donations, charities and sponsorships*

IMQ can recognize donations, contributions and donations without compensation in favor of subjects with social, moral, scientific and cultural purposes, in compliance with the system of thresholds, authorizations and technical checks provided for by the company procedures and / or by the MOG231, refraining if they are deemed possible conflicts of interest, be they personal or corporate.

In order to avoid possible conflicts of interest and ensure standard conduct, these contributions shall be adequately documented in a truthful and transparent way, as well as the purpose, the recipient and the feedback on the actual receipt of the charity itself.

IMQ refrains from making any contribution, direct or indirect, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except for what is admitted and envisaged by the laws and regulations in force. In particular, sponsorships of events, exhibitions, *meetings* and similar initiatives may be carried out only if they comply with the law and the principles of loyalty, correctness, transparency and verifiability, as well as the internal procedures adopted by the Company.

5.15 *Transparency of documentation*

IMQ undertakes to draw up and disseminate company documents in compliance with the principles of truthfulness, completeness and transparency.

Any behavior aimed at preventing or hindering the performance of all control or revision activities of company documentation is prohibited.

IMQ undertakes to keep the documentation relating to each operation carried out (corporate, accounting, etc.), in order to allow the operation to be reconstructed at any time and the identification of the subjects who authorized and performed it.



5.16 *Anti-money laundering and accounting transparency*

IMQ undertakes to respect and expects all Recipients to comply with the anti-money laundering legislation; in particular, any form of use of money, goods or benefits of illicit origin is prohibited.

All Recipients are required to verify information, including financial information, relating to commercial counterparties and suppliers, in order to ascertain their respectability and the legitimacy of their business before establishing business relationships with these, in order to avoid any implication. in operations suitable, even potentially, to favor the laundering of money deriving from illegal or criminal activities.

All Recipients involved in accounting operations are required to make truthful and timely registrations. Each accounting operation shall be adequately recorded and documented in order to allow verification of the decision, authorization and execution processes.

Any behavior aimed at preventing or hindering the performance of all control or auditing activities is prohibited.


5.17 *Protection of Free Competition*

The Company recognizes fair competition as a fundamental element for its growth, for constant business improvement and for the protection of its reputation.

The Company expects compliance with the regulatory rules of the market, avoiding and prohibiting unfair practices such as to distort regular commercial competition.

IMQ ensures fair conduct based on good faith, censoring - by way of example and not limited to:

- boycott practices, underselling, transfer of employees, theft and use of others business secrets, unlawful interference with others' distribution systems, parasitic competition as well as any other agreement with competitors aimed at establishing or controlling prices or sales policies or to interfere in the free distribution of products;
- all ambiguous, incorrect, deceptive or unfair practices, regardless of whether they violate the current legislation on the matter;
- any form of hoarding, approaching customers and concluding business in violation of sector regulations and this Code of Ethics.

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5.18 *Protection of Intellectual Property*

All ideas, data, information generated by the Company, any patents, trademarks and *copyrights* owned by IMQ are protected in compliance with current legislation.

All those who work in any capacity on behalf of IMQ are required to maintain the utmost confidentiality and secrecy and not to disclose or unduly request information on documents, know-how, research projects, company operations and, in general, on all information learned. by reason of their job function.

On the other hand, the Company undertakes to respect (and bind the Recipients of this Code of Ethics in turn to respect) the intellectual property of all Third Parties that may have relations with it.

5.19 *Management of relations with the mass media and confidential information*

IMQ undertakes to ensure that communications to the outside take place in compliance with the principles of truth, correctness and transparency.

All those who work in any capacity on behalf of IMQ are required to maintain the utmost confidentiality and not to disclose or unduly request information on documents, know-how, research projects, company operations and, in general, on all information learned. by reason of their job function.

The Company undertakes to manage relations with the press, the means of communication and information and, more generally, external interlocutors, in compliance with the internal operating procedures and identifying subjects authorized for this purpose.

Any request for news from the mass media received by IMQ personnel shall be communicated to the company / function expressly assigned to it, who will take care, where necessary, to disclose non-confidential information.

Any form of investment, direct or through intermediaries, which finds its source in confidential company news is strictly prohibited ¹.

¹Confidential or secret information constitutes those subject to specific laws or regulations (because they pertain, for example, to national security, military sectors, inventions, scientific discoveries, protected technologies, new industrial applications), as well as those contractually secreted relating, by way of example , technical information relating to products, plants or procedures, inventions, scientific discoveries, protected technologies and new industrial applications, marketing strategies and services. Furthermore, all information learned in carrying out the work activity whose dissemination and use could cause danger or damage to the company and / or undue gain to the employee or third parties are also reserved.



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In any case, it cannot be adopted *insider trading* behaviors or the use of data, news or business opportunities learned in the exercise of the assignment or other behaviors that have as a consequence the depletion of company assets or are aimed at causing undue personal or third party advantages.

The principles already expressed in the part dedicated to the conflict of interest and in the part dedicated to the protection of intellectual property are referred to as far as their competence is concerned.

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6. VIOLATIONS OF THE CODE OF ETHICS AND REPORTS

The violation of the Code of Ethics constitutes a violation of the company provisions and, as such, entails the application of disciplinary sanctions against the transgressor on the basis of the provisions of the relevant National Collective Labor Agreement (employees and managers) or of the sanctions established by the Civil Code and by the contractual provisions (directors, auditors, consultants, Third Parties).

By way of example and not limited to, the violation of the Code of Ethics may involve:

- for individuals in top positions (Board of Directors, Business Unit Directors) and supervisory bodies (Board of Statutory Auditors, Auditors): dismissal for just cause, exercise of the liability action;
- for employees and managers: application of the sanctions provided for by the relevant national collective bargaining agreement;
- for Third Parties: termination of the contractual relationship for just cause, exercise of the action for damages.

If the violation of the Code of Ethics by the Recipients constitutes a complete violation of the MOG231, the disciplinary system provided for therein is applied.

IMQ ensures all Recipients the availability of communication channels to report any violations of the Code of Ethics.

In this regard, IMQ has adopted a reporting system (*whistleblowing*) that can be used whenever a risk is identified that could damage customers, employees, shareholders, the public or the Company's reputation. This reporting system guarantees the confidentiality of the identity of the whistleblower in the management of the report by prohibiting retaliation or discriminatory acts, direct or indirect, against the whistleblower for reasons connected, directly or indirectly, to the report. The system also provides for sanctions against those who violate the protection measures of the whistleblower, as well as those who make reports with willful misconduct or gross negligence that turn out to be unfounded. The reporting process and the *whistleblowing* procedure are published, for Employees, on the company intranet and, for all other subjects, on the website www.imq.it via the following link: www.imq.it/whistleblowing.

Reports of any form of physical, verbal, digital abuse (harassment) in the workplace shall instead be reported through the appropriate section on the company intranet which allows anonymous communication by employees.