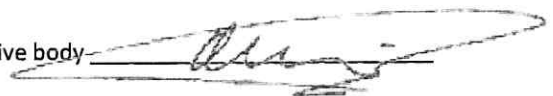


CODE OF ETHICS

Document approved on 17 February 2026

For the administrative body



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INTRODUCTION

NRG GLASS MOULDS S.R.L. (hereinafter also "NRG GLASS MOULDS" or "the Company"), a leading company in the construction of moulds for the manufacturing industry, pays great attention to the **ethical aspects** of the company and considers **legality** and **fairness** as essential conditions in the pursuit of the company mission.

In carrying out any activity directly or indirectly related to the company and in the conduct of business, NRG GLASS MOULDS undertakes to observe, in addition to the laws and provisions in force, also the inspiring principles and high ethical standards that are contained in this Code of Ethics.

The aim is to ensure that the fundamental values expressed in this Code of Ethics and placed to protect all those with whom the company relates create a vision and culture shared with all stakeholders.

RECIPIENTS

The recipients of the Code of Ethics are those who work for the Companies: **employees, directors, control bodies** as well as **internal and external collaborators** who contribute to the achievement of the Company's objectives under the direction and supervision of the Company.

These subjects are therefore required to know the content of the Code of Ethics and to contribute to its implementation and to the dissemination of the principles developed therein.

I. GENERAL PRINCIPLES

The Recipients of this Code of Ethics must comply with the following guiding principles, to the extent of their competence in the exercise of activities in the interest or to the advantage of the Company:

- ❖ act in an informed manner in **compliance with the law** and regulations in force;
- ❖ treat customers, employees, suppliers, the surrounding community and the institutions that represent it, including any public official or public service operator, as well as any third party with whom you enter into a relationship for professional reasons, with fairness, loyalty and transparency;
- ❖ operate according to the principle that **every operation or transaction** must be correctly recorded, authorised, verifiable, legitimate, consistent and congruous, ensuring the possibility of identifying the corporate entities responsible for the decision-making, authorisation and performance of operations;

- ❖ compete **fairly on the market** with competitors, avoiding any behaviour or agreement with competing companies that could affect free competition in violation of the relevant legislation;
- ❖ respect the **industrial property** rights held by third-party suppliers and designers on materials, products, processes and projects used by the Company for the exercise of its activities and the manufacture of its products;
- ❖ refrain from any behaviour that is detrimental to the **image of the Company**.

Under no circumstances can the pursuit of the Company's interests justify conduct by the Company's top management or collaborators that does not comply with the laws in force and complies with the rules of this Code.

II. HEALTH, SAFETY, ENVIRONMENT

❖ Health, hygiene and safety at work

NRG GLASS MOULDS pays particular attention to the protection of health and safety at work, **assessing the** risks arising from its activities and providing the necessary **preventive measures** in order to minimize, as far as possible, the dangers present in the work environment.

The Company operates, at all levels, in order to guarantee the physical and moral integrity of its employees, working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current legislation.

❖ Product safety

Ensuring product safety has always been one of the primary objectives of NRG GLASS MOULDS. The company develops and manufactures its products with a view not only to satisfying functional requirements and aesthetic tastes, but also to ensuring compliance with the strictest safety and quality regulations.

❖ Environmental protection

NRG GLASS MOULDS recognises the environment as a **fundamental asset** of the community, which needs to be safeguarded. To this end, the Company plans the company's activities in compliance with the requirements of environmental protection, in accordance with the applicable laws and regulations, monitoring and, where necessary, minimizing the potentially harmful effects of the company's activities on the environment.

NRG GLASS MOULDS has the primary objective of spreading and consolidating a culture of environmental protection and pollution prevention, developing awareness of risks and promoting responsible behaviour.

III. CONDUCT IN BUSINESS MANAGEMENT

❖ Customer Relations

NRG GLASS MOULDS orients its business to the maximum satisfaction of its customers. To this end, the Company informs the research, development and marketing activities to high standards of product **quality**, paying attention to customer requests.

In relations with customers, the Company ensures fairness and clarity in commercial **negotiations**, as well as the correct and diligent **fulfilment** of contracts.

❖ Supplier Relations

NRG GLASS MOULDS S.R.L. it only uses suppliers who operate **in compliance with current legislation** and the rules set out in this Code.

The selection of the aforementioned parties and the determination of the purchase conditions are based on an **objective assessment** of the quality, the price of the products and services offered, the ability to provide and promptly guarantee services and products of a level appropriate to the Company's needs.

Suppliers are also selected on the basis of the compliance of the supplies with compliance with the regulations on **safety** and hygiene at work.

The Company has relations exclusively with companies that guarantee **respect for children and adolescents** in accordance with the principles enshrined in the relevant international conventions.

❖ Relations with the Public Administration

Relations with the Public Administration are based on maximum **transparency, fairness and legality**.

In relations with public officials, conduct that, directly or indirectly, is such as to incorrectly influence the decision of the other party, in violation of the principles of impartiality and good performance to which the Public Administration is bound, is prohibited. Any form of gift to **Italian and foreign public officials, or their family members**, is **absolutely** prohibited.

In particular, it is not allowed **to propose employment and/or commercial opportunities** that may also indirectly benefit employees of the Public Administration.

If the Company makes use of **consultants** to be represented or receive technical-administrative assistance in relations with the Public Administration, these subjects must comply with the directives given to company employees. In choosing these consultants, the Company will give priority to the criteria of professionalism and fairness, evaluating with extreme care and caution the establishment of collaborative relationships with those subjects who have, or have recently had, organic or dependent relationships with the Public Administration, even indirectly through an intermediary or through close family ties.

All requests for **disbursements, contributions, funding** or relief addressed to public bodies are made in compliance with the applicable rules; once disbursed, they can only be used for the purposes for which they were allocated.

In **its relations with the Judicial Authority**, NRG GLASS MOULDS undertakes to actively collaborate and to refrain from engaging in any conduct towards the parties involved that may affect the way the Authority operates.

❖ Relations with employees and collaborators

NRG GLASS MOULDS recognizes that human resources are an **indispensable factor** for the existence, development and success of a company.

For this reason, the Company strives to **improve** and **increase** the assets and skills possessed by each employee in the organizational context of the company.

Staff are hired with a **regular employment contract** and no form of irregular work is tolerated.

Employees and collaborators, in turn, must act honestly and **fairly**, in compliance with contractual obligations and in accordance with the provisions of this Code of Ethics.

Each employee and collaborator is required to know and implement the provisions of company **policies**, with particular reference to compliance with measures to protect health and safety, confidentiality of information and the integrity of company assets.

Company goods and tools must be used diligently and in compliance with the rules prepared for this purpose by NRG GLASS MOULDS.

❖ Prohibition of discrimination and retaliatory acts

NRG GLASS MOULDS promotes respect for the rights as well as the **physical, cultural and moral integrity** of all the people with whom it interacts, guaranteeing **equal opportunities** and **avoiding any discrimination** based, by way of example, on age, religion, ethnic or

geographical origin, sexual, political or trade union orientation. The Company does not tolerate requests or threats aimed at inducing people to act against the law and in violation of the Code of Ethics, nor acts of psychological violence and/or discriminatory or harmful behavior.

❖ Use of IT resources

All information contained in the company's computer and telematic systems, including e-mail, is the property of NRG GLASS MOULDS and must be used **for the sole purpose of carrying out the company's activities**, in the manner and within the limits indicated by the Company.

Employees are prohibited from using any computer or telematic program on which copyrights are held by third parties and which has not been previously licensed to the Company.

❖ Gifts, Giveaways & Benefits

In relations with third parties, no form of gift or benefit, offer or receipt is permitted, exceeding **normal commercial or courtesy practices** or which may in any case be interpreted by an impartial observer as aimed at acquiring preferential treatment contrary to the law, regulations or the principles of this Code.

NRG GLASS MOULDS does not provide contributions, benefits or other benefits to **political parties** or **workers' trade unions**, or to their representatives, except in compliance with applicable legislation and with the prior authorisation of the competent company departments.

❖ Accounting and tax compliance

All company activities aimed at keeping accounts and managing tax obligations are carried out in compliance with the principles of **legality, fairness, truthfulness and transparency**, making use of the IT resources specifically prepared by the Company.

❖ Anti-money laundering and receiving stolen goods

NRG GLASS MOULDS adopts the necessary tools and precautions to ensure the transparency and fairness of commercial transactions, also for anti-money laundering purposes. With particular regard to financial flows to third parties, specific checks are carried out with specific reference to the registered office of the counterparty (e.g. tax havens, countries at risk of terrorism, etc.), the financial intermediaries used and any corporate screens and trust structures used.

NRG GLASS MOULDS avoids making **payments in cash** or by means of bearer payments, which are in any case excluded if the amounts exceed the limits identified by the anti-money laundering legislation.

❖ **Conflicts of interest**

The Recipients of this Code of Ethics must **avoid** any situation or activity in which a **conflict of interest may arise between personal economic activities and the duties held in the company**.

❖ **Processing of information**

The processing of information takes place in full respect of the **confidentiality** and **privacy** of the data subjects, in accordance with the relevant legislation.

All information and material obtained by the Recipients of this Code of Ethics **in relation to their employment or professional relationship** is strictly confidential and remains the property of the Company.

Disclosure of information **to the outside** world is reserved exclusively for the competent corporate functions.

In the processing of information, the principles of **responsibility, transparency, limitation of collection, purpose of use, verifiability, quality and security must be** respected.

The primary objective of NRG GLASS MOULDS is the protection of all **company information and technical experience**, including commercial ones.

❖ **Relations with the media**

NRG GLASS MOULDS takes care that all news and communications to the outside of the Company are **truthful, clear, transparent** and not ambiguous or instrumental.

They are disclosed, subject to authorisation, by the company functions specifically delegated to do so.

IV. IMPLEMENTATION, MONITORING, DISSEMINATION

The application of the Code of Ethics is entrusted to the **Administrative Body**, which makes use of the corporate structures.

In compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, fairness, transparency and quality, NRG GLASS MOULDS adopts **organisational and management measures** suitable for preventing unlawful conduct or in any case contrary to the rules of this Code by any person acting for the Company.

The Code of Ethics also contains provisions that are functional to the prevention of certain **predicate offences of corporate administrative liability pursuant to Legislative Decree 231/2001** and, for those parties, the Supervisory Body appointed by the Administrative Body (hereinafter "SB") may carry out checks within the scope of its supervisory powers, reporting to the Administrative Body.

This Code of Ethics is adequately **disseminated** to the Recipients, also by publication on the company website.

V. REPORTING VIOLATIONS

For the reporting of violations provided for by Legislative Decree 24/2023, the company has adopted **internal reporting channels**, as required by the specific **Whistleblowing Procedure**.

Reports concerning violations of this Code of Ethics for **matters other than** those permitted by Legislative Decree 24/2023 will be considered as "**Internal Reports**", not subject to the obligations and constraints of the law.

Since NRG GLASS MOULDS also takes any "Internal Reports" very seriously, it voluntarily applies the organisational rules provided for by the Whistleblowing Procedure to them, guaranteeing, again on a voluntary basis, the **confidentiality** of the identity of the whistleblower and the **prevention of retaliation** against him.

VI. PENALTIES

Violation of the provisions of this Code of Ethics, taking into account both its intensity and any recidivism, will constitute a **disciplinary offence** and **breach of the contractual obligations** of the employment or functional relationship or professional collaboration, with all consequent effects of law and contract, also pursuant to Articles 2104 and 2105 of the Italian Civil Code; it may also constitute just cause for **revocation of the appointment** pursuant to articles 2383 and 2400 of the Italian Civil Code. It will also entitle the Company to apply the **disciplinary sanctions** provided for by the National Collective Labour Agreement and the Company Disciplinary Code.

VII. FINAL PROVISIONS

This Code of Ethics is effective immediately from today and until any revision.

All Recipients are required to become adequately aware of it and to observe all the principles and requirements contained therein

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