

I.M.I. SRL CODE OF ETHICS

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1. Preamble

This Code of Ethics defines the principles, values, and rules of conduct guiding the operations of I.M.I. Srl (hereinafter also “the Company” or “IMI”) in carrying out its activities and managing relationships with employees, collaborators, clients, suppliers, and all other external stakeholders.

IMI believes that ethics in business conduct is an essential element for the company’s success, for protecting its reputation, and for building lasting relationships based on trust, transparency, and mutual responsibility. Acting ethically means always complying with current laws and social values that guide civil coexistence, adopting behaviors based on correctness, loyalty, responsibility, and honesty.

The Code of Ethics serves as a fundamental reference for everyone acting on behalf of the Company, ensuring that every decision and behavior aligns with corporate values and considers not only the interests of IMI but also the rights and duties toward all involved parties, internal and external.

The Code is binding for directors, employees, and collaborators of the Company, who must comply with its contents and actively contribute to its dissemination and implementation. IMI also requires that key stakeholders—such as affiliated companies, suppliers, and major clients—share and respect the ethics and legality principles set forth in this document, fully respecting cultural, religious, and social differences.

To protect its image and safeguard its resources, the Company will not engage with parties unwilling to operate in compliance with applicable law or that refuse to adhere to the principles and rules of conduct in this Code.

The Code of Ethics is an integral part of I.M.I. Srl’s organization, management, and control system and will be published on the Company’s official website for accessibility and sharing with all stakeholders.

2. Preliminary Provisions

2.1 Definitions

In this Code, the following expressions shall have the meanings indicated:

- **Code:** this Code of Ethics and any attachments, as amended or supplemented from time to time;
- **Recipients:** all parties to whom this Code applies, including shareholders, directors, employees, managers, collaborators (consultants, agents), suppliers, and clients;
- **Employees:** individuals engaged with the Company in a subordinate employment relationship, including fixed-term or part-time workers;
- **Corporate Officers:** the Chairman, Chief Executive Officers, members of the Board of Directors, the Board of Statutory Auditors, and any other top-level executives;
- **Supervisory Body:** the body provided for under Art. 6 of Legislative Decree 231/2001, responsible for monitoring the functioning and compliance of the Organization, Management and Control Model, as well as its updates;
- **Managers:** individuals responsible for one or more company areas, according to the delegations and responsibilities assigned by the Company.

2.2 Activities of I.M.I. Srl

Founded in 1987 in Travagliato (Brescia), I.M.I. Srl started as a heavy carpentry company and specializes in manufacturing steel products based on client drawings and specifications.

The main in-house activities include:

- Cutting with oxy-fuel and plasma;
- Assembly and welding (MIG-MAG, Submerged Arc, and Plasma);
- Quality control and technical compliance of manufactured products;
- Customization and design according to client requirements.

3. Values

3.1 Quality

For I.M.I. Srl, quality is fundamental and permeates the entire organization. Quality is reflected in producing goods according to client instructions, including technical specifications and drawings.

To guarantee and continually improve quality standards, the Company commits to:

- Promoting continuous staff training;

- Keeping equipment, machinery, and production processes up to date;
- Adopting innovative tools and technologies to improve efficiency and reduce errors.

3.2 Centrality and Enhancement of People

I.M.I. Srl recognizes the central role of people in achieving company goals. The Company promotes:

- A work environment that respects the dignity of all, free from discrimination;
- Professional and personal growth of employees and collaborators;
- Recognition of merit, rewarding fairness and responsibility without favoritism.

4. Application of the Code of Ethics

4.1 Scope of Application

The Code applies to all Recipients, including employees, collaborators, clients, suppliers, and business partners, in compliance with applicable law and collective agreements.

4.2 Obligations to Comply

Directors, Managers, and Supervisors must base their behavior on the principles of the Code, promoting its application and serving as a reference model.

Employees must comply with the Code, which complements contractual and disciplinary obligations under the employment relationship.

4.3 Responsibilities of Managers

Managers must ensure:

- Clear communication of obligations and principles to their collaborators;
- Monitoring and prevention of behaviors contrary to the Code;
- Protection of collaborators from retaliation in cases of good-faith reporting.

4.4 Conduct in Relations with Third Parties

Recipients must:

- Inform third parties of the Code's obligations;
- Require third parties to comply with company rules;
- Report violations or behaviors that may lead to violations.

I.M.I. Srl reserves the right to terminate relationships with parties who do not respect ethical and legal principles.

5. Ethical Principles

5.1 Legality

All activities must comply with national, supranational, and local laws. Recipients must refrain from any illegal conduct and understand the regulations applicable to their role.

5.2 Dignity and Equality

Respect for individuals is central: prohibition of discrimination, harassment, abuse, protection of privacy, and promotion of diversity.

5.3 Business Ethics

Transparency, fairness, and fair competition must guide all business decisions and relationships with clients and suppliers.

5.4 Professionalism and Collaboration

Commitment, responsibility, and continuous professional development are essential. Mutual collaboration is key to project success.

5.5 Anti-Corruption

Active prevention of public and private corruption, ensuring fair business conduct.

5.6 Personnel Management, Health, Safety, and Harassment Prevention

Merit-based evaluation, professional development, risk prevention, anti-bullying and harassment policies, prohibition of retaliation.

5.7 Conflict of Interest

Avoid real or potential conflicts and promptly report any situations.

5.8 Environmental Protection

Reduce environmental impact, use resources efficiently, and raise worker awareness.

5.9 Workplace Health and Safety

Ensure a safe environment, provide adequate resources, maintain constant monitoring, and actively involve employees.

6. External Relations

I.M.I. Srl places great importance on relations with external parties, believing transparency, fairness, and professionalism are essential for building lasting and trust-based relationships. All Recipients must act in compliance with the law, the Code's ethical principles, and corporate values, avoiding behaviors that could damage the Company's image.

6.1 Relations with External Stakeholders

Relations with clients, suppliers, consultants, collaborators, agents, and business partners must be based on:

- Transparency and clarity in agreements;
- Shared ethical values and lawful behavior;
- Selection of suppliers and partners based on objective criteria such as quality, price, reliability, and competence.

6.2 Relations with Public Administration and Institutions

Relations with public entities, supervisory authorities, and institutions must be based on:

- Legality, fairness, and transparency;
- Condemnation of all forms of corruption or extortion;
- Prohibition of favors, undue influence, or personal benefits toward public representatives;
- Immediate reporting of non-compliant requests or offers and suspension of any relationship until clarification.

6.3 Relations with Political and Trade Union Organizations

Relations with parties, political associations, or unions must be managed exclusively by authorized Corporate Officers, respecting impartiality, independence, and fairness, avoiding improper interference.

6.4 Sponsorships and Donations

The Company may provide sponsorships and donations to cultural, sports, or social organizations, provided that:

- They are not intended to obtain undue advantages;
- They contribute to local development and the common good;
- They align with the ethical and social values of I.M.I. Srl;
- They do not constitute favors to private or public parties in exchange for economic advantages or preferential treatment.

7. Accounting and Financial Transparency

I.M.I. Srl considers accounting transparency and accuracy of financial information fundamental for shareholder, client, and supplier trust.

7.1 Transparency and Accuracy of Information

All accounting documents and information must be:

- Complete, truthful, understandable, and accurate;
- Compliant with tax, fiscal, and civil regulations;
- Constantly updated to reflect legislative changes;

- Supported by adequate documentation to allow reconstruction and verification of operations.

7.2 Extraordinary Transactions

In case of extraordinary transactions (mergers, demergers, profit distribution, acquisitions):

- Directors and managers must ensure transparency and correctness;
- All data and information must be truthful, complete, and clear;
- Decisions must protect minority shareholders, creditors, and company interests.

7.3 Social Communications and Accounting Records

Financial statements and accounting records must faithfully represent the Company's and subsidiaries' financial, economic, and equity situation.

Each transaction must be documented to allow internal control, preventing fraud or law violations.

8. Internal Controls

To ensure process regularity, I.M.I. Srl has adopted an internal control system aimed at:

- Verifying proper management of company activities;
- Supporting risk management and preventing illegal conduct;
- Monitoring process efficiency and compliance with procedures.

Each Recipient must:

- Actively contribute to defining and operating controls;
 - Comply with internal procedures;
 - Promptly report anomalies or violations to the Supervisory Body.
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9. Confidential and Privileged Information

Recipients who acquire confidential or privileged information must ensure its utmost protection.

9.1 Personal Data Protection

Personal data of employees, collaborators, clients, and suppliers must be handled according to applicable law, with access limited to authorized personnel.

9.2 Confidentiality and Proper Use of Information

All company information is the property of I.M.I. Srl and includes:

- Personal and sensitive data of internal and external parties;
- Strategic, technical, or financial confidential information;
- Confidential news that, if disclosed, could harm the Company or partners.

Recipients must:

- Use information solely for professional purposes;
- Not disclose it to unauthorized third parties;
- Avoid using it for personal gain or to harm the Company;
- Maintain confidentiality even after the termination of their relationship with I.M.I. Srl.