CODE OF CONDUCT

Mac Tubi S.p.A.

Revision	Date	Approved by
2	30/07/2026	General Management

0. Introduction

0.1 Purpose and scope

This Code of Conduct is an official document approved by the General Management of Mac Tubi S.p.A. It sets out the ethical, social and environmental commitments and responsibilities in the conduct of the company's business and activities, with which every recipient must comply in the performance of their duties.

The Code applies to mangers, employees, collaborators and agents. Mac Tubi S.p.A. also requires its suppliers, customers and all appointed professionals to adopt conduct inspired by the same rules of behaviour, and extends this requirement to all parties involved along the supply chain.

The Code is communicated to employees by making it available on the company server and website; it is communicated to suppliers and business partners when the contractual relationship is established, and made available on the company website to customers and other stakeholders.

0.2 International principles and regulatory references

In addition to the national and European legislation in force, Mac Tubi S.p.A. aligns the principles of this Code with the following international references on human rights, labour, the environment and business ethics:

- the fundamental Conventions of the International Labour Organization (ILO), including C138 on the minimum age for admission to employment and C182 on the worst forms of child labour;
- the United Nations Universal Declaration of Human Rights;
- the OECD Guidelines for Multinational Enterprises;
- the principles of the United Nations Global Compact;
- the standards required by its customers regarding supply chain sustainability, whose substantive content on human rights, labour and the environment is incorporated into this Code.

0.3 Dissemination, training and updating

Mac Tubi S.p.A. ensures that the Code is disseminated to all recipients and organises periodic training on its contents, tailored to the role and responsibilities of each recipient. The Code is reviewed periodically, at least every two years or whenever there are significant regulatory changes, significant changes to the company organisation, or reasoned requests from customers or other stakeholders.

1. Internal relations

1.1 General rules

Every employee is required to comply with the provisions issued by the competent company functions. The company undertakes to promote awareness of these provisions through all means of communication. Relations between colleagues must be based on mutual respect, transparency, fairness and good faith, without discrimination on the grounds of sex, nationality, religion, sexual orientation, political opinions, disability, age, customs or practices, in order to build a climate of professional collaboration, fostered by participation and responsibility, that enables policies for the growth and development of skills and

competences. Relations between different hierarchical levels must be based on principles of appropriate evaluation of performance and conduct.

The Company respects the right of all employees to form or join trade unions and to engage in collective bargaining, ensuring that such persons are not discriminated against. The Company ensures that wages comply with the minimum standards set by law or by collective agreements, including any pay obligations relating to overtime.

The Company undertakes not to maintain financial, economic or commercial relations with parties who in any way violate the rules on the protection against child labour, the prohibition of forced labour and the protection of women.

1.2 Recruitment

Candidates are assessed on the basis of how closely their profiles match those required by the company's needs, while respecting equal opportunities for all persons concerned.

The information requested is strictly related to verifying the aspects set out in the professional and aptitude profile, while respecting the candidate's privacy and opinions.

Employees are prohibited from accepting or soliciting promises, payments of money, goods, benefits, pressure or services of any kind that may be aimed at promoting the hiring, transfer or promotion of an employee.

1.3 Occupational health and safety

Mac Tubi S.p.A. guarantees the protection of occupational health and safety at least within the framework of the applicable national provisions and laws, and pursues the continuous improvement of working conditions.

Working hours, rest periods and the use of overtime must comply, as a minimum, with the limits set by applicable law and collective agreements.

1.4 Prohibition of child labour and forced labour

The use of child labour at any stage of production, trade or company activities is prohibited. Child labour means the employment of persons below the minimum age established by applicable law or, if higher, the age of completion of compulsory schooling, in accordance with ILO Convention C138.

Any use of compulsory or forced labour, in whatever form, is prohibited. Subject to an appropriate notice period, workers must be completely free to terminate their employment. Workers may not be required to hand over their personal documents (e.g. identity card, passport, work or residence permit) as a precondition for establishing or continuing the employment relationship.

1.5 Freedom of association and collective bargaining

Workers must be able to communicate openly with company management about working conditions, without fear of disadvantage or retaliation of any kind. They have the right to join a trade union, to form or stand for election to a workers' representative body (e.g. RSU/RLS) and, more generally, to associate freely to protect their interests.

1.6 Conflicts of interest

Every employee is required to behave fairly towards the company in order to avoid potential or actual conflicts of interest that could harm the Company. This requirement also extends to activities carried out by employees outside working hours, where these could give rise to a conflict. The employment of spouses or relatives is not considered to conflict with the provisions of the Code, provided that no provisions of the Code are breached.

1.7 Confidential information

Confidential information (data, documents, know-how, etc.) relating to the Company or its activities may not be regarded as public knowledge; such information must therefore be made available only to employees or other specifically authorised persons, within the limits required for the performance of their duties. Persons entrusted with such information are required to exercise discretion and preserve its confidentiality, avoiding disclosure to third parties.

1.8 Company property

All tangible assets owned or possessed by the company, or over which it holds rights of use, and which are made available to employees for carrying out their work within the company, constitute company assets and as such:

- may be used by an employee only if expressly authorised;
- must be used properly;
- must be properly safeguarded to prevent theft, loss, etc.

Unless expressly authorised, the company's tangible assets must be used exclusively for work purposes and not for personal ones, and it is strictly forbidden to use them to obtain any benefit or profit for oneself or for third parties, or for recreational and non-professional purposes, especially where these may damage the reputation and ethics of the company and its employees. All documentation generated within the Company, and all information or other material, is and remains the exclusive property of the Company.

1.9 Privacy protection

The Company handles a significant amount of personal data and confidential information, which it undertakes to process in compliance with all applicable laws (including EU Regulation 2016/679 – GDPR) and with best practice on confidentiality and privacy. The Company respects the individual right to the protection of the personal data of data subjects, whether employees, customers or suppliers, providing them with complete and up-to-date information on the processing of data acquired, or to be acquired and/or processed, in the course of its activities, processing personal data in accordance with the conditions of EU Regulation 2016/679 and requesting consent where it constitutes the legal basis for processing. The Company guarantees a high level of security in the selection and use of its IT systems used to process personal data and confidential information.

1.10 Prohibition of money laundering

Recipients of the Code of Conduct must not carry out, or be involved in, activities that could entail money laundering, meaning the acceptance or handling of proceeds deriving from criminal activities. The responsible company officer is required to check the information available on business counterparties and suppliers in order to ascertain their good standing and the legitimacy of their activities before establishing any relationship. The Company complies with anti-money laundering legislation.

1.11 Prohibition of retaliation and reporting (whistleblowing)

General Management does not tolerate any kind of retaliation against persons who, in good faith, report concerns about a breach of the law or of this Code of Conduct. Making reports known to be false or misleading is prohibited.

Mac Tubi encourages employees, collaborators and other stakeholders to report in good faith any conduct contrary to this Code of Conduct or to applicable legislation. Reports may be addressed to General Management, which handles them confidentially and without retaliation against the person making the report.

2. External relations

2.1 Social context and relations with public bodies

Relations with the local area where the Mac Tubi S.p.A. plant is located are based on compliance with applicable provisions and on the fullest cooperation; the Company is open to the initiatives and requests of local communities, in order to establish a climate of mutual trust and cooperation. Relations with Public Administrations may be handled exclusively by the company functions expressly delegated and/or appointed for this purpose, and must be based on transparency and ethics and be as traceable and clear as possible.

Whenever any negotiation, request or relationship with the Public Administration is in progress, the personnel in charge must not attempt to improperly influence the decisions of the counterparty, including those of officials who negotiate or make decisions on behalf of the Public Administration.

Where a consultant or other third party is engaged to represent Mac Tubi S.p.A., the same directives that apply to company employees must be applied to such parties and their personnel.

2.2 Bribery and extortion

Mac Tubi S.p.A. undertakes to implement all measures necessary to prevent and avoid active or passive bribery and extortion.

It is not permitted to pay sums of money or engage in any other form of bribery in order to obtain direct or indirect advantages for the Company.

It is forbidden to accept or offer gifts, favours or hospitality that exceed normal business courtesy or that could be interpreted as intended to improperly influence a decision; any doubts in this regard must be referred in advance to one's manager.

2.3 Administrative management

All administrative, financial and tax management activities must be carried out in compliance with applicable regulations, by suitably trained employees and on the basis of directives issued by senior management.

2.4 Customers

Customers and their needs are the focus of the Company, which is constantly committed to excellence in product, service and quality. Employees must strive for maximum customer satisfaction, in full compliance with the principles of the fullest cooperation, availability, professionalism, transparency, confidentiality and privacy protection.

The Company undertakes to guarantee adequate quality and safety standards for its products and services and to monitor their performance periodically, respecting market and competition rules and all relevant legal provisions.

Negotiations with Customers must be conducted according to principles of mutual commercial fairness, good faith and compliance with the agreements entered into.

2.5 Suppliers and supply chain

Relations with Suppliers aim to obtain the best performance through free negotiations, conducted transparently and on the basis of competitiveness, impartiality, fairness, objectivity and integrity. Any pressure of any kind in the selection of Suppliers must be firmly rejected, and employees of any function or level are not permitted to obtain any personal advantage from the selection of a supplier.

Mac Tubi S.p.A. requires all Suppliers, and through them their sub-suppliers along the entire supply chain, to comply at least with the following standards, aligned with those required by its customers regarding sustainability:

- compliance with applicable legislation and with internationally recognised human and workers' rights;
- the absolute prohibition of child labour and of forced or compulsory labour, at every stage of production and trade;
- payment of wages and benefits in line with legal or contractual minimums, and compliance with the working hours set by applicable legislation;
- freedom of association and the right to collective bargaining for their workers;
- the absence of any form of discrimination against their employees;
- compliance with the environmental standards applicable to their market segment, as set out in Section 3 below;
- the adoption of a level of anti-corruption integrity consistent with the principles of this Code.

To this end, the Company reserves the right to request from Suppliers a periodic self-declaration or self-assessment of compliance and, where necessary, to carry out document reviews or on-site audits, including through third parties. Should the Company become aware that a supplier has engaged in conduct not in line with this Code, it is entitled to require the adoption of a corrective action plan within a defined time frame and, if the required measures are not adopted or are inadequate, to suspend or terminate the existing relationship, precluding any future opportunities for collaboration.

In any case, products and/or services purchased must be justified by concrete business needs, reasoned and supported by internal evidence. The Company verifies the quality, appropriateness and timeliness of the service received and the fulfilment of all obligations undertaken by the supplier.

3. Environmental standards

3.1 Environmental responsibility

Mac Tubi S.p.A. promotes the development and dissemination of environmentally friendly technologies and carefully manages the environmental issues and risks arising from its industrial activities.

3.2 Environmentally friendly production and products

At all stages of production, Mac Tubi S.p.A. adopts measures aimed at preventing and reducing the environmental impacts associated with its activities, taking into account what is technically and economically feasible.

Mac Tubi requires its suppliers to ensure that the products, materials and substances used comply with applicable environmental legislation and the standards of the relevant sector. Chemicals and materials that pose a hazard to the environment if released must be inventoried, with appropriate procedures for their safe and environmentally sound handling, transport, storage, reuse and disposal.

4. Governance, oversight and disciplinary system

4.1 Code Officer

General Management appoints an internal contact person responsible for the dissemination, monitoring and updating of this Code, as well as for receiving and handling the reports referred to in section 1.11.

The contact person is Giuseppe Maghei, who can be reached at the telephone numbers 0521525413 and 3357717115 and, for written reports, at the certified email (PEC) address: giuseppe.maghei@ingpec.eu

4.2 Disciplinary system

Any breach of the principles of this Code by employees, collaborators or directors constitutes a failure to fulfil the obligations arising from the employment or collaboration relationship, with all legal consequences, including the disciplinary action provided for by the applicable National Collective Labour Agreement (CCNL). Breaches by suppliers or business partners are governed by contract and may lead to the consequences set out in section 2.5.

4.3 Updating and review

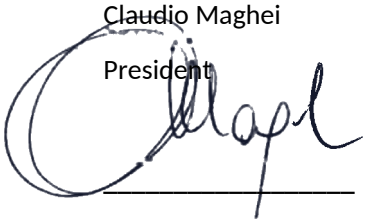
This Code is updated at least every two years, or more frequently in the event of significant regulatory changes, significant organisational changes or reasoned requests from customers and other stakeholders.

5. Approval

This Code of Conduct is approved by the General Management of Mac Tubi S.p.A. and comes into force on the approval date shown in the document control table at the beginning.

Claudio Maghei

President



Giuseppe Maghei

Vice President

