CODE OF ETHICS

TABLE OF CONTENTS

1. **INTRODUCTION** – 3

2. **FUNDAMENTAL PRINCIPLES** – 3

3. **SCOPE** – 4
   3.1. Obligations of the Recipients – 4

4. **RELATIONSHIPS WITH PERSONNEL** – 4
   4.1. The Value of Personnel – 4
   4.2. The Value of Integration – 5
   4.3. Employee Training – 5
   4.4. Health and Safety Policy – 5

5. **RELATIONSHIPS WITH STAKEHOLDERS** – 6
   5.1. Relations with Shareholders – 6
   5.2. Local Authorities and Public Institutions – 6
   5.3. Judicial and Supervisory Authorities – 6
   5.4. Relations with Associations, Trade Unions, and Political Parties – 6
   5.5. Media Relations – 7
   5.6. Suppliers – 7
   5.7. Customers – 7
   5.8. Competitors – 7

6. **SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION** – 8
   6.1. Sustainable Development - Environmental, Social & Governance (ESG) – 8
   6.2. Environmental Protection – 8

7. **INTEGRITY AND COMPLIANCE** – 9
   7.1. Compliance with Laws and Regulations – 9
   7.2. Anti-Corruption – 9
   7.3. Anti-Money Laundering – 9
   7.4. Prevention of Criminal Activity – 9
   7.5. Conflict of Interest – 9

7.6. Privacy – 9
7.7. Transparency, Accuracy, and Completeness of Financial Information – 10

8. **COMPANY RESOURCES AND ASSETS** – 10
8.1. Responsible Use of Company Assets – 10
8.2. IT Systems – 10
8.3. Confidentiality – 11
8.4. Proprietary Information and Intellectual Property Rights – 11

9. **IMPLEMENTATION AND CONTROL MECHANISMS** – 11
9.1. Dissemination of the Code of Ethics – 11
9.2. Monitoring Compliance with the Code of Ethics – Supervisory Body – 11
9.3. Whistleblowing Policy – 12
9.4. Sanctions System – 12

1. INTRODUCTION

This Code of Ethics (the "Code of Ethics" or "Code") forms an integral part of the **Organization, Management, and Control Model ("MOG")** adopted by **Cromodora Wheels S.p.A.** (the "Company") pursuant to Legislative Decree **231/2001**. It sets forth the fundamental principles and rules of conduct of the Company in its interactions with **stakeholders** during its business activities.

Further guidance is provided by the **Policies** adopted and periodically updated by the Company, notably its **Sustainability Policies**. Cromodora Wheels is fully committed to pursuing and implementing a **sustainable strategy** through policies, management practices, operational guidelines, and other initiatives issued from its specificities designed to promote a **healthy, inclusive, and sustainable global economy**. This approach upholds adherence to fundamental **human rights** as well as **labour rights; it safeguards the environment, and actively promotes business integrity** in all its aspects.

In this regard, Cromodora Wheels establishes relationships with third parties (both **individuals and legal entities**), including subsidiaries and/or affiliates, in accordance with the **principles of this Code**, **transparency guidelines**, and **fairness**.

All **recipients** (as defined below) who, in any capacity, act on behalf or in the interest of **Cromodora Wheels**, must comply with the **principles and rules of conduct** set forth in this Code, as well as with the applicable **internal and external regulations**.

The **Board of Directors** and the **executive management** of Cromodora Wheels undertake all appropriate measures to ensure the full implementation of the **rules of conduct as well as the ethical and moral principles** contained in this Code of Ethics, including its **dissemination**.

The **Code of Ethics is made available to all employees** and can be accessed at **www.cromodorawheels.com**, where it is freely downloadable.

2. FUNDAMENTAL PRINCIPLES

Cromodora Wheels' core business activities include the **study, design, production, and sale of aluminum alloy wheels for vehicles**, as well as the **trade of foundry products and metalworking products** in general. Operating in the **automotive market**, the Company conducts its personnel's activities in accordance with the following **fundamental principles**:

- **Excellence**: Defined as **managerial and operational efficiency**, shared expertise, networking, and strategic partnerships meant to drive the **Company's growth, supply chain development, as well as the creation of value and competitiveness**.
- **Sustainability**: Considered as a **lever for success and continuous growth** in environmental, economic, and social areas. This drives a **process of change** in which the **responsible use of natural resources, investment planning, technological and industrial development, and institutional reforms** are all in harmony to enhance both **current and future potential**.
- **Innovation**: Defined as a **proactive and dynamic approach**, capable of **challenging entrenched practices** to continuously develop **new business and market initiatives**.
- **Responsibility**: Defined as the **ability to anticipate the consequences of one's actions** and adjust behaviour accordingly.

- **Legality**: The **strict compliance with laws and voluntary regulations** as **fundamental, non-negotiable elements** of the Company's operations.
- **Confidentiality**: The **protection of data and information** in the Company's possession, which ensures security in dealings with third parties, be they individuals or legal entities.
- **Transparency**: Ensuring **clarity in information** as well as **non-concealment**, even while safeguarding **data confidentiality and sensitive information**.
- **Collaboration**: The ability to **foster personal and professional relationships** aimed to **share best practices and knowledge** by promoting **personal and professional growth** through **mutual respect, trust, cooperation, and integration**.
- **Integrity**: Defined as **honesty and loyalty** in all relationships with **internal and external stakeholders**. This includes **proactiveness and transparency in information disclosure, even while maintaining confidentiality in handling sensitive information**.
- **Integration**: Defined as **the enhancement of interpersonal relationships and the appreciation of difference** while paying respect for different **cultures and lifestyles** within a **framework of equal opportunities and gender equality**.

3. SCOPE

The recipients of the **Code of Ethics** include:

- **Personnel**, defined as **employees of the Company,** as well as **all individuals collaborating with the Company** under **quasi-subordinate employment relationships** and other **collaboration agreements**, including project-based workers, temporary employees, and contract workers.
- **Individuals performing (even *de facto*) managerial, administrative, executive, or supervisory functions** for the Company or any of its **organizational units**, including **members of the Corporate Bodies** (such as **Directors, Statutory Auditors, etc.**).

- **Individuals who, directly or indirectly, on a permanent or temporary basis, establish contracts and/or collaborative relationships with Cromodora Wheels**, working on its behalf or cooperating in its business operations and objectives.
- **Any individual acting in the interest of the Company**, whether bound by **contractual or other legal agreements** (e.g., joint venture partners, business initiative partners, etc.).
- **All individuals listed under Article 3, paragraph 3 of Legislative Decree 24/2023 in matters of whistleblowing and the reporting of unlawful activities**.
- The Code of Ethics is valid in all the jurisdictions in which Cromodora Wheels operates.

3.1. Obligations of the Recipients

The **Recipients** must **strictly comply** with all **laws, applicable regulations, internal company policies, as well as with the principles and rules set forth in this Code**. Additionally, they must **uphold the Company's reputation, prestige, and image**, avoiding any situations, behaviors, or actions that may **conflict with the interests of Cromodora Wheels**.

Ignorance of the principles set forth in this Code cannot constitute an excuse for any unlawful or non-compliant behaviour. Likewise, under no circumstance is an assertion of having acted in the interest or for **the benefit of the Company** to justify any conduct that **is illegal or in violation of the principles set forth in this Code**.

Compliance with the provisions of the **Code of Ethics** is a **mandatory condition for all employment contracts**, regardless of **type or nature**, including those involving **executives, project-based workers, part-time employees, and quasi-subordinate collaborators**, as well as **third parties involved with the Company**.

Accordingly, **Recipients are required to promptly report** to their **supervisors or designated authorities** (including the **Supervisory Body**) any instance of breach or **non-compliance with the principles set forth in this Code**.

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4. RELATIONSHIPS WITH PERSONNEL

4.1. Value of Human Resources

Human resources are recognized as **fundamental and inalienable factor** of Cromodora Wheels' **development.** They are the foundation of the Company's **knowledge, experience, expertise, and culture**, which have been and continue to be the basis of its **industrial and commercial growth**.

The Company is committed to **enhancing and developing** the professionalism and wellbeing of all its Personnel by fostering a work environment **free from discrimination, intimidation, or any conduct that may violate a person's dignity**. Cromodora Wheels upholds the **freedom and liberty of individuals**, rejecting **any activities that may involve exploitation, curtailment of freedom, or subjugation of individuals**—even in potential.

The **Company's relationships with its Personnel** are based on **fairness, loyalty, transparency, and mutual respect**. These relationships are governed by the **labour laws** applicable to the countries in which the Company operates, as well as by the **principles and rules of the Code of Ethics**, which all employees are expected to follow.

Employees must act in a manner that upholds the prestige and reputation of Cromodora Wheels by fulfilling the **tasks and responsibilities** assigned to them **with commitment, dedication, and professional rigour**, in accordance with the **instructions provided**. They must maintain **confidentiality, transparency, loyalty, and fairness**, ensuring that their conduct is **never misleading** and the information they provide is never **deliberately inaccurate or incomplete**. Employees must also refrain from engaging in **competitive activities against the Company**, taking **personal accountability for their actions** in carrying out their assigned duties.

Managerial and executive roles have the **additional duty to oversee the activities of personnel under their supervision**, with the awareness that a **senior executive is held responsible for any misconduct resulting from a failure to exercise proper oversight**.

4.2. The Value of Integration

Cromodora Wheels promotes and supports **equal opportunities and gender equality**, fostering **interpersonal relationships, integration, and appreciation of diverse cultures and lifestyles**, while respecting individual characteristics such as **age, nationality,**

health, political opinions, race, gender, and religious beliefs. The Company regards **diversity and pluralism as assets** and, in this regard, encourages and values the **contribution of each individual** to corporate activities.

Cromodora Wheels is committed to creating an **inclusive work environment** that is **respectful of human dignity**, reinforces the **value of individual contributions**, and acknowledges the **strengths of diversity**. The Company **fosters cooperation** among employees from different cultures, perspectives, and experiences by **implementing training and communication measures** that promote **equal opportunities and gender equality**.

Cromodora Wheels requires the **Recipients** of the Code of Ethics to adhere to these values in their interactions with third parties.

4.3. Employee Training

Cromodora Wheels considers the **intellectual, relational, organizational, and technical skills** of each individual as a **strategic resource** to safeguard and enhance, ensuring that individual talents are **recognized and developed** through **professional development programs**. The Company **fosters a corporate culture** based on the **dissemination of knowledge**, encouraging behaviours that **enhance both individual and collective contributions**.

Cromodora Wheels believes in **lifelong learning** as a **key driver** for employee development in such areas as **ethical values, organizational integration, change management, innovation, sustainability, ESG factors, environmental protection, and workplace health and safety**.

4.4. Health and Safety Policy

The protection of **health, individual and collective safety** is a **non-negotiable principle** for Cromodora Wheels. This commitment **drives both corporate decisions and individual employee behaviour**. The Company promotes and encourages a **culture of accident prevention, health safeguard, and risk awareness** in the workplace, requiring all employees to **strictly comply with health and safety regulations** and to

actively monitor potential risks and address them immediately. Furthermore, Cromodora Wheels requires its **business partners** (namely, **suppliers and customers**) to meet the **same safety standards**.

Cromodora Wheels ensures workplace **health, safety, and hygiene** compliance by continuously **improving management systems** and **promoting a safety culture** based on **prevention strategies** and the **effective occupational health risk management**.

The **Recipients** working in Company's premises are considered **"workers" under Legislative Decree 81/08** and are **obliged** to:

a) **Follow the instructions and directives** issued by the **employer (or delegated representatives), managers, supervisors, and the occupational physician** to ensure collective and individual protection.

b) **Handle machinery, equipment, tools, hazardous substances, transportation means, other work equipment,** as well as **safety devices with caution and for their intended purpose**.

c) **Wearing Personal Protective Equipment (PPE)** provided when appropriate.

d) **Immediately report to the employer, manager, or supervisor any defects or deficiencies in the equipment and safety devices**, as well as any other potential hazards they become aware of. In urgent situations, they must act within their **competence and capability** to **eliminate or mitigate such deficiencies or dangers** while informing the **worker safety representative**.

e) **Refrain from removing or altering safety devices, warning systems, control systems, or PPE** without authorization.

f) **Avoid performing unauthorized operations or actions** that fall outside their competence or that could **jeopardize their own safety or that of others**.

g) **Undergo the required medical examinations** as outlined in the workplace **health monitoring plan**.

h) **Cooperate with the employer, the delegated representatives (under Article 16 of Legislative Decree 81/2008), the Occupational Health and Safety Officer (OHSO or RSPP in Italian), managers, supervisors, the occupational physician, and the Worker Safety Representative (RLS)** in fulfilling all **legal and regulatory obligations** necessary to **ensure workplace health and safety**.

i) **Attend the training programs organized by the Company**.

Finally, Cromodora Wheels **ensures** that when **outsourcing work or services**, or in **business relationships** in general, third parties are **required to comply with health and safety regulations**.

5. RELATIONSHIPS WITH STAKEHOLDERS

5.1. Relationships with Shareholders

In compliance with **legal and statutory provisions**, Cromodora Wheels periodically provides **shareholders** upon request with **confidential information** regarding the **Company's activities, results, development programmes, and approved investments**.

5.2. Local Authorities and Public Institutions

The relationships between Cromodora Wheels and **Local authorities, public institutions and civil servants** (hereinafter collectively referred to as **"PI"**) are entrusted exclusively to **authorized corporate representatives**.

For the purposes of this Code, **PI** refers to, but is not limited to:

- **Public institutions and bodies**
- **Public officials or civil servants**
- **Representatives of central or local authorities, legislative bodies, EU institutions, international public organizations, and foreign states**
- **The judiciary, public supervisory authorities, and private entities acting as public service concessionaires**
- **Any personnel working in or for PI**

The **Company strictly prohibits any unlawful conduct**, including but not limited to:

- **Influencing the judgment or conduct of public officials or civil servants**
- **Obtaining contracts, tenders, or public/private procurement through deceit or unlawful conduct**
- **Interfering with or attempting to influence PI decisions**

All **authorized recipients** who engage with **PI** must ensure that their actions, as well as those of their collaborators, **comply with the principles and rules of this Code of Ethics**. These relationships must be **transparent, conducted with integrity, and in full compliance with applicable laws**.

It is strictly **prohibited** for all **Recipients** to:

- **Offer money or promise benefits to public officials or civil servants, either directly or indirectly, to influence their official duties**.
- **Circumvent this prohibition through alternative forms of compensation**, such as **sponsorships, consultancies, advertising, gifts, benefits, or employment offers**.

Recipients must refrain from any conduct that may **constitute bribery, extortion, fraud, or the unlawful receipt of public funds or benefits**. They are strictly **forbidden** from misleading **PI** through deception or fraudulent means to obtain **unjust financial advantages**, including:

- **Misusing public funds, benefits, or financial aid** from the **State, public bodies, EU institutions, or international organizations** for purposes other than those for which they have been granted.
- **Submitting false statements or documents**, omitting required information, or making inaccurate statements to obtain **public funding, benefits, incentives, or contracts**.

5.3. Judicial and Regulatory Authorities

All **Recipients** must engage with the **judiciary and regulatory authorities** (hereinafter referred to as **"Authorities"**) with **the utmost cooperation and transparency**, avoiding any actions that **obstruct them in the execution of their institutional duties**.

It is strictly **prohibited** to:

- **Offer, promise, or provide money or other benefits, directly or indirectly, to representatives of judicial or supervisory authorities with the aim of receiving favourable treatment** during **inspections, audits, document reviews,** or the performance of any other duties.

- **Pressure individuals summoned to testify before the Authorities to withhold information or provide false statements**.
- **Assist individuals involved in criminal offences in evading investigation or avoiding detection by authorities**.

5.4. Relations with Associations, Trade Unions, and Political Parties

Employees are **free to engage in political activities outside of working hours**, provided that such activities **remain separate from their professional role** at Cromodora Wheels.

The Company fully recognizes the **right of all employees to participate in trade union activities**, in compliance with **applicable laws and collective labor agreements (CCNL)**.

Recipients must refrain from **direct or indirect pressure** on political figures to obtain **undue advantages**.

Any contributions— be they **monetary or otherwise** —to **political movements, committees, and other political or trade union organizations** must be **granted transparently**, in accordance with **legal requirements**, and **recorded in the Company's accounts** in full compliance with **applicable accounting regulations**.

5.5. Media Relations

External communication must be **accurate, truthful, and transparent**.

Interactions with **media representatives on behalf of the Company** are strictly **reserved to authorized personnel acting as spokespersons**.

It is **prohibited** to provide **information to media representatives** or to **commit to providing information** without the **explicit authorization** of the designated **corporate officers**.

5.6. Suppliers

Suppliers are encouraged to **comply with the principles and rules of the Code of Ethics**. Cromodora Wheels **does not engage with suppliers** who **refuse to adhere to the ethical values** expressed in its Code.

Supplier selection is based on **transparent and objective evaluations** of **professionalism, business structure, and sustainability**, while also considering **quality, price, delivery terms, and delivery of service**, in compliance with the **certified quality management system in place**.

Cromodora Wheels is committed to **assessing the social impact of industrial and corporate activities**, ensuring that **ethical principles of interaction** are upheld in supplier relationships. Furthermore, the Company promotes **supplier alignment with ESG (Environmental, Social, and Governance) factors**, encouraging sustainable business practices, **efficient use of natural resources**, and initiatives to **protect the environment** and **support environmental conservation efforts**.

It is strictly **prohibited** for all **Recipients** to:

- **Offer, promise, or provide money, gifts, or other benefits** to **gain preferential treatment, advantages, or influence** suppliers in their decision-making.
- **Accept money, gifts, or other benefits** from suppliers in exchange for **favourable treatment**, including the **execution or omission of acts** that benefit the supplier.

5.7. Customers

Cromodora Wheels' primary objective is to ensure **complete client satisfaction** and establish **high-quality, long-term relationships** built on **fairness, honesty, efficiency, professionalism, and sustainability**.

The Company and its employees are committed to **delivering the highest level of service**, proactively offering **innovative solutions** to meet customer needs.

All **promotional, commercial, and technical communications**, as well as **contracts entered into with clients**, must adhere to principles of **transparency, clarity, completeness, methodological rigour, fairness, excellence, and integrity**.

In commercial transactions, **Cromodora Wheels and its personnel strictly avoid any conduct that may violate competition laws or antitrust regulations**.

The Company also considers the **social impact of its industrial and corporate operations**, applying **ethical principles of interaction** in customer relationships. It promotes **the integration of ESG factors** into environmental, economic, and social aspects to encourage **sustainable development**, optimize **natural resource utilization**, and support **environmental protection initiatives**.

It is strictly **prohibited** for all **Recipients** to:

- **Offer, promise, or provide money, gifts, or other benefits** to **obtain preferential treatment** from customers or to **influence their decisions**.
- **Accept money, gifts, or other benefits** from customers in exchange for **favourable treatment**, including the **execution or omission of acts** that benefit the customers.

5.8. Competitors

Cromodora Wheels upholds the value of **free and fair competition** as a **fundamental driver of market development and innovation**. The Company operates **with full transparency**, in **strict compliance with antitrust and competition laws**, and **with full respect for competitors**.

In dealings with **third-party companies or competitors**, Recipients must **refrain from disclosing confidential or proprietary information** that could lead to actions or conducts that **violate market norms and competition laws**.

6. SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION

6.1. Sustainable Development - Environmental, Social & Governance (ESG)

Cromodora Wheels fosters **synergies** that lead to the integration **with the local environment** in which it operates, while respecting mutual interests and selecting **collaborators and companies** that align with the **principles of social responsibility** set forth in this Code.

To Cromodora Wheels, **economic performance and social responsibility** are **interdependent** in achieving both **competitiveness and corporate sustainability**. Accordingly, the Company pays close attention to the **social impact of its industrial and business operations**, thus ensuring **ethical interactions with all stakeholders**.

The Company is committed to **complying with current regulations** while applying **cutting-edge technologies** to promote the **sustainable development** of its activities. This includes optimizing **natural resource consumption**, preserving the **environment**, and supporting initiatives for **sustainable development of the territory**.

In matters of **environment, economy, and society**, Cromodora Wheels pursues a **strategic transformation** in which **resource management, investment planning, technological advancements, and institutional changes** are **harmonized** to maximize **present and future potential**. The goal is to **meet the needs of the stakeholders and of the environment** in which the Company operates.

To ensure alignment with **sustainability goals**, Cromodora Wheels periodically **reassesses and integrates ESG factors** into its business operations and corporate model. The Company promotes ESG principles among all **Recipients** of this Code, ensuring their full commitment to sustainability.

6.2. Environmental Protection

Cromodora Wheels is committed to conducting all its activities by prioritizing **environmental protection and public health**. Its **investments and business strategies** are geared towards **environmental sustainability** and accelerating **eco-friendly growth** through the adoption of **advanced technologies and sustainable production methods**. Where **feasible**, the Company implements solutions that **reduce environmental impact beyond legal requirements**.

The Company actively implements **environmental management systems and waste-reducing production methods**, **preserves natural resources** while fostering partnerships with leading organizations to promote **sustainability initiatives**.

Cromodora Wheels continuously works to **improve its environmental performance** and remains fully **compliant with all applicable environmental laws and regulations**.

Additionally, it is committed to developing **innovative technical solutions** that **limit environmental impact** and **enhance safety standards** across all its operations.

The Company's **environmental policy** is centred around the **continuous improvement of energy management systems**, with a focus on:

- **Reducing overall energy consumption**,
- **Enhancing efficiency and energy performance**, and
- **Minimizing environmental and social impacts**.

Cromodora Wheels strives to develop **innovative and effective solutions** while promoting a **culture of environmental responsibility** within the Company and among its partners.

The Company takes **sector-specific environmental actions**, including but not limited to:

- **Minimizing, mitigating, and offsetting environmental impacts** caused by industrial activities.
- **Ensuring strict oversight of supply chain impacts**, ensuring environmental compliance across procurement activities.
- **Prioritizing risk prevention programmes** and continuously improving technologies and management practices to **prevent environmental damage**.
- **Encouraging the responsible use of natural resources** and **reducing consumption**.
- **Maintaining transparency with stakeholders**, notably the **local community** and the areas affected by industrial operations.
- **Adopting the highest standards** in **industrial processes, safety, environmental protection**, and **product innovation** to support **sustainable and responsible consumption**.
- **Enhancing the energy efficiency and technological innovation** of **company-owned properties**.

- **Fostering a culture of energy conservation and environmental respect** among employees.
- **Promoting environmental awareness and sustainable practices** among suppliers and customers.

7. INTEGRITY AND COMPLIANCE

7.1. Compliance with Laws and Regulations

Cromodora Wheels conducts its activities in accordance with the **principle of legality**, ensuring full compliance with **Italian and international laws**, including applicable **technical regulations**.

The Company considers it essential that **Personnel** be aware of the **governance framework** in place so that each individual—depending on their role, mandate, or contractual relationship with the Company—**understands their responsibilities and the appropriate conduct to adopt**.

To this end, the Company takes **all necessary measures** to ensure that Personnel are **fully informed** about the **legal requirements** applicable at both the **national and international levels** in which the Company operates.

7.2. Anti-Corruption Measures

Cromodora Wheels **rejects and condemns all forms of corruption**, including **bribery, undue influence, abuse of office, and influence trafficking**, be they in the **public or private sector**.

The Company requires **all Recipients** to take **every necessary measure** to **prevent and avoid** any involvement in such offences during their professional activities.

7.3. Anti-Money Laundering Measures

Cromodora Wheels **fully complies with anti-money laundering laws** in the countries where it operates and requires **all Recipients** to do the same.

Recipients must **not** engage in activities that involve:

- The **use, conversion, or concealment of illegally obtained capital**.
- The **disguise or transfer of funds, assets, or proceeds originating from illicit activities**.
- Any **transactions aimed at obstructing the identification of criminally derived assets**.

Furthermore, Cromodora Wheels **rejects and prohibits** any illicit conduct related to:

- **Money laundering**
- **Terrorist financing**
- **Criminal activities affecting cultural heritage and environmental preservation**

The Company expects **all Recipients** to refrain from any actions that could contribute to such offences.

7.4. Prevention of Criminal Activity

Cromodora Wheels **does not enter or maintain any business relationships** with individuals or entities—whether **natural or legal persons**—that are **known or suspected** to be involved in **terrorism or organized crime**.

Likewise, the Company **does not contribute to or support** the activities of such organizations.

All **Recipients** of this Code are requested to **take all necessary precautions** to prevent even the **risk of being associated** with **any direct or indirect relationship**—whether through assistance, cooperation, or any other form of support—with **criminal or terrorist organizations**.

7.5. Conflict of Interest

In performing their assigned duties, Cromodora Wheels requires all **Recipients of this Code** to **avoid situations of actual or potential conflicts of interest**.

Under no circumstances are personal interests to **prevail over those of Cromodora Wheels**.

If a **conflict of interest** arises, the Company will take **appropriate measures** to **manage the situation in accordance with the law, internal governance policies, and the principles of this Code**.

Examples of **conflicts of interest** include, but are not limited to:

- **Holding significant financial interests** (such as shares or equity) in **competitor companies**, directly or through **family members**.
- **Engaging in business activities**—either personally or through **family members**—with **customers or suppliers**.
- **Accepting money, gifts, or favours** from **individuals, companies, or entities** that have, or seek to establish, **business relationships** with Cromodora Wheels.
- **Using proprietary company information** for **personal gain at the expense of the Company**.
- **Exploiting business opportunities** discovered through one's **corporate role for personal benefit**.
- **Providing technical sponsorships or establishing collaborations** with **non-profit organizations** or **cultural/charitable institutions** for **personal benefit**.

7.6. Privacy Protection

Cromodora Wheels is committed to **handling personal data and confidential information** collected during its business activities **in full compliance with applicable data protection laws and best practices**.

Cromodora Wheels processes **personal information, both general and sensitive, with the consent of the individuals concerned**, in compliance with the **legal provisions** and as integrated by **EU Regulation GDPR**.

Additionally, the Company processes **privacy-related data and information** of all **Recipients** (including **personnel, customers, suppliers, business partners, and any other**

parties with whom it establishes relationships) **exclusively for purposes defined by the nature of the relationship**.

To this end, the Company, in its capacity as **data controller**, has established an **internal privacy organisation** that defines the **roles and responsibilities** required by law. These include **internal and external data processors, authorized data handlers, and system administrators**.

7.7. Transparency, Accuracy, and Completeness of Financial Information

Cromodora Wheels provides **stakeholders** with both **financial and non-financial reports** on the Company's performance, ensuring their **accuracy and completeness**.

All **Recipients** involved—directly or indirectly—in **accounting activities** must **guarantee transparency, accuracy, truthfulness, completeness, and verifiability** of the financial records and of the information they handle.

To this end:

- Every **accounting transaction and financial record** must be **duly entered** in the Company's **accounting system**, in compliance with **legal criteria and applicable accounting standards**.
- Every transaction must be **authorized, verifiable, legitimate, consistent, and appropriate**.

To ensure **accuracy, completeness, verifiability, and transparency** in financial reporting, the Company must retain **adequate and comprehensive supporting documentation** for all recorded activities, allowing for:

- **Accurate financial recordkeeping** for each transaction.
- **Immediate identification** of the characteristics and motivations behind accounting entries.
- **Seamless recording** of operations in both **chronological and formal order**.
- **Verification of decision-making, authorization, and implementation processes**, including the **identification of responsible parties and oversight mechanisms**.

Each financial record must **faithfully reflect** the information in its supporting documentation. **All Recipients involved must ensure** that their **supporting documents are well-organized, accessible, and logically structured**.

No **payment is to be executed** without proper **supporting documentation, authorization, and delegation of authority** by the **competent corporate body**.

Any **Recipient who becomes aware of omissions, falsifications, or inaccuracies** in financial records or their supporting documents must **immediately report the issue** to their **supervisor, the responsible function, or the Supervisory Body**.

Company personnel and collaborators must **act with full transparency** toward the **Company's external auditors and Board of Statutory Auditors**, providing **the utmost cooperation** in their **audit and control activities**.

8. COMPANY RESOURCES AND ASSETS

8.1. Responsible Use of Company Assets

Cromodora Wheels' corporate assets include **real estate, movable property (including registered assets), and intangible assets**. The **loss, damage, or improper use** of these assets may **severely impact the Company's operations**.

Each **Recipient** is responsible for **protecting and properly maintaining** Company assets assigned to them for their professional duties. They must **ensure their efficiency and prevent improper use**.

Company personnel must use **facilities, equipment, machinery, systems, and any other company-owned assets exclusively for assigned job functions and responsibilities**.

Any **use of Company assets** beyond the assigned duties **must be expressly authorized** by the designated **responsible party**.

8.2. IT Systems

Cromodora Wheels' **IT systems and licensed software** are **Company-owned or made available for use**.

Recipients must use **IT resources responsibly**, following **principles of diligence and integrity**, and in full compliance with **applicable laws and Company regulations**.

In particular, the Company **prohibits** any actions, using either **personal or corporate IT systems**, that result in the **forgery of paper or electronic documents** with **legal or evidentiary value**.

It is **strictly forbidden** to use **Company IT systems for illegal activities**, including but not limited to:

- **Unauthorized access to IT systems** (hacking).
- **Accessing protected IT or telecommunication systems without authorization**.
- **Intercepting communications**.
- **Installing unauthorized hardware or software**.

8.3. Confidentiality

All **information, knowledge, and data** acquired by **Cromodora Wheels personnel** within their professional relationship with the Company **belong exclusively to Cromodora Wheels** and may not be **used, disclosed, or shared** without the **explicit authorization of the designated superior**.

Confidential information may be shared **internally within the organization only with those who demonstrate work-related necessity** to access such data.

Recipients who, while carrying out their duties for the Company, interact with **third parties** (including **current or potential competitors**) must:

- **Emphasize the confidentiality of the relationship**.
- **Refrain from discussing or referencing confidential information** that belongs to or is owned by **Cromodora Wheels**.

Each **Recipient** must ensure that the **confidentiality of sensitive information is maintained**, regardless of its source (e.g., **reports, databases, internal communications, or confidential conversations**).

8.4. Proprietary Information and Intellectual Property Rights

The **unauthorized disclosure of proprietary Company information**—or its improper use—**can cause serious financial and reputational damage** to Cromodora Wheels.

Recipients with access to **intellectual property, industrial property, or Company know-how** may use such information **exclusively to perform their assigned tasks** and only **in compliance with existing confidentiality agreements**. Any **exceptions must be expressly authorized** by the **designated responsible party** and may apply **only to specific business or market-related needs**.

Personnel must **not** use **Company information or documentation** for **non-professional purposes** and must comply with **professional, commercial, and industrial secrecy obligations**.

Upon **termination of employment or contractual relationships**, all **Recipients entrusted with Company materials** (including but not limited to **documents, digital media, industrial engineering designs, mobile devices, etc.**) **must return them**.

Under no circumstances will exclusive Company information be disclosed or misused.

9. IMPLEMENTATION AND MONITORING MECHANISMS

9.1. Dissemination of the Code of Ethics

Cromodora Wheels ensures the dissemination **of the Code of Ethics, Sustainability Policies, and other governance documents** by **publishing the relevant materials on its official website**.

Furthermore, the Company is committed to **spreading awareness of the Code of Ethics among all Recipients** engaged in business relationships with Cromodora Wheels. Namely, this is achieved by:

- **Providing clarifications and support** to anyone requesting information.
- **Conducting information and training sessions** on the Code of Ethics.

- **Investigating any potential violations of the Code of Ethics** and, where appropriate or required, **sanctioning misconduct**.
- **Ensuring that all Recipients are fully informed** of their **obligation to comply with the Code** in their professional activities.
- **Encouraging adherence to the Code's principles among all Recipients**.
- **Implementing awareness initiatives** for all Recipients who engage with the Company.

9.2. Monitoring Compliance with the Code of Ethics – Supervisory Body

Pursuant to **Legislative Decree 231/2001**, the Company has established an **internal Supervisory Body** with **control powers**.

The **Supervisory Body** is responsible for:

- **Ensuring compliance with the Code of Ethics**.
- **Overseeing its dissemination**.
- **Updating the Code of Ethics as necessary**.

To carry out its duties, the **Supervisory Body** may request **support from department heads, functional managers, and internal corporate structures**.

All **information and communications received by the Supervisory Body** are considered **confidential** and **cannot be disclosed** except as required by applicable laws.

Additionally, all **Cromodora Wheels personnel** are required to **ensure compliance with the principles outlined in the Code of Ethics**.

Any inquiries regarding the **implementation of the Code of Ethics** may be addressed to the **Supervisory Body** through the following email address: odvcromodorawheels@gmail.com.

9.3. Whistleblowing Policy – Reporting Unlawful Conduct

To comply with the obligations set forth in **Legislative Decree 24/2023** regarding **whistleblowing**, Cromodora Wheels has issued **specific guidelines** outlining the procedures for submitting reports concerning **unlawful conduct**. These guidelines, along with **privacy policies**, are available on the Company's institutional website at: https://www.cromodorawheels.com/whistleblowing/.

In compliance with **Legislative Decree 24/2023**, Cromodora Wheels has made available an **electronic platform** for individuals wishing to report unlawful conduct they have become aware of **during their employment or professional relationship with the Company**. This platform ensures the **confidential processing of all submitted data**. Additionally, the Company has appointed a **manager for the whistleblowing channel**.

Pursuant to the **applicable regulations**, any situation that may **constitute, or even potentially constitute, a violation** of **Legislative Decree 24/2023**, including:

- **National and international regulations**
- **Legislative Decree 231/2001**
- **The Organization, Management, and Control Model**
- **The principles of this Code of Ethics**

that the whistleblower becomes aware of in the course of their **employment or collaboration with Cromodora Wheels** may be reported through the **whistleblowing reporting channel**, accessible via the following link: https://cromodorawheels.integrity.complylog.com/.

As laid down by **Legislative Decree 24/2023**, **no form of retaliation will be tolerated** against individuals who **report unlawful conduct** they become aware of during their professional relationship with Cromodora Wheels.

9.4. Sanctions System

Compliance with the provisions of this **Code of Ethics** is to be considered an **integral part of the contractual obligations** of employees (both **fixed-term and permanent employees**) in accordance with **Article 2104 of the Italian Civil Code**, including any subsequent amendments and supplements.

With specific reference to **non-employee personnel**, the obligations set forth in this **Code of Ethics** must be fulfilled with the **diligence required under Article 1176, paragraph 2, of the Italian Civil Code**, including any subsequent amendments and supplements.

Failure to comply with the **principles of this Code of Conduct** will be regarded as:

- A **breach of primary employment obligations**, constituting a **disciplinary offence subject to appropriate sanctions**.
- A **breach** of contract in relationships with **non-employee third parties**.
- A **potential criminal, administrative, or civil offence**, which, in addition to causing **damage to the Company**, may also give rise **to personal liability for Recipients**.

In any case, failure to comply with the directives set forth in this **Code of Ethics** grants Cromodora Wheels the right to **take disciplinary action** against those **found to be responsible**, in accordance with:

- **Applicable laws**
- **Collective labour agreements**
- **The Workers' Statute**
- **Current corporate regulations and policies**
- **Existing contracts**

Acknowledgment of Receipt

I, the undersigned _____, an employee of **Cromodora Wheels S.p.A.**, hereby confirm that I have received the **"Code of Ethics"**, the contents of which I acknowledge and commit to complying with.

Furthermore, I declare that I am **not currently aware of any violations** of these rules and directives by personnel or third parties in relation to **Cromodora Wheels S.p.A.**.

First Name:

Last Name: _____

Department:

Date: _____

Signature: