

MadeInAdd S.r.l.
Code of Ethics

1. INTRODUCTION

MadeInAdd S.r.l. (the “Company”) is active in the field of industry 4.0 and additive manufacturing and proposes a new digital model for the design and production of 3D-print components for manufacturing companies, with a special focus on SMEs. In particular, the Company makes available a digital platform to assist its customers through a component design process by defining the most suitable characteristics and materials for additive printing and completing such process through the purchase of a printing service.

In carrying out its activities, the Company is inspired by values and ethical principles that are set out clearly and transparently in this code of ethics (the “Code of Ethics”), the observance of which is required of all those who or which, in various capacities, contribute to the performance of the Company’s activities.

2. SCOPE AND INTENDED USERS

The principles set out in this Code of Ethics are binding, first and foremost, on the intended users of the Organisation, Management and Control Model adopted pursuant to Decree 2311 (the “231 Model”), namely:

- directors and statutory auditors;
- employees (wage earners), including managers employed by the Company;
- temporary or seconded workers, i.e., workers involved in the Company’s processes via an employment contract signed with third-parties, who are nevertheless permanently included in the Company’s organisation and work under its management and control;
- quasi-employees (including trainees and interns), i.e., workers involved in company processes, who work continuously and physically in the Company’s workplaces, or who, in any case, are subject to the Company’s management and control.

Unlike the provisions of the 231 Model, the principles of the Code of Ethics (insofar as they are compatible) also apply to external contractors that interact with the Company, such as suppliers, hired consultants, customers. At the contractual stage, the Company shall send a copy of this document, the reading and acceptance of which is a precondition for the conclusion of a contract with them. These persons, therefore, undertake to ensure that, in the performance of the contract entered into, their directors, employees, representatives and also any hired contractors and consultants comply with the principles of this Code of Ethics, in particular by adopting all appropriate measures to prevent behaviours contrary to the provisions hereof, with the duty to report to the Company any breach of which they become aware or any suspected breach.

In conclusion, the intended users of this Code of Ethics are all users of the 231 Model and all external parties with which the Company interacts (the “Intended Users”).

1 Short for legislative decree no. 231 of 8 June 2001 - “Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of Law no. 300 of 29 September 2000”.

3. FUNDAMENTAL ETHICAL PRINCIPLES

Below are the fundamental values and principles to which the Company aspires and which shall inspire its activities at all times.

3.1 Legality

Legality is an indispensable value in the conduct of any activity. As a result, in addition to complying with the internal regulations that the Company has adopted, Intended Users are required to comply with all applicable laws, equivalent regulatory acts, European legislation, secondary sources of law, as well as all the prescriptions of the competent supervisory authorities (e.g., guidelines from the Italian Data Protection Authority, etc.). This also applies with reference to the national legislation of any country with which the Company may have business relations.

Lack of knowledge of the above regulations does not exempt anyone from liability and, in case of doubt, as to their interpretation, workers may refer to their line manager.

3.2 Integrity, transparency and traceability

All the activities carried out, whether directly or indirectly, by the Company are characterised by respect for the principles of integrity and transparency, reflected in the fairness, professionalism and sense of responsibility that should characterise the actions of each Intended User. The Company and, in particular, the persons and departments specifically appointed for this purpose have a duty to ensure the correct internal circulation and external disclosure of corporate information whose communication is to be considered mandatory.

In no event is the dissemination of false or misleading news allowed; similarly, no form of pressure may be exerted on the media to acquire favourable attitudes towards the Company. Although the pursuit of the Company's interest is prioritised, any conduct that, while appearing to be advantageous to the Company, violates the principles of integrity and transparency, the regulations in force or the other provisions of this Code cannot be tolerated.

Finally, every activity shall be documented, so that it is always possible to identify the reason for any action and reconstruct the chain of requests, controls, authorisations and, consequently, responsibilities for any performed activities.

3.3 Respect for fundamental rights and for the value of individuals

The Company undertakes to offer working conditions that respect personal dignity, human rights, equal opportunities and a professional and participative working environment.

In general, the Company shall ensure respect for the fundamental rights of the people with whom it interacts for any reason, undertake to protect their physical and moral integrity and ensure equal treatment, while rejecting any form of favouritism or discrimination based on age, gender, health, ethnicity, sexual orientation, nationality, political opinions and religious beliefs. In any case, investigations into the political and religious ideas and, in general, into the private life of Intended Users of this Code are prohibited.

3.4 Confidentiality

The Company undertakes to treat as confidential any information obtained in the performance of its activity and to ensure high standards of protection, management and storage of the data entered in its information systems. In particular, the protection of the Company's or third-parties' secret and confidential information is guaranteed. These obligations and prohibitions shall continue to apply even after the end of the Intended User's work relationship with the Company.

The Company shall adopt appropriate security measures to minimise, according to technical progress, the risk of data dispersion as well as the risk of unauthorised access to or processing of its held data. In the exercise of their functions and within the scope of their responsibilities, Intended Users are required to apply these security measures with regard to both IT tools and paper files and archives.

3.5 Sustainability

The Company is sensitive to the current need for a real change in the concept of doing business. The classic entrepreneurial objective of creating profit for the benefit of a limited number of persons (interest holders) cannot now be dissociated from the awareness of the Company's impact on the persons that make up the social context where it operates (i.e., stakeholders), for its development and production to be sustainable with regard to ESG (Environmental, Social and Governance) aspects.

Industry 4.0 and, in particular, additive manufacturing are part of a process of positive change in terms of sustainability, with special reference to environmental aspects. Unlike conventional production processes that are "subtractive" in nature – otherwise said, they involve the elimination of a part of a material – additive manufacturing involves the manufacture of goods from 3D models by means of "layer upon layer" production, which allows for a more precise calculation of the raw materials needed. One of the main benefits of this manufacturing method is a drastic reduction of production waste, which simplifies waste management. At the same time, the amount of the material needed for production is minimised. This helps a lot in terms of, e.g., lower emissions related to transport, and lower overall costs (including energy costs) borne by the producer.

From a social standpoint, the Company places the respect for individuals at the centre of its activities and undertakes to guarantee the dignity of workers and all stakeholders with whom it comes into contact, while avoiding any form of discrimination towards anyone and contributing to greater social cohesion and aggregation. The ultimate aim of this Code is to contribute to corporate growth as well as to the growth of the entire social community.

Finally, the Company is aware that the achievement of environmental and social objectives directly depends on suitable governance, which is an essential element in view of lasting and sustainable corporate growth. For this reason, it is committed to adopting corporate management tools that are always in line with the current best practices, with special attention to all key aspects that ensure good governance such as, without limitation, respect for interest holders' rights, transparency of corporate decisions and choices, respect for minorities, and remuneration of its management.

4. BUSINESS MANAGEMENT

4.1 Conflicts of interest

In line with the principles of proper business management, Intended Users should avoid all situations where a personal interest may conflict with a duty or responsibility towards the Company, such as to affect the ability to make decisions objectively and impartially. Likewise, any abuse of one's role in the Company aimed at obtaining personal benefits should be strictly avoided. Potential situations of conflict of interest should be promptly reported to the Company by the Intended User concerned, or by whoever is aware of it. The Company should take steps to prevent any behaviour that causes prejudice to the Company, even on a merely reputational level, when this is not done spontaneously by the Intended User concerned.

Potential conflicts of interest may, for example, occur in the context of donations made by the Company; therefore, any sponsorships or donations should be preceded by an accurate and documented assessment of the beneficiary, the activities carried out and, possibly, the project to be sponsored. To that end, an ex-post report on the use of the funds should be requested.

4.2 Anti-money laundering legislation

All Intended Users are not allowed to carry out or be involved in activities associated with the laundering, use or self-laundering of proceeds from illegal activities, and laws on anti-money laundering and combating organised crime should be strictly observed. Intended Users are required to assess the integrity and propriety of suppliers, consultants and customers and the lawfulness of the activities they carry out in the light of available information before establishing a business relation with them.

4.3 Anti-corruption legislation

The concept of Public Administration (the “PA”) includes all those parties that can be qualified as such under current legislation and current case-law and legal theory.

Only specifically appointed persons and corporate departments may assume commitments and manage relations with the PA, which should be done in strict compliance with the applicable regulations, with a special focus on the need not to compromise the integrity or reputation of the Company. For this reason, such relations should be accurately documented and take place with the utmost clarity and fairness in order to establish a professional and transparent relationship. It is therefore strictly forbidden to: offer money or benefits of any kind to representatives of the PA (or their relatives or other persons known to be “closely” related to them) in order to influence them in the performance of their duties; receive illegal benefits; and, more generally, to obtain undue advantages in the context of, for example, requests for authorisations, permits and concessions, inspections or requests for public funds.

4.4 Protection of intellectual property rights

Given the nature of its core business, the Company is particularly sensitive to the protection of intellectual property rights, understood as industrial property rights (patents, trademarks, designs and industrial models) and copyrights.

For this reason, all Intended Users are required to actively contribute to that end and observe the regulations of the industry and, in general, the obligations of confidentiality and secrecy, as well as to report any violations or infringements of which they become aware.

For the same purpose, the Company regularly carries out the necessary controls to ensure that the rules protecting these rights are respected. In addition, with a view to making customers accountable for their actions, in all contracts signed with them, the Company includes clauses referring to industry regulations and clauses involving the termination of the contractual relationship in the event of proven violations and infringements.

At the same time, the Company protects its know-how and any intellectual property rights it owns and requires all Intended Users to fully comply with the obligations and duties provided for by internal and industry regulations.

4.5 Protection of personal data

Both within and outside its organisation, the Company ensures the protection of the personal data of all persons who come into contact with the Company in accordance with current privacy laws, which all Intended Users of this Code of Ethics are required to know and respect.

4.6 Relations with the market

The Company recognises the value of free and fair competition as a key principle of an advanced economic system and shall not engage in any collusive and predatory conduct such as to violate current antitrust and consumer-protection regulations.

4.7 Relations with customers

In all its activities, the Company prioritises customers and their needs, which the Company undertakes to satisfy at the highest technical and professional level and with the highest standards of punctuality, care and spirit of collaboration

in order to achieve excellent quality at every stage, from the assistance given during the design phase to the printing and delivery of a project.

In its business relations, the Company informs customers of the existence of this Code of Ethics and the principles and values it contains and requests them to read and accept it before entering into a contract.

4.8 Relations with suppliers

The process of purchasing goods and services involves targeting the highest value for the Company. It being understood that any forms of favouritism or discrimination are strictly prohibited. The choice of suppliers and the purchase of goods and services are made by dedicated corporate departments after a careful, objective and documented qualification procedure which involves assessing their technical skills, quality, reputation, sustainability, reliability, delivery times and pricing terms.

The Company's suppliers are requested to read and accept the provisions of this Code of Ethics and to acknowledge that its effects extend to them insofar as applicable. Contracts with suppliers include clauses that, in the event of non-compliance with this Code of Ethics, may lead to requests for alignment or, in the most serious cases or of repeated violations, to termination of the relationship.

All the Company's suppliers should ensure that the working conditions of their employees are based on the respect for fundamental human rights and the laws and international conventions in force, with special reference to the following: (i) prohibition of child labour; (ii) prohibition of exploitation of human resources with physical or psychological abuse; (iii) prohibition of production processes that are harmful to workers' health. Violation of the above prohibitions shall entail immediate termination of any contractual relationship.

The relationships to be established with suppliers should be efficient, transparent and characterised by an open and extremely clear dialogue in which the full application of contractual conditions and compliance with current regulations and the provisions of this Code of Ethics shall be required. Whenever possible, relations that generate forms of dependency, with excessive long-term constraints, are to be avoided. All contractual documents certifying the agreed conditions and the obligations respectively borne by the Company and its suppliers shall be kept for the period prescribed by law.

The principles described above also apply to relations with independent consultants and agents, if any.

4.9 Relations with other stakeholders

The Company intends to have transparent relations with its main stakeholders.

First and foremost, the Company undertakes to provide its own interest holders with accurate, truthful and timely information, in full compliance with the applicable legislation and its memorandum of association, so that their participation in corporate decisions is fully effective.

Relations with the supervisory body, the statutory auditors and the independent auditors shall be characterised by the utmost transparency and fairness, in order to establish a professional and collaborative relationship, and shall take place under the supervision and coordination of the dedicated corporate functions or those that will from time to time be involved.

Finally, the Company does not contribute in any way to financing political parties nor does it engage in conduct aimed at exerting pressure on political representatives. Relations with trade associations shall be developed within the limits of the regulations in force and be characterised by the utmost clarity and transparency.

4.10 Giving or accepting gifts or other gratuities

The Company has adopted a policy of total rejection not only of public bribery, but also of bribery among private individuals and of any practice considered unlawful by the legislation in force. Consequently, no direct or indirect offers of money, gifts, gratuities or donations of any kind shall be permitted to persons with whom the Company has business or consultancy relations, with the purpose of influencing them in the performance of their duties or activities and therefore gaining an undue advantage, to an extent that goes beyond normal business or courtesy practices and can be considered detrimental to the integrity and reputation of the parties involved.

For persons in the Company's employ or service, the 231 Model prohibits the acceptance (even on the occasion of national holidays) of valuable gifts and presents or in any case such as to negatively influence the fairness of the manner in which the Company's business should always be conducted. Those who should, in any case, receive them are required to give immediate notice thereof to the Company, which will then assess whether to return or retain the received gifts or presents.

5. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

The Company complies with all applicable regulations concerning the preparation of financial statements and all types of mandatory administrative and accounting documentation. Accounting entries shall be accurate, complete and be reported promptly – also with the support of independent consultants formally appointed for this purpose by contract – in compliance with the Company procedures and accounting policies applied and currently in force. All the Company's transactions should be correctly recognised, authorised and audited; they should also be consistent, reliable and such as to represent the Company's financial position, result of operations and cash flows in a truthful manner.

All corporate departments are required to ensure their maximum cooperation so that management facts are correctly and promptly presented in the Company accounts. Adequate supporting documentation should be kept for each accounting entry to reflect a corporate transaction and such as to be easily found and consulted, for both internal use and use by independent auditors.

6. DILIGENCE IN THE USE OF COMPANY RESOURCES

Company resources should be used with the utmost care and diligence; attention must be paid to avoiding all uses that may cause damage or even be in conflict with the corporate purpose to the extent of disrupting the Company's continuity in the most serious cases.

The use of corporate resources is not permitted for personal uses and interests of any kind, even when such uses imply an abstract advantage for the Company.

7. IT SECURITY

The Intended Users of the 231 Model are required to strictly comply with the Company's procedures and policies on IT security, using the equipment assigned to them exclusively, so as not to compromise the functionality and protection of the Company's IT system.

The IT tools made available by the Company are deemed to be work tools at all times and, therefore, used for Company purposes only. No unauthorised or unlicensed software may be downloaded and used as this may lead to abusive access to confidential Company databases.

8. HUMAN RESOURCE MANAGEMENT

The Company offers equal opportunities for employment and professional advancement. In the processes of personnel recruitment, management and development, all decisions should exclusively be based on the correspondence between the expected profiles and the employees' technical skills and aptitudes and on objective results (in the case of

promotions or assignment of rewards and incentives based on the results achieved). Personnel assessment should be carried out in a shared and documented manner involving line managers and other persons who may have entered into relations with the person being assessed.

Staff are hired with a regular employment contract and no form of irregular employment is tolerated. Upon joining the Company, each worker receives accurate information on: (i) job description; (ii) applicable regulations and remuneration details; (iii) workplace health and safety rules and procedures; (iv) relevant standards and Company procedures. This information is presented to the employee in such a way that acceptance of a job is based on the actual understanding of it.

Where possible and without affecting the general efficiency and effectiveness of work, flexibility in the organisation of activities is favoured so as to, inter alia, improve the employee's quality of life, facilitate the provision of care to family members and, more generally, optimise the work-life balance.

9. USE OF SOCIAL MEDIA AND RELATIONS WITH THE MEDIA

Each person operating within the Company represents it and its interface with the outside world. For this very reason, any content published on social media – either on a personal level or on behalf of the Company subject to its prior authorisation – may affect the Company and its brand.

Furthermore, no one is authorised to report on the Company's activities with any journalist or press office, unless expressly authorised to do so. All Intended Users that are contacted by a media outlet are strictly prohibited from answering any questions or making any statements that could be used against the Company. Such situations shall be promptly reported to their respective line manager.

10. PROTECTION OF THE ENVIRONMENT AND OF OCCUPATIONAL HEALTH AND SAFETY

With regard to occupational health and safety, the Company undertakes to fulfil its legal obligations, promote a culture of prevention and safety, and ensure the wellbeing of workers, also by favouring an optimum work-life balance.

The principles guiding the Company's decisions on this matter are as follows: (i) identifying and assessing the risks associated with work activities and removing (or at least limiting) them at source; (ii) adapting the activity to be performed to the worker's individual characteristics; (iii) taking into account and updating the safeguards adopted to the degree of scientific and technical progress; (iv) providing workers with the necessary personal protective equipment; (v) ensuring that training sessions are held on a regular basis.

In line with the general principles of sustainability underpinning the Company's activities, the Company is aware of the direct and indirect effects of its activities in the social and economic context where it operates and, more importantly, on the wellbeing of its local community and neighbourhood. All Company activities, including the choice of suppliers and business partners, are therefore driven by the need to find a balance between the development of profitable projects for the Company and unavoidable environmental requirements, both in terms of compliance with current regulations and the rights of future generations.

11. DISSEMINATION AND UPDATING OF THE CODE OF ETHICS

The Company undertakes to promote and encourage adequate knowledge of this Code of Ethics in its information and training activities meant for Intended Users and also through its publication on the Company's website.

The Code of Ethics will be updated in the event of changes in the reference legislation or internal changes to the Company organisation.

12. REPORTS OF VIOLATIONS OF THE CODE OF ETHICS AND DISCIPLINARY MEASURES

Each Intended User of the Code of Ethics is required to notify the Company of any doubt about, suspected violation of, or non-compliance with this Code of Ethics of which it becomes aware.

In particular, each “external” Intended User (i.e., supplier, consultant or customer) undertakes to ensure that their directors, employees, representatives and also any hired contractors and consultants make the above-mentioned reports.

With particular reference to the Intended Users of the 231 Model, they shall report any violations of which they become aware to the Supervisory Body (Organismo di Vigilanza), as the body appointed to receive and review all reports of violations of the 231 Model, of which the Code of Ethics forms an integral part. Such reports shall be made and processed in line with the provisions of the General Part of the 231 Model.

Failure to comply with the Code of Ethics by any Intended Users outside the Company may lead to the termination of the existing contract, depending on the seriousness of the alleged violation.

All Intended Users of the 231 Model who violate the Code of Ethics are subject to disciplinary measures pursuant to Article 7 of the Workers’ Statute and the General Part of the 231 Model. These disciplinary measures will be commensurate with the type and extent of the violation and may also involve dismissal, according to the applicable legislation and the relevant collective agreement.