

# **CODE OF ETHICS**

## **A&M S.R.L.**

Rev. 00.01 – 15.03.2024

**A&M s.r.l.**

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## PREAMBLE

A&M S.R.L. (hereinafter also referred to as "A&M" or the "Company") has consistently promoted ethical management of business activities, inspired by respect for regulations, transparency, and fairness in business and personal relationships, integrating ethical values into its corporate strategy and mission.

This Code of Ethics aims to articulate the essential ethical principles and values to which A&M is committed, and which all individuals operating on behalf of and in the interest of the Company (administrators, employees, external collaborators, etc.) must adhere to in the performance of their assigned tasks and responsibilities.

Given the recent growth in the number of collaborators and partnerships, the Company deems it necessary to officially communicate the principles and values that form the foundation of A&M's image, reputation, and success. This includes initiating a process of monitoring, gathering information, and reporting on fundamental ethical aspects.

Adhering to the commitments and principles outlined in this Code of Ethics is a fundamental prerequisite for achieving A&M's ethical objectives, such as environmental and social sustainability and the safety of its employees and collaborators, as well as its entrepreneurial and business goals.

The ethical principles contained in this Code apply to administrators, employees, and external collaborators of the Company who are linked by any organic contractual relationship.

It is important to reiterate that each administrator, manager, employee, and anyone operating in the interest and pursuit of the Company's objectives, without distinction or exception, must adhere to these principles in the performance of their activities, actively contributing to their implementation and reporting any deficiencies and violations.

The Company is committed to facilitating and promoting awareness of the Code of Ethics among employees and collaborators by providing each of them with a copy.

The Board of Directors, collectively, will carefully monitor compliance with the Code, providing adequate tools for information, prevention, and control to ensure transparency of operations and behaviors, and will intervene with corrective actions if necessary.

The Code of Ethics is an official document desired and approved by A&M's Board of Directors, drafted in Italian, and published on the website [www.aemproduction.com](http://www.aemproduction.com).

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## 1. RECIPIENTS, OBLIGATIONS, AND SCOPE OF APPLICATION

The "Recipients" of the Code of Ethics include:

- i. The administrators of A&M and the Board of Statutory Auditors or Auditor (if applicable);
- ii. The managerial staff and other employees of the Company;
- iii. Other individuals (external collaborators in any capacity, agents, consultants, suppliers, business partners, etc.) whose work is coordinated with the company's organization.

All Recipients are required to observe and adhere to the principles contained in this Code of Ethics, integrating its contents into their various activities and promptly reporting any violations to the Administrative Body.

These principles, rules, and procedures must be regarded as contractual obligations assumed by the worker pursuant to Article 2104 of the Civil Code.

Non-compliance with these principles by workers, employees, and collaborators may lead to the application of disciplinary measures as provided by law, as well as the disciplinary section of the applicable national collective labor agreement.

Recipients are therefore prohibited from engaging in behaviours that violate the principles, rules, and procedures of this Code of Ethics.

## 2. A&M VALUES AND ETHICAL PRINCIPLES

A&M has identified the fundamental values and ethical principles that guide its business activities.

### 2.1. Impartiality and Equality

A&M operates with an objective and equitable approach, ensuring no favoritism towards any party, whether public or private. Relationships are not influenced by friendships, enmities, kinship, or affinity with counterparts. The Company promotes equal treatment and social interaction with every interlocutor, regardless of gender, age, ethnicity, disability, sexual orientation, pregnancy, maternity, personal beliefs and opinions, corporate position, religion, political ideology, economic power, social influence, or any other form of diversity. Recipients must adhere to these practices.

### 2.2. Legality

Respect for the laws of all countries in which it operates is a fundamental principle for the Company. A&M rejects and condemns any illegal, illicit, or unethical acts. Recipients must understand the ethical implications of their actions, never committing acts that conflict with honesty, whether for personal or corporate gain.

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## 2.3. Transparency

The Company conducts its activities with full transparency, ensuring that all operations are understandable and accessible. Actions taken by Recipients and those interacting with A&M must be fully traceable and easily identifiable, making all relationships clear and actions justifiable.

## 2.4. Confidentiality

A&M strictly refrains from disclosing any company information (technical, logistical, strategic, economic) and personal information, in full compliance with GDPR and other applicable privacy laws, as well as in the context of handling internal and third-party data.

## 2.5. Professionalism, loyalty, and honesty

The Company believes that all Recipients must adhere to its core values, which include:

- Acting in the interest of the Company by assuming responsibilities related to their roles while pursuing objectives and maintaining high standards of professionalism;
- Acting with honesty, professional diligence, and moral integrity in both internal relations and interactions with other stakeholders, aiming to enhance and protect the Company's assets without using their work activities to realize private profits or interests, including through the use of confidential information;
- Operating in the market with respect for the principles of fair competition and good faith, honoring contractual obligations and ensuring the required performance.

## 2.6. Health and safety protection at work

A&M is committed to maintaining a safe working environment, recognizing workplace safety as a fundamental principle, and adhering to all current regulations regarding accident prevention and occupational disease prevention.

## 2.7. Environmental Protection

Respect for the environment is one of the Company's fundamental principles, which includes compliance with all environmental regulations. Additionally, A&M integrates sustainability principles into its corporate mission and constantly monitors the negative impacts of its activities to progressively maintain and enhance environmental sustainability.

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A&M extends the sharing of these values to all individuals operating within the Company and to external parties through the drafting and publication of the Sustainability Report, starting in 2023. This report outlines the Company's contribution to achieving the ESG goals defined by the United Nations 2030 Agenda for Sustainable Development, identifying the objectives where the Company can make the most significant impact, with a focus on continuous improvement.

## **2.8. Protection of copyright**

The Company guarantees and respects copyright principles and provisions as defined by Law 633/1941 and its subsequent amendments and additions.

## **3. APPLICATION OF PRINCIPLES AND RULES OF CONDUCT**

To ensure the precise application of the stated principles, A&M requires the Recipients of this Code of Ethics to respect its principles and adhere to the following rules of conduct in their interactions with various stakeholders.

In general, the Company requires all individuals operating within the organization to respect the personality and dignity of each individual from the selection phase onwards, avoiding situations of discomfort, discrimination, or abuse of any kind. The Company promotes continuous and appropriate training based on the position held by each individual, clearly defines roles, responsibilities, and delegations, and provides the necessary information to enable each person, within the limits and respect of their role, to make decisions in the Company's interest or to execute legitimate decisions made by others.

### **3.1. Management of conflicts of interest**

To prevent conflicts of interest, all operations and activities must be conducted solely in the interest of A&M, ensuring they are legal, transparent, and fair.

Regarding conflicts of interest, administrators, employees, collaborators, and all human resources of A&M:

- Must refrain from engaging in any activity that could conflict with the interests of the Company;
- Must avoid any situation that could create a conflict between personal interests or other activities and the interests of A&M;
- Must not perform work or provide services to competitors;

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- Cannot use company assets during work hours or in their free time without prior authorization from the appropriate corporate function or direct supervisor;
- Must refrain from engaging in activities during work hours that are not aligned with their duties or organizational responsibilities;
- Must refrain from accepting money, favors, or any other form of benefit unless within the limits of customary and normal courtesy relationships and in any case within modest value limits.

Given the trust relationship between A&M and its collaborators, all Recipients must avoid situations and activities that could negatively impact their ability to make impartial and objective decisions in the Company's interest.

If employees and collaborators become aware of any situations that could generate or give rise to potential conflicts of interest, they must immediately report this to their superiors or members of the Board of Directors.

Administrators and Statutory Auditors or the Sole Auditor may report such situations to the Board of Directors.

## **3.2. Work relationships between parties**

A&M promotes the coordination and achievement of corporate goals in a harmonious work environment, respecting shared ethical and moral principles and regulations.

The Company:

- Assumes responsibility for fostering a balanced work environment where everyone can adhere to and respect the principles of this Code of Ethics in their activities;
- Recognizes that the operational core of employees and collaborators is crucial to business success;
- Supports the professional development of all workers, providing appropriate training tools;
- Offers employment and collaboration contracts that clearly outline rights, duties, and obligations to employees and collaborators;
- Ensures every worker is employed under a regular contract;
- Does not tolerate any form of illegal, irregular, or "black market" labor, nor any exploitation;
- Adopts fair compensation systems, commensurate with individual skills and qualifications;
- Maintains merit-based and lawful criteria in the personnel selection process;
- Monitors workers' behaviour to ensure full respect and dignity for individuals;
- Enforces appropriate sanctions for behaviour contrary to regulations, ethical principles, and rules of conduct;

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- Opposes any form of discrimination, exploitation, harassment, mobbing, or isolation for personal or work-related reasons.

Those in senior positions and with representation, administration, or management roles within the Company must perform their functions in compliance with the principles of the Code of Ethics and A&M's guidelines, understanding that they must project an image of the Company fully aligned with the principles of this Code of Ethics and provide an appropriate example to other Recipients.

The Company ensures that its relationship with the Statutory Auditors, Sole Auditor, or any other control and/or supervisory body is conducted with the utmost professionalism, diligence, transparency, cooperation, availability, and in full respect of their respective institutional roles, promptly and effectively implementing their prescribed actions and requirements. Data and documents are made available in a precise, clear, objective, and comprehensive language, providing accurate, complete, faithful, and truthful information, while avoiding and reporting any conflicts of interest in the appropriate form and manner.

A&M employees and collaborators:

- Must provide maximum cooperation in performing their activities, following the instructions of their supervisors and/or the Company;
- Must always conduct relationships with colleagues based on the ethical principles of mutual loyalty, honesty, and fairness, contributing to a work environment that protects individuals and workers both professionally and relationally;
- Have the right to refuse any work performance improperly requested by any Company subject and the duty to report directives that are clearly contrary to existing laws or the principles of this Code of Ethics;
- Must consider and respect the Company's rules regarding environmental protection, workplace safety, and privacy protection;
- Must use the resources, trademarks, logos, and other distinctive signs of A&M (or affiliates) only within the limits allowed by their assigned duties, avoiding any abuse or unauthorized use for personal purposes or outside the working hours required by their job responsibilities.

Furthermore, employees must comply with all provisions of the applicable Collective Bargaining Agreement and all union directives related to employee behavior. Adherence to these regulations will help maintain a harmonious work environment and promote effective management of relationships within the Company.

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### **3.3. Prohibition of activities aimed to corruption and money laundering**

A&M conducts its activities in full compliance with current anti-money laundering regulations and the provisions issued by the relevant authorities. To this end, the Company, along with its employees and collaborators, is committed to refusing any operations that are suspicious in terms of integrity, transparency, and legality. Particular attention must be given to transactions involving the receipt or transfer of money or other benefits: all individuals operating within the Company must refrain from accepting or offering cash payments in any capacity and from engaging with entities based in or operating in countries that do not ensure corporate transparency. More generally, they must avoid any operations that could obscure financial flows.

Recipients are required to:

- Verify in advance the available information on commercial counterparts, suppliers, collaborators, and consultants to ensure their respectability and the legitimacy of their activities before establishing business relationships;
- Avoid any involvement in operations that could, even potentially, facilitate money laundering from illicit or criminal activities, acting in full compliance with primary and secondary anti-money laundering regulations and internal control procedures.

### **3.4. Confidentiality**

Each employee, collaborator, and administrator of A&M is required to maintain confidentiality regarding information related to the Company that they become aware of. This includes the duty not to disclose confidential information, such as details about the organization, industrial secrets, know-how, production methods, and any other information that, if disclosed, could harm the company.

Additionally, any requests for information received from third parties related to the Company, its employees, or any confidential information must be promptly communicated to the responsible persons or administrators, refraining from responding to such requests without specific authorization.

All information, data, or documents that workers become aware of are the exclusive property of A&M and, therefore, can only be used in the exercise of business activities.

All employees and collaborators must also:

- Acquire and process only data necessary for the purposes related to their corporate function;

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- Acquire and process data following the specific procedures issued by the Company;
- Store data so that it is not accessible to unauthorized persons;
- Communicate data only within established procedures or, if externally, with explicit authorization from superiors;
- Ensure that there are no absolute or relative restrictions on the disclosure of information concerning third parties connected to the company and, if necessary, obtain their consent.

A&M prohibits all recipients of the Code of Ethics from initiating any form of investment, directly or through third parties, based on confidential corporate information.

Under no circumstances does the Company allow the use of privileged corporate information for insider trading or any other activity involving the improper use of data, information, or business opportunities acquired during the assignment, nor behaviours aimed at damaging corporate assets or obtaining undue personal benefits or for third parties.

All individuals working in or on behalf of the Company are required to maintain the highest level of confidentiality and not to disclose or request confidential information, including documents, know-how, projects, studies, research, and any other information learned during the performance of their duties or otherwise within the company.

Confidential or secret information also includes, but is not limited to, information subject to specific regulations or rules, such as information concerning national security, military sectors, inventions, scientific discoveries, protected technologies, or new industrial applications, as well as those subject to contractual confidentiality clauses.

Additionally, all information learned during work activities whose release or use could cause harm to the company, its representatives, or its counterparts, or produce undue advantages for the employee or third parties, is considered confidential.

## **4. RELATIONSHIPS WITH STAKEHOLDERS**

A&M interacts daily with various third parties, including suppliers, customers, public entities, media, and other counterparts.

In general, all Recipients must adopt ethical behaviour in their commercial relationships with third parties, adhering to the law and characterized by transparency, clarity, fairness, efficiency, and equity, as outlined in this Code of Ethics.

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## 4.1. Relationships with Authorities and Public Administrations

A&M conducts its activities with integrity and transparency in all interactions with the Public Administration, its employees, officials, and Public Officials, always in full compliance with the law.

The Company prohibits any illegal payments or provision of benefits to Italian or foreign entities, their employees, or persons acting on their behalf, which could constitute acts of corruption of a Public Official or a public service employee.

Relationships with public institutions are restricted exclusively to the functions and responsibilities delegated for this purpose.

No employee is authorized to make direct or indirect payments to public officials or public administrations that are not related to services or contracts legitimately authorized by the competent corporate functions managing these services, while adhering to the law and proper commercial practices.

In general, in dealings with the Public Administration and public employees, Recipients of the Code of Ethics must:

- Conduct these relationships in total compliance with current laws and regulations, the principles established in the Code of Ethics, and internal procedures and protocols;
- In the case of transactions related to public procurement, operate in compliance with the law and proper commercial practices;
- Understand that any negotiation, request, or relationship with the Public Administration must be conducted by corporate bodies and individuals expressly delegated for this purpose, in line with corporate strategies, in compliance with the law, and in written form. Those delegated for such operations must report to the delegating party in accordance with legal and internal corporate procedures;
- Record and archive all correspondence with public entities, including telephone contacts;
- Communicate to the Company's administrators any personal conflict of interest with the involved parties;
- Refrain from offering or accepting any gifts (direct or indirect), acts of courtesy, or hospitality intended to influence the decisions of public institutions or to gain any advantage from the Public Administration. Customary gifts must respect criteria of modest symbolic value and cost equality for all public and private customers; this should never be interpreted as seeking favours;
- Refrain from offering job and/or commercial opportunities that could benefit public administration employees during a negotiation, request, or commercial relationship with the Public Administration;
- Refrain from soliciting or obtaining confidential information that could compromise the integrity or reputation of both parties.

All Recipients and third parties interacting with or representing the Company must promptly communicate and report to the administrators any violation or attempt or offer of violation of the law and the principles of this Code of Ethics governing relationships with the public administration, managers, officials, or public employees.

A&M refrains from providing any form of direct or indirect contribution to parties, movements, committees, political and trade union organizations, their representatives, and candidates, except as permitted and provided by current laws and regulations.

## **4.2. Relationships with suppliers, partners, and other contractual counterparties**

A&M selects suppliers, partners, and other contractual counterparts (collectively referred to as "Suppliers") based on objective criteria of quality and professionalism, establishing relationships with them in accordance with the principles of this Code of Ethics and exclusively in written form.

The Company evaluates suppliers based on criteria including quality, cost-effectiveness, efficiency, sustainability, reputation, and alignment with the values expressed in this Code of Ethics. A&M requires suppliers to adhere to this Code of Ethics and prohibits behaviours that contradict it, considering such behaviours serious breaches of duties of fairness and good faith in contract execution, constituting legitimate grounds for termination.

Recipients of this Code of Ethics must adhere to the following rules of conduct:

- Do not offer or accept money, goods, advantages, or other benefits (whether direct or indirect) to or from suppliers to gain preferential treatment, influence decisions, affect the completion of acts, or conclude agreements, or to favor the interests of A&M or the suppliers and/or harm competitors;
- Gifts and courtesies are allowed only if they are of modest value, conform to customs, and do not compromise the integrity and reputation of the parties. Such acts must always be authorized and documented;
- Personal donations and gifts using funds not intended for this purpose without explicit authorization from A&M are not allowed. Only the Company can decide the corporate policy on gifts and allocate the relevant funds;
- In the case of unsolicited offers and gifts, recipients must immediately report their receipt to the Board of Directors, which will inform the offeror about the corporate policy and take appropriate measures.

A&M also requires adherence to agreed contractual terms and promotes open and sincere dialogue with suppliers, respecting good commercial practices. Recipients must promptly inform A&M administrators of any breaches by suppliers so that the consequences can be evaluated.

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## 4.3. Relationships with Clients/Customers

A&M and all Recipients of this Code of Ethics give priority attention to customer needs, maintaining their relationships and ensuring the highest possible excellence in the offering of products and services.

Relationships with clients are characterized by maximum courtesy and clarity; information about products and services must be provided accurately and completely, allowing clients to make informed decisions.

A&M commits to the principle of truthfulness in advertising communications and other communications and works constantly to offer high-quality, innovative, and sustainable products.

To this end, the Company has adopted a quality management system (UNI EN ISO 9001) to continuously improve customer satisfaction and loyalty through the maintenance and development of corporate performance.

## 4.4. Relationships with the Mass Media and Information Management

Relationships with the mass media, communication channels, and external interlocutors must be managed exclusively by specifically delegated persons, in accordance with the law, procedures, and directives established by A&M, with the aim of preserving the interests and image of the Company.

Employees, collaborators, and all Recipients of A&M are not authorized to provide information or opinions or make statements on behalf of the Company to the mass media, press, communication channels, or through websites, social media, and similar tools, without the proper authorization from the administrators.

Any requests for information from the mass media received by A&M employees, collaborators, and all Recipients of the Code of Ethics must be promptly communicated to the administrators, who will evaluate the confidentiality, relevance, and appropriateness of the information to be disclosed before responding.

In external communications, A&M commits to respecting the guiding principles of truthfulness, correctness, transparency, and caution, avoiding any form of communication that could lead to partial, distorted, ambiguous, or misleading interpretations.

## 5. COMPANY COMMITMENTS

A&M has appointed a Single Auditor responsible for the control and legal audit of the accounts. This external figure ensures proper bookkeeping and certifies the accuracy of

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the information in the financial statements. To continuously improve corporate procedures and policies and better implement this Code of Ethics, A&M commits to:

- Widely disseminate the Code of Ethics among its employees and external collaborators;
- Be available to provide clarifications on the interpretation and application of the rules contained in the Code and corporate procedures;
- Conduct investigations in case of reports of alleged violations of the Code of Ethics;
- Evaluate the facts and adopt appropriate disciplinary measures in case of confirmed violations;
- Consider assigning the functions of Sole Auditor to the current Sole Auditor, to ensure the presence of a corporate body also responsible for "legitimacy control," i.e., the control over compliance with the law and the corporate bylaws, as well as the Code of Ethics itself;
- Implement a system for reporting any violations of this Code of Ethics and/or anti-discrimination regulations, as well as the presence of discriminatory, improper, or disrespectful behavior, ensuring the anonymity of the whistleblower.

A&M commits to carry out all necessary activities to implement an adequate control system as outlined in the points above during the 2024 financial year, with particular attention to the dissemination of the Code within the company, the evaluation of appointing a Sole Auditor, and especially the configuration of an adequate whistleblowing system.

## 5.1. Health, Safety, and Environmental Protection

A&M is committed to promoting and consolidating a culture of workplace safety, raising employee awareness of risks, and encouraging responsible behaviour. To achieve this, the Company adopts health and safety management systems, sets specific objectives, and continuous improvement programs, and invests in training and communication in these areas.

A&M ensures that its employees work in a safe and healthy environment, complying with health and safety laws and regulations.

The fundamental principles and criteria guiding corporate decisions on health and safety include avoiding risks, adequately considering unavoidable risks, eliminating risks at the source, adapting work to the individual, and prioritizing collective protection measures over individual ones.

Each administrator, manager, and employee is responsible for ensuring a safe, healthy, and decent work environment and must operate according to principles of proper

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management and compliance with health and safety rules. They must also report accidents, injuries, and unsafe equipment or conditions.

Furthermore, the Company is committed to protecting the psycho-physical integrity of workers and respecting their moral personality, avoiding undue pressure or discomfort.

Regarding environmental concerns, A&M incorporates sustainability into its corporate mission, recognizing the importance of considering and protecting future generations. Starting from the 2023 financial year, the Company will draft and publish its Sustainability Report on its website to raise awareness among all recipients and external third parties about the importance of mitigating environmental risks and reducing ecosystem impact. The Company is committed to constantly monitoring and improving its environmental impacts to mitigate the generation of effects that could alter the ecosystem, evaluating investments aimed at environmental respect and energy efficiency through procedures, means, and technologies that do not harm nature or significantly reduce the negative effects of its activities on the surrounding environment.

To this end, A&M commits to establishing, implementing, adopting, and continuously improving a sustainable management system recognized by a certifying body (UNI EN ISO 20121), explicitly applicable to the goods and services offered by the Company in its core activities.

Each administrator, manager, employee, and collaborator of the Company is required to apply criteria of caution, respect, and adequate prevention towards the environment and its biodiversity in their activities.

## **6. COMPLIANCE WITH THE CODE OF ETHICS AND SANCTIONS**

A&M, particularly its administrators, are responsible for ensuring the commitments expressed in the Code of Ethics are implemented.

All Recipients must adhere to the principles and rules outlined in this Code of Ethics. Violations constitute a contractual breach and, for employees, a disciplinary violation.

Specifically, the Administrators are tasked with:

- Ensuring that the Code of Ethics is known and adhered to by all Recipients who work with the Company;
- Monitoring, reviewing, and updating the principles and rules of the Code of Ethics and promptly communicating any changes;

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- Interpreting the rules, principles, and procedures in the Code of Ethics, acting as a reference for resolving conflicts or doubts regarding the application of these principles;
- Acting promptly to protect, assist, and safeguard employees who report non-compliant behaviour with the Code of Ethics, shielding them from pressure, interference, intimidation, and retaliation, including through the use of appropriate IT tools to ensure anonymity;
- Considering any reports of alleged violations of the law or the Code of Ethics, as specified;
- Imposing and applying disciplinary sanctions for violations of the Code of Ethics, proportionate to the severity of the violations and their consequences;
- Promoting and coordinating internal monitoring activities;
- Preparing an annual report on compliance, updates, adjustments, and any violations of the Code of Ethics, with recommendations for improvement actions;
- Communicating this annual report to the Sole Auditor (or another independent supervisory body) for adequacy assessment.

## 6.1. Reporting alleged violations

To ensure the effectiveness of the Organizational Model and the Code of Ethics, and to generally ensure compliance with the law and prevent and combat discriminatory behaviour, A&M requires that anyone aware of an alleged violation of the Code of Ethics must immediately report it to their direct supervisor, who will inform the Board of Directors. If the direct supervisor refuses to report it to the Board or if the employee feels uncomfortable reporting to their supervisor, the report can be made directly to the Board of Directors.

If the reporting person wishes to remain anonymous, A&M has an adequate reporting system that ensures the anonymity of the whistleblower (whistleblowing).

The Administrators must carefully verify the reports received (respecting the privacy and rights of the individuals involved and the anonymity of the source, if requested) to promote the application of disciplinary sanctions or activation of contractual resolution mechanisms.

A&M does not permit any form of retaliation or punitive actions against administrators, employees, or collaborators who report violations of the Code of Ethics. However, anyone who makes false reports will be subject to appropriate disciplinary actions.



## 6.2. Sanctions System

A&M and the Recipients understand that violating the principles established by the Code of Ethics and internal procedures endangers the reputation and trust between A&M and its administrators, employees, consultants, collaborators, customers, suppliers, and business and financial partners.

Whenever the Board of Directors receives a report or learns of a violation of the Code of Ethics (whether from employees, collaborators, or other sources), it must promptly conduct appropriate investigations to assess the validity of the allegations. This verification must be carried out in full compliance with current labor law, union law, privacy, and individual rights regulations.

If the Board of Directors confirms the validity of the allegations, it must take necessary actions to address the reported situations and prevent their recurrence. The Board of Directors will adopt appropriate sanctions in accordance with current regulations, rules, and collective labor agreements.

The Code of Ethics will automatically apply and must be observed by all employees and collaborators who begin their activities after the Code's entry into force. Those already operating in the Company will be required to explicitly accept it by signing the Code of Ethics.

## 7. ACCOUNTING TRANSPARENCY

A&M's accounting transparency policy emphasizes accuracy, clarity, truthfulness, reliability, and adherence to all accounting principles for every operation and transaction conducted by the Company. All employees and collaborators are responsible for ensuring that management events are recorded accurately and promptly in the company's accounts.

Accounting management is based on three fundamental principles:

1. Clarity: Information in the financial statements must be presented comprehensibly, ensuring it follows the classification schemes required by civil law, reflects the values of individual items according to legal evaluation criteria, and is supplemented by additional information if necessary.
2. Truthfulness and Accuracy: Truthfulness refers to the conformity of values and estimates made by administrators and the adequacy of complementary information needed to provide a faithful picture to the readers of the financial statements. The behaviour of those preparing the financial statements must be

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fair, with evaluations, estimates, and entries made in good faith, with loyalty, and without arbitrariness, aiming to provide truthful and accurate information.

3. Relevance: This principle prioritizes substance over form in terms of recognition, evaluation, presentation, and disclosure when formal adherence has insignificant or misleading effects for a truthful and accurate representation.

To ensure accounting transparency, every operation must have adequate supporting documentation, facilitating accurate accounting records and the precise reconstruction of the operation if needed or verified by third parties. All employees and collaborators are responsible for maintaining documentation in an orderly and easily traceable manner. Every operation must be duly authorized by those with decision-making power within the company, preventing unauthorized, dangerous, irregular, or fraudulent operations.

Company payments must align solely with the performance and terms established in duly authorized underlying contracts. Payments must not be made to parties other than the contractual counterpart, and the use of company funds for illegal, improper, or unrelated purposes is strictly prohibited.

Any negligence, omission, or falsification of accounting information discovered by an employee must be promptly reported to the Board of Directors, which will investigate and take appropriate measures to resolve the situation. Reporting such irregularities is essential to ensure the accuracy and transparency of company operations and can be done according to the methods outlined in Article 6 of this Code of Ethics.

The Chairman of the Board of Directors

  
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