



COMI CONDOR
Milan (ITALY)

Code of Ethics

Index

1	Comi Condor S.p.A. vision.....	3
2	General principles	5
3	Respect and Development of Human Resources.....	6
4	Development of Professionalism	6
5	Employment protection.....	7
6	Employment policies.....	7
7	Relations with Public Administration.....	7
8	Relations with judicial authorities, supervisory and control bodies.....	9
9	Relations with suppliers, consultants and contracting companies.....	9
10	Relations with the staff	11
11	Irregular work	11
12	Harassment in the workplace	11
13	Abuse of alcohol and narcotic substances.....	12
14	Smoking	12
15	Health, safety and environment	12
16	Prevention on money laundering	12
17	Commissions and consultants.....	12
18	International trade relations (export control).....	12
19	Business relationship	13
20	Use and protection of company assets.....	13
21	Intellectual property and industrial rights.....	14
22	Conflict of interest	14
23	Use and disclosure of information.....	15
24	Control and Accounting transparency	16
25	Health and safety management.....	17
26	Environmental protection	17
27	Effectiveness and violations of the code.....	18
28	Implementation of the code	18
29	ESTABLISHMENT OF THE SUPERVISORY BODY	19
30	Sanctioning provisions	19

1 Comi Condor S.p.A. vision

Comi Condor is a global leader in the design and manufacture of centrifuges for solid-liquid separation, serving the pharmaceutical (API – Active Pharmaceutical Ingredients and HPAPI – Highly Potent Active Pharmaceutical Ingredients), chemical, and food industries. Our expertise covers both filtration and decantation processes.

Operating in over 50 countries worldwide with more than 5,000 centrifuges installed, Comi Condor provides not only innovative and customized equipment but also extensive know-how in solid-liquid separation — offering vertical and horizontal filter centrifuges, both peeler and inverting types.

Comi Condor develops tailor-made, high-value solutions designed to meet the specific needs of each customer.

The company operates across two sites: Settimo Milanese (Milan) and S. Cristina e Bissone (Pavia), employing approximately 82 people in total.

The Settimo Milanese headquarters hosts the commercial, administrative, and financial departments, along with purchasing, mechanical, electronic, and software engineering divisions.

The S. Cristina e Bissone plant spans 6,000 m² on a total area of 25,000 m². The production facility houses all departments for manufacturing, assembly, and testing of centrifuges. It includes a modern workshop equipped with welding, cleaning and polishing, water jet cutting, and mechanical machining departments, featuring several CNC machines, as well as assembly areas — ensuring high-quality, fully controlled production.

Comi Condor S.p.A. recognizes that a company's authority and reputation derive not only from the competence of its people and the high quality of its services but also from its commitment to the broader community.

The principles that have always guided the Company's activities are formally expressed in this **Code of Ethics**, based on the belief that reliability is built daily through respect for rules and appreciation of people.

The primary objective of this Code is to promote and share the Company's core values at all levels, ensuring that they are known and upheld by everyone involved in the decision-making process.

This document represents a *moral contract* signed by all Company stakeholders: directors, auditors, managers, employees, external collaborators, and suppliers.

The goal of Comi Condor S.p.A. is to pursue excellence in its markets through sustainable development, while respecting the environment and ensuring the safety of all individuals

involved. By maintaining consistent, ethically responsible behaviour, the Company seeks to generate value and satisfaction for employees, customers, and the wider community.

This Code outlines the ethical commitments and responsibilities that guide business conduct and corporate activities for all those interacting with Comi Condor S.p.A., regardless of the nature of their relationship.

The principles and provisions of the Code are binding for the following recipients:

- a) members of the Board of Directors;
- b) executives and managers;
- c) employees and collaborators under any contractual arrangement, whether occasional or temporary;
- d) all parties maintaining commercial and/or financial relationships of any kind with the Company.

Comi Condor S.p.A. conducts its activities in strict compliance with laws, market regulations, and the guiding principles of fair competition.

The Code serves the following purposes:

- **Preventive:** by codifying ethical principles and basic rules of conduct applicable to all individuals operating with the Company, it expresses Comi Condor's firm commitment to legality, particularly in the prevention of offences;
- **Cognitive:** by defining general principles and conduct guidelines, the Code helps identify unethical behaviour and clarifies the proper exercise of roles and responsibilities;
- **Legitimizing:** it clarifies the duties and responsibilities of the Company toward its stakeholders, offering them a clear framework of expectations and reference;
- **Incentive:** by requiring compliance with its principles, the Code fosters the development of an ethical conscience and strengthens both the Company's reputation and its relationship of trust with stakeholders.

The Code also forms an integral part of the Organization, Management, and Control Model adopted by Comi Condor under Article 6 of Legislative Decree 231/2001, concerning the *Administrative Liability of Legal Entities*.

Compliance with this Code is an essential element of the contractual obligations of the Company's employees, pursuant to Article 2104 of the Italian Civil Code. Violation of the Code may constitute a breach of contract and/or a disciplinary offence and may result in compensation for damages, in accordance with applicable laws and collective agreements.

The members of the Board of Directors, or the Sole Director if appointed, are guided by the principles of this Code when defining the Company's strategic objectives.

The Managing Director, Managers, and Department Heads:

- demonstrate loyalty, transparency, and impartiality in their relationships with colleagues, collaborators, and all stakeholders;
- foster a positive and respectful organizational climate;
- promote information sharing, staff training, continuous professional development, and the appreciation of diversity in gender, age, and personal background;
- within their capacity, prevent the spread of false information about the Company and its people, while encouraging the dissemination of good practices and examples that strengthen trust in the organization.

Employees and external collaborators, in full compliance with laws and regulations, must consistently align their actions and behaviours with the principles and objectives set out in this Code.

Partners — whether commercial or operational — are likewise expected to ensure that their activities align with the ethical principles of Comi Condor.

All recipients commit to pursuing their goals with integrity, diligence, honesty, competence, and transparency, in full compliance with the law and the values of this Code.

In this spirit, Comi Condor undertakes to promote the broad dissemination of the Code of Ethics and to provide employees with appropriate training on its content and application.

2 General principles

The general principles that represent the core values guiding the conduct of all recipients of this Code are primarily as follows:

- **Personal integrity and fairness** in all internal and external relationships;
- **Social responsibility**, expressed through ethically sound business practices that promote production models respecting human rights, the environment, and the well-being of the community;
- **The centrality of the individual**, understood as the commitment to personal growth and development while safeguarding physical, cultural, and moral integrity, and upholding the right to interaction and association;
- **Respect for human rights** and the promotion of **equal opportunities** for personal and professional development;
- **Protection of personal privacy**;
- **Rejection of all forms of discrimination or exclusion**, based on — among other factors — age, culture, ethnicity, nationality, religion, race, political opinion, marital status, pregnancy, gender, sexual orientation, gender identity and/or expression, genetic information, health status, or disability;
- **Commitment to health, safety, and environmental protection**;

- **Recognition of the value and potential** of all individuals who work with or maintain relationships with the Company;
- **Refusal of any behaviour** that, while ostensibly aimed at achieving corporate objectives, is inconsistent with the law, the organizational model, or the Company's established procedures and codes of conduct governing internal and external relations.

3 Respect and Development of Human Resources

Human resources are an essential element for the existence, growth, and success of any business.

Comi Condor recognizes the central role of its people, acknowledging that the most important factor in the Company's success is the professional contribution of those who work within it, in a climate of loyalty and mutual trust.

Comi Condor ensures equal employment opportunities for all its employees, based on individual professional qualifications and performance, without any form of discrimination. The Company is therefore strongly committed to valuing, protecting, and developing the abilities and skills of all employees, enabling them to fully express their potential and professionalism.

The Managing Director and all Managers, in full compliance with applicable laws, regulations, and company policies, undertake to:

- select, hire, compensate, train, and evaluate employees according to criteria of merit, competence, and professionalism, without discrimination based on political opinion, trade union affiliation, religion, race, language, gender, or any other personal characteristic;
- employ foreign workers in accordance with applicable immigration and residence permit regulations;
- prevent the use of labour, including that of foreign workers, in violation of current legislation, whether directly or through suppliers and consultants;
- ensure a work environment in which relationships among colleagues are based on fairness, collaboration, solidarity, mutual respect, and trust;
- guarantee working conditions that ensure health and safety, as well as respect for individual dignity, fostering interpersonal relationships free from prejudice;
- take prompt action in response to any behaviour that violates these principles;
- actively oppose all forms of intimidation, hostility, isolation, undue interference, coercion, or sexual harassment.

4 Development of Professionalism

4.1 Comi Condor actively promotes the development of each individual's potential and professional growth by providing targeted training and continuing education programs aligned with each employee's role and capabilities.

All staff members are expected to foster the acquisition of new skills, knowledge, working methods, and information to continuously enhance their professional competence.

4.2 Managers are required to pay the utmost attention to recognizing and enhancing the potential of their teams, while ensuring that the performance demanded is consistent with the assigned duties and responsibilities.

It is considered an abuse of authority to request personal favours or to demand any behaviour from subordinates that violates this Code of Ethics or applicable laws and regulations.

5 Employment protection

5.1 Comi Condor guarantees the freedom of association for all employees and recognizes their right to collective bargaining. The company undertakes not to employ, either directly or indirectly, any form of forced, compulsory, or child labour.

5.2 Comi Condor firmly rejects:

- any form of discrimination in recruitment policies or human resource management;
- any form of workplace harassment, mobbing, or unlawful labour exploitation, whether direct or indirect.

5.3 The company is committed to recognizing merit, work performance, and professional potential as the primary criteria for salary progression and career development.

6 Employment policies

6.1 Comi Condor ensures equal employment opportunities and fair treatment for all employees, based exclusively on merit.

Recruitment and selection processes are conducted by assessing candidates' specific skills, professional background, and technical and psycho-aptitude competencies, in alignment with the company's operational needs and strategic requirements.

Periodic objectives established for the allocation of economic incentives to managers, employees, or collaborators are defined according to specific, concrete, and measurable results, and are proportionate to the timeframes set for their achievement.

6.2 Comi Condor promotes the ethical training of all personnel with the aim of:

- disseminating the principles and standards of conduct set forth in this Code;
- preventing the commission of any unlawful acts;
- ensuring ongoing education and consistent communication regarding the application and observance of this Code.

7 Relations with Public Administration

7.1 For the purposes of this Code, Public Administration (hereinafter also "P.A.") shall include, by way of example, public bodies, concessionary entities, public service providers, natural or legal persons acting as public officials or entrusted with a public service,

members or officials of European Community institutions or foreign states, the judiciary, and public supervisory authorities.

In all dealings with the Public Administration, particular diligence must be exercised to ensure full compliance with applicable laws and with the principles set forth in this Code of Ethics.

All activities and negotiations carried out in the name and/or on behalf of Comi Condor must be conducted with the highest standards of honesty, integrity, and transparency, in order to safeguard and enhance the Company's image and reputation.

Relations with the Public Administration may only be managed by persons who have been formally authorized or delegated to do so. Without prejudice to applicable legal and internal provisions, it is strictly forbidden to offer, promise, or provide—either directly or indirectly—any payment, benefit, or advantage in money, goods, or services to officials, employees, or representatives of the Public Administration, or to their relatives, except for gifts or items of modest value consistent with lawful business practice.

7.2 Any unlawful payment or benefit offered or made—whether directly by Comi Condor or indirectly through intermediaries acting on its behalf—constitutes an act of corruption and is strictly prohibited.

7.3 It is forbidden to offer or accept any object, service, benefit, or favour of value with the purpose of obtaining, or appearing to obtain, preferential treatment or undue advantage in any dealings with the Public Administration.

7.4 During any negotiation, request, or relationship with the Public Administration, those involved must not attempt to improperly influence the decisions or conduct of the counterpart, including the officials responsible for negotiating or making decisions on behalf of the P.A. Likewise, they must not submit to external pressures or influences that could lead Comi Condor to adopt decisions contrary to internal regulations or the principles of this Code.

7.5 Should Comi Condor appoint a third party to represent it in dealings with the Public Administration, the related contract must explicitly require full compliance with the provisions and ethical standards contained in this Code.

7.6 Comi Condor must not be represented by consultants or third parties in dealings with the Public Administration where potential or actual conflicts of interest may arise.

7.7 During any negotiation, request, or commercial relationship with the Public Administration, it is strictly prohibited—directly or indirectly—to:

- offer or discuss employment or commercial opportunities that could personally benefit Public Administration officials;

- solicit or obtain confidential information that could compromise the integrity, impartiality, or reputation of either party.

8 Relations with judicial authorities, supervisory and control bodies.

8.1 Comi Condor conducts its business activities in strict compliance with applicable laws and regulations, ensuring legality, integrity, and transparency in all operations.

The Company fully cooperates with all public officials and authorities vested with inspection, supervisory, or investigative powers, facilitating the lawful execution of their duties.

8.2 During judicial proceedings and/or investigations or inspections carried out by public authorities, no employee or collaborator shall:

- destroy, alter, or conceal records, minutes, accounting documents, or any other relevant material;
- make false statements or instruct others to provide false or misleading information to competent authorities.

8.3 Any attempt at extortion, bribery, or undue pressure by a public official must be promptly reported to one's direct manager and, where applicable, to the Company's Compliance or Ethics Officer.

8.4 All communications, reports, and responses to requests issued by supervisory and control bodies must be accurate, complete, objective, transparent, and provided in a timely manner.

It is strictly forbidden to present false or incomplete information, or to conceal facts—whether wholly or partially—through fraudulent means.

Similarly, any conduct aimed at obstructing or hindering the institutional duties of public supervisory authorities or control bodies during their verification or inspection activities is expressly prohibited.

9 Relations with suppliers, consultants and contracting companies

9.1 Comi Condor recognizes the strategic role of suppliers in creating the value of the Company's products and services. The Company is committed to establishing relationships based on mutual trust and defining contracts that ensure long-term competitiveness.

Supplier selection and procurement conditions are based on objective and impartial criteria, primarily considering: reliability, professionalism, quality, efficiency, cost-effectiveness, and adherence to environmental and social sustainability standards.

9.2 In all purchasing procedures, Comi Condor:

- ensures fair and adequate competition;
- provides clear and comprehensive information to allow all potential suppliers to submit a

reasonable offer;

- applies objective and documentable criteria in supplier selection;
- evaluates suppliers based on quality, cost-effectiveness, technical and professional suitability, and environmental compliance.

9.3 Suppliers and collaborators must not be subjected to undue pressure to perform services beyond the contractual scope, in terms of both content and execution methods. Gifts or benefits from suppliers must comply with normal business courtesies and customary commercial practices.

9.4 Supplier and partner selection must prioritize operators who demonstrate ethical conduct, reliability, professional reputation, credibility in the market, and overall integrity. Contracts with suppliers and consultants must include prior acknowledgment of Comi Condor's Ethical Code and provide for sanctions or contractual termination in case of violation.

9.5 Compensation for professional services must be proportionate to the activity performed, in line with market standards. Payments must be made only to the contractual counterparty.

9.6 Decisions and actions related to procurement or supplier management must be free from any form of external influence or pressure.

9.7 All personnel acting on behalf of Comi Condor in procurement, supply of goods and services, or external collaborations must:

- follow internal procedures for supplier selection and management; ensure that all eligible parties can compete fairly;
- apply objective evaluation criteria transparently;
- cooperate with suppliers and collaborators to ensure quality, cost-effectiveness, and timely delivery;
- ensure contractual compliance and maintain open, professional communication;
- report significant issues to management for appropriate assessment and action.

9.8 Payments must correspond strictly to the contracted service. No payment may be made to a third party, to a person other than the contractual counterparty, or to a jurisdiction other than that of the parties or contract execution. Comi Condor ensures that compensation offered is fair and does not facilitate illicit intermediation or labor exploitation.

9.9 Favouritism, collusion, or the offer of material or immaterial benefits intended to influence or reward institutional representatives or Comi Condor employees is strictly prohibited.

9.10 This Code is made available to suppliers and consultants via the Company website.

10 Relations with the staff

10.1 Human resources are fundamental to the existence and success of Comi Condor. Employee dedication and professionalism are key values for achieving Company objectives.

Comi Condor guarantees:

- Merit, competence, and professionalism as the basis for all employment decisions;
- Non-discrimination in selection, hiring, training, and remuneration;
- A work environment in which personal characteristics cannot give rise to discrimination.

The Company promotes professional development and continuous training to enhance employee skills and competencies.

10.2 Confidentiality - Comi Condor ensures the confidentiality of personal and professional information in accordance with applicable laws and the Company's "Personal Data Protection Code." Employees and collaborators must not use confidential information for purposes unrelated to their work responsibilities.

10.3 Pornographic Material - The production, possession, or dissemination of pornographic material is strictly prohibited on company premises, in any company-related context, or via Company-managed communication channels.

10.4 Harassment and Discrimination - Comi Condor prohibits all forms of harassment, discrimination, or workplace violence, including sexual harassment. This applies to employment and collaboration relationships, with violations subject to disciplinary measures up to and including termination.

The Company opposes:

- discrimination based on race, language, colour, religion, political opinion, nationality, ethnicity, age, gender, sexual orientation, marital status, disability, physical appearance, or socio-economic status;
- privileges or benefits based on the above factors;
- psychological violence, mobbing, or any discriminatory or harmful conduct.

11 Irregular work

11.1 Comi Condor condemns illegal, child, and juvenile labour, as well as any conduct constituting a crime against individual dignity.

All employment and collaboration relationships are established through legally compliant contracts. Employees and collaborators are fully informed of their rights and obligations arising from the contractual relationship.

12 Harassment in the workplace

12.1 Comi Condor requires that no harassment occur in internal or external work relations, defined as:

- creating an intimidating, hostile, or isolating work environment;
- unjustifiably interfering with others' work performance;
- obstructing career opportunities for reasons of personal competitiveness.

13 Abuse of alcohol and narcotic substances

13.1 It is strictly prohibited to:

- perform work under the influence of alcohol, narcotics, or substances with similar effects;
- use, possess, or distribute narcotic substances during work.

14 Smoking

14.1 Smoking is prohibited in the workplace, in compliance with occupational health and safety regulations.

15 Health, safety and environment

15.1 Comi Condor is committed to promoting and consolidating a culture of workplace safety, raising awareness of risks, and allocating all necessary resources to safeguard the health and safety of employees, collaborators, and the communities in which it operates.

15.2 All employees and collaborators must comply with risk prevention principles, environmental protection requirements, and applicable health and safety regulations, taking responsibility for themselves, colleagues, and third parties. The Company is responsible for providing guidance and resources to ensure compliance.

16 Prevention on money laundering

16.1 Comi Condor requires maximum transparency in all commercial operations and relationships with third parties, in full compliance with national and international anti-money laundering regulations. Employees must not establish business relationships with partners, suppliers, or third parties who lack integrity, a good reputation, or are associated with money laundering or self-laundering activities.

16.2 All financial transactions must be justified, traceable, and executed using lawful and transparent payment methods.

17 Commissions and consultants

17.1 In the sales process, Comi Condor may engage consultants or intermediaries, strictly in accordance with contractual conditions, ensuring compensation reflects the services rendered.

18 International trade relations (export control)

18.1 Comi Condor complies with laws regulating the import and export of products, services, information, and financial transactions. Business dealings with embargoed countries, organizations, or individuals are strictly prohibited.

19 Business relationship

19.1 Persons acting on behalf of Comi Condor under powers of attorney or delegated authority must operate strictly within the scope of such powers. It is prohibited for these individuals, as well as for anyone without such authority, to commit or give the impression of committing Comi Condor to any activity or obligation. Company managers are also responsible for ensuring that the parties with whom they engage in business relationships possess the legitimate and appropriate authority to act on behalf of Comi Condor.

20 Use and protection of company assets

20.1 Company assets, both tangible and intangible, must be used:

- with the utmost care and in an appropriate manner, in order to prevent damage to property or persons;
- avoiding, as far as possible, waste, tampering, or any use that could compromise their efficiency or accelerate their normal deterioration;
- exclusively for purposes related to and instrumental to the performance of work activities;
- strictly avoiding, except as permitted by specific regulations or contractual provisions, the use or transfer of company assets to third parties, even temporarily.

20.2 IT equipment and applications must be used in compliance with the above principles and, in particular:

- The use of IT systems and databases must occur solely for work-related activities, in compliance with applicable legislation and guided by principles of integrity and honesty. Each Recipient is responsible for the proper use of assigned IT resources, including system access credentials.
- Unauthorized access to protected computer systems, or the illegal acquisition or dissemination of access credentials, as well as damage to information, data, or software, is strictly prohibited.
- Company assets, particularly IT and network resources, must never be used for purposes that violate legal provisions, public order, or morality, or to commit or facilitate crimes, promote racial hatred, glorify violence, or infringe on human rights.
- Employees are prohibited from making audiovisual, electronic, paper, or photographic reproductions of company documents except when such activities are necessary for the proper execution of their duties and in strict compliance with company security and confidentiality policies.
- The acquisition, use, or transmission—particularly in large quantities—of information and content unrelated to work activities is strictly forbidden.
- Alteration of company-provided hardware or software configurations is not permitted.

20.3 In compliance with applicable laws, the Company conducts monitoring and implements measures to prevent behaviors that violate these provisions. All employees are also required to actively reduce the risk of theft, damage, or other external threats to

Company resources and to promptly report any anomalies to the relevant corporate functions.

21 Intellectual property and industrial rights

21.1 Recipients of this Ethical Code are strictly prohibited from using, in any form or manner and for any purpose—including personal use—intellectual works or materials protected by copyright or related rights, as well as any intellectual or industrial property rights (including, in particular, trademarks, designs, models, patents for inventions and utility models, and trade secrets), even when such materials are legitimately accessible to them.

21.2 Recipients must obtain explicit authorization, in accordance with applicable legislation, prior to using works or materials protected by copyright or related rights.

21.3 Recipients are strictly prohibited from counterfeiting patents, designs, or models, and from marketing products bearing Company trademarks that are counterfeit or of illicit origin.

22 Conflict of interest

22.1 Directors, managers, employees, and collaborators in any capacity must avoid situations and refrain from activities that could place their personal interests—direct or indirect—in conflict with those of the Company or that could compromise their ability to make decisions objectively and impartially in the Company's best interest. Situations of conflict of interest, in addition to potentially violating the law and the principles of this Ethical Code, are detrimental to the Company's reputation and integrity. Recipients must therefore prevent any overlap or interference between their functional role within the Company and economic activities pursued for personal or family gain.

22.2 Each Recipient is required to prevent and report any conflicts of interest between personal or family economic activities and their duties within the Company. In particular, all Recipients must disclose any situations in which they, or to the best of their knowledge, their relatives, in-laws within the second degree, or de facto cohabitants, hold economic or financial interests (as owners or partners) in suppliers, beneficiaries, third parties, or related investee or controlled companies, or hold corporate administration, control, or managerial positions.

22.3 A conflict of interest may arise when a Recipient undertakes initiatives or holds interests that could impede the objective and effective performance of their duties for the Company. Examples of potential conflicts include:

Holding corporate roles or performing work activities of any kind with suppliers;

Holding economic or financial interests—direct or indirect—in suppliers, including qualified shareholdings in their capital.

22.4 Recipients are strictly prohibited from exploiting business opportunities that they become aware of through the performance of their duties for personal gain.

22.5 In cases of uncertainty, all potential conflicts must be reported in advance to the hierarchical superior or, when established, to the Supervisory Body, and, if necessary, to the auditing entity. The relevant body will assess the situation and may provide guidance or measures to mitigate or resolve the conflict.

22.6 Recipients in a potential conflict of interest must refrain from participating in or executing actions that could harm the Company, third parties, or compromise the Company's reputation.

23 Use and disclosure of information

23.1 The obligation of confidentiality applies not only to information concerning Comi Condor but also to information regarding customers, suppliers, partners, and any other individuals or entities with whom the Company maintains commercial or otherwise significant relationships.

23.2 Employees are required to:

- Maintain the strictest confidentiality regarding all corporate information acquired in the course of their duties;
- Obtain explicit consent before processing personal data, ensuring it is used solely for the purposes communicated.

23.3 With respect to information in general, employees must:

- Avoid improper or instrumental use of information in their possession and must not use it for personal gain or for the benefit of family members, acquaintances, or third parties;
- Protect information from unauthorized access and prevent its dissemination unless explicitly authorized by the Manager;
- Refrain from seeking or attempting to obtain information that is outside the scope of their role or responsibilities;
- Organize and classify information so that authorized parties can easily access it and obtain a complete and accurate understanding.

23.4 Employees who are not expressly authorized or delegated in accordance with the provisions of GDPR 679/16 and subsequent amendments, which regulate the protection of

personal data, are strictly prohibited from accessing, recording, processing, or disclosing the personal data of other employees or third parties.

24 Control and Accounting transparency

24.1 All activities and actions performed within the scope of each employee's or collaborator's responsibilities must be fully verifiable. Maximum accounting transparency shall be pursued, based on the accuracy and reliability of documentation and accounting records. Each transaction, along with the corresponding levels of responsibility involved in achieving the objectives that justified it, must be easily traceable.

24.2 Comi Condor, in compliance with the principles of accounting clarity and transparency, ensures that financial statements and their accompanying reports are prepared accurately, truthfully, and in full accordance with applicable laws and accounting regulations.

24.3 The Company condemns any conduct aimed at compromising the clarity, accuracy, or truthfulness of data and information contained in financial statements, reports, or legally required corporate communications addressed to shareholders, the public, or auditors.

24.4 All individuals responsible for preparing the aforementioned documents must exercise due diligence to verify the correctness of the data and information received. Any balance sheet items whose determination involves discretionary judgment must be supported by appropriate documentation and reflect legitimate, well-founded, and sustainable choices.

24.5 All company functions are required to provide full cooperation to ensure accurate and timely accounting records.

24.6 Accounting records based on economic and financial assessments must adhere to principles of reasonableness and prudence. Adequate supporting documentation must be maintained for each entry, clearly indicating the rationale for the transaction and the corresponding authorization. Supporting documentation must be properly archived and easily accessible. Any employee aware of potential omissions, falsifications, or irregularities in accounting must immediately report them to their superior. During verification and control activities performed by the Board of Statutory Auditors or external auditors, employees must act transparently and provide full cooperation.

24.7 Any corporate operation likely to cause undue harm to creditors is strictly prohibited. Engaging in any conduct that could compromise the integrity of the Company's assets, whether simulated or fraudulent, is forbidden. Directors, consultants, and employees must act with integrity and transparency, providing truthful and accurate information to satisfy any requests from competent bodies, including shareholders, the Board of Statutory Auditors, auditors, internal audit, or relevant public authorities.

24.8 Employees are required to comply with company organizational procedures and the Organization and Management Model pursuant to Legislative Decree 231/2001, even in the absence of express powers of attorney.

25 Health and safety management

25.1 Comi Condor places the highest priority on the physical and moral integrity of its employees and collaborators, on working conditions that respect individual dignity, and on maintaining safe and healthy work environments. Accordingly, the Company promotes and consolidates a culture of occupational health and safety, raising awareness of risks and encouraging responsible behavior by all personnel.

25.2 All recipients of this Code, in the course of their duties, are required to actively participate in risk prevention and the protection of health and safety for themselves, their colleagues, and third parties. In particular, the Risk Assessment Document is made available in accordance with the timelines and procedures established by applicable legislation.

25.3 The Employer and corporate officers with hierarchical or functional authority must ensure, or ensure that third parties acting on behalf of Comi Condor ensure, compliance with current legal provisions, including the requirements of Legislative Decree No. 81/2008.

25.4 Corporate bodies and the Employer must ensure that the Company's organizational structure clearly defines roles, responsibilities, and obligations related to occupational health and safety. These responsibilities must be formally documented and aligned with both the Company's organizational framework and legal requirements, from the Employer to individual employees. All recipients are required to comply with company procedures and general protective measures established by the Company.

25.5 When contracting work to third parties, the Employer and relevant Managers must promote cooperation and coordination, producing a unified risk assessment document that identifies the measures adopted to eliminate or minimize interference-related risks.

26 Environmental protection

26.1 Comi Condor promotes resource management policies guided by principles of circularity and efficiency, balancing the needs of economic development and value creation, inherent to business activities, with the imperative of environmental respect and protection. The Company regards environmental safeguarding and sustainable development as a primary responsibility in the territories where it operates, considering the rights of the community and future generations.

26.2 In its operational management, including procurement of goods and services and execution of business initiatives, Comi Condor undertakes to account for essential

environmental considerations and to minimize the impact of its activities on the environment. To this end, and in full compliance with applicable environmental legislation, the Company focuses on:

- promoting activities and processes that are environmentally compatible, through the adoption of advanced technologies and best practices for environmental protection and sustainable resource use;
- assessing, preventing, and mitigating any environmental impacts arising from corporate activities and processes;
- collaborating with internal stakeholders (e.g., employees) and external stakeholders (e.g., institutions) to optimize environmental management and performance.

27 Effectiveness and violations of the code

27.1 All recipients are required to observe and ensure compliance with this Code. Adherence to the rules set forth herein constitutes an essential part of the contractual obligations of Company employees, pursuant to Article 2104 of the Civil Code, as well as of all collaborators.

27.2 Any violation of these rules shall be considered a failure to fulfill contractual obligations and/or a disciplinary offense, with all legal consequences, including those relating to the continuation of the employment or collaboration relationship and/or compensation for any resulting damages.

27.3 Comi Condor undertakes to establish and apply, consistently, impartially, and uniformly, sanctions proportionate to any violations of this Code, in full compliance with applicable laws and regulations governing employment relationships.

28 Implementation of the code

28.1 Recipients of this Ethical Code include the Sole Director, members of the Board of Directors (if appointed), members of the Board of Auditors, auditors, managers, employees, collaborators, consultants, suppliers, customers, partners, contractual counterparties, and all natural or legal persons who, even temporarily, establish relationships with Comi Condor in pursuit of shared objectives.

28.2 Every company representative, external collaborator, consultant, supplier, and customer is required to be familiar with, respect, and explicitly accept this Ethical Code.

28.3 Managers are required to observe this Code when proposing and implementing company projects, initiatives, and investments, and Directors when defining business objectives. All individuals in positions of responsibility, including top management, must set an example for employees, guide them in complying with the Code, and actively promote adherence to its principles.

28.4 Recipients must report to the competent authority any useful information concerning deficiencies in controls, suspicious behaviour, or other issues, and implement adjustments to their functional control systems as instructed by the authority.

29 ESTABLISHMENT OF THE SUPERVISORY BODY

29.1 With the approval of this Code and the Organization and Management Model pursuant to Legislative Decree 231/2001, Comi Condor establishes a Supervisory Body tasked with preventing the occurrence of administrative liability arising from crimes and, among other responsibilities, monitoring the effectiveness of compliance with the rules. This Supervisory Body (hereinafter "SB") has a collegial and independent composition and is endowed with autonomous powers of initiative and control.

29.2 The SB is responsible for overseeing the implementation of the Ethical Code and is assigned the following functions:

- Promote awareness and dissemination of the Ethical Code among all Recipients;
- Monitor the implementation of and compliance with the Ethical Code by all Recipients;
- Protect Recipients from any form of pressure, intimidation, or retaliation when reporting to the SB any behaviors or actions that conflict with the principles and provisions of the Ethical Code;
- Examine and verify the accuracy of reports received;
- Implement updates to the Ethical Code when necessary to reflect changes in the company's situation or legislative amendments, submitting such updates to the Company's administrative body.

30 Sanctioning provisions

30.1 Compliance with this Code constitutes an essential part of the obligations assumed by employees, collaborators, and any parties engaged in business relationships with the Company. Violation of the provisions of the Code, in addition to constituting a breach of the Organization and Management Model with the consequent application of disciplinary measures, may be regarded as a failure to fulfill contractual obligations. Such violations may entail all legal consequences, including termination of the employment or assignment, and may result in liability for any damages incurred.