



IMPEA
CODE OF
ETHICS

Do 7.1.1

Approved by the Board of Directors
22/05/2024

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Impea S.r.l.

Capitale sociale € 600.000 i.v.
REA C.C.I.A.A. n. 74997
Registro Imprese n. 00111040192
C.F. e P.I. 00111040192

Sede Legale

Viale Trento Trieste, 106
26100 Cremona - Italy
T. +39 0372 22577

Sede Produttiva

Via XX Settembre, 15
26034 Piadena (CR) - Italy
T. +39 0375 98316 / 98560



Foreword

This document illustrates the guiding ethical principles, values and rules of conduct of IMPEA Srl.

Ethics are the basis of the company's philosophy and entire identity: a key and valuable asset for achieving its objectives.

For this reason, this Code of Ethics has been adopted as a reference model for anyone involved, in various ways, in the Company's business.

This model is binding on IMPEA and all its employees, executives and collaborators in the performance of their daily duties, assessments, decisions and working relationships.

Therefore, all Recipients are required to comply with this Code of Ethics as well as with the provisions of the law in force, always taking into account, in addition to their own interests, those of other interlocutors, respecting all cultural, religious and social differences, the community and the environment.

To protect the Company's integrity, no relationships of any kind will be established with persons or organisations that refuse to act according to the laws in force or that do not intend to follow the principles of conduct outlined herein.

This Code of Ethics is available for consultation or download on the website www.IMPEA.it.

1. History and business of IMPEA

Established in 1963 to produce steel bumpers and body parts for the automotive industry, IMPEA grew rapidly, supplying customers such as Fiat, Maserati and Lamborghini; over time IMPEA specialized in the production of cabs, bonnets and components for agricultural and work vehicles.

With over 90 direct employees, a state-of-the-art facility of over 60,000 square meters and more than two million pieces produced per year, IMPEA is now a reference point for sheet metal stamping, forming, welding and assembly, serving large industrial groups in the agricultural, earthmoving, lifting, logistics and ecological sectors.

The Company's strength is its ability to innovate by using the latest technology and advanced lean manufacturing and monitoring models, in an integrated 4.0 production system that ensures high quality standards and high production efficiency.

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2. Recipients

The values, principles of conduct and rules listed in this document must underpin the actions of all those who are authorised to act on behalf of IMPEA (hereinafter, "Recipients").

The Recipients are:

- directors and executives of the Company;
- direct employees;
- collaborators, consultants and self-employed persons appointed by the Company;
- suppliers and sub-suppliers of raw materials and services;
- trade or business partners.

IMPEA undertakes to keep the Code up to date and disseminate it to its Recipients by publishing it on the Company's website.

The Recipients are required to:

- act in accordance with the principles set out in the Code;
- promptly inform the Supervisory Body (hereinafter "SB") if they become aware of any violations of the Code.

The adoption of the Code is made known during the contractual phase to anyone who is about to start working with IMPEA.

3. Core values

Below are the core values of IMPEA which must guide the Recipients' conduct when carrying out activities in the name and on behalf of the Company.

Lawfulness

Each activity must be carried out in full compliance with internal procedures and Italian and international laws. Therefore, the Recipients undertake to acquire adequate knowledge of and stay up to date with the laws in force in the countries in which the Company operates.

Integrity

Everyone has the duty to carry out their duties with morality and a sense of responsibility, always acting with respect, honesty and in good faith.

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Dignity and equality

The Recipients have a duty to recognise and respect the dignity of people, their rights, freedom of thought and privacy. Any discriminatory or intolerant conduct based on gender, culture, religion, race, sexual or other orientation is not tolerated.

Transparency

All internal and external communications must be truthful, clear and complete as well as in accordance with the Company's policies, in order to encourage transparent information about the progress of activities at all times.

Professionalism

Everyone must ensure the necessary commitment and professionalism for the optimal performance of their tasks, encouraging the exchange of knowledge, experience and collaboration with the other persons concerned, to ensure the achievement of objectives.

Trust and due care

The relationship between IMPEA and all its employees and collaborators is based on mutual trust. Therefore, everyone is required to act in the interests of the Company, avoiding conflicts of interest or situations that may prejudice the integrity of their conduct.

Confidentiality

Any information acquired in the performance of the Recipients' duties on behalf of IMPEA may not be disseminated in any way without the authorisation of the Directors or used for purposes other than those related to the Company's business and objectives.

Quality

The guiding principle of the work carried out by IMPEA is the achievement of ever higher quality levels in products, services and company organisation; this objective must be shared by all the Recipients of this Code.

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Protection of the environment

Everyone must be committed to protecting the environment, carrying out their activities in such a way as to minimize their impact, complying with national and international laws and striving to find and promote increasingly sustainable solutions.

Protection of the local community

IMPEA is strongly rooted in the place where its production facilities are located and from which most employees and collaborators come: for this reason it is the duty of everyone to establish and maintain good relations with the local community and take care of local resources.

Respect for competition

In the course of their business and strategic planning activities, IMPEA and the Recipients are committed to adopting conduct inspired by the principles of loyalty and fairness, respecting laws and considering competition as a useful stimulus for the Company's improvement and growth.

4. Ethical principles of conduct

In carrying out their activities on behalf of IMPEA, the Recipients are required to comply with the principles of conduct listed below. Any conduct that is not in line with this Code is not permitted.

Selection and management of human resources

Staff selection and evaluation must be carried out impartially and transparently, without favouritism or discrimination, in order to ensure equal opportunities and respect the dignity and aspirations of candidates.

IMPEA is committed to ensuring fair working conditions and fair pay so as to foster professional growth and participation, rejecting all forms of harassment, physical or psychological violence and discriminatory conduct.

Relationships between the Company and employees and collaborators are based on loyalty, fairness, transparency and mutual trust.

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Relationships with customers, suppliers and business partners

Relationships between IMPEA and its customers, suppliers, consultants, external collaborators and partners are based on mutual trust, professionalism, seriousness and compliance with laws and rules.

Their selection is based on principles of quality, impartiality, honesty and efficiency: the Recipients are thus required to establish relationships only with reputable companies that operate in full compliance with the law and share the same ethical principles.

It is forbidden to enter into agreements or covenants that violate current laws, with subjects of dubious morality or behaving not transparently.

Fight against money laundering and organised crime

IMPEA complies with all national and international laws on anti-money laundering and the fight against organised crime, carefully verifying that no money or assets of unlawful origin are used in the operations in which it is involved.

To this end, the Company undertakes to:

- acquire in advance useful information to assess the integrity of its customers and suppliers and the lawfulness of their activities;
- ensure full traceability of incoming and outgoing flows;
- entrust transactions only to approved financial operators.

Relations with authorities, institutions and the public administration

Anyone dealing with public bodies, institutions, officials of the State, judicial authority or public administration must act in compliance with the principle of lawfulness, fairness, moral integrity, transparency as well as with this Code.

IMPEA prohibits and strongly condemns any form of direct or indirect pressure, corruption, bribery or attempt to influence the decisions of the other party for one's personal benefit or that of third parties.

It is forbidden to offer or accept money, goods, services or employment, commercial or professional collaboration opportunities, performances or other benefits unless they are of modest value, not contrary to morals or the law and offered or received in a transparent manner.

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Anyone who receives offers or becomes aware of any unlawful conduct is required to promptly inform the Company's directors and the SB.

Relations with political and trade union organisations

IMPEA does not favour or discriminate against any political or trade union organisation and refrains from providing any kind of funds or contributions to political parties, unions or other national or international political organisations.

Relations with trade unions are held exclusively by the directors of the Company or by persons authorised by them, in compliance with the principles of this Code.

Any pressure, threat, offer of money, services or other benefits to political and trade union representatives to gain an advantage, directly or indirectly, whether for personal or third parties' interests or on behalf of the company, is prohibited.

Financial statements and accounting records

All operations and transactions must be duly and promptly recorded in the Company's accounting system – according to the law and the principles of truthfulness, accuracy and transparency – and filed in such a way as to allow for an easy and immediate reconstruction of each activity, with the identification of those responsible for any errors or anomalies.

Likewise, the Company's financial statements must duly, truthfully, accurately and exhaustively represent the Company's economic, financial and asset situation.

Any financial operation or pecuniary transaction must be carried out only by persons authorised by the Company's directors and must be duly justified, documented and traceable.

It is the responsibility of the Recipients in charge of the aforesaid activities to ensure that all documentation is constantly updated, organised and easily available.

Confidential information

All information collected and obtained by the Recipients in the performance of their duties – relating to contracts, prices, production figures, negotiations, personal data or market news – is to be considered confidential.

The Recipients are required to protect the confidentiality of such information, undertaking not to disclose it to outside parties and not to use it for personal purposes or to favour or damage third parties.

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Personal data

Personal data may be processed on behalf of IMPEA only by staff authorised by the Company's directors.

All the Recipients are required to comply with the laws on the protection of personal data, acquiring only necessary data, storing them adequately, preventing third parties from acquiring them, and processing them in compliance with the law and company regulations.

Internal controls

Compliance with the principles contained in this document is entrusted to the Recipients, within the scope of their respective corporate functions and responsibilities.

Controls shall include all instruments useful to check compliance with laws and internal procedures, the protection of persons, company property, the truthfulness and clarity of information and to identify, assess and prevent unlawful or non-compliant risks and conduct.

All the Recipients are required to report to the Company's directors any facts and circumstances that are potentially harmful or contrary to the principles and values listed in the Code of Ethics.

5. Sanctioning system

In case of violations of this Code, IMPEA will take appropriate disciplinary measures, which will be proportionate to the seriousness of the violation, regardless of any other measures adopted by the judicial authority.

The sanctions can take the shape of:

- measures ranging from a verbal reprimand to dismissal for just cause for employees;
- revocation of the mandate for directors;
- termination of the relationship with the Company for suppliers, external collaborators and consultants.

In addition, IMPEA may take all actions deemed appropriate to obtain compensation for the damage caused by the violation.

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6. Supervisory Body

The Supervisory Body (SB), consisting of a team of duly appointed managers, is responsible for monitoring compliance with the Code of Ethics (SB), in accordance with the laws in force.

In particular, the SB:

- verifies that the Code is applied and complied with by all the Recipients;
- assesses the content of the Code and points out the need to adapt it to regulatory developments;
- reports any violations to the appointed persons within the Company;
- proposes updates, changes and additions to the Code;
- receives reports and assesses the presence of any violations;
- reports to the Board of Directors on its activities.

The Recipients are urged to report any violation by notifying the human resources manager, writing to marta.bosisio@impea.it, or using the Whistleblowing reporting channel.

IMPEA ensures the confidentiality of the identity of the whistleblower, to the extent permitted by law, protecting the latter from any type of retaliation, intimidation or discrimination.

7. Adoption, review and dissemination

The Code of Ethics was adopted by the Board of Directors in consideration of the Company's adaptation to the provisions of Legislative Decree 231/01.

Any update to this document must be approved and adopted by a Board of Directors' resolution.

The Board is responsible for ensuring that the Code of Ethics is made available to all the Recipients, who are required to read it, understand its content and comply with it.

The full document may be consulted and downloaded on the website www.impea.it.

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