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1. Introduction

1.1. Premise

This code of ethics (hereinafter also the “Code”) represents the values and principles of conduct that Comet Sud Srl (hereinafter only “Comet” or “the Company”) recognizes, shares and promotes in the exercise of its activities.
The Code also sets out the rights, duties and responsibilities that the Company assumes with respect to all parties with whom it enters into relations for the achievement of its corporate purpose and represents a document, approved by the Company, to define the principles of conduct, commitment and responsibility of employees as well as the program to ensure effective prevention and detection of violations of laws and/or regulatory provisions.

1.2. Scope of application and dissemination

The Code is binding, without exception, on all company representatives.
Its rules apply, without exception:

- to the sole director, the mayor, the function and plant managers;
- to employees and external collaborators on base continuous (consultants, auditors, etc.);
- to any other entity, private or public, which, directly or indirectly, permanently or temporarily, establishes, in any capacity, collaborative relationships or relations or operates in the interest of the Company.

These subjects (hereinafter referred to as "Recipients"), in due compliance with the law and current regulations, will adapt their actions and behaviors to the principles, objectives and commitments set out in the Code.

Compliance with the Code of Ethics must be considered an essential part of the contractual obligations of all Recipients.
Any behavior contrary to the letter and spirit of the Code of Ethics will be sanctioned in accordance with the provisions of the disciplinary or sanctioning system, an integral part of this code.
Conduct in line with the principles contained in the Code is also required of suppliers, business partners, as well as all those who, directly or indirectly, have relationships with the Company. Infringements by such third parties will be sanctioned according to the criteria indicated in the specific contractual clauses provided.
Comet is committed to promoting knowledge of the Code and to ensuring compliance with the rules contained therein, through specific communication and dissemination activities. Within the Company, adequate knowledge and understanding of the Code by all personnel is ensured through information and training programs.
Each Recipient is required to be aware of the rules contained in the Code and the reference rules that regulate the activity carried out within the scope of his/her function. These individuals must also adopt, in their private behavior, conduct that in no way can harm the Company, even in terms of image. In particular, they have the obligation to:

- refrain from behaviors contrary to these rules and demand compliance with them;
- contact your superiors or the functions assigned to this task in case of need for clarification on the

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methods of application of the same;
- report promptly to superiors or delegated functions;
- report any news, whether directly discovered or reported by others, regarding possible violations of the rules of the Code;
- report any requests for violations of the rules that have been addressed to them;
- collaborate with the structures responsible for verifying possible violations.

Should a Recipient become aware of illegal situations or situations contrary to the principles expressed in this Code of Ethics which, directly or indirectly, benefit the Company or are committed in its interest, he/she must directly inform, in addition to his/her immediate superior, also the Sole Director, exempting himself/herself from the obligation to comply with the pre-established hierarchical order.

1.3. Approval, Updates and Implementation Code Availability

The Code is adopted by the company through the approval of the Administrator, who will make any subsequent changes and additions that may be necessary following the evolution of the reference legislation. It is the duty of the Administrator, directly or through his representative, to monitor the adequacy, correct functioning and compliance with the Code and to ensure that it is updated.
The Code is created in accordance with the requirements of the "AIAG Corporate Responsibility Guidance ". Amendments to the Code may be proposed by any corporate function and addressed to the Administrator who will evaluate their value.

2. Fundamental Principles

2.1. Respect for human dignity and non-discrimination

Human rights are the inalienable prerogatives of human beings in the world and the basis of freedom, justice and peace.
Comet protects, supports and promotes the value and development of internationally recognized human rights, starting from those provided for by the "Universal Declaration of Human Rights" of 1948 and subsequent conventions inspired by it. Comet does not tolerate and rejects the use, even indirectly, of any type of forced or compulsory labor, as well as child labor.
Comet guarantees workers' freedom of association and the effective recognition of the right to collective bargaining.
The Company respects the fundamental rights of individuals, protecting their moral integrity and guaranteeing equal opportunities.
In both internal and external relationships, behaviors that have discriminatory content based on political and union opinions, religion, race, nationality, age, sex, sexual orientation or health status are not permitted. In managing relationships that imply the establishment of hierarchical relations, Comet requires that authority be exercised with fairness and correctness, prohibiting any behavior that could be considered harmful to the dignity and autonomy of the employee.

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2.2. Honesty, fairness, loyalty and objectivity

Comet conducts its business according to the principles of correctness, honesty, loyalty and objectivity. All individuals who, directly or indirectly, carry out any activity for the Company or on its behalf are required to operate in accordance with these principles.

Aware that free competition represents an essential factor for the economic, technical and professional growth of countries and companies, Comet intends to develop the value of competition by operating according to principles of correctness, fair competition and transparency towards all operators present on the market.

2.3. Compliance with laws, regulations and company rules

Comet believes that compliance with national and international regulations is a binding and essential condition of its actions.
In carrying out activities and in relationships of any type and nature, all those who have relationships with Comet are required to diligently comply with the laws and regulations of the countries in which the company's business takes place.
Applicable laws and regulations must also include those relating to import/export, including sanctions, embargoes, government orders and policies controlling the transportation of goods and technologies.
Within its organization, Comet provides and makes available company rules in full compliance with workers' rights, current provisions and the relevant collective agreement. Each collaborator must document and comply with these provisions according to their duties and tasks.

2.4. Respect for the environment

Comet considers the environment a common heritage to be safeguarded for current and future generations. In addition to compliance with current legislation, to this end Comet:

- adopts an environmental management system compliant with internationally recognised technical standards, aimed at minimising the actual and potential impact on the environment, reducing consumption and aiming at continuous improvement;
- submits its management system for certification by an accredited third-party body.

2.5. Protection of industrial and intellectual property

The Company acts in full compliance with the industrial and intellectual property rights of others, as well as the laws, regulations and conventions that, even at a community or international level, protect these rights. In this regard, all Recipients must refrain from using, in an illicit or improper manner, in their own interest, that of the company or of third parties, intellectual works (or parts thereof) protected under the legislation on copyright infringement. All Recipients must refrain from using, in any capacity and for any purpose, products with counterfeit trademarks or signs, as well as from manufacturing or marketing - or in any case carrying out any activity in this regard - products already patented by third parties and over which Comet does not claim rights.

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2.6. Transparency

The principle of transparency is based on the truthfulness, clarity and completeness of information.
Each operation, transaction and action must be specifically documented so that its legitimacy, coherence, appropriateness and correctness can be detected at any time, also in terms of the financial resources used.
Any information communicated on behalf of the Company must be truthful, comprehensible and responsive to the purposes of the communication itself.
The Recipients, within the scope of their respective competences and functions, must take steps to ensure that the facts relating to the management of Comet are represented in a correct, truthful, clear and complete manner.

2.7. Confidentiality and information processing

Comet complies with the provisions on the confidentiality of personal data set out in European Regulation EU 2016/679 and Legislative Decree No. 196/2003 as amended by Legislative Decree No. 101/2018 and subsequent amendments, additions and implementing regulations .
The Company consequently guarantees the treatment of personal and sensitive information in its possession – relating to its employees, collaborators, business partners, customers and suppliers – in full compliance with the legislation in force on the matter.
To this end, specific procedures for the processing of personal information are defined and continuously updated.
Comet collaborators are required not to use confidential information for purposes not connected to the exercise of their own activity and not to treat the same information in a manner different from that foreseen by the authorizations received and by the established company procedures.

2.8. Conflicts of interest

All those who operate in the interests of Comet do not use for personal purposes the information, goods and equipment at their disposal in carrying out the function or task assigned to them.
They must refrain from any activity that may conflict with an individual interest or from any activity that may affect the company's ability to make decisions in an impartial, objective and transparent manner.
In the event that situations of conflict of interest are identified, even potential ones, both internal and external to the company's activity, each individual involved or anyone who becomes aware of them is required to promptly communicate them to their superior or contact person, who is responsible for assessing the existence, on a case-by-case basis, of any incompatibilities or situations of prejudice.

2.9. Gifts, presents and benefits

Comet condemns all practices of corruption, illegitimate favors, collusive behavior, direct and/or indirect solicitations for personal advantages.
The Company, in particular, prohibits all those who operate in the interest of the company from accepting, promising or offering money, gifts, goods and other benefits, except for gifts of modest value that can be traced back to normal courtesy relationships.
In any case, such expenses must be authorised according to specific company regulations and adequately documented.

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2.10. Responsible management

The assumption of economic risks must be fully aware and compatible with the economic and financial conditions of the Company.
To this end, Comet undertakes to detect, measure and control the risks it assumes in line with the complexity and size of the business carried out and to ensure that the assumption of risks is accompanied by the activation of appropriate provisions or the use of insurance instruments.
Comet recognizes that the protection of the integrity of the share capital, the interests of creditors and third parties in general is a reference ethical value.

2.11. Prevention of money laundering

Comet does not permit any form of money laundering or receiving of goods or other utilities of illicit origin. The Company undertakes not to carry out suspicious transactions in terms of correctness and transparency and to verify in advance, with professional diligence, the information available on commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with them.
The recipients of the Code are required to comply with all the rules and provisions of law relating to the fight against money laundering.

2.12. Export Controls and Economic Sanctions

Comet Sud is committed to fully complying with all applicable national and international regulations regarding **export controls, economic sanctions and trade restrictions.**

Given the technical and potentially strategic specifications of some of the components produced, the Company ensures that any export or transfer of goods, technologies or know-how is assessed in accordance with the provisions set forth by:

- EU regulations on dual-use goods,
- Italian regulations on international trade,
- Economic sanctions and restrictions imposed by supranational bodies (e.g. UN, European Union, United States of America).

In particular, **it is not permitted to export components or technologies to countries or subjects subject to embargo or restrictions** , nor to carry out transactions with customers, suppliers or intermediaries present on international control lists.

All employees, particularly those involved in commercial, logistical, technical and legal functions, are required to:

- verify that exports and transactions comply with applicable regulations;
- request, where necessary, export licenses or specific authorizations before proceeding;
- promptly report any concerns or risks to the Legal Department or the Compliance function;
- refrain from continuing suspicious transactions until clarification by the competent authorities.

Violation of these regulations may result in severe administrative and criminal sanctions for the Company and the individuals involved, as well as significant reputational damage. The Company promotes a culture of responsibility and transparency to prevent any risk related to international trade

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2.13. Minority and Indigenous Peoples' Rights

Comet Sud recognizes the importance of respecting the rights of indigenous peoples and minorities, committing to promote their inclusion, protection and self-determination in every aspect of our production and commercial activities.

2.14. Land rights, forest use, water resources and prevention of forced evictions

Comet Sud recognizes and respects the legitimate, formal and customary land rights of local communities and indigenous peoples, in line with the principles of respect for human rights, the environment and sustainability.
The company is committed to:

- not participate directly or indirectly in activities involving forced acquisition or eviction of land, forests or water resources;
- ensure that access to such resources occurs only in compliance with the law, the rights of local communities and the principles of free, prior and informed consent, where applicable;
- avoid any form of unsustainable environmental or social exploitation;
- verify that suppliers involved in the supply chain act according to the same principles of land and environmental protection.

2.15. Use of public or private security forces

Comet Sud may use public or private security services solely to ensure the protection of its employees, assets and facilities, excluding any form of abuse or violation of human rights.
In particular, the company:

- undertakes to ensure that security personnel are trained and act in compliance with applicable regulations and international human rights principles;
- requires that every security service provider commit not to use force in an arbitrary, disproportionate or discriminatory manner;
- adopts rigorous selection criteria for security services, including ethical and reputational assessments;
- cooperates, when necessary, with public authorities in compliance with the law, promoting transparent and proportionate action.

3. Criteria of Conduct in Relations with Personnel

3.1. Workers' rights

3.1.1. Selection of the staff

Comet selects personnel in compliance with the ethical values and provisions of this Code, avoiding any discrimination based on sex, race, personal and social conditions, religious and political beliefs.
The selection of personnel is carried out on the basis of the profiles sought and the company's needs, in full compliance with equal opportunities for all subjects, avoiding any form of favoritism, clientelism or nepotism.

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Comet staff are employed with a regular employment contract. No form of work that does not comply with current laws and collective bargaining agreements is tolerated.

3.1.2. Personnel Management

Access to roles and responsibilities, as well as decisions taken by the Company in the context of personnel management and development, are based on considerations of merit profiles or correspondence between the expected profiles and the profiles possessed by the collaborators.
Comet is committed to protecting the moral integrity of its collaborators by guaranteeing the right to working conditions that respect the dignity of the person and not tolerating acts of physical or psychological violence, sexual harassment or any discriminatory or harmful behavior towards the person, their beliefs and preferences.
In managing hierarchical relationships, Comet is committed to ensuring that authority is exercised with fairness and correctness, avoiding any abuse. It constitutes abuse of the position of authority to request services, personal favors or any behavior that constitutes a violation of this code.

3.1.3. Health and safety

Comet considers respect for the psycho-physical integrity of its workers a reference ethical value to inspire its activity at all times.
To this end:

- scrupulously complies with current regulations by adopting all safety measures and carries out all technical interventions required by current legislation on prevention and protection;
- adopts a system of risk, health and safety management at work that complies with an internationally recognised standard and is subject to periodic monitoring and updating, aimed at continuous improvement;
- annually submits its management system for certification by an accredited third-party body.

3.1.4. Salaries and benefits

The company recognizes the right of every worker to receive a fair and sufficient remuneration to guarantee a dignified existence for themselves and their families. We are committed to complying with all applicable regulations regarding minimum wages, legal and contractual benefits, and to adopting practices that guarantee fair remuneration.

In particular:

- Wages are paid regularly, traceably and on time.
- No unauthorized or punitive wage deductions are made.
- The benefits provided for by national legislation, the applied collective agreement and company policies are guaranteed
- Each employee receives clear and transparent communication of their remuneration, the items that make it up and any deductions.

3.1.5. Working Hours

The company adopts a work organization that respects the limits established by national legislation, collective agreements and the principles of health and safety of workers.

In particular:

- Ordinary working hours do not exceed the legal limits, unless otherwise provided for in the contract or collective agreements.

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- Overtime hours are used only exceptionally, on a voluntary basis, and are remunerated as provided by law or the applicable contract.
- Daily and weekly rest periods are guaranteed.
- The conciliation between professional and private life is encouraged through flexible working hours compatible with organizational needs.

3.2. Duties of the worker

3.2.1. General principles of conduct

Comet requires anyone who works within the company to act according to the fundamental principles expressed in paragraph 2 above. Therefore, employees and collaborators:

- must act with professionalism, correctness and honesty, in full compliance with company policies, legal and contractual obligations and with the provisions of this Code of Ethics, ensuring high standards of performance;
- treat personal information in compliance with the confidentiality and privacy of the subjects to whom they refer. Any information obtained in the performance of corporate duties cannot be communicated to third parties, both inside and outside Comet, except in the case in which such communication is necessary to fulfill one's professional duties;
- must refrain from carrying out activities which, pursuing a direct patrimonial interest, are – even potentially – in conflict with the interests of the Company;
- may be beneficiaries of gifts or donations from third parties who have or may have relationships with the Company exclusively within the scope of custom and within the limits of normal courtesy relations. Likewise, they may not in turn offer gifts, presents or benefits to third parties except in compliance with the previous art. 2.9;
- must know and observe the ethical rules contained in this Code pursuant to art. 2104 of the Civil Code

3.2.2. Use of company assets

All company assets must be considered work tools and used exclusively for that purpose.
Each employee and collaborator is required to work diligently to protect the conservation and functionality of the company assets, means and resources assigned to him and to prevent their improper use which may cause damage, reduce efficiency or in any case be in conflict with the interests of Comet.
Each employee or collaborator is also required to promptly inform his/her manager of any distorted or improper use of company assets to the detriment of the Company of which he/she may become aware.
With reference to IT applications, each employee and collaborator of Comet has the obligation to use the hardware and software equipment made available to them exclusively for purposes related to the performance of their duties, scrupulously adopting company procedures.
Under no circumstances may the use of computer and network resources be permitted for purposes contrary to mandatory provisions of law, public order or morality.

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4. Criteria of Conduct in Customer Relations and The Suppliers

4.2. Customer Relations

Comet is committed to not discriminating against its customers and to establishing a relationship of high professionalism, efficiency, respect, correctness and availability with them.
Comet does not tolerate under any circumstances corruption practices, illegitimate favors, collusive behavior and solicitations, directly or through third parties, of personal advantages of any kind, regardless of the importance of the business being handled.
The relationship with customers is also based on mutual respect for ethical principles.
Contracts and communications with customers must be:

- clear and simple, formulated in language as close as possible to that normally used by the interlocutors;
- compliant with current regulations, without resorting to evasive or otherwise unfair practices;
- complete, so as not to overlook any element that is relevant for the customer's understanding.

Comet also undertakes to:

- market products in compliance with all applicable regulations;
- ensure quality standards based on what has been agreed with customers, appropriately monitoring their progress.

To this end the Company:

- adopts a quality management system, compliant with an internationally recognised standard and aimed at continuous improvement;
- submits its management system for certification by an accredited third-party body.

4.2. Supplier Relations

Comet bases its conduct in relations with suppliers on the principles of transparency, equality, loyalty and free competition.
The Company establishes appropriate procedures to ensure a transparent and efficient purchasing process.
The choice of suppliers is based on objective criteria, relating to the relationship between quality and price of the services/products offered, delivery times as well as the technical/economic capacity of its contractors and their reliability in reference to the specific service to be provided.
Each selection procedure must be carried out in compliance with the broadest conditions of competition. Any derogation from this principle must be authorised and justified, in accordance with current legislation.
Relations with suppliers are governed by the general ethical principles set out in the previous chapter 2 of the Code, and are subject to constant monitoring by the Company itself.
Comet informs suppliers of the content of the Code of Ethics by publishing it on the website www.cometsud.it

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5. Conduct criteria in relations with the Public Administration

Comet does not normally have business relationships with the Public Administration.
Every relationship with the Public Administration is exclusively attributable to the need to respond to informal requests and inspection acts (questions, interpellations, etc.) and to the initiation of procedures to obtain authorizations, financing, public contributions, etc.
It is not permitted, either directly or indirectly or through a third party, to offer or promise money, gifts or compensation in any form, nor to exert illicit pressure, nor to promise any object, service, performance or favor to managers, officials and employees of the Public Administration - or to persons in charge of public service, or to their relatives or cohabitants - with the aim of inducing them to perform an official act or an act contrary to official duties. This also includes the aim of favoring or damaging a party in a civil, criminal or administrative proceeding in order to bring a direct or indirect advantage to the company.
It is not permitted to use or present false declarations and documents, certifying untrue things or omitting information to obtain, for the benefit or in the interest of the company, contributions, financing or other disbursements however named granted by the State, by a public body or by the European Union.
It is forbidden to use contributions, financing or other disbursements however named granted to Comet by the State, by a Public Body or by the European Union for purposes other than those for which they were assigned.

6. Relations with Parties, Trade Unions and Associations

Comet does not finance, nor otherwise support, even indirectly, companies or other entities with profit-making purposes, political parties and trade unions, whether in Italy or abroad, their representatives or candidates, nor does it sponsor conferences or parties that have an exclusive purpose of political or trade union propaganda.
The Company also refrains from any direct or indirect pressure on political, trade union or public utility representatives.

7. Relations with Institutions

Comet undertakes to maintain with all institutional interlocutors of the State, Regions, Local Authorities, as well as with international interlocutors and with Supervisory, Regulatory and Guarantee Authorities, relationships of effective collaboration based on criteria of integrity, correctness and transparency, making available to them any information requested in carrying out the investigative activities and complying with the provisions issued. The Company undertakes to fully and scrupulously implement the rules dictated by the Authorities for compliance with the legislation in force in the sectors connected with its activity.
Comet does not deny, hide or delay any information requested by the Authorities in their inspection supervisory functions and actively collaborates with its managers, employees and collaborators during the investigative procedures.
In order to ensure maximum clarity in relationships, contacts with institutional interlocutors take place exclusively through representatives who have received an explicit mandate from Comet's top management.

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8. Conduct criteria relating to accounting activities

The corporate bodies and the managers, employees and collaborators of the corporate functions involved ensure that the preparation and approval process of the financial statements and, more generally, the accounting information takes place in compliance with the legislative and statutory provisions, that it adheres to the principle of transparency and that it respects the standards of truth, accuracy and completeness of the basic information for the related accounting records.
The corporate bodies and managers, employees and collaborators of the company functions involved are also required to provide maximum collaboration so that management facts are represented correctly and promptly in the accounting.
It is forbidden to prevent or in any way hinder the performance of control or auditing activities legally attributed to the members, the auditor or the auditing firm.

9. Reporting of violations

The Recipients of this Code are required to promptly inform the Company, through the channels made available to them by Comet, when they become aware of even potential violations of this Code.
In order to facilitate reporting and communications by company representatives and external collaborators, the Company has activated a specific email address reserved for this purpose (etica@Cometsud.it).
For each report made in good faith, protection from retaliation, discrimination or repercussions of any nature will be guaranteed, thus ensuring the confidentiality of the subjects who made the report, except in the event of any legal obligations that impose otherwise.

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