

**MANUAL**

# CODE OF ETHICS

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Issue date	Expiry date	Status	Classification level
15/01/2025	15/01/2028		Public
Edited by		Approved by	
Benvenuti Daniela 13/01/2025		CDA	
		Bertilotti Andrea 15/01/2025	

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### 1 Introduction

This Code of Ethics expresses the ethical commitments and responsibilities in the conduct of company business undertaken by the management, employees and generally by all collaborators of the Company.

FOMA's Code of Ethics is the main tool for promoting, disseminating and managing work and business ethics within the company.

FOMA hopes for the spontaneous adherence to, sharing and dissemination of the principles expressed in the Code of Ethics and requires its observance and application by every individual working on behalf of FOMA, or coming into contact with it, also providing for the application of disciplinary and contractual sanctions for any violations.

This Code of Ethics turns out to be a foundational component of the Company's Organizational Model and internal control system, in the belief that ethics in conducting business is the basis for the success of business activities.

This Code includes the Founding Values present in the company by which all FOMA people are inspired in their daily work; in particular, the Company's efforts are aimed at achieving sustainable growth understood as the production and development of the highest quality products with constant respect for people and the environment.

In the pursuit of its mission, FOMA considers it essential to develop the fiduciary relationship with all stakeholders, i.e., the individuals, groups and institutions that are indispensable to the pursuit of the corporate mission or that are otherwise affected by it or have legitimate interests in its outcomes.

The Company's main stakeholders include shareholders, staff, customers, suppliers, the state, PA, and local and national public control bodies, the national community, and the local communities within which production facilities are located.

### 2 Target audience

The principles and provisions of this Code of Ethics (hereinafter also referred to as the 'Code'), are binding on the Directors, all persons bound by employment relationships with FOMA ("Employees") and all those who work for FOMA, whatever their relationship with it (by way of example, consultants, agents, intermediaries and project workers, collectively hereinafter also referred to as "Collaborators").

This Code is also adopted for the purpose of strengthening the control system aimed at preventing the commission of the offenses set forth in Legislative Decree No. 231/2001.

The principles and provisions of this Code constitute illustrative specifications of the general obligations of diligence, fairness and loyalty that qualify the performance of work services and the behaviour that the employee or collaborator is required to observe.

FOMA considers compliance with the norms and provisions contained in the Code of Ethics to be an integral and essential part of the contractual obligations arising, for employees from employment relationships also pursuant to Article 2104 of the Civil Code, and for non-subordinate collaborators from their respective contractual regulations.

All those acting within or on behalf of the Company are required to maintain conduct in line with the general principles of this Code.

Violation of the rules contained herein constitutes breach of obligations arising from the employment or cooperation relationship, with all consequences of law or contract.

Each person is expected to respect, enforce compliance with the Code, and report any violations, depending on his or her duties and the scope of his or her task.

### 3 General principles

#### 3.1 Respect

The Company places respect for human beings at the core of its values, a principle that inspires not only internal interpersonal relations, but also relations with external individual and collective stakeholders.

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Special attention is paid to respect for the needs of the target communities in which the company operates and the rights of future generations in terms of well-being, quality of life and the environment.

The processing of personal data and privacy related to employees, customers and suppliers complies with the law on the right to confidentiality and is inspired by the utmost respect for the dignity of the person concerned. Information acquired from employees and collaborators belongs to FOMA and may not be used, communicated or disclosed without specific authorization.

Human rights are fundamental freedoms for all human beings, therefore, FOMA protects these rights by working to ensure that they are implemented and promoted in daily activities within the value chain.

Behaviour and/or attitudes and/or statements that are detrimental to one's moral or personal beliefs and preferences are not tolerated at FOMA.

FOMA is actively committed to avoiding any discrimination based on age, gender, sexual preference, health status, ethnicity, nationality, political opinions, membership in labour organizations, and religious beliefs.

### 3.2 Transparency

The information provided to stakeholders is complete and transparent: in particular, transparency is the basis of fair dealings, such as to ensure that each stakeholder can make informed decisions based on known facts and equally known interests involved.

In bilateral relationships, transparency is pursued through clear and understandable contracts between the parties. In external relations, FOMA implements social and environmental reporting initiatives aimed at assessing the company's sustainability and is committed to achieving the best international certifications.

### 3.3 Truthfulness

The conduct in accounting matters and information on administrative facts is inspired not only by criteria of truthfulness, completeness and accuracy of all information on administrative facts, but also those imposed by law or those required for obtaining certifications. The criterion of truthfulness, combined with that of transparency and honesty, is the basis of daily internal relations at Foma, as a condition of mutual trust, and of the information provided to external stakeholders.

### 3.4 Equity

FOMA's relations with collaborators are marked by principles of fairness, equal treatment and balanced recognition of merit. In its relations with stakeholders, the Company also pursues and defends a fair balance of recognized interests.

### 3.5 Honesty

The value of honesty is the basis of corporate reputation and is therefore part of the Company's assets. The activities carried out by employees and more generally by FOMA's collaborators must be respectful of applicable laws, this Code and internal regulations consistent with it.

The Company is aware that honesty requires constant respect for the law and is therefore committed to conduct consistent with the Code even in those national contexts where respect for the law and legal certainty is lacking.

Under no circumstances may the pursuit of the Company's interest result in the implementation of conduct contrary to the provisions contained herein.

### 3.6 Trust and loyalty

FOMA recognizes and promotes the climate of trust in the relationships between the parties. Internal and external relationships are guided by loyalty and mutual trust. Internal relationships are based on loyalty and prior recognition of each other's good faith. The employee in good faith works with commitment and pursues substantive excellence and not just formal correctness of his or her task. Employees at all levels refrain from making decisions even potentially in conflict of interest with the Company.

FOMA's activities in the market are guided by fair trade and competition practices always in full compliance with applicable regulations.

### 3.7 Diligence and professionalism

In carrying out its activities, the Society seeks the highest quality standards.

Contracts and assignments imply the personal commitment of employees to the best possible performance by using all their skills.

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Personal contributions, by employees and all collaborators, aimed at process improvement, are an indispensable element of corporate development and the enhancement of people. For this reason, the Company promotes the growth of professionalism through systematic internal training programs at all levels.

### 3.8 Values

These are the founding values present in the company by which all FOMA staff and collaborators are inspired in their daily work.

#### 3.8.1 Organization

The growth and development of FOMA's staff and employees guide the daily choices of Management, which must guarantee them a safe and stimulating workplace. Motivation, a sense of belonging and transparency in relationships are the pillars of the FOMA organization.

#### 3.8.2 Passion

FOMA's success comes from the daily satisfaction its employees derive from their work, driven by passion and the desire to always go further. Each achievement is a starting point for new goals and becomes an opportunity for improvement.

#### 3.8.3 Innovation

FOMA has always improved its production processes and pioneered technological innovations necessary for business development and sustainability.

The success of its Customers is the drive for continuous improvement.

#### 3.8.4 Sustainability

FOMA assumes responsibility to all its stakeholders with continuity and a long-term vision of returning a sustainable world to future generations.

### 3.9 Collaboration

FOMA recognizes the value of collaboration among all those involved in the company's business and is committed to developing team spirit. The value of collaboration is also pursued with all external stakeholders, who are offered conditions and practices conducive to dialogue and mutual listening.

### 3.10 Health and safety protection

It is the primary commitment of the Company to ensure working conditions that respect individual dignity.

To this end, in addition to overseeing compliance with current regulations, FOMA promotes well-being in the workplace. To this end, it pursues every effort to improve work environments from the standpoint of health and safety, through the adoption of the most advanced production systems and constant efforts to find new solutions.

To this end, the participation of all employees, within the scope of their duties, in the process of risk prevention and health and safety protection for themselves, colleagues and third parties is always encouraged.

### 3.11 Environmental protection and sustainable development

FOMA is aware that its production activities have an environmental impact.

Therefore, it is committed to the continuous improvement of technologies and production practices in order, not only to ensure compliance with current regulations, but also to adopt the best and most advanced technological solutions available in order to minimize potentially negative impacts and to observe the utmost respect for the external and internal environment for the protection of all stakeholders.

### 3.12 Responsible use of artificial intelligence

As part of FOMA's commitment to innovation and excellence, the Company recognizes the potential of Artificial Intelligence (hereinafter "AI") as a tool for improving its processes.

FOMA is committed to using AI ethically and responsibly, this means ensuring that all AI applications respect human rights, privacy and data security.

FOMA is also committed to avoiding bias and discrimination in its AI systems, choosing solutions that ensure fairness and impartiality.

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In addition, FOMA firmly believes in the importance of human oversight. Every significant automated decision supported by AI must be evaluated and monitored by qualified personnel, ensuring that AI technologies complement and enhance human capabilities without replacing them.

A product with AI, and/or those who use it, must not violate the articles of the Universal Declaration of Human Rights and its use must comply with the laws of the countries for which the product with AI was made.

The product with AI is used as a simple tool. At any time, people can decide when and how to use the results provided by the tool.

Humans can intervene and directly influence or modify decisions made by an AI-powered product.

### 4 Criteria for conduct

#### 4.1 Criteria for conduct in shareholder relations

Decisions made by the Board of Directors aim to create value for shareholders over the medium to long term.

The Board of Directors is constantly striving to develop a systematic dialogue with shareholders based on understanding and distinction of mutual roles.

Executive directors, when appointed, exercise their powers within the limits assigned by the Board of Directors to which they report in a comprehensive and timely manner, respecting each other's responsibilities.

Non-executive directors contribute to the formation of corporate decisions by providing their specific expertise and experience, to encourage discussion according to different perspectives and articulate and in-depth interlocution.

Directors and auditors undertake to keep confidential the documents and information acquired in the performance of their duties. Insider information, of which they are bearers, and which may be of significance to the markets, is handled by the Managing Director who takes care of any public disclosure, avoiding that the disclosure itself may be selective, untimely, incomplete or inadequate.

The directors shall see to the effective operation of the internal control system that is set up to protect and safeguard the company's assets as well as compliance with laws and regulations.

To ensure the reliability of financial information, each employee shall ensure that management events are represented in the accounts in a correct, truthful and timely manner and the documentation is always traceable and searchable.

The company's financial statements are audited by a leading auditing firm, as commissioned by the Assembly.

The Board of Statutory Auditors is responsible for supervising the independence of the auditing firm, also considering the extent of services other than auditing that it may provide, in addition to its responsibilities assigned by law.

In the context of management, particularly in the case of extraordinary transactions (e.g., mergers, demergers, acquisitions of significant shareholdings, issuance and/or placement of financial instruments), corporate officers strictly observe all the rules laid down by the Law to protect the integrity and effectiveness of the share capital, in order not to harm the guarantees of creditors and third parties in general, ensuring that due information is provided in a complete and timely manner to the Board of Statutory Auditors and shareholders.

It is the duty of the Board of Directors to identify situations in which a director has an interest of his or her own or of third parties. Each Director undertakes to carry out in a transparent manner before the Board-complying with criteria of substantive and procedural fairness-all transactions with related parties or in which he or she has an interest of his or her own or of third parties.

#### 4.2 Criteria for conduct in relations with staff and co-workers

Personnel selection procedures adopt universalistic criteria, respecting equal opportunity, privacy and the opinions of the candidate. Appropriate measures are taken to avoid favouritism and patronage practices at the selection and recruitment stages.

FOMA does not resort in any way to irregular forms of labour. In addition, Recipients involved in the process of selecting and hiring personnel must ensure that foreign workers with valid residence permits are included in the company's workforce, both for fixed-term and open-ended contracts, and monitor their effective renewal, according to the terms of the law. At the time of hiring, each employee receives exhaustive information on the contract, regulations and remuneration, in compliance with the collective bargaining agreement for the sector, and on the rules of conduct designed to protect health and avoid the risks associated with the task performed.

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Any form of discrimination based on criteria other than merit is banned, and the dissemination of ideologies, as well as the perpetration of attitudes of a discriminatory or violent nature based on racial, ethnic, national or religious grounds is rejected.

Any employee who believes that he or she has been discriminated against because of age, gender, sexual preference, ethnic identity, health status, nationality, political opinions, religious beliefs, etc. is required to report the incident through the appropriate channels established for this purpose.

The skills and work experience gained by staff at all levels are a strategic resource, and FOMA has always been committed to its development through basic and specialized, group and individual training and refresher programs.

It constitutes abuse of the position of authority to request personal favours and services from the hierarchical superior beyond those aimed at achieving the company's purposes. Every employee must be informed of the personal data kept by the company and the measures taken to protect them; guarantees access to personal data by the person concerned; undertakes to disclose personal data to third parties only with the consent of the person concerned (subject to the cases provided for by law).

It is the prerogative of the Company to ensure safe, healthy working conditions for its employees and to protect the physical and moral integrity of its employees.

Appropriate management systems aimed at identifying, preventing and reacting to possible risk situations are adopted and maintained to ensure the health and safety of all personnel. The Company is committed to promoting and spreading a culture of safety, developing awareness of risk management, promoting responsible behaviour, and preserving, especially through preventive actions, the health and safety of all employees and contractors.

### 4.3 Duties of employees and contractors

Each employee performs his or her duties with commitment, care, a sense of responsibility, loyalty and seriousness, in full compliance with the law, contracts and regulations, and company directives.

Offensive behaviour and speech or speech that may disturb a person's sensibilities with images, insistent innuendo, and any kind of harassment should be avoided in interpersonal relationships.

Those in coordinating positions must behave with courtesy and respect toward their co-workers by promoting professional growth.

Each employee at the various levels undertakes to work diligently to protect the company's assets, adopting appropriate and responsible behaviour, tending toward the scrupulous and sparing use of what is entrusted to him or her, avoiding improper or inconvenient uses of equipment and materials.

Users authorized to use the Company's information technology equipment and systems shall make use of the Company's information technology resources within the limits of the authorization they have received and in compliance with the applicable regulatory provisions, protecting their integrity and refraining from manipulation that may alter their functionality in any way.

Everyone is required to strictly observe the confidentiality of data and information learned by reason of his or her work, in accordance with what is preestablished by current laws on confidentiality. Depending on his or her level of responsibility, everyone is required to preserve and protect the integrity, confidentiality and access to the company information entrusted to him or her.

All collaborators are required to scrupulously comply with the rules and obligations arising from the relevant health, safety and environmental regulations, as well as to comply with all measures required by internal procedures and regulations. Each employee must comply with the instructions and directives provided by the persons to whom the Company has delegated the fulfilment of safety obligations. Each employee must take the utmost care in the performance of his or her work, strictly observing all established safety and prevention measures to avoid any possible risk to himself or herself and his or her colleagues.

All employees and collaborators are required to avoid situations that lead to a conflict of interest and in any case to refrain from taking personal advantage of business opportunities of which they become aware in the course of their duties.

The employee or collaborator is required to inform the Company of the performance of any outside activities when they may appear to be in conflict of interest.

In the event that the possibility of a conflict of interest arises, the employee or collaborator is required to notify the Company.

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Independent third parties (such as consultants, agents, suppliers, distributors, and collaborators in general) must not engage in conduct that is incompatible with the principles of the Code of Ethics; in the event of conduct in violation of the provisions of this Code, the Company, depending on the seriousness of the conduct, may terminate the relationship with the third party in question.

### 4.4 Criteria for conduct in customer relations

FOMA's dealings in customer relations are guided by clarity, availability, respect, courtesy and the utmost understanding of each other's needs, with the understanding that customer loyalty and satisfaction represent a strategically important corporate asset.

This also applies to aspects involving intellectual property rights.

The declaration of customers' knowledge of the Code of Ethics is a precondition for entering into contracts.

Customers are forbidden to give gifts or offer concessions of any kind to the address of FOMA employees or their family members, which may induce the person to engage in conduct that is contrary to the interests, including moral interests, of the Company. Customers are also encouraged to report any improper conduct concerning personnel of either party.

In any case, employees and collaborators are prohibited from granting benefits and gifts to customers, whether directly or indirectly, acts of courtesy and hospitality, unless the value, nature and purpose of the gift are considered legal and ethically correct, such that it does not compromise the Company's image, and the value and nature of the gift are such that it cannot be interpreted as a means of obtaining favourable treatment.

From the perspective of the products and services offered, the Company has always been actively engaged in ensuring the highest quality standards, based on contractually recognized and systematically monitored levels.

With a view to continuous improvement, suggestions are always encouraged, and all complaints and proposals are properly evaluated.

The network of Agents that FOMA uses to reach customers is subject to the same conduct criteria defined above.

### 4.5 Criteria for conduct in supplier relations

FOMA's relationships in dealing with suppliers are guided by clarity, availability, respect, courtesy and the utmost understanding of each other's needs.

This also applies to aspects affecting intellectual property rights

In full compliance with the general principle of equal opportunity, the Company shall ensure sufficient competition in each tender, and purchasing personnel shall not preclude any person meeting the requirements from competing for contracts.

The declaration of suppliers' knowledge of the Code of Ethics is a precondition for entering into contracts.

Employees dealing with suppliers at various levels shall refrain from receiving gifts or benefits of any kind and value in the context of working relationships, unless they are of symbolic value, and shall also refrain in turn from granting benefits and gifts to suppliers, whether directly or indirectly, acts of courtesy and hospitality, unless the value, nature and purpose of the gift are considered legal and ethically correct, such as not to compromise the image of FOMA, and the value and nature of the gift are such that it cannot be interpreted as a means of obtaining favourable treatment for the company.

In general, supply relationships must be in accordance with and justified by concrete internal needs, authorized by those responsible for making the expenditure commitment.

Entering a contract with a supplier must always be characterized by extreme clarity and must avoid all possible forms of abuse. In particular, any behaviour aimed at disguising simulated or non-existent transactions in whole or in part, and generally evading tax obligations, is expressly prohibited.

For the purpose of pursuing corporate sustainability and adopted ethical principles, FOMA adopts, for particular supplies, environmental and/or social requirements (e.g., the presence of an environmental management system or the protection of the rights of workers in the upstream supply chain or even compliance with European standards on Responsible Sourcing Minerals).

Failure to comply with these conditions and/or contractual clauses may result in sanction mechanisms agreed between the parties or termination of the relationship with the supplier.

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### 4.6 Duties of suppliers

Suppliers are required to operate within the framework of current regulations on contractual, contribution, labour safety and hygiene, and environmental protection. The Company is committed to verifying the proper application of regulatory provisions by suppliers.

These aspects are included in the contractual conditions, the violation of which may result in the application of penalties and/or nullity of the contracts themselves.

Suppliers are prohibited from giving gifts or offering concessions of any kind to the address of FOMA employees or their family members, which may induce the person to engage in conduct that is contrary to the interests, including moral interests, of the Company. Suppliers are also encouraged to report any improper conduct concerning personnel of either party.

In any case, employees and collaborators are prohibited from accepting benefits and gifts, whether directly or indirectly, acts of courtesy and hospitality, unless the value, nature and purpose of the gift are considered legal and ethically correct, such that it does not compromise the Company's image, and that the value and nature of the gift are such that it cannot be interpreted as a means of obtaining favourable treatment.

Suppliers must not use child labour or the labour of non-consenting persons in the performance of their activities and must in any case ensure respect for human rights.

### 4.7 Criteria for conduct in relations with the public administration

Aware of the complexity of the problems related to constantly evolving regulations and the duties incumbent on a large company in its relations with various central and local public bodies, FOMA encourages transparent and respectful behaviour from the public interlocutor if necessary, even making its expertise available in the definition of shared solutions, on the basis of mutual good faith.

In full compliance with the provisions of the law, the Company is committed to cooperating with the bodies of the Public Administration, Market Control Authorities, Environmental Agencies, Labor Inspectorate, Tax Administration, Customs Agency and in general with public institutions, providing clear, comprehensive and timely information.

In the context of relations with such persons, it is expressly forbidden for employees and collaborators of the Company to offer, even through intermediaries, money or other benefits to the public official involved, his family members or persons in any way connected to him or who have relationships of a privileged type with him, whether asserted or existing, and from seeking or establishing personal relationships of favour, influence, interference with the aim of directly or indirectly influencing his activities. No conduct that could be construed as the promise or offer of payments, goods or other benefits of any kind to promote and favour the Company's own interests and take undue advantage of them is permitted.

Gifts or gratuities are permitted only if they are of modest value and, in any case, if they cannot be interpreted in any way as a means of receiving illegitimate favours, and always with the explicit authorization of the Directors. The Company refuses the solicitation of favours, gifts, facilitations of any kind, even for the benefit of third parties, from representatives of the central and local Public Administration at any level, Control Bodies and Public Institutions of any kind. Any employee who directly or indirectly receives proposals for benefits from public officials, public service appointees or employees in general of the Public Administration or other Public Institutions that constitute such a case must immediately notify the Company.

The Company adopts specific organizational models and control procedures for the prevention of crimes against the Public Administration.

In general, all procedures deemed necessary and useful are adopted to combat the commission of the predicate offenses provided for in Legislative Decree No. 231/2001, among which, by way of example only, include, among others, the cases of embezzlement, bribery, fraud, extortion, receiving stolen goods, money laundering, etc.

FOMA undertakes to promptly, according to the terms of the law to make tax declarations and payments, including customs payments, to the relevant Authorities and to prepare and send tax declarations to the relevant Authorities not containing false, fabricated, incomplete or otherwise untrue data for the purpose of tax evasion.

The Company guarantees cooperation in the legitimate audits implemented by the Tax Administration and the Customs Agency, within the framework of a fair and transparent adversarial process.

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4.8 Criteria for conduct in community relations

FOMA pursues its objectives with respect for the environment; to this end, it defines environmental and sustainable industrial development policies, follows the evolution of environmental regulations, and prepares consequent application guidelines. The environmental policy is also pursued with the awareness that respect for the environment represents a competitive advantage in a market that is increasingly sensitive to such issues and increasingly stringent regulations. Therefore, environmental management systems have been adopted that aim at continuous improvement of performance and safety according to international standards.

Recognizing the relevance of the relationships that are established at the local level between its factories and the reference territories, FOMA is committed to periodically reporting its activities and the results of its commitment to all stakeholders through the publication of the sustainability report.

Attention to the local area can also take the form of sponsoring initiatives aimed at supporting quality of life, socially relevant activities and activities of ethical value, insofar as they are compatible with corporate values.

"Information disclosure" understood as the process of communicating or sharing relevant information is carried out by FOMA with the aim of ensuring transparency and enabling the best understanding by all stakeholders.

5 Methods of application

5.1 Supervisory Board

Enforcement and compliance with the Code of Ethics are monitored by the Supervisory Board.

Any violation of the Code may be reported at any time to the Supervisory Board or the person in charge of internal control, who undertake to ensure the secrecy of the identity of the reporter, without prejudice to legal obligations. Reports, like any other violation of the Code detected because of other investigative activities, are promptly evaluated by the Supervisory Board for the adoption of any sanctioning measures.

5.2 Whistleblowing

Whistleblowing reports constitute those made by an employee who, while performing his or her duties, notices situations, facts, or circumstances that may reasonably lead to the belief that an irregularity or wrongdoing has occurred.

Activated reporting channels take necessary measures to ensure the protection of the identity of the reporter to avoid possible retaliation against him or her.

5.3 Sanctions

For FOMA employees, compliance with the rules of the Code of Ethics is an essential part of their contractual obligations.

Therefore, their violation constitutes non-fulfilment of the primary obligations of the employment relationship or disciplinary offence and entails the adoption of proportionate measures in relation to the seriousness or recidivism or the degree of guilt, in compliance with the discipline of the Workers' Statute, with all legal consequences, including the preservation of the employment relationship and compensation for damages. The provisions of this Code also apply to temporary workers who are required to comply with its precepts.

Regarding members of the Board of Directors and members of the Board of Statutory Auditors, violation of the rules of the Code may result in the adoption, of measures proportionate in relation to the seriousness or recidivism or the degree of guilt, up to and including the revocation of the mandate for just cause to be proposed to the Shareholders' Meeting.

Violation of the Code by suppliers, collaborators, external consultants and by other recipients other than the aforementioned persons shall be considered as a serious fact, such as to determine in the event that such relationship is regulated by a contract, the termination of the contract, in compliance with the law and the contract and without prejudice to the right to compensation for damages and the possibility of criminal proceedings in cases where a criminal offence is involved.

6 ATTACHMENTS

CATEGORY	CODE	TITLE
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## 7 HISTORY OF REVISIONS

REVIEW	DATA	DESCRIPTION
0	26/12/2012	New issue
1	15/01/2025	New revision