



ARGOMM

ARGOMM GROUP

CODE OF ETHICS AND CONDUCT OF ARGOMM S.P.A.

Revision no.01 dated 15/04/2022, superseding the previous version dated
23/05/2018



ADDRESSEES:

- Directors
- Auditors
- Representatives
- All employees
- Consultants
- Collaborators (including temping personnel)
- Suppliers
- Third parties who engage in relations with Argomm S.p.A.

APPROVAL:

- Human Resources and Social Responsibility Dept.
- Managing Director

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1. THE BASIS AND STRUCTURE OF THE CODE OF ETHICS AND CONDUCT

Argomm S.p.A. (hereinafter "**Argomm**" or the "**Company**"), with this Code of Ethics and Conduct (hereinafter the "**Code**") intends to highlight - as it in fact highlights - in a clear, transparent and formal manner, what the policies (and principles) of behaviour of the Company and of all those who work with it are, in particular by establishing, with determination and strength, the values of ethics and respect for legality. This Code is the concrete result of the Company's decision to make an actual "manual" of the policies of behaviour that can enable individuals to be able to readily trace, in every situation, the set of values pursued and the operational tools available for this purpose.

The Company - at the urging of its administrative body - has therefore started, since the spring of 2017, a path of study and reflection in order to formalize the principles and values which have always inspired Argomm and according to which it has always sought to conduct its business. Since its foundation in fact, the Company has sought to build its business on solid principles and human values. For this reason, the Company has identified in this document the set of rules and principles that the approach of those who work with Argomm must comply with.

The intention of the Code is not to cover every single ethical principle to which to conform one's behaviour, but to provide a framework for assessing one's conduct during the course of one's activities: the distinctive characteristic of this Code is represented by the fact that the principles and values contained herein are directly derived from the founders of Argomm.

The Code shall be read, transposed and applied in close connection and correlation with the codes of conduct, policies, procedures, guidelines and/or organizational provisions (all collectively referred to herein as the "**Regulations**") currently in force at the Company, or those the Company intends to adopt in the future, with appropriate emphasis given to the Addressees.

The Regulations expressly include:

- Anti-Corruption Code of Conduct (PS4-P6)
- Corporate quality, health, safety and environment (QHSE) policy
- The Rubber-Plastics (Industry) CCNL, with particular reference to the relative Disciplinary Code
- Supplier Homologation Procedure (PS3-P2)

The edition of the Code dated 15 April 2022 supersedes the previous version dated 23 May 2018.

2. SCOPE OF APPLICATION

The Code addresses directors, auditors, representatives, employees, consultants, collaborators (including temping personnel), suppliers, and third parties in general who maintain relations with Argomm; in short, the Code addresses all company personnel and all those who, directly or indirectly, permanently or temporarily, entertain relations, including business relations, with the Company (hereafter the "**Addressees**" or, individually, the "**Addressee**").

Compliance with the contents of the Code by all those who work for the Company is crucial to the proper operation, reliability and reputation of the Company as well as being an indispensable factor for business success.

Therefore, the Recipients are required to know and to comply with the Code, to actively contribute to its effective implementation and to report, to the extent applicable, any shortcomings and failures.

3. ARGOMM'S VALUES

The Company's business is inspired by compliance with current legislation in all the countries where it operates and it is committed to acting accordingly at all times. All Recipients must comply with the spirit and purpose of the current laws and behave above reproach in all their activities.

In particular, all Addressees should be aware of the laws applicable to their work and functions; Addressees should also be aware of the provisions of the Code and, within the extent of their duties, the Regulations. Any doubts concerning the provisions of the Code or concerning the Regulations in general, should be raised by the Addressees with their superior and/or contact person within the Company.

The Code defines the set of values that Argomm recognises, accepts and shares, and the set of responsibilities that the Company assumes, inspired by these principles, both internally and externally.

In this respect, Argomm deems it appropriate to emphasise that the Company firmly believes in the importance of promoting a culture of **responsibility** based on the essential principle of **respect** for people, the environment, the territories and the communities that live there; the promotion and application of this culture have enabled Argomm to build its business in a sound and responsible manner and to create global development.

The quality of its relations, its passion for its work and its tendency to **listen** to the experiences of those working with Argomm, together with the **flexibility and adaptability** of the proposed solutions, have led the Company to be recognised as a reliable supplier and to build long-term relations with those who choose it as their partner.

All Recipients, as subjects who work, collaborate, entertain relationships and commercial relations with the Company, are appointed to make the above values their own and, a time, to promote them towards the subjects with whom they interface.

Responsibility

"We want to be responsible for everyone who places their trust in us, responsible for keeping our word, demonstrating credibility in every action and in every result."

Respect

"We firmly believe that respect is the core element of everything.

When we talk about respect, we mean respect for people, everyone, without distinction: our employees, their families, our customers, our suppliers, and our collaborators.

Respect also for our beloved territory, which has given us the opportunity to build our business, acting as a driving force and which, in turn, we intend to make the most of.

This is a vital and core principle we apply to every action we take".

Quality of relations

"Words matter to us. We like to communicate clearly, openly, simply.

We strive to ensure the necessary information is accessible and available to everyone who needs it, and to help all those who work with us to know exactly where the things they need are, and how we intend to provide them. We have built our business trusting and winning the trust of the people who have chosen us.

We have learned that betting on trust is always the best bet”.

Passion

“We love our work. We keep our passion alive as always, with the commitment and satisfaction we still feel today as we engage in a new project, deliver the products we have made, and see them generate value for our customers. We have made quality and excellence cornerstones of honour throughout our history and they way we envisage our work.”

Listening

“We have learned that listening allows us to grow.

Listening to the requirements of our customers, the words and experiences of those working with us, listening to what our past actions and achievements have to say, what the market says and what research says.

Listening allows us to truly understand what we need to accomplish and, above all, how to do so increasingly well.

There is no development without sincere and profound listening, there is no improvement and innovation if we do not understand where we are and what we are creating.”

Flexibility and Adaptability

“We have always explored all that surrounds us, what was close to us and what was a little further away, we have pushed boundaries and overcome difficulties relentlessly. We have made research and change our courage, the strength to say yes to what's new, to continue experimenting and embracing new opportunities fearlessly and with enthusiasm. We have learned that adapting to the times is key to continue growing, and that every boundary is a great opportunity to do things increasingly well.”

4. BUSINESS ETHICS AND LEGALITY

4.1. Legitimacy and compliance with laws

For Argomm integrity is the benchmark ethical principle for all business activities.

In accordance with the principles of sound and prudent management, the Recipients, each within the scope of their responsibilities, are required to comply with national and community laws, as well as with internal policies, plans, regulations and procedures in order to contribute to the ethical management of the Company. Violating the law is not permissible under any circumstances. Ignorance of the applicable regulations does not justify any violations committed.

4.2. Conflict of interest

The Recipients shall avoid any situation, and refrain from any activity, which could cause a conflict between a personal interest and the interests of the Company, or which could interfere with the ability to take impartial and objective decisions on the Company's behalf. Situations involving a conflict of interest are not only against the law and against the principles set out in the Code, but are also detrimental to the image and integrity of the Company. In the event of a conflict of interest, the party concerned is required to notify the relevant manager or their contact within the Company.

4.3. No bribery, corruption or extortion

Argomm promotes the ethical principles of honesty and fairness in all its relations, inside and outside the company, and does not tolerate extortion, bribery and/or corruption. In accordance with the Anti-Corruption Code of Conduct (PS4-P6) it is prohibited to give, promise, offer, request or receive money. Furthermore, the Company requires maximum transparency and ethics when it

comes to gifts or presents. This rule applies to relationships with customers, suppliers pursuant to the purchase of goods and services, institutions, public officials and among Argomm personnel or relations in general. It is not permitted to offer or receive gifts or hospitality that may compromise a decision or give rise to a sense of obligation in the choices to be made, and therefore be misinterpreted.

4.4. Money laundering

Addressees must not initiate or become involved in any activity that may involve money laundering. All economic transactions must be conducted and concluded in a manner that ensures full traceability of cash flows and compliance with legal requirements at all times.

4.5. Fair competition and compliance with the so-called antitrust regulations

Fair competition is a fundamental prerequisite for business development and the success of the Company. Under no circumstances does Argomm engage in any acts and conduct other than free and fair competition. The Addressees are therefore obliged to respect fair competition regulations within the framework of the legal provisions. Therefore, no agreements or exchange of information (verbal and/or written) relating to costs, prices, production capacity, sales policies or any other information that could affect the Company's competitive conduct are allowed if their intention is to induce competitors to comply with such conduct.

Any agreements entered into in violation of fair competition principles, or in violation of the so-called antitrust regulations, shall be deemed null and void.

4.6. Exports, imports and penalties

Argomm ensures and requires Addressees to comply with all regulations concerning export control, import conformity and any applicable sanctions for such violations.

4.7. Relations with public administration and impartiality

The conduct of the Company and the Recipients is inspired by and conforms with the respect for the impartiality and good performance to which public administrations are subject. Contacts with public administration, whether Italian or foreign, are held by persons explicitly authorised by the Company to deal with or have contact with these administrations, with their related civil servants, with bodies, organizations or institutions.

5. WORKING CONDITIONS AND HUMAN RIGHTS

5.1. Policy on working conditions and human rights

Respect for Human Rights is a key requirement for Argomm when carrying out all its activities, including production operations, and a vital and essential element for corporate sustainability.

The Company firmly believes and acknowledges the fundamental values of the **United Nations Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union and the ILO Declaration on Fundamental Principles and Rights at Work**, which are all key principles on which its Code is inspired.

The Addressees of this Code are required to respect such as Human Rights and these Basic Working Conditions, as set out below:

No child labour

Child labour is not permitted and the Company complies with all current legislation on protection against child and adolescent labour, including verification of the minimum working age during the recruitment process.

It recognises and complies with Directive (EC) 94/33, art.37 of the Italian Constitution and the legislation in force concerning the protection of young people at work and, to ensure the maximum protection of workers, the Company does not employ any workers under the age of 18.

No forced labour, compulsory labour or human trafficking

The employment relationship must always be of a voluntary nature.

No form of forced or compulsory labour shall be tolerated along with any disciplinary action involving the use of violence; no form of human trafficking shall be tolerated.

It is prohibited for Addressees to request for/receive any amounts of money at the time when employees are recruited.

At the time when employees are recruited, the Addressees are also required to comply with the so-called labour regulations also in terms of the request for and/or delivery of identification documents or work permits: only copies of such documents must be requested (and retained in the Company archives), and it is prohibited to retain the original copies of the same.

Guaranteed rights to rest periods and holidays

The Company complies with the requirements of the applicable laws and the applicable National Collective Bargaining Agreement on the regulation of working hours and proper management and remuneration of overtime.

Corporate dialogue is respected and promoted

The right to work, to free association and to national collective bargaining in the relative sector is acknowledged and respected.

No discrimination, harassment, intimidation or retaliation against trade union members and workers' representatives shall be tolerated.

The Addressees of the Code hereby declare they are willing to establish an honest and constructive discussion with workers' representatives and the OO.SS. (Trade Unions).

Respect for equal opportunities

Equal opportunity rights are acknowledged and respected and the Company does not tolerate any harassment and/or discrimination based on gender, religion, beliefs, race and ethnic origin, disability, age, marital status, sexual preferences, union or political party membership or any other personal condition.

No harassment, abuse, intimidation, lack of consideration or any other form of physical or verbal aggression shall be tolerated.

Respect for and protection of the dignity of all personnel is an inviolable fundamental prerequisite.

Respect for salary conditions

Dignified and adequate remuneration shall be guaranteed based on the role, responsibilities and competences of all personnel, in line with current legislation and the conditions of the markets in which we operate.

Contractual arrangements with personnel which prevent and/or limit compliance with (legal and/or regulatory) obligations shall not be permitted.

Fostering of relations with schools

We foster the launch of school-work alternation programmes, vocational traineeships, training programmes and on-the-job apprenticeships, which comply with local laws and aim to provide an educational benefit to young people approaching the job world.

Fostering of training, growth and development of skills

We foster the development of our employees' knowledge and skills to create a competitive advantage. In line with this philosophy, we promote the growth and continuous strengthening of the skills of our collaborators, including technical training, cross training and individual coaching.

In developing and maintaining its relations with stakeholders, Argomm requires all Addressees to behave with absolute fairness and mutual respect, in accordance with the ethical principles envisaged in the Code.

This policy is drafted and updated by the Company's Human Resources and Corporate Social Responsibility Department.

5.2. Human Resource Management

The Company acknowledges and invites Addressees to acknowledge the central role of Human Resources and the importance of establishing and maintaining relations with them based on mutual trust.

Therefore, in the management of its labour and collaboration relations the Company is inspired by its respect for the rights of workers and the full exploitation of their contribution with a view to promoting their development and professional growth.

5.3. Safeguarding of health and safety

The Company undertakes to consolidate and disseminate a safety-based culture, developing risk awareness and promoting responsible conduct and behaviour by all employees.

Addressees shall, in turn, consolidate and disseminate this culture and, in any case, comply with the principles set out in the Corporate Quality, Health, Safety and Environment policy, paying particular attention to:

- prevention of occupational accidents and diseases;
- risk awareness;
- correct operation of plant and machinery, safe use of materials and chemicals and the use of suitable PPE where necessary;
- the identification of emergency situations and the management of the same.

Addressees are required to pay attention to their own health and safety, and that of others and contribute to fulfilling the obligations envisaged by the occupational health and safety regulations.

In fact, Argomm pays particular attention to the occupational environment and safety of its personnel and the personnel of third parties operating on the Company premises, duly complying with the applicable occupational safety regulations in a timely manner. The Company promotes a culture based on accident prevention and personnel risk awareness, actively supporting this policy providing specific information and training in relation to corporate requirements. The Company invites each Addressee to report, in the manner deemed most appropriate to provide sufficient information, any potential personal or global health and safety risks, to use work equipment, hazardous substances and preparations correctly, the means of transport, and the safety devices and personal protective equipment made available and to comply with the defined corporate practices and regulations.

5.4. Protection of the environment

Argomm regards the environment as an inviolable world heritage, for which everyone is responsible. In addition to meeting all legislative requirements, Argomm also adopts an Environmental Management System (EMS) certified in accordance with ISO 14001 standards in order to promote sustainable development and prevent or minimise negative environmental impacts.

All Addressees are invited to comply with the principles envisaged by the Corporate Quality, Health, Safety and Environment policy, paying particular attention to:

- compliance with applicable environmental laws and requirements;
- the adoption of rational and controlled management of resources, energy, materials and plant systems so as to minimise waste and risks;
- monitoring of the quality of the air and water to reduce emissions;
- maximising the recovery and recycling of produced waste;
- management of chemicals used in the processes and their legal obligations (e.g. REACH, ROHS, etc.).

6. PROTECION OF INFORMATION

6.1. The protection of property, corporate information and industrial and intellectual property

Each Addressee shall be directly and personally responsible for the correct use and protection and conservation of the physical and intangible assets and resources, whether tangible or intangible, assigned to him/her to perform his/her duties and/or collaboration, further to the use of the same in a manner consistent with the Company's interest.

Dissemination either inside or outside the Company of false information concerning the enterprise, or those working for it, shall not be tolerated. Personal data is collected and recorded for specific, explicit and legitimate purposes that are relevant to the Company's business operations. Each Addressee shall be required to ensure the accuracy and, to the extent possible, the updating of the processed data. It is the responsibility of the assigned data processors to ensure that the security and confidentiality requirements relating to the processing of personal data are always guaranteed.

Addressees shall respect all third-party intellectual property rights; likewise the Addressees shall also protect the Company's internal know-how.

Argomm refuses and requests all Addressees to expressly refuse any form of activity involving counterfeit products; Argomm also undertakes to promote respect for the laws in force and to oppose any initiative aimed at the manufacturing and marketing of counterfeit products and encourages the Addressees to apply the same conduct. This involves constantly promoting compliance with the laws in force, combating all initiatives aimed at the manufacturing and/or marketing of counterfeit products.

6.2. Economic and financial management

Argomm, and likewise the companies it relies on for the services concerned, adopts an administrative-accounting system that ensures transparency, authenticity, accuracy, completeness and proper administrative, fiscal and financial control. The documentation is prepared in compliance with the relevant legislation and applicable accounting standards. The Company undergoes audit and statutory audits of the financial statements by the board of Auditors. All Recipients, each within their field and to the extent of their responsibilities, are required to provide the utmost collaboration so that operational events are correctly and rapidly recorded in the corporate accounts. For each operation, adequate documentation in support of the activities carried out must be kept for the records. To ensure a careful monitoring of financial flows and to prevent any commission of crimes, Argomm tracks and stores all financial flows, with the possibility of accurately reconstructing the entire decision-making and operational path ex-post.

6.3. Relations with the press and other media

The Recipients must refrain from issuing press releases and giving interviews or news about the Company to representatives of the press or other media. Within the organization, these activities are delegated to the HR and Social Aspects function.

6.4. Communication management

Argomm and the Addressees shall communicate (and undertake to communicate) in an open, transparent, respectful, professional and timely manner with regards to all requests, and in particular in relations and documentation with government or public authorities, so as to provide complete, fair, truthful, accurate, comprehensive, objective and understandable information at all times.

7. RELATIONS WITH CUSTOMERS AND SUPPLIERS

7.1. Customer relations

With regards to customer relations management, the Company's own employees shall, in compliance with internal procedures, ensure the maximum Customer satisfaction, providing, among other things, comprehensive and accurate information on the services and products supplied, to allow the customers to make conscious choices.

The Company's employees must not promise or offer payments or goods or other utilities to promote or benefit the Company's interests, except if the value of the same is such that it does not compromise the Company's image in accordance with the Company's Anti-Corruption Code of Conduct (PS4-P6).

7.2. Supplier relations

The selection of suppliers and the finalising of purchasing conditions shall be carried out by the department managers on the basis of the internal procedures already in place within the Company and, in any case, on the basis of an objective and transparent assessment which takes into account competence, quality, attention to workers and their safety, environmental protection as well as the economic conditions of the supply.

The Company undertakes to establish, develop and maintain professional and constructive relations with suppliers, based on mutual respect, respect for any third party involved, and compliance with all applicable laws in force and applicable to the business relationship entered into.

Argomm's suppliers are also required to enforce and comply with all aspects of the Code (as they are expressly listed among the Addressees), as well as with all relative Regulations. The Code is, in fact, part of the supplier's contractual obligations. In the event that any contractual requirements between Argomm and the Supplier are more restrictive than the ones indicated in the Code, the more restrictive requirement shall apply.

In such a context, and based on the volume and nature of their business activities, all Suppliers shall put in place management systems, tools and processes that:

- ensure compliance with all laws, regulations and all sections of this Code;
- ensure that all required measures are implemented accordingly;
- ensure dissemination and effective application of the contents of the Code to its entire supply and sub-supply chain, as well as to the personnel of all parties involved in the chain (for instance, by training its partners, collaborators and employees on all compliance requirements, including those related specifically to the Code);
- facilitate the prompt discovery, investigation, and communication to Argomm and, depending on the context, to any third parties of any situations and/or circumstances in breach of the provisions of the Code or Regulations or also any laws in force, and facilitate the implementation of corrective actions in the event that such violations are ascertained;
- process reports, including anonymous reports, relating to violations of this Code, and duly inform Argomm to allow the latter to verify the situation and carry out any corrective action if necessary;
- integrate its own comprehensive practices concerning Occupational Health and Safety Management (for further information, see the Corporate Policy on Quality, Health, Safety and Environment);

- integrate its own comprehensive practices concerning Environmental Management (for further information, see the Corporate Policy on Quality, Health, Safety and Environment); ISO 14001 certification is highly recommended in this regard.

Management of sustainability in the Argomm supply chain is described in the internal Supplier Homologation procedure (PS3-P2).

Argomm reserves the right to verify compliance with the principles envisaged by the Code, with audits conducted by Argomm and/or third-party personnel, and with due notice given in advance.

In the event that any Supplier should violate the principles of the Code and no improvement and/or corrective plans are put in place to rectify the non-conformities, Argomm reserves the right to suspend and/or terminate the business relationship as a precautionary measure.

8. REPORTS OF VIOLATIONS (WHISTLEBLOWING)

It is the responsibility of each Recipient to ensure full compliance with all the provisions contained in this Code and the procedures mentioned (Anti-corruption code of conduct PS4-P6 and Code of Basic Working Conditions and Human Rights PS4-P7) and – where appropriate – to ask managers or company officials for any clarifications required. Failure to observe the principles mentioned in the Code compromises the relationship of trust between the Company and the person or third party that has committed the violation. It is the right and duty of each Recipient to report to the HR and Social Aspects Department potential violations of this Code should they become aware of any. The report must be submitted to the HR and Social Aspects Department in either paper copy or electronic form:

- **Paper copy:**

The report shall be sent to the mailing address

Argomm S.p.A.

Via Camozzi, 22/b, 24060, Villongo (BG).

To the attention of the HR and Social Aspects Department

- **Electronic form:**

The report must be sent to the following e-mail address: *csr@argomm.it*

It is appropriate that the report, in order to be examined in depth, contains all relevant information including the following:

- *When the incident occurred*
- *Where the incident (department, corporate spaces, etc.) occurred*
- *What happened*
- *Any information relevant to understanding who is involved*
- *How you were involved in this incident*
- *If appropriate, you may include your name.*

The HR and Social Aspects Department, upon receipt of the report, shall promptly ascertain its validity and run an immediate check. All those who receive the report and all those who will be involved in the process of reporting the same shall be bound by confidentiality obligations without prejudice to legal obligations and the protection of the rights of the Company. The HR and Social Aspects Department deals with providing suitable protection for the person who has reported the possible violation of the contents of the Code.

We remind you that Argomm has no interest whatsoever in receiving reports made with defamatory intent, in bad faith or which are not in the right spirit of company cooperation. The HR and Social Aspects Department shares the report received with the Managing Director.

The Company undertakes to ensure the confidentiality of the whistleblower's identity and to protect those who report alleged violations of the Code in good faith from any intimidation or reprisals.

9. DISSEMINATION

Knowledge and observance of the Code are primary conditions for transparency and for Argomm's reputation. The Code is therefore brought to the attention of the Recipients and all those with whom the Company has business relations.

10. UPDATES

It is the task of the Board of Directors to update the Code in order to adapt it to any relevant new norms, and according to the development of civic awareness.

11. CODE VIOLATIONS – PENALTY SYSTEM

The violation of the principles established in the Code compromises the relationship of trust between Argomm and the Recipients. Such violations shall, therefore, be addressed by the Company in an incisive and timely manner, by adopting appropriate and proportional measures (towards employees through the application of the disciplinary system referred to in the current National Collective Labour Agreement), regardless of the possible criminal nature of the conduct and the initiation of criminal proceedings in the cases where this constitutes a crime. All those who for any reason have relations with Argomm must take the effects of violations of the Code into serious consideration.

The reports received are subject to regular review by the Board of Directors.

The Company, in order to safeguard its image and its resources, shall not enter into relations of any kind with parties who do not intend to operate in strict compliance with current legislation and/or who refuse to behave according to the values and principles laid down in the Code.

12. FINAL CLAUSE

In case of conflicting provisions between the principles of the Code and other company documents, the contents of this Code shall prevail. In this case, the Recipient who identifies any inconsistencies or overlapping regulations shall immediately notify the Board of Directors for appropriate action.

Knowledge of the Code is provided through appropriate notifications. The document is also available on the Company's website [www.argomm-group.com].



13. SUPPLIER STATEMENT OF ACKNOWLEDGEMENT AND COMPLIANCE

I declare to have received a copy of the “Code of Ethics and Conduct of Argomm S.p.A.”, revision no.01 of 15/04/2022, and that I have had the opportunity to ask questions and to request explanations concerning its content. I undertake that it is my responsibility and obligation to adhere to the provisions envisaged by this Code and I also agree that the indications contained in the “Code of Ethics and Conduct of Argomm Spa”, revision no.01 of 15/04/2022, form an integral part of my contractual obligations undertaken with Argomm S.p.A.

Company registered name	
Signatory's name	
Signatory's position	
Date	
Signature	