



Advanced Composites Solutions Srl Unipersonale
Sede legale: Via Astengo n. 11 – 40017 San Giovanni in Persiceto (BO) Italy
Sede operativa: Via Fondovalle Salinello Snc – 64018 Tortoreto (TE) Italy
Capitale sociale: 200.000,00 € i.v.
Cod. fisc. e partita Iva n. 01850670678 / Numero R.E.A. BO - 543245
info@acs-carbon.com

CODE OF ETHICS and CONDUCT

ADVANCED COMPOSITES SOLUTIONS SRL

Rev.	Data	Descrizione	Redazione	Verifica	Approvazione
Rev. 0	25/03/2020	1° emissione per applicazione IATF 16949:2016	RSGHASEQ	DS	DS
Rev. 1	07/10/2020	Aggto per SGSA	RSGHASEQ	DS	DS

This Code **OF ETHICS EXPRESSES** all the ethical and moral values and principles that inspire the behaviors, culture and business conduct that Advanced Composites Solutions Srl (from now on ACS Unipersonale Srl) recognizes, accepts and promotes in the performance of its activity, namely:

1. recognition of the centrality of Human Resources
2. protection of young workers
3. non-use of child labour
4. wage guarantees and benefits that can be used by resources
5. compliance with the national collective agreement
6. respect for working hours on the basis of the contract
7. freedom of association and national bargaining
8. prohibition of all forms of slavery, servitude, forced or compulsory labour, trafficking in human beings
9. protection of health and safety at work
10. environmental protection
11. equal opportunities, non-discrimination and the fight against harassment
12. legality and social value of business activity
13. transparency and verifiability
14. respect for fair competition and professional correctness
15. honesty, integrity and fairness towards Customers, Suppliers, Employees, Collaborators, Business, Financial and Community Partners
16. protection of Confidentiality and Privacy

This Code of Ethics applies to all employees and collaborators linked by a contractual relationship with ACS srl, who undertake to share and promote its contents.

In addition, ACS srl undertakes to share the contents, described below, with all interested parties with whom it has business or other relationships or: collaborators in the broadest sense, Public Administration, Customers, Suppliers of goods and services, Competitors, Trade Union Organizations, Media, Supervisory Bodies, Environment and Territory.

With this in mind, ACS srl undertakes to guarantee the dissemination of the Code to all its recipients through publication on its website, physical and electronic company notice boards and/or through the delivery of a hard copy at the entrance; ACS srl is also committed to ensuring that all updates and changes are promptly communicated.

The Code of Ethics is subject to periodic review carried out on the basis of the regulatory evolutions that have occurred and the best practices collected during its application.

CODE OF CONDUCT

The Code of Conduct is based on ethical principles and rules of conduct shared by the Property; they are inspired by both internal and external behaviors and relationships, in order to ensure the smooth functioning of the company, the reliability of the management and the reputation of ACS srl.

Employees, collaborators, suppliers, and the company's other business partners are made aware of the contents of the Code of Conduct and, therefore, of the best practices to which the Company establishes the conduct in professional relations.

Ethical principles

The company's ethical principles are best applied in the following areas:

1. Legality: ACS srl carries out its activity in compliance with the rules in force in the territories in which it operates and in any case in compliance mainly with national, local and European legislation.
2. Conflict of Interest, Gifts and Gifts: all decisions taken on behalf of ACS srl must be implemented in the interest of the latter. All recipients of the Code must therefore avoid behaviors such as conflicts of interest, gifts, and personal favors, able to influence the independence of the interlocutor.
1. Fair competition: in carrying out its business activity, ACS srl is inspired by the principles of legality, loyalty and fairness, promotes fair competition and acts in conformità della normativa vigente. In particular, ACS srl establishes its commercial policy independently and does not set any price in agreement or collusion with its competitors, does not distribute customers, territories or

markets in agreement or in collusion with competitors, establishes fair relationships with its customers and suppliers, in accordance with the laws governing competition.

2. Privacy - Confidentiality: the confidentiality of the information of all those who have relations with the Company is considered to be of primary importance, as such to protect and safeguard, preventing unauthorized disclosures, undue intrusions and illicit uses of stored data. ACS srl collects personal data useful for carrying out its activity that it undertakes to process in compliance with current laws on the subject and best practices for the protection of privacy.

Rules of Conduct

The company's rules of conduct are best applied in the following areas:

- Protection of people: ACS srl recognizes the 'person' as an absolutely central role, ensuring dignity and well-being in a protected working environment. From this point of view, ACS srl, with express reference to discrimination and/or harassment condemns all forms of discrimination and/or harassment against anyone, based on race, gender, sexual orientation, social and personal position, physical condition, health, pregnancy, disability, age, nationality, religion or any characteristic and/or personal beliefs. With express reference to equal opportunities in the employment relationship, ACS srl guarantees that all aspects of the employment relationship concerning recruitment, training, remuneration, promotions, transfers and termination of the relationship itself, are based on criteria of fairness, impartiality and meritocracy, applied in a fair and uniform way, avoiding any form of discrimination. With reference to the job/role ACS srl guarantees each employee the performance of his activity in accordance with the role and position held, in accordance with the tasks associated with it, in compliance with the legislation on safety and hygiene. In addition, as far as concerns child and/or forced labour ACS srl does not use child or forced labour, and does not establish, or maintain, commercial relationships with partners employing child labour.
1. Fairness and transparency: each function or assignment must be carried out in a clear and transparent manner, allowing the Property to evaluate its regularity and correctness; the relationships conducted by the employees and collaborators of ACS srl must be characterized by integrity, consistency and loyalty, as well as free from conflicts between corporate and personal

interests. In this regard, ACS srl requires that everyone, employees and collaborators, comply with the highest standards of correctness in commercial relations, as set out in this Code. Fairness and transparency are the fundamental values not only in internal relations but also in external relations, mainly towards Suppliers, Customers, and Authorities (Supervisory and Judicial). With regard to Suppliers, considering the objective of guaranteeing the highest level of satisfaction of its customers and considering the primary role assumed by suppliers in the search for a constant increase in competitiveness, ACS srl makes a careful selection and monitoring of its business partners. In the context of customer relations, Clienti, the recipients of this Code, in relation to the tasks awarded to them, undertake not to arbitrarily discriminate against customers, to respect the commitments made, to provide accurate, complete and truthful information, avoiding the use of deceptive, elusive or incorrect practices. With regard to relations with the Authorities, ACS srl undertakes to give full and scrupulous compliance with the rules dictated by them, as well as to mark relations with the aforementioned to the maximum collaboration, committing itself to give prompt execution to the indicated requirements and providing accurate, complete and truthful information.

ANTI-CORRUPTION POLICY

ACS srl is committed to respecting the highest standards of integrity, honesty, transparency and fairness in all relationships inside and outside the company, promoting policies consistent with anti-corruption laws, national and international, and with legal standards for the prevention of corruption.

In particular for the staff of ACS srl, for each agent or other representative, and in general for anyone who carries out activities for or on behalf of ACS srl, it is forbidden to:

1. any kind of corruption against public officials or other third parties related to a public official, or against legal persons or individuals or other persons indicated by law.

2. promise, offer, pay or accept, directly or indirectly, sums of money or other benefits of any kind to public subjects or persons indicated by them, in order to influence their decisions in any way or induce them to provide benefits to Acs srl;
3. submit untruthful statements to public bodies in order to obtain disbursements, contributions or soft loans;
4. to allocate grants, grants, public funding for purposes other than those for which they have been granted;

The company acts in full cooperation with regulatory and government bodies in the context of their legitimate scope of activity, also allowing legitimate inspections to be carried out.

POLITICA DI WHISTLE BLOWING

ACS srl invites employees, suppliers, customers and, more generally, all stakeholders to report/report behavior that could potentially turn out, during the work activity within the company, as a possible fraud, danger, serious risk, or violation of the law, which may harm colleagues, customers, shareholders, other stakeholders, or the reputation of the organization itself.

The reports must be detailed and based on facts, precise and consistent; they must also provide all appropriate and useful information to enable appropriate work to be carried out to establish their merits, in order to allow for a precise and appropriate investigation.

ACS srl undertakes to guarantee the confidentiality of the identity of the whistleblower in the reporting management activities, as well as the protection of the whistleblower from acts of retaliation or discriminatory, direct or indirect, for reasons related, directly or indirectly, to the report.

The Management reserves the right to take appropriate action against anyone who puts in place, or threatens to implement, acts of retaliation against those who have submitted reports.

Once the reports have been received, an internal investigation is carried out into what has been reported.

The verification actions will take place in compliance with the principles of impartiality and confidentiality.

At the end of the verification phase, if the report is well founded, the Management will take the appropriate disciplinary measures and in any case actions to protect the company.

The communication channels prepared to guarantee the confidentiality of the identity of the whistleblower are:

1. by ordinary mail: at the so-called Advanced Composites Solutions Srl Unipersonale, Via Fondovalle Salinello Snc – 64018 Tortoreto (TE) Italy
2. by e-mail: info@acs-carbon.com

HEALTH, SAFETY AND ENVIRONMENT POLICY

ACS srl supports and implements the organization of work according to the principles of Health and Safety at Work as defined in the Single Reference Text D. Lgs. 81/08 (smi), promoting a policy of evaluation, management and control of risks, general and specific, specific to the working environment of reference.

The company uses and uses its resources to ensure that the contents of Legislative Decree 81/08 are respected, establishing the function of Prevention and Protection (RSPP), of the Competent Doctor (MC) in coordination with the Workers' Representative for Safety (SGM) promoting a culture based on compliance with the requirements and, in particular, working to ensure that safety procedures are respected.

Each employee is adequately informed and trained, in accordance with the provisions of Legislative Decree 81/08, about the prevention of risks, and is responsible for the appropriate management of its own safety, and/or others, against the dangers of its reference environment, as well as on the use of the indicated protective equipment (PPE).



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It also promotes the development and application of environmentally safe processes and products, as well as the optimization of resource efficiency, the reduction of emissions and waste and waste on the basis of TUA Legislative Decree 152/2006 (smi).

Tortoreto, REV 01, of 17/05/2020

Advanced Composites Solutions Srl Unipersonale

CEO

Ing. Roberto Catenaro