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CODE OF ETHICS

Contents

1. Purpose and scope
2. Guiding principles
3. Conduct and behaviour in relations with the public and the community
4. Human resources management. Human resources are the foundation of the company
5. Administrative and accounting management
6. Entry into force, coordination with company procedures, updates and amendments

Rev.	Revision date	Description
00	7 January 2021	Company Policy
01	7 January 2022	Policy revision incorporating the Code of Ethics
02	16 April 2023	Further integration – reference to ISO 30415 certification
03	25 June 2026	Integration of provisions concerning the prevention of corruption, gifts, invitations and other benefits

For approval
Chairperson
[Signature]

Vicenza, 25 June 2026

1. PURPOSE AND SCOPE

The Bedin Galvanica Code of Ethics identifies the guiding principles and fundamental rules of conduct that all internal and external collaborators, as well as, more generally, all persons with whom Bedin Galvanica comes into contact in the course of its business activities, are required to observe and promote within their respective areas of responsibility.

Since 2012, the company has operated an integrated certification system compliant with ISO 9001:2015, ISO 45001 and ISO 14001:2015. Together with the more recent ISO 30415 certification obtained in January 2023, this system is reflected in a Policy and Management System that ensure compliance with the principles set out in this document.

This Code of Ethics supplements the provisions already established and constitutes an essential component of the company's integrated management system.

2. GUIDING PRINCIPLES

The principles on which Bedin is founded are those expressed by the United Nations in the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights and the ten principles of the United Nations Global Compact.



Bedin confirms its commitment to pursuing the economic, social and environmental benefits arising from its business activities and to making decisions that contribute to sustainable development.

In particular, the values that have distinguished Bedin for more than 50 years are:

Respect for employees – Teamwork – Innovation – Professional growth – Expertise – Individual responsibility.

Business Ethics

All persons to whom this Code applies are required to perform their activities with the utmost diligence, honesty, cooperation, fairness, loyalty, moral integrity and professional rigour, in compliance with applicable laws, company procedures and regulations, and with the following principles:

1. We undertake to conduct our activities according to high ethical standards and in a manner that ensures integrity, transparency and compliance with applicable laws.
2. We will not engage in corruption or become involved in bribery or extortion. We adopt a zero-tolerance policy towards all forms of corruption. It is prohibited to offer, promise, request or accept money, gifts, invitations, benefits or other advantages that may influence, or may be perceived as capable of influencing, the impartiality of business decisions. Only occasional gifts and hospitality of modest value that comply with normal business courtesy practices are permitted.
3. We will not tolerate money laundering and/or the financing of terrorism.
4. We will communicate the characteristics of Bedin coatings accurately and comprehensively.
5. We will comply with the principles of business confidentiality and the protection of sensitive data.

Human Rights and Social Performance

1. We believe in fundamental human rights and respect the dignity of every individual, in accordance with the United Nations Universal Declaration of Human Rights.
2. We will not tolerate the employment of persons under the age of 18.
3. We will not use any form of forced, bonded, indentured or prison labour, nor will we restrict the freedom of movement of our collaborators.
4. We undertake to ensure high standards of health and safety throughout our activities.
5. We will not obstruct workers' freedom of association.
6. We will not accept any form of discrimination based on race, ethnicity, social background, country of origin, religion, disability, sex, sexual orientation, trade union membership, political affiliation, marital status, physical appearance, age or any other restriction not permitted in the workplace. Any individual who is fit for work must be given equal opportunities and must not be discriminated against on the basis of factors unrelated to their ability to perform the job.
7. Corporal punishment will not be used under any circumstances, and degrading treatment, threats, abuse, coercion or intimidation of any kind will be prohibited.
8. We will comply with applicable legislation concerning working hours and remuneration.
9. We will support the development of the communities in which we operate, contributing to the economic and social wellbeing of our local area and supporting the value of Made in Italy.
10. We recognise and respect the rights of local communities and the value of their traditions, culture and social heritage.

Management Systems

1. We undertake to comply with applicable laws and, through the integrated management system in place, to implement any recommendation that may contribute to improvement and growth.
2. We will assess all types of business risks in order to protect everyone who works with the company and/or maintains business relations with it. We will adapt our systems and processes to ensure the achievement of ethical, social and environmental principles and respect for human rights.

3. CONDUCT AND BEHAVIOUR IN RELATIONS WITH THE PUBLIC AND THE COMMUNITY

Customers

Relations with customers must, as far as reasonably possible and in compliance with company procedures, promote the highest possible level of customer satisfaction.

Customers must be provided with comprehensive and accurate information concerning the products and services supplied to them, enabling them to make informed decisions.

In its relations with customers, Bedin generally operates by:

- a. accurately recording all transactions, excluding cash transactions and ensuring the full traceability of all financial movements;
- b. obtaining and monitoring all information concerning the customer, the customer's actual beneficial ownership and the nature of its activities, to the extent permitted by the market and applicable legislation;
- c. periodically analysing the risks associated with this area in order to prevent situations that are inappropriate or inconsistent with the principles set out above.

Suppliers

As with customer monitoring, when selecting suppliers Bedin chooses the most suitable party capable of providing goods and services of the required quality, always on condition that the principles upheld by Bedin Galvanica are respected, even where this may mean not obtaining the lowest price.

In accordance with this company policy, relations with suppliers follow the same principles as those described above for customers. In particular, Bedin operates by:

- a. accurately recording all transactions, excluding cash transactions and ensuring their full traceability;
- b. monitoring and obtaining all information concerning the actual ownership and beneficial ownership of suppliers and the nature of their activities, to the extent permitted by the market and applicable legislation;
- c. periodically analysing the risks associated with this area in order to prevent situations that are inappropriate or inconsistent with the principles set out above.

4. HUMAN RESOURCES MANAGEMENT

The success of Bedin Galvanica S.r.l. depends on the professionalism and diligence of its human resources.

The following therefore constitute fundamental principles of human resources management:

- a. providing equal employment opportunities in relation to recruitment, remuneration, overtime, access to training, promotion, termination of employment and retirement, without discrimination based on race, ethnicity, caste, nationality of origin, sex, age, sexual orientation, physical or mental disability, religious belief, political affiliation, trade union membership, marital status, pregnancy, physical appearance, AIDS or any other applicable ground;
- b. ensuring fair, merit-based and strictly professional treatment in all decisions concerning employment relationships with employees and external collaborators;
- c. promoting and consolidating a culture of workplace safety and taking action, particularly preventive action, to protect workers' physical and psychological health and safety;
- d. protecting employees' privacy and their right to work without being subjected to unlawful pressure or influence;

e. respecting employees' rights to collective bargaining and freedom of association, and prohibiting child labour;

g. ensuring that no worker is subjected, in any form, to forced labour, corporal punishment, excessively strenuous work, degrading treatment, sexual or physical harassment, psychological, physical or verbal abuse, coercion, intimidation or threats;

h. requiring all collaborators, within their respective areas of responsibility, to adopt conduct consistent with the principles set out above.

Employees are prohibited from pursuing personal interests to the detriment of the company's interests.

The following conduct is also prohibited:

- exploiting the name and reputation of Bedin Galvanica S.r.l. for private purposes;
- exploiting for personal purposes one's position within Bedin or information acquired during the performance of one's duties;
- adopting conduct that may compromise the company's image;
- wasting or making irrational use of equipment and resources;
- disclosing to third parties, using for private purposes or otherwise improperly using information and news concerning Bedin;
- performing work, including unpaid work, that conflicts or competes with the company;
- keeping pornographic material or images involving persons under the age of 18, whether in printed or digital form, at Bedin's premises.

The interruption or termination of the employment relationship with the company, regardless of the reason, does not justify the disclosure of confidential information or the expression of opinions that may damage the company's image or interests.

Employees are required to use the assets made available to them in accordance with their intended purpose and in a manner that protects their preservation and functionality.

Child Labour

The company does not use or support child labour involving children under the age of 15 and does not employ personnel who have not completed their compulsory education.

Should children be observed working, for example at a supplier's premises, the matter must be reported in writing. Where the report concerns Bedin personnel, the matter must be reported by calling the free "Emergenza Infanzia" child emergency number, 114.

The company assesses the suitability of young workers for their assigned duties and ensures that their rights are respected, including in relation to school-work programmes and the maximum number of hours for which they may be employed, including travel time.

The assessment is carried out in cooperation with the company's employment consultant. Young workers are entitled to request a copy of all documentation relating to their employment.

As a general rule, Bedin does not employ personnel under the age of 18. In any event, young workers are not assigned to night shifts or duties that may be hazardous to their health.

Forced Labour

The company does not use or support forced labour and does not require employees to deposit money, identity documents or any other form of security with the company. Nor does it directly or indirectly withhold recruitment fees or employment-related costs.

Workers' Health and Safety

The company's safety policy, also supported by an ISO 45001 certification system, protects workers through:

- the appointment of dedicated and appropriately trained personnel;
- detailed risk assessments;
- medical examinations;
- measures to improve working conditions;
- systematic training and information;
- the provision of personal protective equipment;
- regular meetings involving the relevant stakeholders.

Periodic safety training is carried out and personal protective equipment is made available. Should any need arise, it must be reported to the relevant Department Supervisor or to the Workers' Health and Safety Representative, M.R.

Bedin has undertaken to provide workers with a spacious and comfortable "Relaxation Area" in which they may eat their meals.

Bathrooms, showers and equipped changing rooms are also provided. These facilities are separated for men and women and are maintained under suitable environmental conditions and to appropriate standards of cleanliness and decorum.

Freedom of Association and the Right to Collective Bargaining

The company guarantees all personnel the right to establish or join trade unions of their choice and to engage in collective bargaining.

The company guarantees the right to hold workplace assemblies by making suitable spaces available for meetings.

Discrimination

Our company does not engage in or support any form of discrimination. In full accordance with this principle, BEDIN GALVANICA is ISO 30415 certified.

The right of personnel to observe religious beliefs or practices, or to meet needs relating to race, national, territorial or social origin, caste, birth, religion, marital status, disability, gender, sexual orientation, family responsibilities, trade union status, political opinions or age is respected.

Conduct, materials such as posters, gestures, language or physical contact that are sexual, threatening or related to exploitation are prohibited.

Anyone who is subjected to or witnesses acts of discrimination, threats or violent behaviour, or who feels disturbed by posters or other materials, must report the matter to the company owners, Giulio Bevilacqua and Stefania Bedin.

The organisation does not subject personnel to any medical examination other than those specifically required under the applicable occupational health protocol.

Disciplinary Practices

The company does not engage in or support corporal punishment, mental or physical coercion or verbal abuse.

Any disciplinary measures imposed are governed by Italian law and are applied progressively, in proportion to the seriousness of the misconduct and in cooperation with the employment consultant.

The applicable disciplinary procedure may progressively include:

- a verbal warning;
- a written warning;
- a fine not exceeding three hours' wages;
- suspension from work and remuneration for a maximum of three days;
- dismissal for misconduct.

Anyone who is subjected to or witnesses physical punishment, violence or disciplinary practices that conflict with personal dignity and respect must report the matter.

Workers are entitled to provide their explanations, including verbally and, where appropriate, with the support of a trade union representative.

Working Hours

In relation to working hours, the company applies the provisions of the National Collective Labour Agreement for the Metalworking Industry.

Overtime is governed by the applicable collective agreement and is always paid at a higher rate than normal working hours.

Remuneration

Bedin guarantees that salaries comply with applicable legislation, the National Collective Labour Agreement for the Metalworking Industry and the individual employment contract.

Employees who require clarification or wish to raise concerns regarding their payslips may contact the Administration Department within a few days of receiving them or after viewing the relevant information on the company portal.

Where, following repeated requests, the clarification provided is not considered comprehensive and/or satisfactory, the employee may report the matter using the most appropriate reporting channel.

5. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

The company's accounting records are maintained according to the principles of accuracy, transparency and completeness.

Only truthful entries corresponding to the actual nature of the transactions carried out may be recorded in the accounts.

Everyone working within the company is required to provide the fullest cooperation to ensure that management transactions are accurately and promptly represented in the company's accounting records.

Every entry in the accounting books must reflect the nature of the transaction, representing both its formal and substantive aspects, and must be supported by adequate documentation to enable the transaction to be accurately reconstructed.

Adequate supporting documentation must be retained for every accounting entry relating to a company transaction.

This documentation must make it possible to identify the reason for the transaction that generated the entry and the relevant authorisation.

6. ENTRY INTO FORCE, COORDINATION WITH COMPANY PROCEDURES, UPDATES AND AMENDMENTS

This Code of Ethics was adopted by BEDIN GALVANICA S.R.L. on 1 January 2022 and entered into force with immediate effect.

The Code of Ethics supplements the company policy. It does not replace current or future company procedures, which will remain effective insofar as they do not conflict with the Code of Ethics.

The Recipients are required to comply with the Code of Ethics as an essential part of the obligations assumed by virtue of their relationship with the company.

Violations of the provisions concerning the prevention of corruption, as well as the offering, promising, requesting or accepting of money, gifts, invitations, benefits or other advantages not permitted under this Code, constitute violations of the Code of Ethics.

Such violations will result in the application of the disciplinary and contractual measures provided for by applicable legislation and company procedures, without prejudice to any further liability established by law.

The Director and the Shareholders of the Company, as Recipients of this Code of Ethics, acknowledge that compliance with the Code of Ethics constitutes a PREREQUISITE for the continuation of the existing professional relationship.

Decisions concerning the measures to be adopted as a consequence of violations of this Code of Ethics are the responsibility of the shareholders of BEDIN GALVANICA S.R.L.

Any update, amendment or addition to this Code of Ethics must be approved by the company's shareholders.

This document supplements the existing company policy published on the company website.

Its contents as a whole will be reviewed annually to ensure that they remain up to date and applicable, with a view to continuously improving workers' conditions, ensuring regulatory and legislative compliance and meeting the expectations of stakeholders.

Vicenza, 25 June 2026



BEDIN GALVANICA SRL