



NordSinter s.r.l.

CAP. SOC. € 119.000,00 I.V.

PRODUZIONE SINTERIZZATI

Sede Legale: 20123 – Milano – Via Aurelio Saffi 21

Sede Operativa: 21042 – Caronno Pertusella (VA) – Via Asiago 244

Tel.: +39 02 93790102

E-mail: info@nordsinter.com – www.nordsinter.com

REA MI 2516137 – N. REG. IMPRESE: 02254360122



CODE OF ETHICS

Introduction

The Nordsinter S.r.l. company (hereinafter also referred to as 'Nordsinter' or, for brevity, 'the Company'), is dedicated to the study, development and production of mechanical parts made of iron, steel, stainless steel, bronze and special alloys, filtering elements that are not made by milling on a monolithic piece, but from powdered material, which is subsequently heat-treated by sintering.

Nordsinter handles the study, design and construction of production equipment, which is carried out completely independently, in-house.

Nordsinter boasts a wide range of production equipment (including, but not limited to, moulding presses from 5 to 150 t; calibrating presses from 20 to 150 t; belt sintering furnaces; steam oxidation furnaces; impregnation plants for various oils; powder mixing plants; tumbling and deburring plants) and in-house equipment capable of guaranteeing rapid and constant maintenance of the equipment and presses.

Furthermore, Nordsinter's laboratory is equipped with machinery (metallography, carbon analysis, hardness analysis, etc.) and equipment that ensure constant control during the final production cycles, ensuring maximum reliability and efficiency.

The comprehensive and integrated programme, which covers a broad segment of the specific market, features cutting-edge products in terms of both technology and quality/functionality, putting its customers at a distinct advantage over the competition.

Promotion of work and respect for ethical values underpin the Company and are of fundamental importance both for the proper functioning and credibility of the Company and for customers, suppliers and, in general, the economic context in which it operates.

To this end, Nordsinter S.r.l. decided to adopt this document (hereinafter also referred to as the 'Code of Ethics' or, for the sake of brevity, the 'Code'), aimed at summarising in a single document and bringing to the attention of all those who work within this Company, the principles, values and rules, shared over the years, which the Company's conduct and activities are based on and which must inspire the good work of those who work within the Company.

These values, principles and rules reflect the nature of Nordsinter and the Code of Ethics and its fundamental contents are also in line with the provisions of Legislative Decree No. 231 of 8 June



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Nordsinter employees, within the scope of their duties, actively participate in the process of risk prevention and environmental protection, as well as the protection of their own, their colleagues' and third parties' health and safety, without prejudice to their individual responsibilities pursuant to the applicable legal provisions.

Nordsinter believes in respecting and protecting the environment and aims to ensure compatibility between business development and environmental protection. The Company undergoes regular environmental audits and has implemented an energy efficiency programme, striving to continuously improve occupational health and safety and environmental protection conditions.

Within the scope of Nordsinter's activities, alcohol abuse and drug use are prohibited, as well as smoking in the workplace, in accordance with the law and in all cases where smoking could endanger Nordsinter's facilities, property or the health or safety of colleagues and third parties.

2.5. Diligence and professionalism

Nordsinter considers it essential for its staff to work with diligence, care and professionalism, striving to continuously improve the Company's provided services.

All activities must be carried out with commitment and professional integrity, with a duty to provide professional input appropriate to assigned roles and responsibilities.

Business goals, the proposal and implementation of projects, investments and actions must all be aimed at increasing the company's values in the long term in terms of assets, management, technology and knowledge.

Corrupt practices, unlawful favours, collusive behaviour, solicitation, directly and/or through third parties, of personal and career advantages for yourself or others, are prohibited without exception. It is never permitted to make or offer, directly or indirectly, payments, material benefits or other advantages of any kind to third parties, government representatives, public officials and public or private employees, in order to influence or compensate them for an act of their office.

Acts of commercial courtesy, such as gifts or forms of hospitality, are only permitted if they are of modest value and in any case do not compromise the integrity or reputation of one of the parties and cannot be interpreted, by an impartial observer, as aimed at acquiring improper advantages. In any case, this type of expenditure must always be authorised by the position defined by internal procedures and appropriately documented.

2.6. Confidentiality and data protection



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In compliance with the relevant regulations, Nordsinter maintains the utmost confidentiality regarding market, confidential or intellectual property information of its own, its suppliers and third parties in general, which are required to behave in the same manner.

All Nordsinter staff are required to comply with this obligation, avoiding any misuse of such information, in compliance with the relevant regulations and internal procedures.

Nordsinter staff are strictly forbidden to use confidential information for purposes unrelated to the performance of their duties.

Any information relating to a natural or legal person, body or association, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number, is considered 'personal data'. In the course of its activities, Nordsinter acquires this information for processing purchases and orders, assessing business risk and identifying market segments.

In order to guarantee the protection of personal data, Nordsinter, through its employees, undertakes to process personal data in compliance with the relevant regulations and in particular according to the criteria of lawfulness and correctness of data processing, transparency, relevance and quality assurance. No data will ever be disclosed to third parties without the consent of the person concerned (except in cases required by law), and the right of the person concerned to view the data and request its correction, if necessary, will be respected.

2.7. Anti-money laundering

Nordsinter endeavours and ensures that its economic and financial activities do not become a tool to facilitate, even potentially, unlawful activities and criminal and terrorist organisations, and always applies anti-money laundering regulations in any jurisdiction in which it operates.

3. Rules of conduct

Without prejudice to the Ethical Principles set out in the first part of this document, a number of rules are set out below, which are intended to outline the conduct that must be maintained in the performance of the various corporate activities in order to ensure compliance with the Ethical Principles.

3.1. Relations with staff

Addressees of the Code of Ethics are required by Nordsinter to conduct themselves in accordance with criteria of transparency, honesty and ethical integrity and to behave with decorum and dignity. Ethical conduct also includes compliance with all laws and regulations applicable to the performance of duties and with this Code of Ethics.



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Nordsinter recognises the importance of human resources and promotes their value, with the aim of constantly improving the skills possessed by each individual. The Company offers equal opportunities to all employees on the basis of their professional qualifications and individual abilities, without discrimination on the basis of religion, ethnicity, political belief or gender.

Nordsinter guarantees fundamental equality and equal treatment.

Nordsinter requires that the addressees of the Code of Ethics are aware of and comply with the provisions of the Code of Ethics to the extent of their competence, and that they promote awareness of the Code of Ethics among newly recruited employees, as well as other addressees with whom they come into contact in the course of their duties, to the extent feasible within their individual capacity.

The addressees of the Code of Ethics must avoid situations in which conflicts of interest may arise between personal economic activities and the tasks they perform within the Company, refraining from taking advantage of their position and always acting impartially in the best interests of Nordsinter. Anyone who perceives a potential personal conflict of interest must refrain from participating in the potentially conflicting operational or decision-making process.

It is not permitted to make or offer, directly or indirectly, payments, material benefits or other advantages to directors, officers or employees of customers, suppliers, Public Administration bodies, Public Institutions or other Organisations for the purpose of gaining undue advantages.

It is forbidden for Nordsinter staff to accept money, material benefits or other advantages of any kind – other than acts of commercial courtesy, such as gifts or forms of hospitality, of modest value and, in any case, such as not to compromise the integrity or reputation of one of the parties – from persons, companies or entities that conduct, or intend to enter into business relations with the Company. Anyone who receives, directly or indirectly, gifts or favourable treatment or requests in this regard from third parties must reject them and immediately inform their hierarchical superior, the administrative body and the Supervisory Board.

Nordsinter staff must operate with due diligence to protect the company's resources and assets, through responsible behaviour in line with the operating procedures drawn up to regulate the use thereof, avoiding improper use that may cause damage or reduced efficiency, or in any case that may run contrary to the company's interests.

Staff are authorised to use company computer media and Internet connections only for purposes related to their employment.



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The increasing dependence on information technology makes it necessary to ensure the availability, security, integrity and maximum efficiency of this particular asset class.

Every employee must comply with the following provisions:

- do not send threatening or insulting e-mails, do not use coarse language, do not make inappropriate or undesirable comments that may cause offence to a person or damage the company's image;
- avoid spamming, which can generate data/information/process traffic within the company's telematics network that can significantly reduce network efficiency, negatively impacting productivity and the company as a whole;
- do not surf websites with indecent and offensive content;
- scrupulously adopt the provisions of the company's IT security policies so as not to compromise the functionality and protection of information systems;
- do not run programmes whose installation has not been authorised or infringes the intellectual property rights of third parties, and, more generally, do not install unauthorised software on company systems, nor make unauthorised copies of licensed programmes for personal use.

In particular, Nordsinter prohibits any use of computer systems that could constitute a violation of applicable laws, or otherwise offend the freedom, integrity and dignity of persons, and in particular minors. Any use of computer systems that may cause undue interference with or damage to other parties' computer systems is also prohibited.

Nordsinter is committed to ensuring a working environment that complies with current health and safety regulations through monitoring, management and prevention of risks related to work performance. The Company's goal is to prevent accidents or illnesses related to workplace conditions by taking all necessary or appropriate actions. The Company employs external consultants to assist it in the process of identifying risks and ensuring compliance with current legislation.

Adopted company measures must be supported by the constant participation of each employee, who must diligently observe and comply with all the instructions they receive. Every employee shall therefore maintain a safe and clean working environment, adhering to prescribed guidelines and also paying the utmost attention to the interests of colleagues and third parties. For Nordsinter, sharing and cooperation between staff is considered highly important, not least in order to create a positive working environment based on mutual trust and respect.



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3.2. Customer relations

All public and private entities that use goods offered by Nordsinter are considered customers. The Company, although it does not express any partiality towards any customer or customer category, has no relations with persons known or suspected to belong to criminal organisations or operating outside the law.

Contracts concluded with customers follow criteria of simplicity, clarity and transparency. Deceptive practices are prohibited and fair, honest and professional behaviour must be upheld.

In particular, it is absolutely forbidden to offer (or receive), directly or indirectly, to (or from) customers money, objects, services, favours or other utilities – other than acts of commercial courtesy of modest value – aimed at obtaining an advantage, including a non-economic advantage, contrary to mandatory rules of law, regulations and the principles of this Code.

3.3. Relations with suppliers

Suppliers are all public and private entities that Nordsinter uses in various ways to acquire goods, services, resources or services necessary to carry out its activities.

Nordsinter establishes relations with its suppliers based on criteria of good negotiating faith, in compliance with the values and principles set out in the Code of Ethics.

The supplier selection process is based on objective evaluations, according to principles of transparency and impartiality, in strict compliance with EU and national regulations.

It is forbidden for suppliers to offer, directly or indirectly, to the staff of Nordsinter or their relatives, and to receive, money, objects, services, favours or other utilities – other than acts of commercial courtesy of modest value – aimed at obtaining an advantage, including an undue advantage, including a non-economic advantage.

3.4. Relations with the auditing company

Auditors must have free access to the data, documents and information necessary to perform their work.

3.5. Relations with the Public Administration



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Nordsinter adopts, in its relations with the Public Administration and with entities carrying out activities of public utility or public interest or in any case concerning relations of a public nature, the strictest compliance with applicable EU, national and corporate regulations.

The Company's relations with the Public Administration are based on criteria of truthfulness, fairness and transparency in order to guarantee the autonomy, impartiality and transparency of relevant decisions.

The addressees of the Code who are in charge of overseeing any negotiation, request, or institutional relationship with the Public Administration must not attempt to improperly influence its decisions, nor engage in unlawful conduct, such as the offer of money or other benefits, that may alter the impartial judgement of the representative of the Public Administration.

It is strictly prohibited to alter the operation of a computer or telematic system belonging to the Public Administration or to manipulate the data contained therein in order to obtain an unfair profit.

Any suspicious situations must be immediately reported to your superior and/or the Company's legal representative.

Should Nordsinter employ a consultant or third party to represent the Company in its dealings with the Public Administration or public service concessionaires, they must comply with the principles and rules set out in this Code.

3.6. Relations with supervisory and control authorities and the judiciary

Nordsinter's relations with supervisory and control authorities are based on maximum cooperation, fully respecting their institutional role.

Every individual authorised to liaise with supervisory and control authorities and with the judiciary must base their conduct on transparency, fairness and diligence, avoiding any conduct that could be misinterpreted.

Inducing any person, by means of violence or threats, or by offering or promising money or other benefits, not to make statements or to make false statements before the judiciary, is considered a breach not only of the law, but also of this Code of Ethics.

3.7. Relations with external parties

External parties who deal with Nordsinter (external professionals, consultants, agents, representatives, intermediaries, etc.) are required to observe the principles contained in this Code.



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4. Implementation of and compliance with the Code of Ethics

All addressees of the Code of Ethics are required to respect and ensure compliance with its provisions.

The function in charge of supervising the application of the Code of Ethics, until the appointment of a Supervisory Body for Nordsinter S.r.l., which shall be set up in accordance with the Organisation, Management and Control Model for the prevention of offences pursuant to Legislative Decree 231/2001 and related regulations, is the Company's management, which serves as the corporate function responsible for the proper implementation and control of the Principles contained in this document.

Communications, such as reporting a suspected violation, requesting clarification or advice, may also be made anonymously, provided they are objective and substantiated.

Nordsinter undertakes to protect from any intimidation or retaliation those who make reports of alleged or obvious violations of the Code in good faith, proceeding against the offenders with the disciplinary actions applicable in each case.

Nordsinter is committed to enforcing compliance with this Code, including through timely application of sanctions in accordance with the disciplinary system provided for in the applicable CCNLs or the relevant contracts stipulated with the respective counterparts.

This Code shall be distributed to the addressees in the manner, on each occasion, deemed most appropriate for its effective dissemination and shall be published on the Company's website.

5. Sanction system

The contents of this Code of Ethics strongly emphasise the need for precise and timely compliance with all legal regulations.

Violations of this Code damage the relationship of trust established between the Company and its staff and lead to disciplinary action, regardless of whether criminal proceedings are brought in cases where the conduct constitutes a criminal offence.

Violation of the Code and internal procedures is independent of the violation of the law resulting from the commission of an offence. On the basis of this premise, the principles of timeliness and immediacy of the sanction make it inadvisable to delay the imposition of the disciplinary sanction pending the outcome of the criminal trial.



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The sanctions and disciplinary system is also adopted in the case of senior individuals who hold positions of representation, administration or management or who exercise powers of management and control within the Company.

In relations with third parties (consultants, etc.), specific measures are provided for, such as clauses for their declaration of commitment to read and comply with the Code of Ethics of Nordsinter S.r.l., with a provision for the application of penalties or the termination of the contract in the event of non-compliance with the clauses.

Caronno Pertusella, 21/06/22

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