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Code of Conduct

REV 01 10/01/2025

TRASER ITALIA SRL

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In the course of its activities, TRASER ITALIA SRL adopts the following guiding principles: respect for the law and regulations of the countries in which it operates, in accordance with the principles of legality, fairness, transparency, confidentiality, and respect for human dignity.

RECIPIENTS

The Code of Conduct applies to all individuals who establish stable or temporary relationships with TRASER ITALIA SRL. Violations of the principles and rules contained in this Code undermine the trust relationship established with the company. All recipients are required to be familiar with the Code of Conduct, contribute to its implementation, improvement, and diffusion.

The company commits to distribute copies of this Code to all employees, suppliers, and collaborators and to promote awareness of its content and objectives.

PURPOSE

This code of conduct has been developed to ensure that the company's ethical values are clearly defined and serve as the foundation of the corporate culture. It sets the standard of behavior for all employees in conducting business activities.

TRASER ITALIA SRL operates in compliance with the law and ensures that all personnel act accordingly. This commitment extends to consultants, suppliers, clients, and anyone associated with the company.

Each administrator, employee, and collaborator working with TRASER ITALIA SRL must act with loyalty, diligence, and integrity and take responsibility for their actions. They should refrain from behaviors inconsistent with the Code and promptly report any violations.

Furthermore, they must adhere to the laws and regulations of all countries where they operate on behalf of TRASER ITALIA SRL.

GENERAL ETHICAL PRINCIPLES

TRASER ITALIA SRL conducts its business activities based on fundamental principles of fairness in relationships with employees, other companies, the market, and public authorities. Transparency, pursuit of the common good, and avoidance of ethically improper behavior (such as corruption and illegality) are central to the company's values.

TRASER ITALIA SRL considers respect for laws and regulations, transparency (clarity, completeness, and relevance of information), and confidentiality of work-related information as essential. Sensitive information should not be disclosed without explicit consent. Furthermore, the company upholds fundamental human rights, ensuring moral integrity and equal opportunities.

DISCRIMINATION

TRASER ITALIA SRL provides a welcoming environment for all staff members, customers, volunteers, subcontractors, and suppliers, operating without any form of discrimination based on ethnicity, skin color, religion or creed, sex or gender expression, age, national or ancestral origin, physical or mental disability, marital status, sexual orientation, and/or social status.

In accordance with applicable law, any inquiry into opinions, preferences, personal tastes, and, in general, the private lives of the Recipients is prohibited.

Workers must be treated equally and evaluated strictly based on their abilities and qualifications.

TRASER ITALIA SRL also promotes integration, intercultural dialogue, and the protection of minority rights, ensuring protection against any act or behavior that produces a prejudicial effect or discriminates against workers, even indirectly.

WORKPLACE HARASSMENT

TRASER ITALIA SRL, referring to Recommendation 92/131 EEC on the protection of the dignity of women and men at work, guarantees to every employee an environment where interpersonal relationships are characterized by correctness, equality, and mutual respect for freedom and human dignity.

TRASER ITALIA SRL condemns any unwanted behavior or harassment, whether sexual, social, or racial, that undermines a person's dignity, both within and outside the workplace.

CHILD LABOR

TRASER ITALIA SRL commits to never using child labor under any circumstances, in accordance with the International Labor Organization (ILO) Conventions.

The company respects the importance of human rights worldwide, particularly the prohibition of harassment, bullying, discrimination, the use of child or forced labor, and human trafficking for any purpose.

PRIVACY

TRASER ITALIA SRL is sensitive to the privacy of stakeholders covered by this code and has adopted appropriate precautions and security measures regarding the processing of personal data.

TRASER ITALIA SRL ensures the protection and confidentiality of collected data in compliance with all applicable data protection regulations and in accordance with European Regulation 679/2016.

Except as provided by law, it is prohibited to communicate/disseminate personal data without the prior consent of the data subject and without complying with Reg. EU 679/2016.

CONFIDENTIALITY

Every employee or collaborator is required not to use confidential information acquired in the course of their work for purposes unrelated to the exercise of that activity. They must always act in accordance with the confidentiality obligations assumed by TRASER ITALIA SRL.

In particular, recipients are bound by maximum confidentiality regarding documents that could reveal transport information, commercial information, accounting information, corporate operations, and production information. The following are considered confidential information:

- Projects and investments
- Data related to personnel, customers, and suppliers.
- Commercial contracts
- Company documents
- The production process
- Databases related to external suppliers, customers, employees, and collaborators.

Specifically, employees must:

- Maintain confidentiality regarding news and information learned during the course of their duties.

- Observe the duty of confidentiality even after leaving the company.
- Consult only authorized documents, using them in accordance with their responsibilities.
- Prevent data leakage by following imparted security measures, carefully safeguarding entrusted documents, and avoiding unnecessary copies.

ACCOUNTING AND FINANCIAL STATEMENTS

TRASER ITALIA SRL adheres to:

- Accounting standards
- International and local laws and regulations
- General accounting standards and controls

The preparation of financial statements and any other accounting documentation is carried out in compliance with applicable laws and regulations, adopting accounting practices and principles based on clarity, truthfulness, and correctness.

COMPLIANCE WITH COMPETITION LAW

The company will always ensure, to the best of its ability, that competition in every market where it operates is fair, free, and unlimited, respecting all laws and regulations related to competition applicable to its activities or business.

CORRUPTION

TRASER ITALIA SRL conducts its business fairly and legally. It is prohibited to accept promises of favors, personal privileges, money offers, or any other favors to benefit third parties in relation to TRASER ITALIA SRL.

FAIRNESS AND LOYALTY

TRASER ITALIA SRL is committed to fair competition, in compliance with regulations, and recognizes that virtuous competition serves as a healthy incentive for innovation and development. It is not allowed to pursue personal interests at the expense of social interests, engage in unauthorized personal use of company assets, or hold direct or indirect interests in competing companies, clients, or suppliers.

INCENTIVE PAYMENTS

TRASER ITALIA SRL will conduct its business fairly and legally, which means it will not make any type of incentive payments or allow such payments to its advantage.

SUPPLIER SELECTION AND CUSTOMER MANAGEMENT

TRASER ITALIA SRL will operate fairly and will not grant any advantage that could unduly influence a supplier or customer representative in their dealings with the company. Only suppliers who respect human rights and do not employ child labor, in accordance with International Labor Organization (ILO) conventions, are used. Supplier selection and purchasing conditions are based on an objective evaluation of the quality and price of goods or services. Supplier or customer behaviors contrary to the principles expressed in the Code may constitute serious breaches of fairness and good faith in contract execution, as well as grounds for breach of trust and just cause for terminating contractual relationships.

CONFLICTS OF INTEREST

TRASER ITALIA SRL ensures that business decisions are made in the best interest and will not allow an employee to use their position within the organization for personal gain or the benefit of others rather than the company.

DONATIONS TO POLITICAL PARTIES

TRASER ITALIA SRL has a clear objective which is independent from political parties' policies; therefore, it does not support or make donations to any political party or candidate.

HEALTH AND SAFETY

All employees must comply with internal rules and procedures regarding risk prevention, health, and safety, and promptly report any deficiencies or violations of applicable norms.

TRASER ITALIA SRL provides information and training, as required by law, particularly regarding safety practices at work to prevent hazards, assess risks, and combat them at the source.

ENVIRONMENT

TRASER ITALIA SRL recognizes that environmental protection must be continuously improved. Therefore, it commits to applying and respecting current regulations related to environmental protection and management.

EMPLOYEE RELATIONS

COMPENSATION

TRASER ITALIA SRL ensures proper application of the remuneration regulations established by the current National Contract and oversees the correct application of allowances, bonuses, and any other compensation due to workers.

DISSEMINATION

TRASER ITALIA SRL is committed to disseminating the Code of Conduct using all available communication channels and opportunities, such as specific communications, IT tools, or staff information and training meetings. All interested parties must have access to the Code of Conduct, understand its contents, and adhere to its provisions.

COMPLIANCE

Observance of the Code of Conduct is considered an integral part of contractual obligations, as per Article 2104 of the Civil Code, both for employees and collaborators. The effects of violations of the Code of Conduct and internal protocols must be taken into account by all those who, in any capacity, have dealings with TRASER ITALIA SRL.

Depending on the severity of the conduct committed by the individual involved in one of the illicit activities outlined in the Code, TRASER ITALIA SRL will promptly take appropriate measures. Non-compliance with the Code by an employee may lead, according to the procedures set out in Article 7 of the Workers' Statute, to disciplinary action. Subject to the above, behaviors by an employee in violation of the Code of Conduct are punished with appropriate disciplinary measures according to the provisions of the current National Collective Bargaining Agreement (CCNL):

- Verbal reprimand
- Written reprimand

- Fine not exceeding the amount of three hours of total compensation (base salary and contingencies)
- Suspension from service and compensation for a period not exceeding 3 days.
- Dismissal

The identification and application of sanctions will always consider the general principles of proportionality and adequacy in relation to the contested violation.

VIGILANCE REGARDING THE IMPLEMENTATION OF THE CODE OF CONDUCT

The responsibility for verifying the implementation of the Code of Conduct lies with the Management Personnel.

Compliance with the provisions of this Code is also entrusted to the prudent, reasonable, and attentive oversight of each of the Recipients, within the scope of their respective roles and functions within the company.

CONCLUSION

The entire company, including customers and suppliers, must adhere to these principles in all activities carried out, especially when decisions need to be made or choices need to be exercised.

Roberto Solaroli (CEO) **Jorge Eduardo Michel (Plant Manager)**