COMPANY CODE OF ETHICS

Principles of conduct for employees, collaborators, suppliers and third parties

1. Introduction and Purpose

Fittinox S.r.l. recognises that quality, reliability and stakeholder trust are based on proper, transparent and responsible conduct. This document sets out the ethical principles that guide the company's relationships with employees, customers, suppliers, consultants, partners and other interested parties, in accordance with the Quality Policy, Nuclear Safety Culture and the company's sustainability guidelines.

2. Integrity, Legality and Fairness

Fittinox is committed to operating in compliance with applicable laws and regulations, contractual obligations and relevant customer requirements. All professional relationships must be conducted with integrity, loyalty, impartiality and good faith. Fraudulent, misleading or improper conduct intended to obtain undue advantages is not permitted.

3. Prevention of Corruption and Conflicts of Interest

Fittinox does not tolerate corruption, bribery or any form of payment, gift, favour or benefit intended to improperly influence a decision. Gifts and hospitality, where permitted, must be reasonable, transparent and compliant with applicable laws and rules.

Anyone acting on behalf of the company must avoid situations in which personal interests may interfere with the company's interests and must promptly disclose any actual or potential conflicts of interest.

4. Quality, Compliance and Product Safety

Fittinox ensures compliance with technical, regulatory and contractual requirements throughout the procurement, production and inspection stages. Traceability, records and inspections must be accurate. Any non-conformity or issue that may affect quality or safety must be reported and managed in accordance with the quality management system.

5. Nuclear Safety Culture

For activities and supplies intended for the nuclear sector, nuclear safety awareness requires attention, rigour, compliance with procedures and the timely communication of issues. No production or commercial requirement may justify failure to comply with applicable requirements, alteration of records or concealment of a non-conformity.

6. People, Respect, Health and Safety

Fittinox promotes a working environment based on respect for human dignity, proper conduct in professional relationships and cooperation Discrimination, harassment, intimidation and any harmful conduct are not accepted.

Occupational health and safety rules must be observed. Equipment, protective devices and work areas must be used correctly, and hazardous conditions must be reported. The company recognises the importance of training and of the skills required to perform assigned duties.

7. Relationships with Customers and Suppliers

Relationships with customers and suppliers must be based on transparency, reliability, confidentiality and respect for commitments. Supplie selection takes into account quality, reliability and compliance with applicable requirements, fostering relationships based on mutual trust and cooperation.

8. Confidentiality, Data and Accurate Information

Company, technical, commercial and personal information must be protected and used exclusively for authorised purposes. Data, documents and records must be accurate, complete and truthful.

9. Environment and Responsible Use of Resources

The company promotes the efficient use of resources, waste reduction and proper waste management, pursuing continuous improvement i its environmental performance.

10. Responsibility, Reporting and Improvement

All persons working for Fittinox are required to comply with the principles set out in this document and to cooperate in resolving issues. Violations, concerns or non-conformities must be reported through the company's available reporting channels.

Reports are handled confidentially and without retaliation. The company promotes the continuous improvement of its management system

11. Implementation and Updates

This document has been prepared as a draft for review and approval by Management. Once approved, it shall be communicated to personnel and made available to customers, suppliers and other interested parties.

It may be referenced in business relationships and purchasing terms and conditions, in accordance with the arrangements defined by the company, and updated whenever necessary.

12. Reporting of Unlawful Conduct

In accordance with applicable legislation, any employee, collaborator, supplier or other interested party may report, including on a confidential basis, conduct, actions or omissions that may constitute violations of laws, regulations, company procedures or ethical principles.

Reports may be submitted by email to f.trabacchi@fittinox.it or in writing by placing them in the designated whistleblowing box made available by the company.

All reports will be handled with the utmost confidentiality and in compliance with the safeguards provided for under applicable legislation, ensuring that the reporting person is protected against any form of retaliation or discrimination.

Draft document pending Management approval — this document does not constitute confirmation that procedures or systems that have nc yet been formally established have been adopted.

Management approval: _____

Date: 22 / 10 / 2026