

**Our points of reference.
Our values.
Our ...**

CODE OF ETHICS



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FOREWORD

DMA is a company affiliated with Plasser & Theurer, a global leader that provides complete solutions for the maintenance and construction of railway lines and manages a worldwide network of technical service points, repair workshops and spare parts warehouses.

DMA operates in the sector of design, measurement and inspection installation and maintenance of onboard systems for railway machines and railway operational vehicles.

Ethics in the conduct of business promotes the success of entrepreneurial activities, contributing to building an image of reliability, fairness and transparency in pursuing its objectives.

Unethical behaviours are those carried out by individuals, groups or organizations acting on behalf of DMA that violate the rules of civil coexistence and proper social and commercial relationships, as governed by laws and regulations. The adoption of unethical behaviours compromises the relationship between DMA and its shareholders, employees and collaborators, as well as between DMA and its commercial, business and financial stakeholders, both public and private.

Today's economic and social environment presents new challenges in terms of sustainable development, and companies must take into account the interests of all legitimate stakeholders involved in their activities.

DMA therefore considers it necessary to clearly define the values and responsibilities it recognizes, accepts, shares and undertakes, contributing to building a better future for all.

In this Code of Ethics and Conduct, DMA identifies and defines the values that all recipients of this Code — Directors, employees at all levels, collaborators, suppliers, subcontractors, consultants and all those who, directly or indirectly, whether permanently or temporarily, establish relationships with DMA in pursuit of its objectives — must share, accepting responsibilities, roles and behavioural standards when acting in the name of and/or on behalf of the Company.

All recipients, wherever they work, are encouraged to act with fairness, loyalty, reliability, honesty and in compliance with this Code, in the firm belief that the image DMA presents externally largely depends on the actions of its personnel. Moral integrity and respect for the principles of honesty, loyalty and fairness form the basis of the Company's success and are reflected not only in the quality of its products and services but also in the transparency of its relationships with all stakeholders.

Communication and Sharing of the Code of Ethics and Conduct is one of the measures adopted by the Company to ensure compliance with, sharing of and protection of its ethical values.

Under no circumstances may the belief of acting in the interest or for the benefit of the Company justify, even in part, behaviour that conflicts with the principles and contents of this Code of Ethics and Conduct.

The adoption of this Code of Ethics and Conduct also complies with Italian law No.

231/2001 concerning the "Regulation of the administrative liability of legal entities, companies and associations, including those without legal personality, pursuant to Article 11 of Law no. 300 of 29 September 2000".

In case of any doubt regarding the appropriate conduct, employees may contact their direct supervisor or the Compliance Officer.

Recipients and Scope of Application

The recipients of this Code of Ethics and Conduct are all natural or legal persons who hold roles of representation, administration or management within the Company, as well as all those who, even de facto, exercise management and control of the Company (“Directors”), all persons bound to the Company by an employment relationship, including occasional ones (“Employees”), and all those who operate in the name or on behalf of the Company, for example as consultants or partners, suppliers, regardless of the relationship that binds them to DMA and who act in pursuit of its objectives (“Collaborators”).

Directors, Employees and Collaborators are hereinafter collectively referred to as “Recipients”. All Recipients are required to be familiar with the content of this Code of Ethics and Conduct and to refrain from behaviours that are contrary to its provisions.

It is the specific duty of each Recipient to:

- contact their direct supervisor in case of need for clarification regarding the application of the Code of Ethics and Conduct;
- promptly report to their direct supervisor or to the internal Supervisory Body any information, whether directly observed or reported by others, concerning possible violations of the provisions of the Code of Ethics and Conduct, as well as any request made to them to violate such provisions;
- cooperate with the relevant functions in carrying out the activities necessary to verify possible violations of the Code of Ethics and Conduct.

All Recipients, without distinction or exception, are required to align their actions and behaviour with the principles and contents of this Code within the scope of their roles and responsibilities, being aware that compliance with the Code constitutes an essential part of the quality of their work and professional performance.

ETHICAL PRINCIPLES AND STANDARDS OF CONDUCT

Honesty, Impartiality, Loyalty and Mutual Respect

Honesty represents the fundamental ethical principle guiding all activities carried out by DMA in the pursuit of its mission.

DMA employees and collaborators are required to comply with applicable national and EU laws, internal regulations or codes and, where applicable, professional ethical standards.

When operating abroad, personnel are also required to comply with the laws in force in the country in which they operate and to respect local customs, culture and traditions.

Under no circumstances does the Company justify or tolerate conduct in violation of such rules.

Relationships with stakeholders, at all levels, must be based on fairness, cooperation, loyalty and mutual respect.

DMA does not tolerate any form of discrimination based on age, gender, sexuality, health status, race, nationality, political opinions or religious beliefs. Disparaging or disrespectful remarks towards colleagues regarding any personal characteristic are not tolerated.

The Company’s success is also based on a genuine team spirit. This requires a positive, collaborative and respectful attitude towards colleagues, with the awareness of working towards a common goal.

Transparency

In conducting its business, the Company is guided by the principle of transparency, which is an expression of the principle of honesty and requires the truthful and unaltered representation of reality.

Anti-Corruption

In its relations with Public Administrations, DMA prohibits any action aimed at undermining the impartiality and independence of judgment of its counterparts in order to obtain advantages or to unlawfully favor its own interests.

DMA does not allow the giving or receiving of sums of money, gifts or favors to/from third parties for the purpose of obtaining direct or indirect benefits for the Company; however, it is permitted to offer or accept gifts or favors that fall within customary practices of hospitality, courtesy or special occasions.

DMA is strongly committed to implementing all necessary measures to prevent and avoid corruption. To this end, a specific code of conduct entitled "Anti-Corruption Code" has been established, with which all recipients of this Code of Ethics are required to strictly comply.

Health and Safety in the Workplace

Respect for and protection of health and safety in the workplace represent a primary ethical value for the Company.

DMA's Safety Policy is applied to every workplace and at every site, with the objective of eliminating accidents. This goal is pursued by applying the highest safety standards, promoting a culture of risk prevention and encouraging responsible behaviour by all employees and all those who work with or have relations with DMA.

The Policy is continuously monitored and updated in order to ensure protection against unsafe behaviours that may cause workplace accidents.

DMA does not accept any compromise regarding Health and Safety at Work and firmly believes in the importance of ensuring the safety of its employees, subcontractors, third parties, visitors and all other stakeholders involved in the Company's activities.

Environmental Commitment

The Company implements all necessary actions to remain constantly aware of the impact that its activities have on the environment and on the quality of life of the areas in which it operates, committing to mitigate negative impacts and to maximize the positive impacts of its activities.

The Environmental Policy is an integral part of DMA's mission and is fundamental for business development as well as for productivity, efficiency, quality, and health and safety in the workplace. The objective is to reduce environmental impacts and improve health and working conditions.

The Policy is continuously monitored and updated in order to prevent or minimize potential negative environmental effects related to DMA's activities.

To this end, the Company prioritizes less invasive technological solutions that minimize environmental impact, thereby contributing to sustainable development.

Legality

All Recipients are required to comply with applicable Italian primary and secondary laws, as well as with the laws of any foreign countries in which the Company may operate, the Company's internal provisions, including this Code of Ethics and Conduct and the Anti-Corruption Code, as well as all agreements, contracts and conventions entered into with third parties.

Fairness

Each Recipient must act with absolute fairness both in external relations and within the organization, avoiding any behaviour contrary to the principles of loyalty, honesty, moral integrity, responsibility, mutual respect and good faith.

Diligence

Recipients must perform their duties and responsibilities with the utmost commitment and professionalism, within the limits of their competencies and roles.

Confidentiality

Any information, data or document acquired during work activities is confidential and may not be disclosed in any way, except in accordance with company procedures.

In this regard, each employee shall:

- acquire and process only the data necessary and directly related to their duties;
- store such data in a way that prevents unauthorized third parties from accessing it;
- communicate and disclose data within the framework of established procedures or with prior authorization from the designated person;
- determine the confidential and sensitive nature of information in accordance with the relevant procedures;
- ensure that no confidentiality constraints exist due to relationships of any kind with third parties.

Fairness and Impartiality

All conduct must be guided by principles of objectivity and impartiality, avoiding any form of favoritism or discrimination..

Responsibility towards the Company

All actions and activities of the Recipients must safeguard the integrity, reputation and image of the Company externally.

Professional Ethics

Each Recipient must carry out assigned tasks and responsibilities with the highest level of professional and moral responsibility.

ETHICAL STANDARDS IN RELATIONS WITH THIRD PARTIES

Business Ethics

In business relationships, Recipients are guided by the principles of legality, loyalty, honesty, fairness, transparency, traceability and efficiency.

All actions, operations and behaviours carried out by Recipients in the performance of their work must be based on the highest standards of fairness, transparency and legality, both in form and substance, in compliance with applicable regulations and internal procedures.

Ai Destinatari è pertanto richiesto di non intraprendere alcuna azione o stipulare alcun patto o accordo senza avere preventivamente accertato che questi siano coerenti e conformi:

- al presente Codice Etico e di Condotta ed ai valori e principi che lo ispirano;
- al sistema legislativo e normativo.

Ciascun Destinatario è tenuto a svolgere le attività di propria competenza con impegno e rigore professionale, fornendo un contributo professionale adeguato alle funzioni ed alle responsabilità assegnate, creando in tal modo valore aggiunto per la DMA.

Relations with Customers

The Company pursues its success through the provision of quality services, in compliance with all regulations protecting fair competition and ensuring the highest standards of safety, reliability and professionalism.

The services included in contracts and/or specifications, where applicable, must be interpreted in good faith and performed in accordance with what has been knowingly agreed by the parties, whether public or private. Recipients shall not exploit situations of ignorance or incapacity of their counterparts, nor take advantage of contractual gaps or unforeseen events to renegotiate contracts solely to benefit from a position of dependence or weakness of the counterpart.

Recipients shall promptly communicate any information relating to:

- any changes to the contract;
- any changes in the economic and technical conditions of service provision or execution of works, as well as the characteristics and performance of the products.

Recipients shall provide Customers or interested parties with information on how to submit suggestions or complaints.

Recipients shall always respond to suggestions and complaints from Customers, ensuring their protection through appropriate and timely communication systems.

DMA shall resort to legal action only when its legitimate claims are not properly satisfied by the counterpart.

Relations with Suppliers

DMA requires its suppliers and external collaborators to comply with the ethical principles set out in this Code of Ethics and Conduct, promoting the development of long-term relationships aimed at continuous improvement in this area.

Therefore, in the selection of suppliers and subcontractors, the Company considers not only economic criteria but also carefully evaluates, over a significant period of time, factors such as alignment with the Company's ethical principles, technical and organizational capability, suitability to perform the required activities, attention to environmental aspects and to health and safety at work, as well as financial stability, assessing overall reliability in relation to the specific nature of the required services.

The Company undertakes to adopt all necessary measures and comply with all specific procedures to ensure that:

- suppliers/contractors who meet the required criteria are not excluded from the opportunity to be awarded orders or contracts;
- orders and contracts are assigned based on objective criteria;
- information and documentation relating to supplier selection, as well as contractual documents, are retained for the periods established by applicable regulations (so-called “traceability of procurement process stages”);
- mutual commitments are clearly defined and governed by comprehensive contracts or orders;
- relationships with suppliers and contractors are clear and collaborative;
- suppliers and contractors comply with, and ensure compliance with, applicable legal provisions, particularly regarding personnel management, ethical treatment of workers, environmental management, and health and safety at work;
- supplier and contractor performance is evaluated objectively and fairly.
- suppliers shall ensure adequate health and safety conditions and limit particularly burdensome or unpleasant situations and assignments;
- all necessary actions shall be implemented to develop and enhance awareness and professional behaviour;
- competent functions and employees shall not induce suppliers to enter into disadvantageous contracts with the expectation of subsequent benefits.

Suppliers are prohibited from:

- presenting false or altered documents/data, removing or omitting genuine documents, or omitting required information in order to improperly influence the Company’s decisions in their favor;
- engaging in deceptive conduct that may mislead DMA in the technical and economic evaluation of products and/or services offered, or improperly influence DMA’s decisions.

DMA continuously monitors the performance of Suppliers and Subcontractors. Individuals involved in the initial evaluation and periodic re-evaluation of Suppliers are required to carry out such activities with the highest level of participation and in compliance with the principles of loyalty, impartiality and fairness.

Relations with Public Institutions

Commitments with Public Administrations and Public Institutions are reserved exclusively for duly authorized company functions. The documentation necessary to reconstruct and maintain traceability of the various stages through which DMA has interacted with Public Administrations must be collected and retained in compliance with internal company procedures.

Recipients must not promise, request, offer or receive, to/from public officials, persons in charge of public services, or employees of Public Administrations or other Public Institutions, whether Italian or foreign, payments, goods or other benefits intended to promote or favor their own interests or obtain advantages, or capable of compromising the impartiality of the counterpart’s judgment.

Therefore, in relations with public officials and/or persons in charge of public services, any form of gift or benefit, whether promised, requested, offered or received, that could be interpreted as exceeding normal business or courtesy practices, or aimed at obtaining favorable treatment in the conduct of any activity related to the Company, is not permitted.

However, on the occasion of particular events (e.g. Christmas holidays), the Company may, in accordance with customary practice, offer gifts of modest value to certain counterparts, including representatives of Public Administrations.

In this regard, strict compliance is required with the provisions set out in the document issued by DMA entitled “Anti-Corruption Code”.

Particular attention and care must be taken in operations relating to: contracts, authorizations, licenses, concessions, applications for and/or management and use of public funding and

contributions (national or EU), contract management, relations with supervisory authorities or other independent authorities, social security institutions, tax collection authorities, bankruptcy bodies, civil, criminal or administrative proceedings, authorities responsible for environmental protection, health and safety at work and accident prevention, and any other entity belonging to Public Administration.

It is prohibited to make, induce or facilitate false statements to Authorities, present false or altered documents/data, remove or omit documentation, or engage in deceptive conduct that may mislead Public Administration in the technical and economic evaluation of the services offered or works performed.

Administrative and accounting function managers must ensure that each operation and transaction is:

- legitimate, consistent, appropriate, authorized and verifiable;
- properly and accurately recorded in such a way as to allow verification of the decision-making, authorization and execution process;
- supported by adequate documentation;
- transparent and verifiable with regard to the origin of the money;
- identifiable with regard to the origin of the funds, assets or other benefits involved.

Relations with Third Parties

Without exception, practices of corruption, unlawful favors, collusive behaviour, and direct and/or indirect solicitations of personal or career advantages for oneself or others are prohibited.

It is never permitted to give, offer, or accept, directly or indirectly, payments, material benefits or other advantages of any kind to/from third parties, public officials, or public or private employees, in order to influence or favor the performance of an official act or to improperly obtain advantages or benefits for the Company.

Acts of business courtesy, such as gifts or forms of hospitality, are permitted only if of modest value and in any case such as not to compromise the integrity or reputation of any party, and not to be interpreted by an impartial observer as intended to obtain improper advantages. In any case, such expenses must always be authorized in accordance with internal procedures.

In this regard, strict compliance is required with the provisions set out in the document issued by DMA entitled "Anti-Corruption Code".

Anti-Money Laundering

Recipients shall adopt behaviours aimed at ensuring that DMA is not, under any circumstances, involved in activities related to money laundering deriving from illicit or criminal activities; they also undertake to comply with all applicable national and international laws and regulations on money laundering.

Before establishing business relationships or entering into contracts, the designated Recipients, where deemed necessary, are required to collect information regarding the reputation of the counterpart, in compliance with internal procedures.

Anti-Mafia

The Company is aware of the risk that locally established criminal organizations may influence business activities by exploiting them to obtain unlawful advantages, and is committed to preventing and combating the risk of criminal infiltration within its organization.

To this end, Recipients are required to comply with the procedures established by DMA for assessing the reliability of the various parties that have relationships with the Company (personnel, suppliers, customers).

Such assessment takes into account various aspects, detailed in the relevant internal procedures, including, but not limited to:

- being subject to proceedings for the application of preventive measures under anti-mafia legislation;
- the application of coercive precautionary measures within criminal proceedings for participation in or external involvement in organized crime offenses, including usury, extortion, receiving stolen goods, money laundering, use of assets derived from criminal activities, and other offenses relevant to organized crime;
- the application of precautionary measures within criminal proceedings for offenses against Public Administration, offenses against the person, money laundering offenses, and criminal association;
- companies that, based on factual elements, are deemed to have been established solely for the purpose of concealing or favoring individuals belonging to criminal groups or, in any case, to circumvent prohibitions in carrying out business activities;
- companies or entities that appear to have no relationships with credit institutions;
- involvement in business negotiations of individuals or entities lacking the authority to participate in such negotiations;
- failure to provide, when requested, a general criminal record certificate, certificate of pending charges, anti-mafia certificate, or equivalent self-declaration;
- failure to provide documentation proving registration in professional registers, orders or lists, where such registration is required to carry out the activity;
- reliability with respect to the risk of criminal infiltration.

All Recipients are prohibited from complying with extortion requests of any kind (protection money, “settlements”, offers, etc.), regardless of their source; in any case, each Recipient is required to inform their internal supervisor and the Police Authorities.

Conflict of Interest

DMA undertakes to implement appropriate measures to prevent situations in which individuals involved in activities are, or may even appear to be, in a conflict of interest.

A conflict of interest arises when the personal or family economic activities of the Recipient are incompatible with the duties that the same Recipient performs within the Company.

A conflict of interest negatively affects the ability of Recipients to make impartial decisions in the best interest of the Company and, more generally, to properly fulfill their roles and responsibilities. All Recipients must avoid situations that may give rise to conflicts of interest and must promptly inform their direct supervisor of any personal interests that may conflict with those of the Company. Conflicts of interest may arise in relation to:

- the presence of personal economic interests of the Recipient related to the activities of potential suppliers, contractors, subcontractors, customers or other related companies;
- roles or positions held by the Employee or Collaborator in competing companies that have interests conflicting with those of the Company;
- improper use of confidential information obtained during the performance of their duties.

Administrative Management and Financial Statements

In preparing financial statements and any other required accounting documentation, DMA complies with applicable laws and regulations and adopts the most advanced accounting practices and principles, inspired by the principle of accounting transparency, which is reflected in the truthfulness, accuracy and completeness of the information underlying accounting records. Financial statements and accounting records faithfully represent management events (economic, financial and asset-related) in accordance with criteria of transparency, accuracy and completeness.

To this end, adequate and complete supporting documentation of the activities carried out must be retained within the Company's records, in order to allow:

- accurate accounting recording of each transaction;
- availability of documents attesting to the characteristics and rationale underlying each transaction;
- easy chronological reconstruction of transactions;
- verification of compliance with the decision-making, authorization, execution and control process.

Each accounting record must accurately reflect the information contained in the supporting documentation. Therefore, it is the responsibility of each designated employee or collaborator to ensure that supporting documentation is easily retrievable and properly organized according to logical criteria, in compliance with company provisions and procedures.

No one may carry out any type of payment in the interest of the Company without adequate supporting documentation.

Any Recipient who becomes aware of omissions, falsifications or negligence in accounting or in the documentation on which accounting records are based must report the facts to their supervisor.

Relations with Competitors

DMA strictly complies with applicable competition laws and refrains from deceptive, collusive behaviour, abuse of a dominant position and any form of unfair competition.

DMA recognizes that fair and honest competition is a fundamental element for the Company's development. Therefore, all Recipients are required to fully and strictly comply with the rules protecting competition.

Furthermore, no Recipient may undertake initiatives aimed at improperly influencing the market: it is not permitted to seek unlawful agreements for price fixing, market sharing arrangements, or any other actions aimed at creating unlawful advantages or distorting the rules governing the free market.

Confidential Information and Data Protection

Recipients must comply with confidentiality obligations regarding company secrets and confidential information (contracts, documents, reports, notes, studies, drawings, photographs, software, etc.), without prejudice to the transparency of DMA's activities.

All Recipients are required to properly manage any privileged information acquired in the course of their duties.

The processing of personal data by the Company is carried out exclusively for purposes related to its business activities and in accordance with procedures that ensure full compliance with applicable legislation.

Recipients are required to comply with all obligations provided for by data protection regulations, in accordance with the procedures specified in internal policies.

The obligation of confidentiality continues even after the termination of the employment or collaboration relationship.

Company Image

DMA's image is also represented by the professionalism, courtesy, integrity and appearance of those who interact with customers. Recipients are aware of this responsibility.

Ethics in Employment Relationships

Employee Obligations in relation to the Code of Ethics and Conduct and the Anti-Corruption Code

This Code and the Anti-Corruption Code form an integral and essential part of the employment contract of every DMA employee or collaborator.

Violation of the provisions contained in this Code and in the Anti-Corruption Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences, including those relating to the continuation of the employment relationship, and may result in actions for compensation for damages caused by such violations.

Employees are therefore required to:

- adopt and comply with the provisions and policies of this Code and of the Anti-Corruption Code relevant to their specific duties;
- carry out actions and behaviours consistent with this Code and the Anti-Corruption Code, and refrain from any conduct that may harm DMA or compromise its integrity, impartiality or reputation;
- promptly report any violations of this Code and of the Anti-Corruption Code;
- consult their direct supervisor or the Compliance Officer in order to obtain any necessary clarification regarding the interpretation and correct application of this Code and the Anti-Corruption Code;
- fully cooperate in any investigations carried out in relation to possible violations of the aforementioned Codes, maintaining the utmost confidentiality regarding the existence of such investigations, and actively participate, where required, in auditing activities related to compliance with this Code.

Additional Obligations for Function Managers

Each Unit/Function Manager of the Company is required to:

- act as an example for their collaborators through their own behaviour and guide them in complying with this Code and the relevant procedures;
- ensure that collaborators understand that compliance with the Code, as well as with procedures and safety regulations, constitutes an essential part of the quality of their work performance;
- cooperate in the selection of internal and external collaborators to prevent assignments being entrusted to individuals who do not provide full assurance of their commitment to comply with the Code and procedures;
- adopt, within their scope of responsibility, the necessary measures to remove or prevent situations that may hinder conduct consistent with ethical principles by Company collaborators.

Protection of Human Resources

DMA recognizes that human resources are a fundamental factor in the development of its business activities. Human resource management is based on respect for the personality and professionalism of each individual.

DMA also recognizes that its growth is supported by strong teamwork, where mutual respect and shared trust ensure that work, both individually and collectively considered, represents a source of satisfaction in many respects.

DMA rejects any form of discrimination based on age, race, social status, national origin, gender, religion, disability, sexual orientation, trade union membership or political affiliation, ensuring that the criteria used for hiring, remuneration, access to training, career progression, dismissal or retirement are based exclusively on merit and competence and, in any case, related to job performance.

For the establishment of the employment relationship, the collaborator must sign the relevant contract, as well as a commitment to comply with the applicable collective labour agreement (CCNL) and the provisions of this Code of Ethics and Conduct.

The collaborator is also fully informed by the competent company managers regarding the characteristics of the role and duties to be performed, the regulatory and contractual elements, the regulations and operational procedures adopted by the Company, the safety measures to be followed for the prevention of risks to health and safety arising from work activities, and any other training required for the specific tasks to be carried out, including training provided through on-the-job coaching.

DMA does not directly use nor indirectly support the use of corporal punishment, mental or physical coercion, or verbal abuse.

In the event of corporate reorganizations, the Company safeguards the value of its human resources by providing, where necessary, training and/or professional requalification activities.

Qualsiasi dipendente che si senta trattato ingiustamente all'interno della Società dovrà riferirlo al diretto responsabile o all'Organismo di Vigilanza interno.

Diversity, Equity and Inclusion

The Company promotes an inclusive work environment based on respect for individuals, the enhancement of diversity and the guarantee of equal opportunities.

In line with the principles of UNI/PdR 125 and the guidelines of ISO 30415, DMA is committed to preventing all forms of discrimination and to fostering conditions of equity, inclusion, respect and the enhancement of individual differences in recruitment, development, career growth and work organization processes.

Health and Safety in the Workplace

DMA is committed to ensuring a safe and healthy workplace by implementing measures for the prevention of accidents, both during work activities and as a consequence thereof, minimizing, as far as reasonably foreseeable, the risks present in the working environment.

DMA adopts systems to identify, prevent or respond to potential threats to the health and safety of individuals in compliance with Legislative Decree no. 81 of 9 April 2008 and Legislative Decree no. 106 of 3 August 2009 (Consolidated Law on Health and Safety at Work).

Within these systems, the following roles are appointed: the Head of the Prevention and Protection Service (RSPP), responsible for ensuring workplace health and safety in accordance with applicable legislation; the Occupational Health Physician (MC); First Aid Officers (APS); Fire Prevention and Emergency Officers (API); and the Workers' Safety Representative (RLS).

The Company also undertakes to provide all personnel, including newly hired employees or those reassigned to different roles, with regular and documented training on health and safety at work.

Each worker is required to comply with the safety measures established by the Employer in accordance with applicable health and safety regulations. Furthermore, each worker has the duty, directly or through their representative (RLS), to promptly report to the Head of the Prevention and Protection Service (RSPP) or to their direct supervisor any deficiencies in preventive measures or any risk situations identified in the workplace.

Each worker has the duty to take care of their own health and safety and that of other workers with whom they share workspaces and environments, and to comply with the provisions set out in the Risk Assessment Document and in the procedures of the Health and Safety Management System.

Alcohol and Drug Abuse

Each Recipient must refrain from performing their work under the influence of alcohol, drugs or substances with similar effects, and from consuming such substances during working activities.

Smoking

Smoking is prohibited in workplaces and in areas accessible to the public.

In any case, the Company shall take into account the needs of both non-smokers and smokers, by identifying designated smoking areas, in compliance with applicable regulations.

Workplace Harassment

The Company requires that no form of harassment occurs in internal or external working relationships. Harassment includes, by way of example, the creation of an intimidating, hostile or isolating work environment towards individuals or groups of workers, unjustified interference with the performance of others' work, or hindering others' career opportunities for reasons of personal competitiveness.

Sexual harassment is not permitted, and behaviours or language that may offend the dignity or sensitivity of individuals must be avoided.

Any employee who feels harassed within the Company must report it to the Human Resources Department.

Use and Protection of Company Assets

Everyone is responsible for safeguarding the company assets assigned to them (both tangible and intangible), which are instrumental to the performance of their duties; no employee may use, or allow others to use, company assets and DMA resources improperly.

DMA personnel must behave responsibly and in compliance with the operational procedures established for the use of company assets, documenting their use where required.

Any employee who has access to email or similar communication tools must not misuse such tools for any purpose that may be considered socially or morally unacceptable.

In particular, it is strictly prohibited to access, distribute, disclose, promote or transfer pornographic material using company assets such as PCs and laptops or through the company internet connection.

Each employee and collaborator is responsible for the assets, equipment and resources entrusted to them and must promptly inform their supervisor of any misuse or harmful use affecting DMA's assets and/or reputation.

Use and Protection of IT Systems

In the use of IT and telecommunication resources, Recipients shall act in accordance with the principles of diligence and fairness and comply with internal security rules and procedures.

Unauthorized access to information systems used by Public Administrations is strictly prohibited, as well as any alteration of their functioning or any intervention, without proper authorization, on data, information or programs in order to obtain and/or improperly modify information for the benefit of the Company or third parties.

Under no circumstances may the belief of acting in the interest of DMA justify the damage, alteration or destruction of information, data or IT programs belonging to the Company or to third parties.

SOCIAL ETHICS, ENVIRONMENT, HEALTH AND SAFETY

The Company integrates social and environmental concerns into its business operations with the aim of minimizing, as far as possible, the environmental impact of its processes and activities, while protecting the health and safety of workers and generally reducing the risks of unethical conduct.

Within its organization, the Company has adopted policies and management systems that allow for the control, monitoring and analysis of its performance, both in terms of environmental management and the protection of health and safety at work, with a view to continuous improvement, firmly believing that this management approach can strengthen competitiveness and social cohesion.

Health and Safety at Work

In order to ensure a safe and healthy workplace, the Company has adopted a system to identify, prevent or respond to potential threats to the health and safety of individuals, in compliance with applicable regulations.

Each worker is required to comply with the safety measures established by the Company in accordance with applicable health and safety regulations in the workplace, refraining from behaviours that may endanger their own safety or that of others, and promptly reporting to their direct supervisor and/or to the Prevention and Protection Service any situation that may pose a risk to their own safety or that of others.

Each worker has the duty to take care of their own health and safety and that of other workers with whom they share workspaces and environments.

Environmental Protection

In carrying out its activities, the Company is guided by the principle of environmental protection (e.g. reduction of environmental impacts and pollution, reduction of waste generation, increased procurement of "green" products, reduction in the use of hazardous substances, etc.).

Research and technological innovation are particularly focused on the development and promotion of products and processes that are increasingly environmentally compatible.

Each Recipient, in the performance of their duties, is required to strictly comply with the guidelines, procedures and operating instructions adopted by the Company in order to improve environmental performance (e.g. carrying out separate waste collection in offices, implementing energy-saving measures, using available resources responsibly and efficiently, etc.).

All Recipients are prohibited from abandoning and/or disposing of waste on or in the ground arising from activities attributable in any way to DMA.

It is also prohibited to discharge waste of any kind, whether solid or liquid, into surface or groundwater.

The abandonment of waste is sanctioned under Article 192 of Legislative Decree 152/2006 and represents not only damage to the Company, but also harm to the entire community, which bears the associated economic and environmental costs.

IMPLEMENTATION OF THE CODE OF ETHICS AND CONDUCT

Sanctions

The provisions of this Code form an integral part of the contractual obligations undertaken by Recipients and by parties having business relationships with the Company, pursuant to Article 2104 of the Italian Civil Code.

Violation of the provisions of the Code may constitute a breach of contractual obligations or a disciplinary offence, in accordance with the procedures set out in Article 7 of the Workers' Statute, with all legal consequences, including termination of the contract or assignment and possible compensation for damages.

In particular, the following sanctions may be applied:

- verbal warning, for minor violations;
- written warning, in cases of repeated minor violations;
- fine, in cases of more serious violations due to negligence;
- suspension from pay and service, in cases of repeated violations (more than three times in a calendar year) among those punishable by a fine;
- dismissal without notice, in cases of repeated violations (more than three times in a calendar year) among those punishable by suspension, and in cases of particularly serious violations.

Sanctions for Executives

With regard to Executives, since the applicable collective bargaining agreement does not provide for a specific disciplinary system for them, the application of sanctions shall refer to the provisions set out in the individual employment contract.

In the absence of specific provisions in the individual contract, where a violation of the rules of conduct is committed by an Executive, the disciplinary measures applicable to Employees under Article 26 shall apply, with specific reference to the National Collective Labour Agreement for Executives in the Industry sector.

Furthermore, with regard to the applicable procedure, and in line with the most stringent case law of the Supreme Court, it is deemed appropriate to proceed in accordance with the provisions of Article 7 of the Workers' Statute, which has been held by several rulings of the Court of Cassation to be applicable also to Executives, with the following clarifications regarding suspension and dismissal:

- **Suspension:** An Executive who, within risk areas/processes, adopts behaviour not compliant with the provisions of the Code of Ethics and Conduct or violates the related internal procedures shall be subject to disciplinary suspension from work for a period proportionate to the seriousness of the violation, in any case not exceeding 10 days, with a corresponding reduction in remuneration. The Executive may also be transferred to another location or functional area, with equivalent duties, where the sanctioned conduct gives rise to an objective need due to incompatibility with the working environment. In the event of repeated violations, the Executive shall, in addition to the measures described above, be required to pay a penalty equal to 50% of one monthly salary.
- **Dismissal:** An Executive who, within risk processes/activities, adopts behaviour not compliant with the provisions of the Code of Ethics and Conduct or violates the related internal procedures, thereby acting against the interests of the Company or engaging in conduct clearly aimed at committing one of the offenses sanctioned under Legislative Decree 231/2001, shall be subject to dismissal.

Sanctions shall be applied after 5 days from the written notification of the charge.

Sanctions for Directors and Statutory Auditors

A Director who becomes aware of violations of the provisions and rules of conduct of the Model and the Code of Ethics by one or more Statutory Auditors must promptly inform the Board of Directors and the entire Board of Statutory Auditors.

The recipients of the information provided by the Supervisory Body, having assessed the validity of the report and carried out the necessary investigations, may take appropriate measures in accordance with the Company's Articles of Association and applicable law, including, for example, convening the shareholders' meeting in order to adopt the most suitable actions provided for by law.

Sanctions for Third Parties

Conduct carried out by third parties in violation of the provisions of this Code of Ethics and Conduct may be sanctioned by termination of the contract, pursuant to Articles 1453 and 1456 of the Italian Civil Code, as well as by claims for compensation for any damages incurred.

Approval and Dissemination of the Code

DMA ensures that all Recipients are informed about the provisions and implementation of the Code, recommending its compliance.

In particular, the Company communicates the Code through the following methods:

- information to personnel regarding the adoption of the Code of Ethics and Conduct;
- delivery of a copy of the Code to employees, subject to signing a declaration of receipt;
- information to external Recipients;
- inclusion, in contracts entered into by DMA (with particular reference to contracts with Suppliers, Contractors, Subcontractors and Consultants), of a clause aimed at informing third parties of the existence and contractual relevance of the Code of Ethics and Conduct, as follows:

“Code of Ethics and Conduct”: In conducting its business and managing its relationships, the Company refers to the principles set out in its Code of Ethics and Conduct. Any violation of the provisions contained in the Code of Ethics and Conduct by the contractual counterparty may, depending on the seriousness of the breach, result in termination for just cause of this contract.

DMA reserves the right to amend and supplement the Code of Ethics and Conduct based on input from all involved parties and in line with the evolution of relevant regulations, as well as on the basis of guidance from relevant industry associations.

The present document, relating to the Code of Ethics and Conduct, in force from 01/07/2024, was reviewed and confirmed on 08/05/2025 by the CEO who took office in March 2025 and was subsequently revised on 18/03/2026 for the integration of Diversity & Inclusion topics, with confirmation by Management.

Chief Executive Officer

