CODE OF ETHICS
of
LPM S.p.A.

Approved by the Board of Directors of LPM S.p.A.
by resolution dated 12 October 2026

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1. PREMISE AND DEFINITIONS

1.1 The Code of Ethics of LPM S.p.A.

LPM S.p.A. (hereinafter "LPM" or the "Company") is a metalworking company specialised in the design and construction of machines and plants for the low-pressure casting of aluminium and magnesium alloys.

In line with the provisions of Italian Legislative Decree No. 231/2001, LPM has chosen to formalise this Code of Ethics (hereinafter also the "**Code of Ethics**") in order to clearly define the set of values that it recognises, accepts and shares, as well as the responsibilities that it assumes towards its internal and external stakeholders, in the conviction that the success of a business cannot be separated from ethics in the conduct of business and that competitiveness must go hand in hand not only with ethical sensitivity, but also with social engagement and respect for the environment.

With the adoption of this Code of Ethics, LPM sets itself the objective, among others, of satisfying as fully as possible the needs and expectations of its stakeholders, aiming to recommend and promote a high level of professionalism and to prohibit conduct that conflicts not only with the legal provisions in force from time to time, but also with the values that it intends to promote.

Following the entry into force of Legislative Decree No. 231/2001, the Company may be held liable in the event of commission of the offences listed in the catalogue provided for by that legislation; LPM therefore requires the Recipients to observe strictly the obligations and prohibitions set out in this Code of Ethics and, more generally, in the Organisational Model.

All Recipients are required to know the Code of Ethics and to contribute to its implementation, improvement and dissemination. The Company undertakes to distribute a copy of this Code of Ethics to all employees and collaborators and to disseminate its contents and objectives.

In view of the above, LPM:

- guarantees the prompt dissemination of the Code of Ethics to all Recipients;
- guarantees that all updates and amendments are promptly brought to the attention of all Recipients of the Code of Ethics;
- provides adequate training and information support, making adequate assistance available in the event of doubts about the interpretation of the Code of Ethics;
- guarantees that employees who report breaches of the Code of Ethics are not subject to any form of retaliation;
- adopts fair disciplinary measures proportionate to the type of breach of the Code of Ethics and guarantees to apply them without distinction to all categories of employees, with reference to the provisions of law, of contract and the internal rules in force in the jurisdictions in which it operates.

The Company, also through the appointment of a specific body (the "**Supervisory Body**"), will oversee compliance with the rules of conduct contained in the Code of Ethics.

1.2 Definitions

The following definitions apply in this Code of Ethics, it being understood that those in the plural also apply to the relevant term in the singular and vice versa.

Code of Ethics: this document containing the set of principles, values and internal and external responsibilities of all the persons and bodies that operate within and with LPM.

Collaborators: natural persons who, by virtue of their experience and specialisation, collaborate with LPM under self-employment contracts for the performance of professional services.

Recipients: the members of the Board of Directors, the Statutory Auditors, the Employees, seconded workers, the Collaborators, the Suppliers, the Partners and all those who have dealings with LPM or carry out activities on its behalf.

Employees: all those who have an employment relationship with LPM, at executive and non-executive level.

Suppliers: natural or legal persons who provide goods, services and consultancy to LPM, and their collaborators.

LPM Model: the Organisation, Management and Control Model adopted by LPM pursuant to Legislative Decree No. 231/2001.

Supervisory Body (*Organismo di Vigilanza*): the supervisory body appointed by LPM pursuant to Legislative Decree No. 231/2001.

Partner: the contractual counterparty, intended to cooperate with the Company, with which the Company enters into some form of contractually regulated collaboration (temporary business association, joint venture, consortium, licence, agency, distribution, sale, collaboration in general).

Company: LPM S.p.A.

Function: means the Area/Department/Function into which the Company is structured.

2. RECIPIENTS AND SCOPE OF APPLICATION

The Code of Ethics is addressed to the Recipients.

The Code of Ethics sets out the rules of conduct to be observed in dealings between the Recipients and in relations with the Public Administration, Suppliers, Collaborators, Partners and third parties in general. To this end, the Company includes in employment contracts, in all its procurement procedures and in all its contracts, of whatever nature, an undertaking by the counterparties to comply with the rules contained in this Code of Ethics, insofar as compatible.

The Recipients undertake – upon accepting office or upon signing the employment or collaboration contract, and for the entire period in which they carry out activities at LPM, for or in the interest of the latter – to comply with the provisions contained in this Code of Ethics.

Collaborators, Suppliers and Partners are required to align their conduct with the provisions of this Code of Ethics or, in any event, to behave in line with its general principles.

3. PRINCIPLES OF CONDUCT IN THE MANAGEMENT OF THE COMPANY AND IN THE CONDUCT OF CORPORATE ACTIVITIES

3.1 General principles: legality, integrity, fairness, transparency and good faith

LPM bases the conduct and management of its business, both in relations with Employees and towards the Public Administration, Suppliers, Collaborators, customers and all third parties in general, on the principles and values of legality, reliability, transparency, fairness and good faith, which are considered fundamental, shared and recognised by the Company.

An essential principle of LPM is compliance with the laws, regulations and, in general, the rules in force in Italy and, where applicable, in all foreign countries in which it operates, as well as with this Code of Ethics and company procedures. In no case may the pursuit of the Company's interest justify conduct contrary to the principle of legality.

LPM endeavours, within its organisation, to promote the dissemination and knowledge of the laws, the Code of Ethics and the procedures aimed at preventing breaches of the law.

In dealings with Recipients and third parties in general, LPM undertakes to act fairly and transparently, avoiding misleading information and conduct that would take undue advantage of the disadvantaged position of third parties.

Relations with Recipients, and with third parties in general, must be based on good faith and reliability, and therefore on the maintenance of agreements, promises and pacts, the enhancement of company assets and the pursuit of conduct in good faith in every decision.

The Recipients too must be aware of the ethical significance of their actions and, in no case, may the pursuit of the company's interest justify conduct that is not consistent with a line of conduct based on honesty and good faith.

3.2 Conflict of interest

In carrying out its activities, LPM endeavours to avoid conflict-of-interest situations, that is, cases in which a Recipient pursues an interest different from that of LPM or carries out activities that may in any way interfere with his or her ability to take decisions in the exclusive interest of the Company, or personally benefits from the Company's business opportunities. Every business or corporate decision taken by Recipients in the interest of LPM must comply with the plans and directions of the Company's governing bodies.

Should situations of conflict or potential conflict nonetheless arise on an occasional basis, the utmost communication and transparency towards the manager or the referring function is required, so that any appropriate measures may be taken.

Where the conflict of interest involves members of the Board of Directors or of the Board of Statutory Auditors, the member concerned undertakes, in addition to declaring the conflict as required by law, to inform the Supervisory Body of that conflict, which will give its opinion to the bodies concerned as to the actual existence and relevance of the conflict.

3.3 Principles of accounting management

LPM promotes the utmost transparency, reliability and integrity of information relating to the company's accounting so that the facts relating to its management are represented accurately and truthfully in the accounts.

For every accounting entry, adequate supporting documentation must be kept. Such documentation must make it possible to identify the reason for the transaction that gave rise to the entry and the related authorisation. The supporting documentation must be easily retrievable and filed according to suitable criteria that allow easy consultation by both internal and external bodies authorised to carry out checks.

3.4 Privacy and Confidentiality

LPM ensures the confidentiality of the information and personal data processed and the protection of the information acquired in connection with the work performed; it ensures that the processing of the data acquired will take place in accordance with the principles of fairness, lawfulness and relevance, in full compliance with the provisions and requirements of Legislative Decree No. 196/2003, as amended (the "Privacy Code") and of EU Regulation No. 679/2016 (the "Privacy Regulation"), and, more generally, of the legislation in force, with particular regard to the provisions on adequate security measures.

LPM also ensures that the Recipient acquires and processes only information and data directly connected with his or her own activity, in compliance with the instructions given by the Company, and that he or she may not use or disclose it without the express authorisation of LPM.

3.5 Environmental protection

LPM promotes respect for and protection of the environment, actively committing itself to ensuring full compliance with the environmental legislation in force in the conduct of company activities.

4. PRINCIPLES OF CONDUCT IN RELATIONS WITH EMPLOYEES

LPM recognises the central role of human resources, an indispensable element for the existence of the business. The dedication and professionalism of Employees are determining values and conditions for its success.

LPM undertakes to develop the skills and competences of each Employee so that the energy and creativity of individuals find full expression in the achievement of the Company's objectives.

4.1 Selection and management of personnel and prohibition of discrimination

LPM protects the dignity of its Employees by fostering a working environment based on mutual respect and the absence of discrimination of any kind.

The search for and selection of personnel is carried out solely on the basis of criteria of objectivity, professionalism and transparency, guaranteeing equal opportunities and avoiding any form of favouritism or discrimination.

Hiring takes place under a regular employment contract in full compliance with the law and any supplementary agreements, facilitating the worker's integration into the working environment.

LPM offers all Employees the same opportunities for professional growth, ensuring that everyone can enjoy fair treatment based on merit criteria, without any discrimination.

The competent Functions must:

- adopt criteria of merit, competence and assessment of individual capabilities and potential, and in any case strictly professional criteria, for any decision concerning an Employee;
- select, hire, train, remunerate and manage Employees on the basis of competence and professionalism, without any discrimination and without any distinction of age, sex, race, religion, colour, disability, citizenship, marital status or sexual orientation;
- supervise the working environment so that personal characteristics cannot give rise to discrimination.

Each Recipient is required to show professionalism, dedication, loyalty and a spirit of cooperation in order to maintain a climate of mutual respect for the dignity and reputation of each person.

Any breach of the provisions of this article must be reported immediately to the Head of Human Resources and to the Supervisory Body.

4.2 Health and safety at work

The Company adopts all necessary measures, in compliance with the legislation in force, in order to ensure an adequate and safe working environment safeguarding the health and safety of Employees.

The Company guarantees working conditions that respect individual dignity and safe and healthy working environments, also by spreading a culture of safety and risk awareness, promoting responsible conduct by Employees and Collaborators who, within the scope of their duties and functions, take part in the process of preventing risks, safeguarding the environment and protecting health and safety with regard to themselves, their colleagues and third parties.

In this regard, each Employee is called upon to contribute personally to maintaining the safety of the working environment in which he or she operates and to behave responsibly for the protection of himself or herself and of others, avoiding actions or conduct that may expose other employees to risks to their health or physical safety.

Every person vested with delegations or powers in matters of health, safety and environment must ensure compliance with the legislation in force in the areas within his or her remit and, in carrying out such activities, must not expose Employees to risks that could cause harm to their health or physical safety.

4.3 Prohibition of harassment, intimidation and displays of xenophobia and racism

Any and all forms of psychological, physical or sexual harassment are prohibited. Harassment means any form of intimidation or threat that obstructs the serene performance of one's duties, or the abuse by a hierarchical superior of a position of authority.

In the conduct of the Company's business, Employees and Collaborators must respect the dignity, rights and cultural differences of individuals. No form of workplace bullying (mobbing), nor any expression of xenophobic or racist ideas and/or acts, will be tolerated.

In dealings with colleagues and Suppliers and in the conduct of the Company's business, Employees must avoid any form of propaganda of ideas based on racial or ethnic superiority or hatred, incitement to commit, or commission of, acts of discrimination or violence on racial, ethnic, national or religious grounds.

In the conduct of LPM's business, propaganda, incitement and/or instigation based in whole or in part on the denial, gross minimisation or apologia of the Shoah or of crimes of genocide, crimes against humanity and war crimes are not permitted.

4.4 Abuse of alcohol and narcotic substances

The Company requires each Employee to contribute personally to keeping the working environment safe and respectful of the sensitivity and dignity of others. The following will therefore be considered unlawful conduct: working while under the influence of alcohol, narcotic substances or substances with a similar effect; consuming or supplying, in any capacity, alcohol or narcotic substances during working hours.

4.5 Smoking

LPM, in view of its wish to create a healthy and comfortable environment for its Employees and visitors, has introduced a general prohibition on smoking in the workplace, except in the specially equipped areas dedicated to that purpose.

4.6 Protection of company assets and protection of information

Each Recipient is responsible for the protection and preservation of company assets, tangible and intangible, that are functional or instrumental to the performance of his or her duties, as well as for using them properly and in line with company purposes. Each Recipient has a duty to promptly inform the competent Functions of any threats or harmful events affecting LPM.

In particular, an Employee or Collaborator who uses company assets must:

- act diligently to protect company assets, through responsible conduct in line with the operating procedures laid down to regulate their use;
- avoid improper use of company assets for purposes contrary to mandatory provisions of law, public order or public decency, or to commit or induce the commission of offences and/or, in any event, racial intolerance, glorification of violence or violation of human rights;
- obtain the necessary authorisations if an asset is to be used outside the company context.
- The growing dependence on information technology requires ensuring the availability, security, integrity and maximum efficiency of LPM's data transmitted or stored electronically.
- Every Employee or Collaborator who uses company information systems is therefore required to:
- not send threatening or insulting e-mail messages, not use obscene or otherwise vulgar language, not make inappropriate or undesirable comments that may offend a person and/or damage the company's image and that in any case constitute a breach of the values and policies of LPM, such as sexual or racial harassment and other forms of discrimination;
- avoid spamming or so-called "chain letters" that may generate a volume of data/information/processes within the company's computer network such as to significantly reduce network efficiency, with negative impacts on productivity;
- not browse internet sites with indecent and offensive content nor, even more so, pornographic, child-pornographic or otherwise unacceptable content or content contrary to the law and common morality;
- scrupulously adopt the provisions of the company's security policies, so as not to compromise the functionality and protection of the information systems;
- avoid uploading unauthorised software onto company systems and never make unauthorised copies of licensed programs for personal, company or third-party use.

LPM's confidential documents and information (including projects, proposals, strategies, negotiations, understandings, commitments, agreements, contracts being finalised, products not yet placed on the

market, research results, financial projections and customer lists) may be disclosed or communicated externally only in compliance with company procedures and may not be used for the personal advantage of Employees or other Recipients or of other persons associated with or connected to them.

The Recipients, also outside working hours, cooperate in the correct representation of company activities, ensuring that reports, accounts, statements and every other document relating to the Company's activities and organisation accurately and clearly reflect the relevant facts and the true nature of each transaction.

Each Recipient must keep, in compliance with company procedures, adequate documentation of every transaction carried out, so as to be able at any time to verify the reasons for and characteristics of the transaction in the stages of its authorisation, execution, recording and verification.

Any omissions, falsifications or negligence in company information and documentation must be reported to the Function Manager and/or to the competent bodies.

4.7 Obligations of Employees

Every Employee is required to know the rules contained in the Code of Ethics and the relevant rules governing the activity carried out within his or her Function.

Employees are obliged to:

- refrain from conduct contrary to such rules;
- turn to their superiors and/or the Supervisory Body when clarification is needed on how to apply them;
- promptly report to their superior and/or the Supervisory Body any information, whether directly obtained or reported by others, concerning possible breaches of them, as well as any request made to them to breach them.

Every Function Manager or person in a senior position within the Company is obliged to:

- conform his or her own conduct to the principles laid down in this Code of Ethics and to the relevant procedures, and require compliance with them by Employees and Collaborators. For the purposes of this Code of Ethics, each manager supervises the Employees and Collaborators under his or her direction, coordination or control and adopts the necessary measures to prevent breaches of this Code of Ethics;
- work to ensure that Employees and Collaborators understand that compliance with the rules of the Code of Ethics, as well as with the procedures and safety rules, is an essential part of the quality of work performance, and that any breach may constitute a breach of contract and/or a disciplinary offence, in accordance with the legislation in force;
- take immediate corrective measures when required by the situation, and implement and promote the adoption of suitable measures to prevent breaches from recurring;
- promptly report to the Supervisory Body his or her own findings as well as any information reported to him or her by Employees or Collaborators concerning potential or actual breaches of the Code of Ethics by any Employee or Collaborator.

5. PRINCIPLES OF CONDUCT IN RELATIONS WITH THIRD PARTIES

5.1 Relations with the Public Administration

LPM recognises the importance of proper, sound and productive cooperation with all Public Institutions and, more generally, with the Public Administration.

To this end, all Recipients are obliged to maintain with local, national and supranational (where applicable) institutions and public authorities relations of full cooperation, in complete transparency, fairness and good faith, in accordance with the values contained in this Code of Ethics and with the roles and functions assigned by law.

Relations with officials of public administrations are limited to the company functions in charge and duly authorised, in the strictest compliance with the provisions of laws and regulations, and may in no way compromise the integrity and reputation of LPM.

To this end the Company does not offer, directly or through intermediaries, sums of money or other means of payment or advantages to public officials or persons in charge of a public service, in order to influence their activity in the performance of their duties. These prescriptions may not be circumvented by resorting to other forms of contribution that, under the guise of sponsorships, assignments and consultancies, advertising, etc., have the same prohibited purposes.

Courtesy acts, such as gifts or other forms of benefit, towards representatives of the Public Administration, public officials or persons in charge of a public service are permitted provided they are of modest value. On this point, reference is made to Article 5.1.2 of this Code of Ethics.

5.1.1 Prevention of corruption

LPM does not tolerate corruption in any form, committed by or towards anyone (whether Public Administration or private parties), in any jurisdiction concerned, even those in which such activities are in practice permitted or not prosecuted.

The Recipients are required to comply with all measures aimed at preventing and avoiding corruption, regardless of whether the Recipient is the active or the passive party, or other conduct capable of giving rise to the danger of commission of the offences provided for by Legislative Decree No. 231/2001 or other offences against the Public Administration.

The Recipients are made aware that the commission of such offences for the benefit or in the interest of the Company exposes it to the application of the penalties provided for by Legislative Decree No. 231/2001 and, for this reason, undertake to report promptly any such phenomenon to the Supervisory Body as well as to the competent company functions.

5.1.2 Management of gifts, presents and other benefits

Gifts, presents or other benefits mean tangible goods, such as gifts, intangible goods, promises of future benefits, services, discounts on purchases or other, etc., direct or indirect.

In relations with the Public Administration, Suppliers, Collaborators, Partners and/or third parties in general, offers or grants, direct or indirect, of money, presents, gifts or benefits of any kind in a personal capacity aimed at obtaining undue advantages – real or apparent – of any nature (e.g. promises of economic advantages, favours, recommendations, promises of job offers, etc.) or in any case aimed at acquiring or securing preferential treatment in the conduct of any activity connected with LPM, in order to influence the independence of judgement of the Recipient, are not permitted.

In any case, courtesy acts and gifts are permitted, provided they are of modest value and made in compliance with any applicable legislation and, in any event, such as not to compromise integrity and reputation and not to influence the independence of judgement of the Recipient.

The same considerations apply to the acceptance by Recipients of gifts, presents or other benefits from customers, Suppliers, Collaborators, Partners and/or third parties in general, except for those of modest value. In the event of receipt of gifts or other forms of benefit of modest value, they must be handled in accordance with the company policies in force from time to time.

In the event of receipt of gifts, presents or other benefits not in line with the above, the Recipient must take all appropriate steps to refuse such gift or other form of benefit and inform his or her direct superior. Where return is not possible, the gifts must be immediately made available to the Company for return and/or for any necessary action to protect the integrity of LPM’s reputation.

5.2 Relations with Suppliers and Collaborators

LPM brings the content of this Code of Ethics to the attention of Suppliers, Collaborators and Partners. In their dealings with LPM, contractual counterparties must declare that they are aware of the principles of this Code of Ethics and that they will comply with them, insofar as compatible.

LPM's relations with its Suppliers, Collaborators and Partners, in pursuit of maximum competitive advantage, are in general based on compliance with the rules in force and the principles laid down in this Code of Ethics, including the principles of transparency, impartiality, fair competition and good faith.

The choice of the Supplier, Collaborator and Partner and the determination of contractual terms must be based on objective methods, taking into account quality, costs and the goods and/or services offered, the counterparty's ability to supply and guarantee, in a timely manner, goods and services at a level appropriate to the Company's needs, the requirements of integrity, good repute and professionalism, as well as the absence of any past or present suspicion of involvement in unlawful, terrorist or subversive activities against public order. The Supplier, Collaborator and Partner, in any case, expressly signs their acceptance of the principles set out in this Code.

Should the Supplier, Collaborator or Partner, in carrying out its activity for LPM, adopt conduct not in line with such principles, the Company is entitled to take appropriate measures up to and including termination of the relationship and/or precluding any other opportunities for collaboration.

5.3 Relations with competitors

LPM intends to protect the value of fair competition by refraining from anti-competitive conduct and abuse, convinced that collaboration and comparison are an opportunity to improve its own quality standards.

5.4 Relations with political organisations and trade unions

Each Recipient is aware that any involvement in religious associations or in the pursuit of political and trade union activities, towards which the Company remains neutral, takes place exclusively on a personal basis, in compliance with the law, in one's own free time and at one's own expense.

5.5 Relations with the media

Relations with the press, television and mass media in general, both national and foreign, are conducted exclusively by company representatives authorised to do so or by persons delegated by them. All external communications must be previously authorised and based on truth and transparency.

6. ANTI-MONEY LAUNDERING

In the course of their professional activity, Recipients must not engage in conduct consisting of the use, transformation or concealment of capital of unlawful origin. With reference to such conduct, it constitutes an offence to replace or transfer money, assets or other benefits deriving from a non-negligent criminal offence, or to carry out other transactions in relation to such assets, so as to obstruct the identification of their criminal origin.

Before establishing relations or entering into contracts with any Partner, the Company and its Employees and Collaborators must ascertain the moral integrity, reputation and good name of the counterparty by carefully checking the information available on such persons, including financial information and the legitimacy of their business.

The Company undertakes to comply with all national and international rules and provisions on organised crime and anti-money laundering. Each Employee and Collaborator is therefore required to cooperate, to the extent of his or her competence, so that any fact relating to the management of the Company is correctly and promptly recorded in the accounts.

7. BREACH OF THE CODE OF ETHICS

The Code of Ethics is an integral part of the employment relationship.

Compliance with the rules of the Code of Ethics must be considered an essential part of the obligations of the Company's Employees, also pursuant to and for the purposes of Article 2104 of the Italian Civil Code. Any breach of the rules of the Code of Ethics by Employees constitutes conduct subject to sanction as it undermines the relationship of trust and the duty of diligence under the Civil Code, with every consequence of law, including as regards the continuation of the employment relationship, and may give rise to actions for compensation for the damage caused by the breach.

For Recipients who are not Employees, compliance with the Code of Ethics is a prerequisite for the continuation of the relationship with the Company.

8. MONITORING AND SUPERVISION

The Supervisory Body has the task of supervising the application of this Code of Ethics. Any reports of breaches of the Code of Ethics must therefore be sent to it for the purposes of the relevant checks.

Training activities are provided for Employees to enable them to achieve full knowledge of the contents of the Code of Ethics, the LPM Model and the regulations and procedures in force, as well as systematic updating on the measures and provisions introduced from time to time.

Anyone who becomes aware of omissions, breaches or conduct contrary to the principles and conduct set out in the Code of Ethics may report it to his or her superior, to the Supervisory Body and/or to the so-called Whistleblowing Manager.

In order to benefit from the protection of whistleblowing legislation, reports of any breaches of the Code of Ethics may be made in the manner set out in the Whistleblowing Policy adopted by LPM through the dedicated platform, accessible from the section on reports of the LPM Group website, or by using the link "https://lpm-it.segnalazioni.net".

Communications and reports provided for by this Code of Ethics addressed to the Supervisory Body must be sent in writing to:

Supervisory Body (*Organismo di Vigilanza*) of LPM S.p.A.
c/o LPM S.p.A.
Via Egidio Berto 24/1
35024 Bovolenta (PD)

Or by e-mail to:

odvlpm@lpm-it.com

9. APPROVAL AND AMENDMENT OF THE CODE OF ETHICS

This Code of Ethics is approved by the Board of Directors of LPM S.p.A. and any amendments shall be approved in the same manner.