



Code of Conduct

(rev. 3 – 11/01/2024)

INTRODUCTION

The aim for the future is attention to ethical values as a guide to our work and direction of our actions: importance of the person, integrity of principles and sustainability of choices.

The management of activities according to the purpose, the mission, the ethical principles and the operating principles define the guidelines in the name of ethical and moral innovation.

This Code of Conduct is completed by the Sustainability Policy, so that together they have considered as a unique document. In this Code of Conduct and in the related Sustainability Policy you will find principles and values that characterize our company DNA and that constitute the guide to bring the holistic concept of progress and innovation in our everyday actions, which therefore goes beyond the purely technological boundary because it combines it with cultural, moral and ethical innovation and evolution.

GOAL AND RECIPIENTS OF THE CODE

The Code of Conduct:

- ✓ constitutes one of the pillars of the company Governance model, regulates its way to operate and expresses the values that the workforce - as defined below - shares and promotes, aware that behaviors inspired by the principles of integrity, transparency and responsibilities constitute an important driver for economic and social progress;
- ✓ applies to all members of the Board of Directors, managers and employees, to all temporary collaborators and to other people and companies acting in the name and/or on behalf of the company, anywhere in the world (collectively defined as "Workforce");
- ✓ is approved and updated by the Board of Directors and is adopted by its subsidiaries.



Our company shares, and its Code implements, the principles of the “Universal Declaration of human rights” of the United Nations (“UN”) and the International Labor Organization (“ILO”) Conventions. In this sense, Amper-Auto contributes to the achievement of the Sustainable Development Goals (SDGs) defined by the 2030 Agenda for Sustainable Development adopted by the United Nations.



LEGAL COMPLIANCE

Amper-Auto’s Suppliers must comply with the mandatory provisions of this Supplier Code, of the related Sustainability Policy and with all applicable laws and regulations in each jurisdiction where they operate, and must use their best efforts to comply with the other principles set out herein, when dealing with or acting on behalf of Amper-Auto. Furthermore, to promote corporate social responsibility, Amper-Auto expects its Suppliers to apply the standards set in this Supplier Code and in the Sustainability Policy through their own entire supply chain.

ETHICAL PRINCIPLES

A. PROTECT PEOPLE

impacted SDG



We are committed to respecting, safeguarding and promoting the human rights of all people directly or indirectly interested in our business, committing ourselves to supporting the adoption of actions aimed at bringing lasting improvements to working practices and conditions, including in our supply chain.



For this reason, we expect our suppliers and partners to commit to sharing the principles contained in this Code and in the Sustainability Policy.

DEFENDING HUMAN RIGHTS. Respect for human rights is a fundamental value of Amper-Auto. We want an environment that promotes values and that encourages ethical conduct, in order to create a working context collaborative in which the dignity of each individual is respected and in which there is no space for forms of discrimination. In particular, we are committed to respecting the four fundamental labor standards, as defined by Declaration on Fundamental Principles and Rights at Work of the ILO: freedom of association and right to bargain collective; elimination of all forms of forced labor or obligated; abolition of child labor; rejection of all forms of discrimination.

We also undertake to respect the maximum working hours established by local law and in any case not to exceed 60 hours per week, including overtime on a voluntary basis, except in emergency or unusual situations, allowing at least one day off for every seven days worked.

We conduct the recruitment process fairly and ethically to ensure impartiality, diversity and fairness in the selection process.

We support the goal to prevent mineral exploitation in violation of human rights, with specific reference to those extracted in countries with high risk or affected by conflicts that can be used in our products (so-called Conflict Minerals, such as tantalum, tin, tungsten and gold).

We ask our Suppliers to respect land rights in all their forms, including that of customary law, as well as rights relating to the use of forests and water resources, and to adopt zero tolerance policies against the phenomenon of land grabbing.

Ensure that eventual presence of private security forces operating at our premises and supplier plants act in accordance with universally recognized human rights standards.

ENSURE A FAIR WORKING ENVIRONMENT. We are committed to ensuring a fair and non-discriminatory working environment in which everyone is evaluated according to its own personal contribution. We consider diversity and inclusion issues as strategic elements for our company and plurality and diversity as sources of enrichment and resources for social development.

We can only achieve that goal if everyone take their responsibilities and treat their colleagues, customers, suppliers and visitors with respect, transparency and professionalism. More specifically, each of us must work to promote fairness and ensure an environment, both in the office and in factory, without violent behavior and harassment, free from forms of abuse and discrimination based on age, ethnicity, gender and sexual, political or religious orientation.

The interaction of genres, cultures, generations, perspectives and different backgrounds allows to create lasting values, guarantees progress and represents a fertile soil for contamination of ideas and innovation.

ENSURE HEALTH AND SAFETY. We guarantee a safe working environment and comply with the highest standards in health and safety matters and best practices, monitoring compliance and promoting and encouraging a culture of accident prevention, health protection and awareness of risks in the workplace. Health protection and safety are fundamental principles for Amper Auto and we actively promote them, in particular through the offering of informative contents and training aimed at promoting and supporting individual safety, well-being and a healthy lifestyle.

We ask all our workers to strictly observe the rules of safety and to exercise constant vigilance to identify potential risks, promptly dealing with them.

We are committed to providing products that do not compromise health, safety and physical integrity of our customers and, in general, of people.

We ask business partners to observe the same rules.



VALUE PEOPLE. We believe in our people as an indispensable element for existence and future development and success of our company, and for this reason we enhance their capabilities and skills, so that each of us is in a position to best express our potential.

We promote diversity and equal employment opportunities, particularly between genders, for all employees or candidate, also through performance evaluations based on criteria of merit, competence and fair treatment in relation to the role, to behaviors and to achieved results.

In order to stimulate a process of continuous improvement, we organize and promote training programs for our people, aware that the skills and the related growth are our fundamental asset.

We believe in the power of sharing, exchanging ideas and free discussion, to create that fundamental synergy that characterizes teamwork, feeds a continuous and sustainable innovation process, originating excellent results.

B. ACT WITH INTEGRITY

impacted SDG



We have as an indispensable principle respect for the laws and regulations in force in all the countries in which we operate. This commitment must apply to all our collaborators, whether they are directors or employees in every sense of this company.

LAW RESPECT IN MANAGING BUSINESS. Compliance with internal and external regulations is fundamental for us. The achievement of positive results is also based on our desire to act in complete compliance with applicable laws, including those relating to anti-corruption, anti-money laundering, exports, international economic sanctions, antitrust, insider trading and protection of personal data.

We adopt continually evolving organization, management and control models to prevent the risk of acting in violation of the aforementioned regulations by verifying compliance of the behavioral principles and control measures that regulate our internal processes.

We require that all our suppliers and partners ensure compliance with laws and applicable regulations in relation to any activity or business that these third parties conduct in the name and/or on our behalf.

AVOID CONFLICT OF INTEREST SITUATIONS. We manage situations of conflict of interest, current or potential, with the utmost rigor in order to guarantee the impartiality of the decisions we are called upon to make and with the aim of spreading a culture of integrity within the company.

We ask our people to pay attention to situations that may interfere with their ability to make decisions in the interests of the company and we require them to refrain from engaging in personal activities.

We encourage requests for support and the communication of situations of conflict of interest, even if only potential, which must also be evaluated with reference to the family members of internal staff.

COUNTERFEIT SPARE PARTS. We are committed to manufacture only original spare parts. For this reason it pays attention to the origin of all purchased components and materials and condemns all forms of counterfeiting. The recipients are therefore required to comply with this principle and to avoid the use and the manufacturing of counterfeit products.

ENSURE REGULARITY OF OPERATIONS. We are committed to maintaining clarity and transparency of the accounting records and to ensure that they are authentic, reliable and verifiable.

We train the staff responsible for registration and the management of accounting operations so that it follows the correct processes, respecting the principle of segregation of functions and levels approving.

We store, in compliance with laws and regulations applicable, adequate supporting documentation of the activity carried out, so as to be able to reconstruct in a timely manner an operation and identify the involved subjects.

C. RESPONSIBILITY TOWARDS THE ENVIRONMENT

impacted SDG



Use of sustainable business practices is an integral part of our manufacturing process, which strives to achieve the business objectives while minimizing adverse impacts on present and future generations and resources.

We are committed, in particular, to a responsible use of environmental resources and to positively influencing people and communities in the areas where we operate.

We believe that our suppliers play a significant role in supporting us on this journey and, therefore, we ask them to act in line with our principles concerning environmental protection, in order to guarantee compliance with regional, national, and international standards and regulations in force.

PROTECTING THE ENVIRONMENT Environmental protection is a crucial practice that we promote in our overall business approach. We structure our activities according to the main international standards and guidelines on environmental management and are committed to manufacturing and marketing products that comply with the highest standards in terms of environmental performance and safety. We develop and implement innovative technical solutions to minimize environmental impact and improve efficiency of plants and processes, improving air and soil quality, reducing noise emissions, managing chemical substances responsibly and protecting animal welfare.

OUR COMMITMENT AGAINST CLIMATE CHANGE. We intend to fight climate change by reducing our emissions and supporting the evolution towards a low carbon economy through – amongst other things – research into innovative technologies and the development of partnerships and synergies to speed up change processes. To this end, we define action plans to reduce our direct and indirect greenhouse gas emissions through the use of renewable energy sources, setting scientific objectives and monitoring their progress transparently. In order to support Amper-Auto decarbonization strategy in line with the Paris Climate Agreement, it is crucial that our suppliers act in the same way.

ADDING VALUE TO OUR SUPPLY CHAIN. We believe that collaboration with our supply chain is an integral part of our success, which is why we are committed to sustainable practices in our sourcing activity and to working as a team with our suppliers.



In line with this, the selection of suppliers is not only based on the quality and competitiveness of their products and services, but also their compliance with social, ethical, and environmental principles. We expect suppliers to have an internationally certified environmental management system. More specifically, Amper-Auto expects its suppliers to: implement concrete actions to limit their consumption of energy, natural resources, water, and raw materials; increase their rate of reuse and their use of recycled materials; comply with all applicable regulations on biodiversity and the protection of endangered species; protect natural ecosystems and limit deforestation and forest conversion; identify, monitor, and appropriately process substances constituting environmental or health hazards and adopt new processes and best practices that guarantee not only the supply of parts and components, but protect the environment and health and safety. Should a supplier fail to uphold these principles, we reserve the right to seek alternative supply sources.

D. WE PROTECT THE RESOURCES, TRADITION AND IDENTITY OF AMPER-AUTO

Our reputation is Amper-Auto most significant asset; all our actions, inside and outside the company, must be guided by transparency and fairness.

COMMUNICATING EFFECTIVELY. Clear and open communication, both within our company and with our stakeholders, is the building block of effective relationships. We are committed to conveying accurate and comprehensive messages to our stakeholders, via the relevant departments at Amper-Auto. We use media, and in particular social media, responsibly and carefully assess content and materials prior to publishing them.

PROTECTING OUR ASSETS. We protect our history and our future by using Amper-Auto assets appropriately and by safeguarding them against damage, theft, or unauthorised use, both during the working relationship with us and once it has finished. This principle applies to all types of assets – tangible, intangible, and financial – including our intellectual property rights such as patents, trademarks, copyrights, know-how, and trade secrets. We take the utmost care to protect the personal data of the individuals who are part of Amper-Auto and those who come into contact with us. Confidential information and personal data, as well as all corporate assets, are handled in compliance with applicable external rules and internal procedures.

PROTECTING AMPER-AUTO REPUTATION. We work to protect the prestige and reputation of Amper-Auto, which we consider an intangible resource of inestimable worth. Our reputation comes from the way stakeholders and other people perceive our company, which is why we must endeavour to strengthen and protect our reputation through our everyday actions, refraining from any conduct that could put it at risk. In addition, we choose partners that adhere to our principles so as to protect Amper-Auto reputation overall and from a longterm perspective.

IMPLEMENTATION OF THE CODE

The Code is published on Amper-Auto website, and is available to our employees in paper and digital form. We guarantee and promote the dissemination and awareness of the principles of the Code, through – amongst other things – training programmes and specific initiatives.



It is the responsibility of every one of us to familiarize ourselves and comply with its provisions and to monitor its application within our sphere of duty, as well as to report infringements, thereby helping to protect our company and its reputation.

This is because the principles and provisions contained in the Code form the basis of our work and compliance with them is an essential part of the contractual obligations we have undertaken.

In this respect, the following aspects are particularly worth remembering:

PRINCIPLES-PRACTICES-PROCEDURES. The Code of Conduct, together with the Sustainability Policy, is the primary set of standards in Amper-Auto system of internal rules. Its principles are the cornerstone of our Practices and Procedures, which implement them in further detail in order to regulate the company's processes and guide our conduct in agreement therewith, according to shared ethical standards.

DISCIPLINARY MEASURES. Any employee who violate the principles and provisions of the Code also breaches the obligations to which they are bound as part of their employment relationship and may, therefore, face disciplinary actions, the gravity of which is determined in relation to the seriousness of the violation.

Amper-Auto shall use every reasonable action to prevent and discourage any conduct in violation of the Code, as well as to sanction any misconduct by its employees and interrupt commercial agreements with suppliers and other third parties violating the above mentioned principles and commitments.

In accordance with the provisions of the applicable collective employment agreement, Amper-Auto takes adequate disciplinary measures against employees whose conducts have violated or threatened to violate the Code and the related Practices, up to and including dismissal, to the extent permitted by the applicable labor laws.

The disciplinary measures to be adopted may vary case by case, in accordance with – inter alia – elements such as the gravity and duration of the infringement. In any event, such measures will be applied against anyone that engages in conducts or behaviors contrary to this Code, regardless of the role held within the company.

CONTRACTUAL MEASURES. Any third party, including those acting in the name and/or on behalf of Amper-Auto, who violates the principles and provisions of the Code breaches its contractual obligations and this may, therefore, entail contractual sanctions including termination and – in any case – the activation of remedies provided for by law.

REPORTING OF VIOLATIONS OF THE CODE OF CONDUCT (WHISTLEBLOWING). Reporting a violation of the Code of Conduct helps, amongst other things, to protect our company's reputation. Violations (or potential ones) of the Code can be reported – anonymously, if preferred – using the dedicated website page <https://amperauto.smartleaks.it>

We treat all concerns raised with the utmost confidentiality, protecting the information and data contained therein, as well as the identity of the party that raised the concern and the other parties involved; any form of retaliation, threats, penalties, or discrimination is expressly prohibited, both against these parties and against anyone who participated in the investigations.