



OLTREMATERIA by *ECOMAT srl*

With registered office in San Giovanni in Marignano (RN), Via Al Mare n. 20 Share capital € 50,000.00 fully paid-up Economic and Administrative Register at the Chamber of Commerce of Rimini (RN) n. 309879 VAT number 03819090402 CF/PI. Isrc. Reg. Imp. RN 03819090402

CODE OF ETHICS

This Code of Ethics has been approved by the Board of Directors of ECOMAT srl

Be patient and friendly.

Be inclusive.

We

welcome and support people of all backgrounds and identities.

This includes, but is not limited to, members of any sexual orientation, gender identity and expression, nationality and ethnicity, culture, social and economic class, educational attainment, color, immigration status, sex, age, physical appearance, marital status, political thought, religious beliefs, and intellectual or physical disability.

Be kind.

We depend on

each other to produce the best work possible as a company.

Everyone's choices affect customers and colleagues: it is therefore necessary to take into account the possible consequences of one's actions when making decisions

Be respectful.

You

can't always agree, but differences can't be an excuse for disrespectful behavior.

Any moments of dissatisfaction must not turn into personal attacks on others or colleagues. An environment where people feel threatened or uncomfortable cannot be productive or stimulating.

Choose words carefully.

It is

necessary to adopt a professional behavior, be courteous, not offend or belittle others. Harassment and exclusionary behavior are not accepted. This includes, but is not limited to:

- Threats of violence.
- Insubordination.
- Discriminatory language.
- Sharing material that is not intended for or related to the work being performed, violent or sexually explicit via digital devices or other means.
- Personal offenses, especially if racist or sexist.
- Unwanted sexual attention.
- Supporting or encouraging any of the above behaviors.

Do not harass.

When

you are asked to stop a certain behavior, it is imperative to do so immediately. When you disagree on something, you need to try to understand the motivations. Differences of opinion and disagreements are inevitable: any differences and differing opinions should be ironed out in a constructive manner.

Turning differences into strengths. Strength can be found in diversity. Different people may have different perspectives on certain issues, which can be a starting point for solving problems or generating new ideas. Not understanding another person's point of view does not mean that point of view is wrong.

Everyone makes mistakes and blaming others leads nowhere: you should always focus on solving any problems and learning from mistakes.

Summary

THE VISION OF ECOMAT SRL.....	4
AIMS AND RECIPIENTS	4
1 GENERAL PRINCIPLES	5
1.1 Legality.....	5
1.2 Correctness.....	5
1.3 Non-discrimination.....	5
1.4 Confidentiality.....	5
1.5 Diligence	6
1.6 Loyalty.....	6
2 RELATIONS WITH EMPLOYEES AND COLLABORATORS	7
2.1 Personnel selection	7
2.2 Personnel management	7
3 WORKING ENVIRONMENT.....	7
4 BUSINESS MANAGEMENT.....	7
4.1 Compliance with internal procedures.....	7
4.2 Accounting management.....	8
4.3 Protection of assets.....	8
4.4 Communication	8
5 RELATIONS WITH THE OUTSIDE WORLD	8
5.1 Relations with Authorities and Public Administrations.....	8
5.2 Relations with political and trade union organizations.....	9
5.3 Relationship with customers and suppliers	9
6 INTERNAL CONTROL SYSTEM.....	9
7 GUIDELINES OF THE SANCTIONING SYSTEM.....	10

PREMISE

THE VISION OF ECOMAT SRL

Oltremateria by ECOMAT srl is aware that the authority of a company is recognized not only by the competence of its collaborators and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this Company are formally collected in a Code of Ethics of Conduct in the belief that reliability is built daily by respecting the rules and valuing people.

This Code of Ethics represents, therefore, a distinctive and identifying element towards the market and third parties, whose knowledge and sharing, required of all those who work in the Company or who collaborate with it, constitute the foundation of our activity and the first step to contribute to the pursuit of our *vision*.

The goal of ECOMAT srl is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the Safety of the people involved through the consistency of a behavior respectful of Social Ethics, obtaining satisfaction and ensuring added value for the Employee, for the Customer and, in general, for the Community.

AIMS AND RECIPIENTS

This Code of Ethics (hereinafter, the "**Code**") illustrates the set of ethical and moral principles that underpin the activities of ECOMAT srl (hereinafter, the "**Company**") as well as the lines of conduct adopted by the Company both within its own business (in relations between employees) and externally (in relations with institutions, suppliers, customers, business *partners*, political and trade union organisations as well as the media (hereinafter, the "**Stakeholders**").

Compliance with these principles is of fundamental importance to achieve the corporate mission of ECOMAT srl and to guarantee its reputation in the socio-economic context in which it operates.

Preliminarily, it should be noted that ECOMAT srl firmly believes that every activity must be carried out ethically, recognizing itself in the principle enshrined in art. 41 of the Constitution, according to which private economic initiative "*cannot be carried out in contrast with social utility or in such a way as to cause damage to security, freedom, human dignity.*"

This Code is binding for the directors and employees of ECOMAT srl, as well as for all those who work and collaborate, permanently or on a fixed-term basis, on behalf of the Company (hereinafter, the "**Recipients**").

The Code will be widely disseminated within the internal governance structure, and widely communicated externally, including through its website.

ECOMAT srl also undertakes to adopt any further provision so that the principles and requirements of the Code can be promptly disclosed and applied.

1 GENERAL PRINCIPLES

The conduct of the Recipients, at all company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

1.1 Legality

ECOMAT srl operates in absolute compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments, also making use of the training opportunities offered by ECOMAT srl.

The Company considers the transparency of financial statements and accounting to be a fundamental principle for the exercise of its business and for the protection of its reputation.

1.2 Correctness

Fairness and moral integrity are an indefectible duty for all Recipients.

The Recipients are required not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

In carrying out their activities, the Recipients are required not to accept donations, favours or benefits of any kind (except for objects of modest value) and, in general, not to accept any counterpart in order to grant advantages to third parties in an improper manner.

In turn, the Recipients must not make donations of money or goods to third parties or in any case offer illicit benefits or favours of any kind (except for objects of modest value or gifts of commercial courtesy authorised by the Company) in connection with the activity they provide for the benefit of ECOMAT srl.

The intrinsic conviction of acting in the interest of the Company does not exempt the Recipients from the obligation to punctually observe the rules and principles of this Code.

1.3 Non-discrimination

In relations with Stakeholders and in particular in the selection and management of personnel, in the work organization, in the choice, selection and management of suppliers, as well as in relations with Bodies and Institutions, ECOMAT srl avoids and repudiates any discrimination regarding age, sex, race, sexual orientation, state of health, political and trade union opinions, the religion, culture and nationality of its interlocutors.

ECOMAT srl, at the same time, promotes integration, promoting intercultural dialogue, the protection of the rights of minorities and vulnerable subjects.

1.4 Confidentiality

ECOMAT srl undertakes to ensure the protection and confidentiality of the personal data of the Recipients and Stakeholders, in compliance with all applicable regulations on the protection of personal data.

The Recipients are required not to use confidential information, learned by reason of their work, for

purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the confidentiality obligations assumed by ECOMAT srl towards all Stakeholders.

In particular, the Recipients are required to maintain the utmost confidentiality on documents suitable for revealing know-how, transport information, technical information, commercial information and corporate transactions and anything else concerning sensitive or non-sensitive data of the company and its members.

1.5 Diligence

The relationship between ECOMAT srl and its employees is based on mutual trust: employees are, therefore, required to work to promote the interests of the company, in compliance with the values set out in this Code.

The Recipients must refrain from any activity that may conflict with the interests of ECOMAT srl, renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company. In cases where the possibility of the existence of a conflict of interest can be depicted, the Recipients are required to contact, without delay, their hierarchical superior so that the company can assess, and possibly authorise, the potentially conflicting activity.

In the event of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

1.6 Loyalty

ECOMAT srl and the Recipients undertake to achieve fair competition, in compliance with national and EU legislation, in the awareness that virtuous competition is a healthy incentive for innovation and development processes, also protects the interests of consumers and the community.

2 RELATIONS WITH EMPLOYEES AND COLLABORATORS

2.1 Personnel selection

The evaluation and selection of personnel are carried out according to fairness and transparency, respecting equal opportunities in order to combine the needs of ECOMAT srl, with the professional profiles, ambitions and expectations of the candidates.

ECOMAT srl undertakes to adopt any useful measure to avoid any form of favoritism in the personnel selection process using objective and meritocratic criteria, respecting the dignity of the candidates as well as in the interest of the good performance of the company.

The personnel hired, also through the implementation of this Code, receive clear and correct information about the roles, responsibilities, rights and duties of the parties.

2.2 Personnel management

ECOMAT srl protects and enhances its human resources, committing itself to maintaining the necessary conditions for the professional growth, knowledge and skills of each person, carrying out the appropriate training for professional updating and any initiative aimed at pursuing this purpose. ECOMAT srl promotes the participation of workers in the life of the company, providing participatory tools capable of collecting the opinion and suggestions of workers, ensuring their widest participation.

Without prejudice to the maximum availability and temporary flexibility towards the Company, no worker may be obliged to perform tasks that are not due on the basis of his or her employment contract and role within the company.

The Company is firmly committed to combating episodes of *mobbing*, *stalking*, psychological violence and any discriminatory behaviour or behaviour detrimental to the dignity of the person inside and outside the company premises.

Relations between employees must be carried out with loyalty, fairness and mutual respect, in compliance with the values of civil coexistence and the freedom of people.

3 WORKING ENVIRONMENT

ECOMAT srl is committed to offering its staff a healthy, safe working environment that respects the dignity of workers.

Safety in the workplace is ensured both by rigorously implementing the provisions of the law in force, and by actively promoting the culture of safety through specific training programs. Staff training is a central element of the management system adopted.

ECOMAT srl protects the health of its workers, also ensuring compliance with hygiene and health prevention regulations.

4 BUSINESS MANAGEMENT

4.1 Compliance with internal procedures

ECOMAT srl believes that management efficiency and a culture of control are indispensable elements for achieving objectives.

The Recipients are required to strictly comply with the company's internal procedures and instructions.

Recipients must act on their authorization profiles and must maintain all appropriate documentation to keep track of actions taken on behalf of the company.

4.2 Accounting management

In the accounting management activity, the Recipients are called upon to act in compliance with the principles of truthfulness, accuracy and transparency, so that the reputation of ECOMAT srl is protected both internally and externally.

Compliance with these principles also allows the company to plan its operational strategies based on its real economic and financial situation.

All the items reported in the accounts must therefore be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and/or irregularities.

In the case of assets or income statement based on valuations and estimates, the relevant recording must be based on criteria of reasonableness and prudence.

4.3 Protection of assets

The Recipients exercise their functions by trying to rationalise and contain the use of company resources.

The Recipients are required to correctly apply the provisions relating to security to protect the *hardware* devices from unauthorized access, which could seriously affect the rights to the protection of personal data of ECOMAT srl's staff and customers.

4.4 Communication

ECOMAT srl provides suitable communication tools to Stakeholders through which they can interact with the company to submit requests, ask for clarifications or make complaints.

ECOMAT srl promotes effective corporate communication capable of putting the company in contact with civil society, in order to understand the requests, needs and requirements of the community and to spread its values and mission.

The information disseminated to Stakeholders is complete and accurate so that the recipients can make correct and informed decisions.

The advertising promotion of ECOMAT srl respects ethical values, protecting minors and repudiating vulgar or offensive messages.

5 RELATIONS WITH THE OUTSIDE WORLD

5.1 Relations with Authorities and Public Administrations

Relations with the Authorities and the Public Administration must be based on maximum clarity,

transparency and collaboration, in full compliance with the law and according to the highest *moral and professional* standards.

The Recipients, unless expressly authorised, may not relate in the name and on behalf of ECOMAT srl with the Authorities and the Public Administration.

In relations with Public Officials, Public Service Officers, and the Public Administration in general, the Authorized Recipients shall adhere to the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for ECOMAT srl.

In this regard, the Authorized Recipients will be required to strictly comply with the provisions of this Code, as well as, more generally, with the provisions of the directives given by the *management* of ECOMAT srl.

5.2 Relations with political and trade union organizations

ECOMAT srl does not favor or discriminate against any political or trade union organization.

The Company refrains from providing any undue contribution in any form to parties, trade unions or other social formations, except for specific exceptions and in any case always within the limits of what is permitted by the regulations in force.

The Recipients are required to refrain from any direct, indirect or boasted pressure on politicians or trade union representatives.

5.3 Relationship with customers and suppliers

The Recipients relate to third parties with courtesy, competence and professionalism, in the belief that the protection of the company's image and reputation and consequently the achievement of the company's objectives depends on their conduct.

In particular, the Recipients must refrain from any form of incorrect, unprofessional, unfair or deceptive behavior that may lead customers or suppliers to rely on unfounded facts or circumstances.

The Recipients are required to constantly strive to offer professional, punctual and high-quality services to customers, trying to limit any form of disservice or delay in order to maximize customer satisfaction.

Relations with suppliers are based on loyalty, fairness and transparency.

The choice of suppliers is made on the basis of objective criteria of cost-effectiveness, opportunity and efficiency. The choice of suppliers on purely subjective and personal grounds or, in any case, by virtue of interests that conflict with those of the company, is precluded.

The Recipients must put in place every possible control so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code.

6 INTERNAL CONTROL SYSTEM

Compliance with the provisions of this Code is entrusted to the prudent, reasonable and careful

supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All Recipients are invited to report to their direct superiors the facts and circumstances that may be in conflict with the principles and requirements of this Code.

The *management* of ECOMAT srl and the bodies in charge for this purpose take all necessary measures to put an end to the violations, being able to resort to any disciplinary measure in compliance with the law and the rights of workers.

7 GUIDELINES OF THE SANCTIONING SYSTEM

The internal control system is oriented towards the adoption of tools and methodologies aimed at countering potential corporate risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

In fact, the violation of the principles set out in the Code and in the procedures indicated in the internal controls compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, *commercial and financial* partners.

Such violations may therefore be immediately pursued by ECOMAT srl in an incisive and timely manner, through the adoption of appropriate disciplinary measures.

The effects of violations of the Code of Ethics and internal protocols must be taken into consideration by all those who, for any reason, have relations with ECOMAT srl. Depending on the seriousness of the conduct carried out by the person involved in one of the illegal activities provided for by the Code, ECOMAT srl will immediately take the appropriate measures, regardless of the possible exercise of criminal prosecution by the judicial authority.

Without prejudice to the above, conduct in violation of the Code of Ethics constitutes:

- serious non-compliance for employees (blue-collar workers, white-collar workers, middle managers and managers), with the sanctions, applied according to the seriousness, provided for by the CCNL of the category (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and pay up to a maximum of three working days, dismissal for just cause or justified reason); in the event of pending criminal proceedings or execution of a measure restriction of personal freedom taken against the employee, before adopting the disciplinary measure, the sanction of suspension from service and remuneration may be adopted, for the duration corresponding to the outcome of the criminal prosecution or until the end of the duration of the measure restricting personal freedom;
- just cause for revocation of the mandate of the directors;
- cause of immediate termination of the relationship, in the most serious cases, for external collaborators and para-subordinates;

or cause of immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors.

The identification and application of sanctions will always take into account the general principles of adequacy with respect to the alleged violation.

In all the above cases, ECOMAT srl also reserves the right to exercise all the actions it deems appropriate for compensation for the damage suffered as a result of conduct in violation of the Code of Ethics.