



CODE OF ETHICS

TREVISAN MACCHINE UTENSILI S.p.A. (hereinafter also referred to as the “Company”) operates in the machine tool sector and is recognized for machining accuracy, customization capabilities, reliability, quality, and customer service both before and after sales, as well as for the proposal and management of technological solutions.

TREVISAN MACCHINE UTENSILI S.p.A. acknowledges the importance of the principles, values, and commitments that inspire its activities, both internally (relations with employees) and externally (customers, suppliers, public institutions, the press, organizations, and associations). These are formally set out in this Code of Ethics in order to encourage the adoption of behavior aligned with them and to clarify the implications in the event of non-compliance.

The Code of Ethics moves from the desire to contribute to the development of the community by conducting business activities in compliance with the principles of safety, freedom, and human dignity, and without causing harm to social and environmental welfare. It highlights the Company’s ethical and legal responsibility through principles applicable to Employees, Collaborators, Company Management, and customers, unless otherwise specified herein and within the limits established by law or contractual provisions, including labor law. It is recognized as a cornerstone of the Company’s activities and as a point of reference for a consistent and sustainable development path for the future.

In such a context, the Code of Ethics is to be understood as a living instrument, essential for all those who collaborate with TREVISAN MACCHINE UTENSILI S.p.A., who undertake and commit themselves to know and share it.

Application and dissemination

The Code of Ethics shall be implemented also through training and awareness initiatives, and disseminated both within and outside the Company through the most appropriate tools, including notice boards and/or the corporate website.

VALUES AND PRINCIPLES

Responsibility

TREVISAN MACCHINE UTENSILI S.p.A. is aware that its decisions and activities have specific effects on all stakeholders and contribute to broader impacts on the community and the environment in which it operates, as well as on the country’s competitiveness. The Company intends to make these decisions and carry out its actions in accordance with a principle of responsibility, honoring its commitments toward the various stakeholders and the system in which it operates.

Legality

TREVISAN MACCHINE UTENSILI S.p.A. promotes, both internally and within the communities in which it operates, respect for laws, regulations, and rules, considering them fundamental to the proper conduct of business activities and to its reputation and image. Compliance with the regulatory framework and keeping up to date with legislative developments are duties that all collaborators—both internal and external—of TREVISAN MACCHINE UTENSILI S.p.A. are required to fulfill, with the Company’s training support too.





Transparency

TREVISAN MACCHINE UTENSILI S.p.A. conducts its activities based on behavior inspired by transparency, fairness, integrity, and correctness, promoting independence, absence of conflicts of interest, autonomy of judgment, and clarity of positions taken.

In the event of conflicts of interest, the recipients of this document are required to promptly refer the matter to the responsible company officer, who will assess the situation and may authorize the decision or activity potentially in conflict. TREVISAN MACCHINE UTENSILI S.p.A. may act to protect its interests by adopting all necessary measures in case of violations.

Transparency is also considered essential in the preparation and communication of economic, asset, and financial information, such as the financial statement which represent the primary disclosure tool for third parties.

Fairness

Moral integrity and fairness are considered duties for all recipients of this document who, in the course of activities for or with TREVISAN MACCHINE UTENSILI S.p.A., are required not to establish relationships that generate improper benefits or distort the proper functioning of the free market, nor to accept or offer donations in money or goods, consideration, favors, or advantages—except for items of modest value. TREVISAN MACCHINE UTENSILI S.p.A. is committed to fair competition, in the belief that proper market conduct protects the interests of customers, consumers, and the community.

Listening

TREVISAN MACCHINE UTENSILI S.p.A. recognizes the interests of its Stakeholders, respects their expectations, and—through listening, dialogue, discussion, engagement, and the enhancement of relationships—undertakes to develop targeted and consistent project initiatives.

Non-discrimination

TREVISAN MACCHINE UTENSILI S.p.A. rejects all forms of discrimination and is committed, in its activities—particularly in the selection and management of personnel, work organization, the selection and management of suppliers, relations with entities and institutions, and more generally in all relationships with third parties—to avoiding any discrimination based on health status, culture, gender, sexual orientation, age, race, religion, nationality, or political views, and to promoting cultural integration and the protection of the rights of minorities and vulnerable groups.

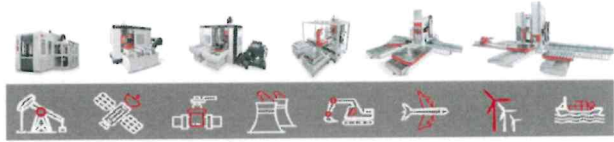
Diligence and customer satisfaction

The Company undertakes to comply with procedures for design, assembly, testing, and after-sales services in line with customer requirements, striving to meet their needs through cooperation in identifying appropriate solutions to technical issues and through transparent discussion of any criticalities or problems in order to address complex requirements.

Innovation

The Company is committed to pursuing projects that meet the needs of customers and, more generally, Stakeholders, as well as developing innovative or high-technology solutions, within a dynamic approach aimed at achieving efficient and effective technological advancement.





EMPLOYEES AND COLLABORATORS

General guidelines

Employees of TREVISAN MACCHINE UTENSILI S.p.A. play a significant role in safeguarding the Company's reputation and image, as they contribute to achieving corporate objectives and commitments. It is therefore essential that they undertake to:

- Act in accordance with the values, principles, and commitments of TREVISAN MACCHINE UTENSILI S.p.A.
- Establish and develop relationships with customers, suppliers, and collaborators based on fairness and transparency, protecting the Company's reputation and refraining from any activity involving conflicts of interest or aimed at personal gain
- Provide appropriate information to their superiors regarding situations of conflict, even potential ones, with the provisions of this document or any potential non-compliance with applicable laws and regulations
- Conduct themselves with public institutions in a manner inspired by fairness and transparency

Personnel selection

The evaluation and selection of personnel are carried out with fairness and transparency, assessing candidates' ambitions and skills while respecting equal opportunities. The Company is committed to using merit-based criteria, free from favoritism or preconceived ideas, in order to align the needs of TREVISAN MACCHINE UTENSILI S.p.A. with those of candidates, in the interest of the efficient and effective functioning of the organization.

Personnel management

TREVISAN MACCHINE UTENSILI S.p.A. is committed to valuing its employees, aware that fulfilling their ambitions, within the scope of their specific skills, is key to the Company's operation and development. It also undertakes to enhance each individual's knowledge and abilities not only through daily on-the-job training but also by providing appropriate professional training initiatives.

The Company is committed to fostering a work environment characterized by loyalty, fairness, mutual respect, and civil coexistence, and to preventing:

- Situations where employees are pressured to perform duties or tasks not required under their employment contract
- Incidents of workplace harassment (mobbing)
- Incidents of stalking
- Situations of psychological violence
- Any behavior that undermines personal dignity





WORK ENVIRONMENT

General guidelines

TREVISAN MACCHINE UTENSILI S.p.A. is committed to providing its personnel with a safe and healthy work environment that respects the dignity of individuals and workers. The Company undertakes to manage its activities in full compliance with applicable laws and regulations concerning the environment, health, and safety. Operational management must be guided by advanced criteria of environmental protection and energy efficiency, pursuing continuous improvement in workplace health and safety conditions.

Workplace safety

Workplace safety and the health of its personnel are considered essential elements for the Company's reputation, management, and development. Within this framework, the Company promotes compliance with applicable legal provisions, including hygiene and health regulations, through the concrete behavior of its personnel, as well as through prevention, training, and continuous updating.

The general measures for the protection of workers' health and safety that the Company undertakes to adopt include:

- Assessment of risks to health and safety
- Minimization of risks and reduction to the lowest possible number of workers exposed to risk
- Planning of prevention measures
- Compliance with ergonomic principles in the workplace
- Priority of collective protection measures over individual protection measures
- Limited use of chemical, physical, and biological agents in the workplace
- Hygiene measures and health surveillance of workers based on specific risks
- Emergency measures to be implemented in cases of first aid, fire prevention, worker evacuation, and serious and immediate danger;
- Use of warning and safety signals
- Regular maintenance of premises, equipment, machinery, and systems
- Information, training, consultation, and participation of workers or their representatives on issues concerning workplace health and safety
- Provision of adequate instructions to workers





BUSINESS MANAGEMENT

Information

TREVISAN MACCHINE UTENSILI S.p.A. undertakes to provide stakeholders with appropriate information tools to highlight issues, to request clarifications, to submit requests or complaints, to provide data or other information, to assess needs and expectations, and to disseminate its values and mission.

It is committed to doing so on the basis of reliable, accurate, and complete data and information, in order to enable stakeholders to make informed decisions.

This need to ensure adequate information is particularly significant in the context of accounting management and financial and non-financial reporting of TREVISAN MACCHINE UTENSILI S.p.A. Anyone collaborating, in any capacity, with the Company in this operational process is required to act in good faith, respecting the principles of truthful and fair representation of the Company's financial position, economic and financial performance, and social and environmental impact, based on reliable and reasonable data, information, and estimates, and grounding any evaluation on criteria of reasonableness and prudence.

The Company is aware that compliance with this approach enables better planning and enhances strategic and operational capabilities. Therefore, it requires all recipients to support accounting operations and non-financial disclosures with valid, clear, and complete documentation, avoiding irregularities, omissions, or falsifications.

The Company's promotional communication, as well as that relating to its activities and products, must respect human dignity and the principles set out in this Code of Ethics.

Internal procedures

Anyone collaborating with TREVISAN MACCHINE UTENSILI S.p.A. is required to comply with internal procedures and instructions, acting according to defined authorization principles and ensuring the proper retention of records, documents, and communications necessary to understand the activities and actions carried out on behalf of the Company.

TREVISAN MACCHINE UTENSILI S.p.A. is committed to developing and updating its internal procedures, in the belief that they contribute to the Company's overall proper, transparent, and efficient conduct, both in the planning phase and in the control phase, aimed at achieving its objectives.

Use of internal resources

Internal resources must be used rationally, both for the proper functioning of the Company and for the sustainability implications associated with their use.

Each employee is responsible for safeguarding company assets using with care and respect and avoiding improper use of assets made available for work purposes. Any misuse of company-owned assets and resources provided to employees and collaborators in connection with their duties is not permitted.

Hardware and software tools must, in particular, be used in compliance with the need to protect the privacy of employees and collaborators, as well as in accordance with data security requirements and workers' health.



Under no circumstances is it permitted to collect or transmit information that promotes or incites racial hatred, glorifies violence or other criminal acts, or contains material deemed sexually offensive within the relevant cultural context. Employees and collaborators are not allowed, without prior authorization from their direct supervisor, to create archives, databases, video or audio recordings, or reproductions using equipment or facilities of TREVISAN MACCHINE UTENSILI S.p.A., except for purposes directly related to business activities.

RELATIONS WITH STAKEHOLDERS

Customers and suppliers

Relations with customers and suppliers must be based on technical and commercial competence, fairness, transparency, and reliability.

Those responsible for dealing with customers and suppliers must act with competence, courtesy, respect for individuals and their time, and with the awareness that the achievement of corporate objectives and the Company's reputation depend on their conduct. They are therefore required to provide timely services, avoiding disruptions or delays, and ensuring consistency with the level of satisfaction of needs aligned with the Company's quality objectives.

The Company undertakes to assess, update, and ensure the technical, production, and safety standards required by the sector in which it operates and by specific market and/or customer requirements, without promoting promises of technical results that cannot be achieved.

It is therefore necessary to avoid any form of misleading conduct that may induce customers or suppliers to rely on unfounded promises, circumstances, or facts.

Relations with customers

In carrying out its activities and managing relationships with customers, the Company strictly complies with applicable laws, the principles of this Code, existing contracts, and internal procedures.

In particular, it is required to:

- Provide high-quality products efficiently and courteously, within the limits set by contractual provisions
- Provide accurate, timely, and comprehensive information about products/services so that customers can make informed decisions

The Company expects its customers to behave in compliance with product operating instructions and to cooperate in accordance with applicable regulations, particularly in the areas of health and safety and controls over national and international trade flows.





Relations with suppliers

In relations with suppliers, selection is not based on personal criteria, interests diverging from those of the Company, or discrimination, but exclusively on aspects such as technical, innovative, or even creative capability, process or service efficiency, and the economic competitiveness of the offer.

The Company expects its suppliers to comply with the following principles:

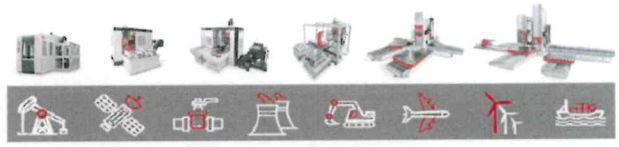
- Ethical recruitment; prohibition of child labor and protection of young workers
- Protection of women's rights, diversity, and minorities; absence of discrimination or harassment
- Prohibition of modern slavery, forced or compulsory labor, and human trafficking
- Fair working hours, wages, and benefits
- Freedom of association, including collective bargaining
- Health and safety
- Prevention of corruption, extortion, and bribery
- Privacy, data protection, and protection of intellectual property
- Fair competition
- Compliance with export controls and sanctions
- Absence of conflicts of interest
- Whistleblowing and protection against retaliation
- Limitation of greenhouse gas emissions, energy efficiency and renewable energy, and responsible use of land, water, and air
- Sustainable resource management and waste reduction

Authorities and Public Administration

The Company recognizes the role of Authorities and Public Administrations in social life, environmental management, and the promotion of the common good. In this context, it undertakes—and requires its employees and collaborators—to establish, maintain, and manage relationships based on loyalty, transparency, and cooperation, without engaging in even indirect omissions or subtle forms of pressure.

In any case, those responsible for managing relations with representatives of public organizations or public service officials may do so only if duly authorized and always in compliance with principles of fairness and integrity, in accordance with this Code and, more generally, with the directives issued by the decision-making bodies of TREVISAN MACCHINE UTENSILI S.p.A.





Political organizations, trade unions, and civic movements

TREVISAN MACCHINE UTENSILI S.p.A. neither favors nor discriminates against political or trade union organizations, nor against civic or social groups and movements. It does not provide them with undue contributions; however, if it decides to support certain social initiatives or those related to the local community, it does so in compliance with applicable laws. Any relationship with parties, organizations, groups, or movements must always be conducted with transparency, avoiding any form of even indirect pressure.

CONTROL SYSTEM

Purpose of the internal system

The internal control system is aimed at managing the risk of violations of the Code of Conduct, namely through the adoption of tools and methodologies designed to prevent and counteract behaviors that are detrimental to the principles and values set out in this Code or to applicable laws and regulations.

Such violations undermine the relationship of trust between TREVISAN MACCHINE UTENSILI S.p.A. and its directors, employees, collaborators, customers, suppliers, and partners.

Controls and sanctions

Without prejudice to the fact that any assessment of a violation must be carried out in accordance with principles of proportionality, impartiality, and adequacy, conduct in violation of the Code is considered:

- Just cause for revocation of the mandate of Directors
- Serious breach for employees, with the application of sanctions provided for by the relevant National Collective Labor Agreement (CCNL). In the event of pending criminal proceedings or enforcement of measures restricting personal freedom against an employee, prior to adopting disciplinary measures, suspension from service or pay may be applied for a duration corresponding to the outcome of the criminal proceedings or until the end of the restrictive measure
- In more serious cases, grounds for immediate termination of the relationship with collaborators
- In more serious cases, grounds for immediate termination of relationships with suppliers, customers, and, in general, third parties

TREVISAN MACCHINE UTENSILI S.p.A., where necessary, may therefore adopt disciplinary measures in compliance with applicable laws, regulations, and labor law. Violations will be addressed promptly, and disciplinary measures—regardless of any criminal action by the judicial authorities—will be proportionate and appropriate to the specific case, depending on the seriousness of the conduct.

In any case, TREVISAN MACCHINE UTENSILI S.p.A. reserves the right to take all actions it deems appropriate to seek compensation for damages resulting from conduct in violation of the Code of Ethics.

In order to limit the risk of violations, the Company expects all recipients of this Code, both within and outside the organization, to comply—within the scope of their roles and responsibilities—with the principles and values set out herein, relying on a system of “diffused control,” whereby each individual carries out reasonable and diligent control activities, including and especially over themselves.



All recipients are also required to report to the Company any facts and circumstances that may potentially violate the principles and provisions of this document, in order to enable TREVISAN MACCHINE UTENSILI S.p.A. to intervene and take the necessary or appropriate measures to prevent, avoid, or put an end to any conduct that breaches or violates the Code.

Relations with supervisory and control bodies

TREVISAN MACCHINE UTENSILI S.p.A. conducts its relations with supervisory and control bodies with the utmost cooperation, in full respect of their role, and undertakes to promptly comply with any instructions they may issue.

The Company undertakes to provide all information requested by supervisory and control bodies in a complete, accurate, adequate, and timely manner. To this end, it establishes and implements appropriate internal communication procedures and systems for the collection, processing, and transmission of the information required by such bodies.