

Code of Ethics



<i>Code</i>	DQA0001
<i>Revision</i>	00
<i>Date</i>	Apr. 07-2021
<i>Page</i>	11 / 20

SUMMARY

1. PREMISE

- 1.1. What is the Code of Ethics
- 1.2. To whom does it apply?
- 1.3. Where can you find it?

2. GENERAL PRINCIPLES

- 2.1. Centrality of the person
- 2.2. Respect of human rights and rejection of all discrimination
- 2.3. Principle of equal opportunities

3. ETHICAL PRINCIPLES IN PROFESSIONAL RELATIONSHIPS

- 3.1. Principle of fairness
- 3.2. Principle of legality
- 3.3. Principle of affordability
- 3.4. Confidentiality
- 3.5. Transparency and completeness of information
- 3.6. Conflict of interest
- 3.7. Protection of health, safety and the environment

4. BEHAVIOUR

- 4.1. Relationships with customers and suppliers
- 4.2. Relationships with employees and collaborators
- 4.3. Relationships with Public Administration
- 4.4. Accounting and financial management
- 4.5. Business management
- 4.6. Sponsorships
- 4.7. Management of information and corporate documentation

5. DISCIPLINARY PROCEEDINGS

6. VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS

7. DISSEMINATION OF THE CODE OF ETHICS

8. ISSUE AND APPROVAL OF THE CODE OF ETHICS

Reason for revision

Issue of the document

Code of Ethics



Code	DQA0001
Revision	00
Date	Apr. 07-2021
Page	12 / 20

1. PREMISE

The mission of SCAME PARRE S.p.A. is to reach TECHNICAL INDUSTRIAL SPECIALISATION WITH HIGH ADDED VALUE

Scame Parre has adopted an organisation and management model aiming at preventing the commission of crimes in the interest or to the advantage of the company itself as referred to in Legislative Decree 231/01.

The Code of Ethics, represented by this document, constitutes an integral part of the company organisational and management model.

Scame Parre identifies in this Code of Ethics the founding values of its work, aimed at satisfying customer expectations.

The correct and transparent performance of the activities, together with the technical-professional due diligence, represent the foundation on which the daily work of each OPERATOR is based.

Scame Parre spa, together with its subsidiary companies (the "Scame Group") is at the service of its current and future customers, in the sectors of the production of components and systems for civil and industrial electrical systems, electrical systems for industries at risk of fire/explosion, electric vehicle charging systems and stations. The Group manages to reach this goal thanks to the collaboration of the women and men who work within it, the collaboration of the companies supplying goods and services, the resources made available by investors and the communities it belongs to and in which it operates. Awareness of these relationships and the responsibilities they entail has always been part of the Group's corporate culture.

1.1 What is the Code of Ethics?

The Code of Ethics summarises the principles, rules of conduct and values that every director, manager, employee, collaborator in any capacity, as well as any supplier of Scame Parre S.p.A., must comply with in their business activity, in performing their work and, in general, in internal and external relationships with the company itself.

The Code of Ethics is an official document of the company.

1.2 To whom does it apply?

The Code binds directors, managers, employees and collaborators, as well as the suppliers of Scame Parre S.p.A.

Reason for revision

Issue of the document

Code of Ethics



Code	DQA0001
Revision	00
Date	Apr. 07-2021
Page	13 / 20

SCAME PARRE also requires the main suppliers, contractors, subcontractors, business partners, as well as all individuals with whom, directly or indirectly, it has relationships of any kind, to behave in line with the principles contained in this Code of Ethics.

The relationships between the various parties involved must be based on criteria and behaviours of honesty, fairness, collaboration, loyalty and mutual respect and in no way can the conviction of acting for the benefit or in the interest of SCAME justify, not even partially, the adoption of behaviours in contrast with the principles and contents of the Code.

1.3 Where can you find it?

Everyone can read the Code in electronic format on the company intranet or on the Group's website or can obtain a hard copy by requesting it from the Personnel Department or the Quality Department.

2. GENERAL PRINCIPLES

2.1 Centrality of the person

Scame Parre adopts the respect for the person as a central and mandatory value in the pursuit of its institutional purposes.

Scame Parre does not allow and does not tolerate acts of violence, including psychological ones, or harassment, or any behaviour that may damage people's sensitivity.

Scame Parre promotes and protects the inalienable rights of the person, such as, for example, freedom, dignity, the protection of one's personality, respect for religious beliefs.

2.2 Respect of human rights and rejection of all discrimination

Scame Parre adopts, as a central and mandatory value in the pursuit of its institutional purposes, the rejection of any type of discriminatory attitude as far as age, sex, sexual orientation, state of health, ethnicity, territorial origin, political opinions and trade union membership, as well as religious beliefs, are concerned.

2.3 Principle of equal opportunities

Scame Parre adopts, as a central and mandatory value in the pursuit of its institutional purposes, the granting of equal professional opportunities, in compliance with the regulatory and management

Reason for revision

Issue of the document

Code of Ethics



<i>Code</i>	DQA0001
<i>Revision</i>	00
<i>Date</i>	Apr. 07-2021
<i>Page</i>	14 / 20

requirements applicable to the specific activities. Scame Parre rejects any penalising attitude in the professional sphere linked to considerations of age, sex, sexual orientation, state of health, race, ethnicity, territorial origin, political opinions and trade union membership, religious beliefs.

3. ETHICAL PRINCIPLES IN PROFESSIONAL RELATIONSHIPS

3.1 Principle of fairness

The management of all activities and related professional relationships is based on the principles of good faith, legitimacy, honesty, fairness and transparency.

3.2 Principle of legality

The management of all activities and related professional relationships is based on the principle of legality, which is carried out in compliance with the laws, regulations and statutory provisions in force. All operators, in performing the activities for which they are responsible, must systematically and rigorously comply with the applicable regulatory and management requirements, also with reference to updating the legislative framework. Particular attention must be paid to compliance with current legislation on administrative and accounting matters, on personnel management, on health and safety at work, on information security, on environmental protection. All operators are also required to cooperate in a fair and effective way with the judicial authority and the supervisory authorities for the parts of their competence.

3.3 Principle of affordability

The management of all activities and professional relationships is based on the principle of affordability, which is operationally expressed in the search for conditions of efficiency and effectiveness, as well as in the optimal use of available resources and the elimination of factors of waste or undue aggravation.

3.4 Confidentiality

Anyone who works with and on behalf of the company must ensure the utmost confidentiality regarding news and information constituting the company assets or relating to Personnel, Customers, Suppliers and, in general, the activity of SCAME PARRE, in compliance with the law, current regulations and internal procedures. Without prejudice to the transparency of the activities carried out and the information obligations

Reason for revision

Issue of the document

Code of Ethics



<i>Code</i>	DQA0001
<i>Revision</i>	00
<i>Date</i>	Apr. 07-2021
<i>Page</i>	15 / 20

imposed by the provisions in force, each subject is obliged to ensure the confidentiality required by the circumstances for each piece of information learned on the basis of their job function.

3.5 Transparency and completeness of information

The information disseminated by SCAME PARRE must be truthful, correct, transparent and understandable and any misleading, aggressive or otherwise incorrect practice in any corporate communication is prohibited.

3.6 Conflict of interest

In performing each activity, SCAME PARRE works to avoid running into situations of real or even only potential conflict of interest. In addition to the statutory assumptions, this conflict can arise in any case in which a subject works for the satisfaction of an interest other than that of the company and its shareholders, but for the sole purpose of gaining a personal or third party advantage.

Anyone who becomes aware of the existence of a conflict of interest, as represented above, must promptly notify the General Management of SCAME PARRE.

All subjects acting in the name and/or on behalf of SCAME PARRE must check in advance the information available regarding commercial counterparties and suppliers, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with the same.

Directors, employees and collaborators pursue the objectives and general interests of the Group in carrying out their collaboration. They shall inform without delay, taking into account the circumstances, their supervisors or contact persons for the situations or activities in which they could be interests holders in conflict with those of the Group (or if these interests are immediate joint owners) and in any other case in which there are relevant reasons of convenience.

3.7 Protection of health, safety and the environment

Scame Parre complies with all the legal, regulatory and technical standards applicable from time to time regarding the protection of the health and safety of workers and adopts management systems suitable for this purpose.

Among others, the following are considered essential principles:

- a) avoid risks;
- b) assess the risks that cannot be avoided;
- c) fight risks at source;

Reason for revision

Issue of the document

Code of Ethics



Code	DQA0001
Revision	00
Date	Apr. 07-2021
Page	16 / 20

- d) adapt work to man, in particular as far as the design of workplaces and the choice of work equipment as well as methods of work and production are concerned, in order to reduce monotonous and repetitive work and to reduce the effects of such works on health;
- e) take into account the degree of technical evolution;
- f) replace what is dangerous with what is not dangerous or less dangerous;
- g) plan prevention, aiming at a coherent complex integrating technique, work organisation, working conditions, social relations and the influence of different factors in the working environment into the same;
- h) give priority to collective protection measures over individual protection measures;
- i) give adequate instructions to workers, both through training for new hires and for those assigned to new tasks/activities within the company, and through information on health and safety at the workplace through periodic meetings and/or specific and effective methods of communication.

4. BEHAVIOUR

4.1 Relationships with customers and suppliers

SCAME guarantees the supply of quality products and services in compliance with all the rules for the protection of fair competition.

SCAME PARRE undertakes to respect the right of consumers not to receive products that are harmful to their health and physical integrity and to have complete information on the products offered.

SCAME PARRE undertakes to ask that its suppliers and external collaborators commit to sharing the principles and contents of the Code.

As regards contracts, procurement and, in general, supply of goods and/or services and external collaboration (including consultants, agents, etc.) SCAME PARRE adopts objective evaluation criteria according to declared and transparent methods and requires compliance with the contractual conditions.

4.2 Relationships with employees and collaborators

Employees hired with a regular employment contract, as no form of irregular work and exploitation is tolerated.

SCAME PARRE avoids any form of discrimination, both in the selection phase and in that of management and career development of its personnel and offers all workers the same opportunities, so that everyone can enjoy fair treatment in line with the requirements of relevant law, with the Workers' Statute and the applicable CCNLs [National Labour Collective Agreements], without any discrimination.

Reason for revision

Issue of the document

Code of Ethics



Code	DQA0001
Revision	00
Date	Apr. 07-2021
Page	17 / 20

In hierarchical relationships, or in any case involving subjection or disparity of positions, authority must be exercised with fairness, respect and moderation, avoiding any behaviour that may damage the dignity and autonomy of employees and collaborators, avoiding any form of discrimination.

SCAME PARRE guarantees and ensures the protection of personnel privacy and the right of each collaborator to work without undergoing unlawful conditioning.

4.3 Relationships with Public Administration

SCAME's relationships with Public Administration must be inspired by strict compliance with the applicable legal and regulatory provisions and cannot in any way compromise the integrity and reputation of the company.

In relationships with Public Administration, in Italy or abroad, SCAME's representatives and/or employees are not allowed to pay or offer, directly or through third parties, sums of money or gifts of any kind and entity to public officials, government representatives, public employees and private citizens, both Italian and from other countries, with which SCAME has business relationships, to compensate or repay them for an act of their office or to induce, facilitate or achieve the performance of an act of office contrary to the duties of the Public Administration.

Acts of commercial courtesy, such as gifts or forms of hospitality, or any other form of benefit (including in the form of donations), are allowed only if of modest value and such as not to compromise the integrity and reputation of the parties and not to be interpreted, by a third and impartial observer, as acts destined to obtain advantages and favours in an improper way.

In any case, such acts must always be authorised and adequately documented.

In countries where it is customary to offer gifts to customers or others, SCAME may do so in the event that these gifts are of an appropriate nature and of moderate value, but always and in any case in compliance with applicable laws, business practices and ethical codes - if known - of the companies or entities with which SCAME has relationships.

Offering work and/or commercial opportunities to Public Administration personnel involved in the negotiation or relationship, or to their families, in order to obtain an interest or an advantage for SCAME is prohibited.

4.4 Accounting and financial management

All actions, operations and transactions performed on behalf of SCAME PARRE must be inspired by legitimacy from both a formal and substantive point of view, as well as by clarity and truth in accounting records, in compliance with current regulations and established procedures, and must be subject to verification by the internal control bodies.

Reason for revision

Issue of the document

Code of Ethics



<i>Code</i>	DQA0001
<i>Revision</i>	00
<i>Date</i>	Apr. 07-2021
<i>Page</i>	18 / 20

The subjects involved in administrative and accounting activities must scrupulously comply with internal procedures, law and accounting principles. The accounting records and documents are based on accurate, truthful, exhaustive and verifiable information and reflect the nature of the transaction to which they refer.

The persons in charge of preparing the financial statements must operate according to prudential criteria, supported by knowledge of accounting techniques or more specific to the sector concerned, and in any case with the diligence required of sector experts.

4.5 Business management

The business development activity must be carried out properly in the regular market context, and in fair competition with competitors, in full compliance with the applicable laws and regulations.

Business relationships must be based on a sense of responsibility and a spirit of transparency and collaboration with the counterparty.

4.6 Sponsorships

Sponsorship activities, which may concern the themes of culture, social issues, environment, sport, entertainment and art, are intended only for events or bodies that offer guarantees of seriousness, and in respect of which any connivance or conditioning capable of altering the activity of SCAME PARRE or compromising compliance with this Code of Ethics can be excluded.

4.7 Management of information and corporate documentation

The processing of personal data must take place lawfully and fairly and, in any case, only data necessary for specific, explicit and legitimate purposes are collected and stored. The data will be stored for a period of time not exceeding that necessary for the purposes of collection.

SCAME PARRE also undertakes to adopt suitable and preventive security measures for all databases in which personal data are collected and stored, in order to avoid the risk of destruction and loss or unauthorised access or unauthorised processing.

All information residing in the company's IT and online systems, including e-mail, must be used exclusively for the performance of company activities, in the manner and within the limits indicated in SCAME PARRE's internal procedures.

Reason for revision

Issue of the document

Code of Ethics



<i>Code</i>	DQA0001
<i>Revision</i>	00
<i>Date</i>	Apr. 07-2021
<i>Page</i>	19 / 20

5. DISCIPLINARY PROCEEDINGS

The SB (Supervisory Board, established in compliance with Legislative Decree 231/01) has the task of verifying and ascertaining any violation of the duties envisaged in this Code of Ethics, directly or through delegated subjects, with the collaboration of all company functions and companies, consultants and external bodies.

The SB is required to transmit the results of the investigations carried out, with any proposal for the application of disciplinary sanctions, to the Chairman of the Board of Directors, at the same time informing the Chairman of the Board of Statutory Auditors.

The body responsible for imposing the sanction is the Board of Directors, which, in the event that one or more of its members are involved in one of the illegal activities envisaged in this Code of Ethics, proceeds with the abstention of the subjects involved.

The procedures for contesting violations of this Code of Ethics and for the imposition of the related sanctions must take place in full compliance with the legal procedures and on the basis of the provisions of the collective labour agreements in force. Any sanction will be proportionate to the seriousness of the violation, also taking into account the possible repetition of unlawful conduct.

All the procedures envisaged by art. 7 of the law dated 20 May 1970, no. 300 and possibly by agreements and employment contracts, where applicable, in the matter of counter-deductions and the right to defence by the person to whom the unlawful behaviour is contested.

6. VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS

Violation of the rules of the Code of Ethics constitutes a breach of contractual obligations, with all legal consequences, including the termination of the agreement or the assignment and any compensation for damages.

The identification and application of the sanctions must take into account the principles of proportionality and adequacy with respect to the alleged violation, complying with, where applicable, the regulations pursuant to art. 7 of the law dated 20 May 1970, no. 300 and possibly provided for by employment agreements and contracts.

The issues concerning the reporting of possible violations, the applicable sanction system and the verification activities are explained in the aforementioned Organisational, Management and Control Model pursuant to Legislative Decree 231/2001, to which express reference is made.

To this end, it adopts a specific disciplinary model which defines the methods for imposing sanctions against the recipients of the Code of Ethics.

Reason for revision

Issue of the document

Code of Ethics



Code	DQA0001
Revision	00
Date	Apr. 07-2021
Page	20 / 20

In particular:

- for employees, the sanctions resulting from non-compliance with the Code of Ethics fall within the case of disciplinary measures;
- for external collaborators, professionals and suppliers, the penalties resulting from non-compliance with the Code of Ethics fall within the case of the reasons for termination of the contract.

7. DISSEMINATION OF THE CODE OF ETHICS

SCAME undertakes to make this Code of Ethics known to all interested parties, in compliance with Legislative Decree no. 231/01, recommending that they comply with it.

In particular, SCAME PARRE, by means of the corporate functions responsible for this, ensures the dissemination of the Code of Ethics among the workers and internal collaborators, by distributing copies of it in paper and/or electronic format, or via the company intranet system, and/o by publishing it on the websites of the Companies of the Group;

SCAME PARRE undertakes to disseminate this Code of Ethics to all external parties, directly or indirectly interested, by publishing it on its corporate website www.scame.com, which can be accessed by all external Stakeholders, including collaborators and providers.

Any future update, due to regulatory adjustments or the evolution of the mores of the civil society, shall be approved by the Board of Directors and promptly disseminated to all interested parties.

8. ISSUE AND APPROVAL OF THE CODE OF ETHICS

This Code of Ethics was presented by the Chief Executive Officer of SCAME PARRE SPA to the Board of Directors and was approved by the Board of Directors of the Company on 2020 October 27th.

Parre, April 7th 2021

Reason for revision

Issue of the document