ORGANISATIONAL, MANAGEMENT AND CONTROL MODEL
Adopted pursuant to Legislative Decree No. 231 of 8 June 2001

ANNEX 3 – CODE OF ETHICS

Document approved by the Board of Directors of ATT S.r.l. on 14 July 2026

INDEX

INTRODUCTION

This Code of Ethics sets out the ethical commitments and responsibilities governing the conduct of ATT's business and corporate activities (hereinafter also referred to simply as the "Company") and defines the set of values and principles, as well as the standards of conduct, to be adopted by the Company's directors, by all persons bound to the Company by employment relationships and, more generally, by all those who operate with the Company, regardless of the nature of their relationship with it, as well as by those who have business relations with the Company (hereinafter, the "Recipients").

The provisions contained in this Code of Ethics are intended to establish certain key corporate values and rules of conduct aimed at safeguarding the Company's reputation and image, with which the Recipients are required to comply. The creation and dissemination of corporate values cannot, in fact, be separated from the effective observance of fundamental principles such as professional integrity, personal integrity, the effective protection of health and safety in the workplace, and transparent competition in the market by all parties operating therein.

Furthermore, it should be noted that the Italian national legal system now recognises legal significance and exculpatory effects in connection with the adoption of ethical principles and standards of corporate conduct, following the entry into force of Legislative Decree No. 231/2001 (the "Decree"), as subsequently supplemented and amended, concerning the "Administrative Liability of Legal Entities, Companies and Associations, including those without Legal Personality". This Decree introduced an unprecedented form of criminal-law-related liability on the part of companies, whereby the Company may now be held personally liable (on an "own-account" basis) where offences are committed "in its interest or for its benefit".

Within the internal control system provided for by the Decree, this Code of Ethics constitutes, subject to an assessment of the risks of offences associated with the activities carried out by the Company, both a prerequisite for and a reference framework for the Organisation, Management and Control Model and for the sanctions system applicable in the event of violations of the rules set forth therein, adopted by the Company pursuant to Articles 6 and 7 of Legislative Decree No. 231/2001.

In light of the foregoing, compliance with the provisions of this Code shall consequently be considered an integral part of the contractual obligations undertaken by the Company's personnel.

Accordingly, the provisions contained in this Code supplement the rules of conduct that personnel are required to observe pursuant to applicable laws and regulations, individual and collective employment agreements, existing internal procedures, and codes of conduct to which the Company has subscribed or may subscribe in the future. For this purpose, in the event of any conflict, the provisions of this Code of Ethics shall in any event prevail over those set forth in internal procedures and regulations.

Knowledge and observance of this Code by all those who carry out activities within, or otherwise in connection with, the Company therefore constitute essential conditions for maintaining the Company's transparency and reputation. These requirements shall likewise apply to parties having business relations with the Company: for non-employee Recipients, compliance with this Code of Ethics constitutes a prerequisite for the continuation of their existing professional or collaborative relationship with the Company.

1. GENERAL PROVISIONS

1.1 Scope of Application of the Code

The provisions contained in this Code are binding upon the directors, statutory auditors, executives, employees and, more generally, all personnel of the Company, regardless of the contractual relationship binding the individual to the Company.

Where applicable and relevant, they shall also be binding upon any external collaborators and consultants, where they act in the name and/or on behalf of the Company, as well as upon third parties having business relations with the Company.

1.2 Dissemination and Implementation of the Code

The Company shall promote, through appropriate means, awareness of and compliance with the Code of Ethics among all directors, employees, collaborators in any capacity, business and financial partners, consultants and suppliers, requiring compliance therewith and providing, in the event of non-compliance, for appropriate disciplinary or contractual sanctions.

All Company employees, within the scope of their respective responsibilities and in their dealings with external parties, shall:

- adequately inform such parties of the commitments and obligations imposed by the Code of Ethics;
- require compliance with the obligations directly applicable to their activities;
- take appropriate internal measures and, where within their remit, external measures in the event that third parties fail to comply with the provisions of the Code of Ethics.

The Company shall also promptly inform the aforementioned parties of any amendments to the Code.

All the aforementioned parties shall therefore be required to be familiar with the contents of this Code and, in the event of any doubts, to seek and obtain from the relevant Company functions appropriate clarification regarding its interpretation. They shall also comply with the Code and contribute to its implementation by reporting any deficiencies or violations (or even attempted violations) of which they become aware.

Supervision of the implementation and application of the Code of Ethics is the responsibility of the Company's directors and employees, all of whom, without exception and individually, are required to report any non-compliance or failure to apply the Code to the Supervisory Body.

2. GENERAL RULES OF CONDUCT

2.1 FUNDAMENTAL PRINCIPLE: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

The Company is committed, through the adoption of all prevention and control measures deemed necessary, to ensuring full and unconditional compliance with applicable laws and regulations in every geographical context and operational area, at all decision-making and executive levels.

In particular, the Company's personnel, on every occasion connected with the performance of their professional duties on behalf of the Company and on every occasion that may otherwise involve the Company's interests, shall comply with the laws and regulations in force in the various countries in which they reside or are domiciled, or in which they regularly or occasionally perform their professional activities. They shall also refrain from coercing or inducing others, whether colleagues or persons external to the Company, to violate or circumvent, even to a minor extent, the laws and regulations in force in the countries in which the Company operates or in which it has direct or indirect interests.

Anyone within the Company who is subjected to coercion or inducement to violate the law shall promptly report such coercion or inducement to their direct supervisor or, where this is not possible, due to the absence of such supervisor or because the supervisor is the person coercing or inducing them, shall promptly report the coercion or inducement to a member of the Supervisory Body.

2.2. INTEGRITY, CONFIDENTIALITY AND IMPARTIALITY

In carrying out their professional activities, the Company requires every director, Employee and Collaborator to act in accordance with the principles of fairness and honesty, as well as to comply with their duties of confidentiality concerning the management of information in their possession.

Every operation and transaction carried out for the benefit or in the interest of the Company, or which otherwise involves its name and reputation, shall be conducted with the utmost fairness in management, completeness and transparency of information, formal and substantive legitimacy, and clarity and accuracy in accounting records, in accordance with applicable laws and regulations and the procedures adopted by the Company. It shall also be appropriately documented and subject to verification.

In its dealings with all parties with whom it conducts business or otherwise interacts, the Company is committed to promoting equal treatment, avoiding any discrimination based on the age, sex, health status, nationality, political opinions or religious beliefs of its counterparts.

2.3. PREVENTION OF CONFLICTS OF INTEREST

A relationship of mutual trust exists between the Company and its employees, within which the employee's primary duty is to use Company assets and their professional skills to pursue the Company's interests, in accordance with the principles set forth in this Code, which represent the values that guide the Company. Accordingly, employees are expressly prohibited from pursuing their own interests to the detriment of those of the Company, including through the improper use of tangible or intangible Company assets or by taking advantage of the Company's name and reputation.

By way of example, and without limitation, situations that may give rise to a conflict of interest include:

- participating in Company decisions concerning business dealings with parties in which the employee or a close family member has an interest, or from which a personal interest could arise (including legal entities owned by or otherwise in which the employee has a direct or indirect interest);
- using one's position within the Company to pursue interests that conflict with those of the Company;

- using the Company's name to obtain personal benefits;

2.4. RULES FOR THE PROTECTION OF CORPORATE CAPITAL AND ASSETS

In accordance with the legal provisions aimed at protecting the integrity of the Company's capital and corporate assets, this Code reiterates a number of prohibitions which, for all persons vested with decision-making responsibilities, constitute non-negotiable limits to managerial discretion:

- it is prohibited, including through concealed or disguised conduct, to return capital contributions made by shareholders or release them from their obligation to make such contributions, except in cases of lawful reduction of the share capital;
- it is prohibited to distribute profits or advances on profits that have not actually been earned, have been allocated to reserves, or to distribute non-distributable reserves;
- it is prohibited to carry out reductions of the share capital, mergers or demergers in violation of legal provisions protecting creditors;
- it is prohibited to fictitiously create or increase the Company's capital through: (i) the allocation of shares for an amount lower than their nominal value; (ii) reciprocal subscription of shares; or (iii) material overvaluation of contributions in kind or receivables, or of the Company's assets in the event of a transformation;
- it is also prohibited to carry out any unlawful transaction involving the Company's shares;
- any transaction that may cause harm to creditors is prohibited;
- any improper distribution of corporate assets by any liquidators is prohibited.

Any violation or attempted violation of the prohibitions set forth in this provision shall be promptly reported by anyone becoming aware thereof to the Supervisory Body, directly or indirectly, in accordance with the general rules.

However, where such reporting is not possible, the Company requires that the matter be reported directly to the Judicial Authority or to another Public Authority that is legally required to report the matter to the Judicial Authority.

3. SPECIFIC RULES OF CONDUCT FOR INTERNAL RELATIONS

3.1. RELATIONS WITH EMPLOYEES AND PERSONNEL POLICIES

3.1.1. General Rule

Based on the belief that the main factor contributing to the success of any company is the contribution of the people who work within it, the Company recognises the central role of its human resources, who are expected to demonstrate professionalism, dedication, loyalty, honesty and a spirit of cooperation.

3.1.2. Personnel Selection and Management

Personnel selection is carried out based on the Company's requirements and on the candidates' suitability for the professional profiles sought, ensuring equal opportunities for all candidates.

The information requested during the selection process shall be strictly related to the assessment of the professional and psycho-aptitude profile sought, while respecting the candidate's privacy and personal opinions.

The Company shall employ exclusively personnel hired in accordance with the types of employment contracts provided for by applicable legislation and national collective bargaining agreements.

Access to positions and/or assignments shall be determined based on the individual skills and capabilities of each person, taking into account the Company's specific requirements and without any form of discrimination, consistently with the criteria of overall work efficiency.

Any form of abuse of positions of authority or coordination is expressly prohibited. Abuse shall include any conduct consisting in requesting or inducing others to provide services, personal favours or other benefits that may undermine their dignity, professionalism or autonomy.

3.1.3. Health, Safety and the Environment

The Company promotes and consolidates a culture of workplace health and safety, raising awareness of risks and encouraging responsible behaviour by all personnel. The Company is committed to creating working conditions that protect the physical and psychological integrity of employees and respect their moral dignity.

More specifically, the Company acts towards its employees and collaborators in full compliance with the provisions of Article 2087 of the Italian Civil Code and with the Consolidated Act on Health and Safety in the Workplace (Legislative Decree No. 81 of 9 April 2008), as well as with all other applicable laws and regulations.

Without prejudice to non-delegable obligations concerning fundamental Company decisions relating to occupational health and safety, the Company is particularly committed to implementing every appropriate measure to prevent risks to health and safety in the workplace, entrusting the relevant responsibilities to suitably qualified personnel.

All Recipients of this Code, within the scope of their respective duties, shall contribute to the process of risk prevention and the protection of their own health and safety and that of colleagues and third parties, including by making observations and submitting proposals. In particular, all persons operating within or in connection with the Company are required to:

- to comply with the provisions and instructions issued by the Company:
- to use correctly the equipment employed in the performance of their work duties;
- to avoid any improper use of Company assets that may cause damage or reduce efficiency, or that may otherwise appear contrary to the principles governing the Company's operations;

- to use personal protective equipment appropriately;
- to promptly report to the relevant Company functions any deficiencies and/or faults in the equipment and protective devices of which they become aware;
- not to remove or modify, without authorisation, safety, warning or control devices;
- not to independently carry out dangerous operations or activities falling outside their assigned duties;
- to undergo any health checks required for the protection of their health.

Furthermore, where works or services are entrusted to third parties under contract, or otherwise within the scope of ordinary business relations, the Company undertakes to require its partners to comply with high safety standards for workers.

The Company conducts its business activities recognising the fundamental importance of safeguarding and protecting the environment. ATT therefore aims to minimise the environmental impact of its activities and the materials it handles, promoting recycling wherever possible and the appropriate disposal of collected waste, making the best possible use of equipment, resources, processes and energy, and adopting appropriate environmental control systems.

To this end, the Company shall:

- assess in advance the potential environmental consequences arising from the performance of its business activities;
- implement appropriate management systems, ensuring that its environmental policy is effectively implemented and that the necessary technical and organisational procedures are continuously monitored and improved;
- promote, at all levels, awareness of responsibility towards the environment;
- cooperate with the competent authorities.

All Recipients of this Code are required to conduct themselves in compliance with environmental protection laws, with particular regard to the provisions of the Consolidated Environmental Act (Legislative Decree No. 152/2006).

3.1.4. Protection of Individuals

The Company does not consider, and shall not tolerate, any form of discrimination based on race, colour, sex, age, religion, physical condition, marital status, sexual orientation, citizenship, ethnic origin, or any other form of discrimination contrary to applicable law.

The Company is committed to ensuring the right to working conditions that respect the dignity of the individual. To this end, it requires that no acts of psychological violence or discriminatory or otherwise harmful attitudes or behaviour towards individuals, their convictions, beliefs or preferences be permitted in internal or external working relationships.

The Company requires that no form of harassment or bullying/mobbing of any kind take place in internal or external working relationships. Prohibited conduct includes, by way of example:

- creating an intimidating, hostile or isolating working environment towards individual employees or groups of employees;
- unjustifiably interfering with the performance of other employees' work duties;
- obstructing other individuals' career or employment opportunities for reasons of personal competitiveness alone.

The Company expressly condemns any form of sexual harassment, including, by way of example:

a) making decisions relevant to the recipient's career or working life conditional upon the acceptance of sexual favours;

b) proposing private interpersonal relationships despite the recipient's express or reasonably foreseeable lack of consent, where, in view of the specific circumstances, such conduct is likely to disturb the individual's peace of mind and objectively affect their working conditions;

c) engaging in sexual behaviour or making sexual remarks that may in any way offend or disturb the individual's sensitivity or sense of decency.

The Company shall neither engage in nor tolerate any form of retaliation against employees who have reported or complained about discriminatory or harassing conduct, nor against employees who have provided information concerning such conduct.

3.1.5. Giving and Receiving Gifts, Benefits and/or Favors

Personnel are prohibited from offering, giving, requesting or accepting, either directly or through intermediaries, compensation or other personal benefits in connection with the management of the Company's activities.

This prohibition applies to anything given to or received from any person, including, for example, other employees, prospective employees, public employees, public officials, competitors, suppliers and other persons with whom the Company has, or would like to establish, business relations.

Only gifts of modest value that can be directly attributed to normal business courtesy are permitted, provided that they are not such as to create, in the other party or in an unrelated and impartial third party, the impression that they are intended to obtain or grant undue advantages, or otherwise create an impression of illegality or impropriety. In any event, such gifts must always be made in compliance with the rules set forth in the Company's procedures and must be adequately documented.

With particular reference to institutional relations with public officials or representatives of Public Administration bodies, the Supervisory Body should be consulted, through the Legal Function, before granting any type of gift, entertainment or payment of any kind or value.
In any event, each person is required to inform their line management or the Supervisory Body of any solicitation or offer of particular benefits made to them, directly or indirectly.

3.2. MANAGEMENT OF FINANCIAL RESOURCES, ANTI-MONEY LAUNDERING AND PREVENTION OF TERRORIST FINANCING

The management of financial resources shall be carried out in compliance with the principles of transparency, legality and traceability of transactions.

With specific regard to cash flows originating from or directed to Public Administration bodies, the Company may derive no advantage other than through the lawful establishment of contractual relationships and/or through lawfully obtained measures, or through the lawful receipt of benefits or grants of any kind, duly obtained and used for the purposes for which they have been granted.

The Company and the Recipients of this Code of Ethics undertake to comply with all national and international laws and regulations concerning anti-money laundering, including the provisions of Legislative Decree No. 231/2007 and the relevant implementing regulations, also adopting any specific internal measures that may be required, which shall be deemed an integral part of this Code.

The prohibition applicable to each Company employee against receiving or concealing money or assets deriving from any criminal offence, or assisting in their purchase, receipt or concealment for the purpose of obtaining a profit for themselves or others, shall remain unaffected.

Any Recipient of this Code who, by virtue of their position, is authorised to manage external money transfers shall exercise particular care in verifying the recipient of the funds, in order to reasonably ascertain that money or other assets leaving the Company are not intended, wholly or partially, for the commission of:

- offences for terrorist purposes, as defined by the Italian Criminal Code and special laws;
- any other act intended to cause death or serious bodily injury to a civilian or any other person not taking an active part in an armed conflict, where the purpose of such act, by its nature or context, is to intimidate a population or to compel a State or another national or international public authority to do or refrain from doing anything.

3.3. MANAGEMENT OF IT RESOURCES

The assets and services (including software and applications) made available by the Company may be used exclusively for business purposes, consistently with the activities carried out by each employee or collaborator in the performance of their duties and in their interactions with colleagues and Company departments.

Persons who have been granted individual access credentials to Company procedures or applications, whether with the authority to perform transactions or for information-access purposes only, shall safeguard such credentials carefully and adopt the appropriate measures provided for by internal rules and recommendations in order to prevent any improper use thereof.

In this regard, it is emphasised that everyone, without exception, is required to comply with and enforce the basic rule of closing IT applications whenever they are absent, even temporarily, from their workstation, regardless of whether or not the so-called time-out function is enabled. Each holder of Company IT resources is also required to comply with the instructions and directives provided by the system administrator.

Accordingly, a password shall be treated in the same manner as a handwritten signature affixed by its holder, who shall therefore be deemed responsible for any irregularities or breaches committed through the use of such password.

The proper, careful and appropriate use of passwords for accessing the various procedures requires compliance with the following principles:

- always close the procedure in use once it is no longer required;
- avoid leaving the terminal “open” with your password entered;
- avoid writing down your password in places accessible to third parties;
- change your password frequently;
- avoid using personal names or the names of nearby or commonly known objects as passwords, so as not to facilitate their identification by third parties;
- if you have multiple passwords, avoid using the same password or coding system for all of them.

The above rules shall not, in any event, be used improperly to create difficulties or impediments to the regular conduct of the Company’s operations. Reference shall, in any case, be made to the applicable provisions in this regard.

Access to Internet websites or the use of data, programmes, applications and IT or telecommunications resources that, based on a reasonable assessment, may contain pornographic or child-pornographic material, or may constitute an expression of individuals or groups incompatible with public order and/or public decency (e.g. claims of responsibility for acts of domestic or international terrorism), is strictly prohibited.
All Company documents governing the use of the Company’s IT and/or telecommunications tools, as well as any applicable security policies, shall be deemed an integral part of this Code.

4. SPECIFIC RULES OF CONDUCT FOR EXTERNAL RELATIONS

4.1. RELATIONS WITH PUBLIC ADMINISTRATION

4.1.1. General Rule

Relations with Public Administration bodies, public entities, Supervisory and Control Authorities, trade unions and public bodies in general shall be conducted with the utmost fairness, impartiality and independence, as well as with the highest standards of transparency and integrity and with full cooperation.

In relations with such entities, it is therefore prohibited to conceal information or provide false documentation or documentation containing untruthful statements, or to prevent or otherwise obstruct control or inspection activities, including those carried out by persons to whom the law grants verification and control powers (shareholders, Statutory Auditors, Auditing Firms, the Supervisory Body and Auditors). In particular, any conduct that constitutes a criminal offence must be strictly avoided, as must any conduct that may appear to be intended to exert undue influence over the decision-making process of an external party for the benefit or in the interest of either the individual or the Company. To this end, and by way of example, in the aforementioned relationships it is prohibited to promise, provide or receive money, advantages, benefits, gifts of significant value or other benefits of any kind.

4.1.2. Commercial Relations with Public Administration

In the event of business negotiations or relations between the Company and public entities, all Recipients of this Code are required to refrain from:

- offering employment or business opportunities to the public official involved in the negotiation or relationship, to their family members or to persons otherwise connected with them;
- offering such persons gifts, presents or benefits, including through third parties, except where these constitute modest acts of business courtesy;
- attempting to obtain confidential information from the public official;
- improperly influencing, including through third parties, the decisions of the institution concerned.

Acts of business courtesy, such as gifts in kind, hospitality or any other form of benefit that is not of modest value, are permitted only where they are not such as to compromise the integrity and reputation of the parties and cannot be interpreted by an impartial observer as intended to obtain improper advantages or favours. In any event, such acts shall be:

- authorised by the head of the function involved;
- communicated in advance to the Supervisory Body by the designated head of the relevant function;
- adequately documented in order to allow appropriate verification.

4.1.3. Non-Commercial Relations with Public Administration

The same behavioural obligations described above shall also apply to relations of any kind between the Company and Public Administration bodies operating in any sector (such as, by way of example: the Italian Revenue Agency, the Italian Tax Police (Guardia di Finanza), labour authorities such as the Labour Inspectorate, INPS, INAIL, Local Health Authorities (ASL), Fire Brigade, etc.).
Furthermore, in the event of funds received from Public Administration bodies, Recipients are strictly prohibited from obtaining unjustified profits to the detriment of the Public Administration. Accordingly, such persons shall under no circumstances:

- improperly obtain grants, funding, subsidised loans or other payments of a similar nature, however named, granted or disbursed by the Public Administration, through the use or submission of false or misleading documents, or through the omission of required information;

- use grants, subsidies or funding intended for the construction of public works or the performance of activities in the public interest for purposes other than those for which they were granted;
- improperly obtain any other type of benefit (licences, authorisations, reductions or exemptions from charges, including social security contributions, tax benefits or failure to pay social security contributions, etc.), whether for themselves, for the Company or for third parties, to the detriment of the Public Administration, through deception or fraudulent conduct (for example, by submitting false documents or documents containing untruthful statements).

4.1.4. Rules for Third Parties Representing the Company in Relations with Public Administration

Where the Company engages consultants or other external parties to represent it in relations with Public Administration bodies or concessionaires of public services, such third parties shall be required to accept the rules of this Code in writing.
The Company shall not be represented in relations with Public Administration bodies or concessionaires of public services by third parties where this could give rise to conflicts of interest.

4.1.5. Public Administration IT Systems

The Company requires its employees and collaborators to exercise the utmost care and respect in relation to the hardware and software required for electronic communication with Public Administration bodies.

In particular, it is prohibited to alter the operation of an IT or telecommunications system belonging to the Public Administration or to manipulate the data contained therein in any way. All electronic communications with Public Administration bodies must always be carried out in compliance with the regulatory and technical instructions issued by the relevant authority. In the event of any doubt, the operations must be suspended and the system administrator or another suitably qualified person promptly contacted.

The creation of electronic documents intended for Public Administration bodies must be carried out not only in compliance with the general principles of truthfulness set forth in this Code, but also through the use of systems and technical means that appropriately ensure the integrity and non-alteration of the data contained therein.

4.1.6. Relations with Tax Authorities and Management of Tax Compliance

Relations with the Tax Authorities and all related control authorities (such as the Italian Tax Police (Guardia di Finanza)) shall be based on the principles of truthfulness, fairness and cooperation. In particular, it is expressly prohibited to engage in or induce others to engage in corrupt practices of any kind. The same provisions shall apply to the management of tax compliance obligations.

In the event of inspections, searches and/or audits by the competent Authorities, immediate notification should be given to the Supervisory Body.

4.1.7. Relations with Authorities Responsible for Verifying Compliance with Personnel-Related Obligations

Relations with the Authorities responsible for verifying compliance with social security and welfare obligations concerning personnel shall be based on the principles of truthfulness, fairness and cooperation. In particular, it is expressly prohibited to engage in or induce others to engage in corrupt practices of any kind.

In the event of inspections, searches and/or audits by the competent Authorities, immediate notification should be given to the Supervisory Body.

4.2. Relations with Judicial Authorities

In relations with Judicial Authorities, any person acting in the name and on behalf of the Company, including any external legal and/or technical consultants, shall comply with the principles of loyalty and probity set forth in Article 88 of the Italian Code of Civil Procedure. It is expressly prohibited to engage in or induce others to engage in corrupt practices of any kind.

Where the Company is a party to, or an interested third party in, judicial or extrajudicial proceedings of a civil, criminal, administrative or tax nature, the Company's personnel and anyone acting in the name and/or on behalf of the Company shall under no circumstances engage in any of the conduct described above towards judges, court clerks or bailiffs, with the purpose of inducing such persons to adopt measures that would unlawfully benefit the Company.

The Company prohibits any form of influence or pressure that could in any way affect statements to be made to the Judicial Authority in judicial or extrajudicial proceedings.

4.3. Relations with Supervisory Authorities

All Recipients of this Code undertake to strictly comply with the provisions issued by the competent Authorities in order to ensure compliance with applicable legislation in the sectors relating to their respective areas of activity (Italian Data Protection Authority, Italian Competition Authority, Ministry of Economic Development, etc.).

When submitting any data, communication or report, whether mandatory or voluntary, the principles of fairness, truthfulness, transparency and diligence shall be observed, and every communication submitted shall be carefully checked.

All the aforementioned persons also undertake to comply with every legitimate request made by the above-mentioned Authorities in the course of their information-gathering and inspection activities, providing full cooperation during investigative procedures and avoiding obstructive or non-cooperative conduct.

In relations with Supervisory Authorities, it is expressly prohibited to engage in or induce others to engage in corrupt practices of any kind.

4.4. Relations with Subsidiaries and Affiliated Companies

The Company encourages its subsidiaries, meaning companies directly or indirectly controlled within the meaning of Article 2359 of the Italian Civil Code, to align their activities with the principles set forth in this Code of Ethics.

The Company conducts its relations with its subsidiaries with due regard for mutual opportunities, implementing communication processes based on continuity of information sharing and cooperation.

In relations with subsidiaries and/or affiliated companies, Recipients who hold corporate positions within such entities are expressly prohibited from engaging in, cooperating in or contributing to acts or conduct directly benefiting or serving the interests of the subsidiaries and/or affiliated companies or the Company, where such acts or conduct may fall within the criminal offences relevant for the purposes of Legislative Decree No. 231/2001. They are also expressly prohibited from engaging in or inducing others to engage in corrupt practices of any kind.

4.5. Contributions and Sponsorships

The Company may carry out sponsorship activities, provided that they are lawful and serve legitimate and appreciable interests of the Company.

Such activities, which may include, by way of example, social, environmental, sporting and artistic initiatives, shall concern events that provide adequate guarantees of quality and seriousness and shall be appropriately documented.

4.6. Relations with Third Parties

4.6.1. Relations with the Board of Statutory Auditors

The Company conducts its relations with the Statutory Auditors with the utmost diligence, professionalism, transparency, cooperation and availability, while fully respecting their institutional role and promptly and accurately complying with any requirements and obligations requested.

Data and documents shall be made available accurately and in clear, objective and comprehensive language, so as to provide accurate, complete, faithful and truthful information, while avoiding and, in any event, appropriately reporting any situations involving conflicts of interest.

It is expressly prohibited to prevent or obstruct the performance of control activities lawfully assigned to shareholders and other corporate bodies.

4.6.2. Relations with Customers, Suppliers and External Consultants

The Company undertakes not to enter into business relations with suppliers, customers, consultants, or business and financial partners included on lists of designated persons issued by the European Union or other authorities, or otherwise subject to European Union restrictive measures.

The selection of suppliers and external consultants shall be based on criteria of competence, cost-effectiveness, transparency and fairness.

All fees and/or amounts paid for supplies or professional engagements shall be adequately documented, proportionate to the activities performed and consistent with prevailing market conditions.

4.6.3. Protection of Competition

The Company respects the principles and laws protecting competition in the markets in which it operates and refrains from any conduct that may have a distorting effect on competition.

ATT condemns any conduct aimed at implementing practices (such as cartel formation, market sharing, restrictions on production or sales, restrictive agreements, etc.) that may constitute a violation of competition law, and expressly prohibits any form of agreement, whether with Company employees or with third parties, aimed in any way at pursuing such unlawful objectives.

Recipients are therefore required to conduct themselves in accordance with these principles and, in the event of any doubt, to seek advice from the relevant Company functions.

4.6.4. Gifts to Third Parties

In business relations with third parties, payments, benefits (whether direct or indirect), gifts, acts of courtesy and hospitality are prohibited, unless they are of such a nature and value as not to compromise the Company's image and cannot be interpreted as intended to obtain preferential treatment that is not determined by market rules.

In any event, the offering of gifts to the aforementioned persons must be:

- communicated in advance to the head of the function involved;
- expressly approved by the head of the function involved, who, where deemed appropriate (for example, due to the value of the gift or the characteristics of the recipient), shall simultaneously inform the Supervisory Body.

4.6.5. Protection of Intellectual and Industrial Property

The Company operates in full compliance with the industrial and intellectual property rights lawfully held by third parties, as well as with the laws, regulations and conventions, including at European Union and/or international level, protecting such rights.

In this regard, all Recipients shall respect the legitimate industrial and intellectual property rights of third parties and refrain from any unauthorised use of such rights, recognising that any infringement thereof may have negative consequences for the Company.

In particular, in carrying out their activities, Recipients shall refrain from any conduct that may constitute the unlawful appropriation of industrial property rights, alteration or counterfeiting of trademarks and/or distinctive signs of industrial products, or of patents, industrial designs or models, whether domestic or foreign. They shall also refrain from importing, marketing or otherwise using or circulating industrial products bearing counterfeit, altered or misleading trademarks and/or distinctive signs, or products manufactured through the unlawful appropriation of industrial property rights.

All Recipients shall also refrain from using, in any form and unlawfully and/or improperly, in their own interest, in the interest of the Company or in the interest of third parties, intellectual works (or parts thereof) protected under copyright legislation, and in particular under the Italian Copyright Law (Law No. 633/1941).

4.7. Conduct in Relations with the Mass Media and External Communications

4.7.1. Conduct

Relations with the press and other mass media shall be handled, in addition to by the Company's Chairperson, by the relevant offices and/or persons expressly authorised for this purpose.

Any request for information received by Company personnel from the press or other media and information channels must be communicated to the persons (Company functions) responsible for external communications before any commitment to respond to such request is made.

External communications shall be based on the guiding principles of truthfulness, fairness, transparency and prudence and shall be aimed at promoting awareness of the Company's policies, programmes and projects. Relations with the mass media shall be conducted in compliance with the law, this Code of Ethics, the relevant protocols and the principles previously established with reference to relations with public institutions, with the aim of protecting the Company's image.

4.7.2. Confidentiality and External Communications

Personnel are required to maintain the confidentiality of information concerning the Company and its current or former subsidiaries, or information otherwise in their possession by virtue of their position.

Where such information is not confidential, it may be circulated within the Company's departments and offices and only to persons who have an actual need to know it for work-related reasons; however, it may not be disclosed to unauthorised third parties. Access to such data, where stored on IT systems, must be protected in accordance with the applicable rules governing the use of passwords.

The transmission to third parties, including by electronic means, of confidential data or data otherwise protected by privacy legislation is prohibited, unless carried out using appropriate security measures or suitable encryption tools and, in any event, following the explicit authorisation of the person responsible for the relevant service.

Furthermore, Company records and documents, or records and documents in the Company's possession, containing confidential or restricted information may be removed from the Company's premises only for reasons connected with the activities carried out by the Company and with the authorisation of the responsible person.

5. ACCOUNTING AND CONTROL

5.1. ACCOUNTING RECORDS AND FINANCIAL STATEMENTS

All Company operations and transactions shall be adequately recorded in the accounting records, so as to enable verification of the decision-making, authorisation and execution processes, as well as of the characteristics and rationale of such operations, also identifying the persons who authorised, carried out, recorded and verified them.

It is prohibited to engage in conduct or omissions that may result in the recording of fictitious transactions or in the misleading recording of operations and transactions.

Particular attention and care shall also be exercised by all persons involved in the preparation of financial statements, reports, statements or similar documents, in order to provide a true and fair representation of the Company's economic, financial and asset position.

All Company personnel involved in accounting functions and in the preparation of accounting statements shall comply with the "Accounting Principles" issued by the relevant Committees of the Italian National Councils of Chartered Accountants and Accounting Experts, as well as with international accounting standards, where applicable. They shall also cooperate to ensure that business transactions and events are accurately and promptly recorded in the accounting records.

Responsibility for establishing an effective internal control system is shared at every level of the organisational structure. Accordingly, each person is responsible for the proper definition and functioning of the control system and, in the event of deficiencies or malfunctions, these must be promptly reported to the Supervisory Body.

For the same purposes, all personnel are required to cooperate with the Board of Statutory Auditors and with the auditing firm appointed to carry out the statutory accounting audit, promptly complying with any legitimate request made by such bodies and avoiding any omissions or obstructive conduct.

5.2. COOPERATION WITH CONTROL ACTIVITIES

Communications addressed to the bodies responsible for control (shareholders, Statutory Auditors, external auditing firm and Supervisory Body) shall be complete, truthful and accurate.

It is prohibited to prevent or otherwise obstruct the performance of the control activities assigned to the afore-mentioned bodies.

6. CONFIDENTIAL INFORMATION AND PRIVACY PROTECTION

6.1. GENERAL PRINCIPLES

The Company ensures the implementation and continuous updating of specific procedures aimed at protecting confidential information.

Each Recipient, with regard to any information acquired by virtue of their professional position, is required to ensure its confidentiality, also with the aim of safeguarding the Company's technical, financial, legal, administrative, managerial and commercial know-how.

In particular, each person shall:

- acquire and process only the information and data necessary for the purposes of their respective function and directly related thereto;
- acquire and process such information and data exclusively within the limits established by the procedures adopted by the Company in this regard;
- store data and information in such a manner as to prevent them from becoming accessible to unauthorised persons;
- communicate data and information in accordance with the established procedures or upon the express authorisation of their direct supervisors and, in any event, in the event of doubt or uncertainty, only after verifying, by consulting their supervisors or objectively checking established Company practices, whether the specific data or information may be disclosed;
- ensure that there are no absolute or relative restrictions on the disclosure of data and information concerning third parties having any form of relationship with the Company and, where applicable, obtain their consent.

6.2. PRIVACY PROTECTION

The Company undertakes to protect, in full compliance with the provisions of Legislative Decree No. 196/2003 – the "Personal Data Protection Code" (the "Privacy Code") – the personal data acquired, stored and processed in the course of its activities, in order to prevent any unlawful or even improper use of such information.

In particular, the Company adopts specific standard procedures aimed at:

- providing data subjects with adequate information on the purposes and relevant methods of processing and storage of their data;
- identifying cases in which, by law, the processing, communication and disclosure of data must be preceded by obtaining the data subject's consent;
- adopting security measures designed to prevent the loss, destruction, unauthorised processing or loss of personal data held by the Company;
- establishing the rules governing the exercise of the rights granted by applicable legislation to data subjects.

In any event, any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees and collaborators is prohibited.

7. IMPLEMENTATION OF THE CODE AND SANCTIONING PROVISIONS

7.1. SUPERVISORY BODY

As part of the activities aimed at adapting its organizational model to the requirements set forth by Legislative Decree No. 231/2001, the Company has appointed the Supervisory Body (*Organismo di Vigilanza* – "OdV") as the body also responsible for verifying the proper implementation of the principles set forth in this Code.

The Supervisory Body carries out its duties through the following control activities:

- monitoring the dissemination within the Company of knowledge, understanding and compliance with the Organizational Model and the Code of Ethics;
- monitoring the validity and adequacy of the Organizational Model and the Code of Ethics, with particular reference to conduct observed within the Company;
- verifying the actual ability of the Organizational Model and the Code of Ethics to prevent the commission of the offences provided for by Legislative Decree No. 231/2001;
- proposing updates to the Organizational Model and the Code of Ethics whenever corrections and/or adjustments are deemed necessary and/or appropriate, including in relation to changes in legislation and/or in the Company's organizational structure;
- reporting annually to the Board of Directors on the activities carried out.

In carrying out these activities with regard to the Code of Ethics, the Supervisory Body shall:

- verify the periodic training plan prepared by the Company and aimed at promoting knowledge of the rules of conduct set forth in the Code of Ethics, differentiated according to the role and responsibilities of the Recipients;
- collect, process, retain and update any information relevant for the purpose of verifying compliance with the Code of Ethics.

All Recipients are required to cooperate with the Supervisory Body in carrying out the activities assigned to it, ensuring free access to all documentation deemed relevant.

7.2. REPORTING

All Recipients undertake to promptly report any violation of the Code of Ethics of which they become aware in the performance of their respective duties.

Reports shall be submitted to the Supervisory Body through the Whistleblowing reporting channel. The Supervisory Body shall take all necessary measures to ensure the absolute anonymity of the reporting person and protect them from any retaliation, in compliance with the applicable Whistleblowing legislation.

Where the person appointed by the Company to manage the Whistleblowing channel is a person other than the Supervisory Body, the latter shall be informed by the channel manager, in compliance with the confidentiality principles concerning the identity of the reporting person established by the applicable legislation, of the receipt of reports concerning possible violations of the Organizational Model or the Code of Ethics.

7.3. DISCIPLINARY PROCEEDINGS AND SANCTIONS

V.4 – Sanctions

The provisions of the Code of Ethics form an integral part of the contractual obligations undertaken by employees and by persons having business relationships with the Company.

Any violation of the principles and rules of conduct set forth in the Code of Ethics undermines the relationship of trust between the Company and the persons responsible for such violation, whether they are directors, employees, consultants, collaborators, customers or suppliers.

The Supervisory Body is responsible for verifying and ascertaining, directly or through the bodies responsible for carrying out such checks, any violations of the duties set forth in this Code and for reporting them to the Board of Directors so that the appropriate sanction may be imposed, with notification to the Board of Statutory Auditors.

The procedures for contesting violations of this Code and imposing the relevant sanctions shall be carried out in full compliance with the provisions of Article 7 of Law No. 300 of 20 May 1970, the Company's Organizational, Management and Control Model, and the provisions established by applicable employment agreements and contracts concerning the right of the person against whom the violation is alleged to submit counterarguments and exercise their right of defence.

The provisions of this Code also apply to temporary workers.

With regard to suppliers, external collaborators, consultants and business partners, the Company shall assess the possible termination of the relevant contracts should it become aware of unlawful conduct by such parties pursuant to Legislative Decree No. 231/2001. The Company shall also retain the right to claim compensation for any damage it may suffer as a result of violations by the aforementioned parties of the provisions contained in the Code of Ethics.

The Company's Supervisory Body shall request the relevant Company bodies to provide information concerning the sanctions imposed in compliance with the Code.

For details of the disciplinary system and sanctioning mechanisms, reference is made to the provisions of the 231 Model adopted by ATT.

The 231 Model also provides for specific sanctions against persons who, intentionally or through gross negligence, submit reports of unlawful conduct or violations of the 231 Model or the Code of Ethics that prove to be unfounded, and in respect of whom criminal liability has been established, including by a first-instance judgment, for the offences of defamation or false accusation, or for the same offences committed through a report to the judicial authorities, or civil liability for the same grounds, in cases of intent or gross negligence.

8. FINAL PROVISIONS

8.1. PROCEDURE FOR REVIEWING THE CODE

In the event of amendments to applicable legislation, changes to the Company's organizational structure, or whenever otherwise deemed appropriate, the Supervisory Body shall propose to the Company's Board of Directors the amendments to be made to this Code of Ethics.

Each proposed amendment shall be accompanied by a brief explanatory report.

The Board of Directors shall include the proposed amendment on the agenda of the first available meeting following its submission by the Supervisory Body.

Any amendments to the Code shall be widely disseminated and made public in accordance with the general provisions.