



231CET	Code of Ethics		
Rev 00	Class C4	Date January 2026	Depts. HR, BoD

Class: C1: riservato ente/department reserved    C2: interno/internal only    C3: interno gruppo/internal group only    C4: non riservato/unreserved

# PRIMA ELECTRO S.p.A.

## Code of Ethics

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## 1. Foreword

Prima Electro S.p.A. (hereinafter "**Prima Electro**" or the "**Company**") conforms the conduction of its activities in accordance with the principles and standards of conduct set forth in this Code of Ethics (hereinafter also the "**Code**").

All of Prima Electro's activities are performed in full compliance with the law, in a framework of fair competition with honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, directors, employees, shareholders, business and financial partners and the community in which the Company is present.

Therefore, all those who work for Prima Electro, without distinction or exception, are required to observe and enforce these principles as part of their duties and responsibilities. In no way whatsoever does the belief to be acting for the benefit of Prima Electro justify actions that conflict with these principles.

For these reasons, this Code has been adopted. Its observance by the Recipients (as hereinafter defined) is of fundamental importance for the smooth operation, reliability and reputation of Prima Electro, which are all crucial factors for success.

## 2. Recipients and scope of application

This Code applies to all directors, employees, partners and associates of Prima Electro, and all those who, directly or indirectly, permanently or temporarily, establish relationships with Prima Electro within which they cooperate to achieve its objectives (hereinafter collectively referred to as "**Recipients**").

Considering this, Prima Electro commits to:

- the dissemination of this Code to all the parties subject to its requirements.
- the correct interpretation of its contents.
- the provision of tools that promote its application.
- the implementation of the necessary measures to (i) carry out audits and monitor the application of the Code and (ii) apply the appropriate penalties in case of violations.


To this end the Board of Directors of Prima Electro (hereinafter the "**BoD**") has formed the Supervisory Board with the task, among others, to monitor the application of the Code.

This Code is approved by the BoD Any modification and / or addition to it must be approved by the BoD and promptly disseminated to the Recipients.

## 3. Ethical Principles

### 3.1. Legality, Loyalty, Honesty and Fairness

Prima Electro operates in compliance with all applicable laws, regulations, and professional ethics standards. The pursuit of corporate interests can never justify conduct contrary to the principles of legality, honesty and fairness, even in part. Relationships with stakeholders of Prima Electro are based on principles and behaviours of fairness, cooperation, loyalty and mutual respect.

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Prima Electro will take appropriate measures to ensure the principles and procedures set forth in this Code are embraced and practiced by the Recipients.

Prima Electro operates to avoid and prevent situations involving conflicts of interests. Conflicts of interest can arise where the Recipients pursue interests other than the mission of Prima Electro, such as by taking personal advantage of business opportunities at the expense of Prima Electro.

### 3.2. Transparency, Reliability and Completeness of information

Prima Electro is committed to inform in a transparent, reliable, and complete way all stakeholders regarding their own economic situation, financial position, and the prospects of development, without favouring any interest group or individual.

Prima Electro is also committed to providing accurate information to shareholders, to the press and to the relevant departments regarding significant facts concerning corporate and accounting management.

Concerning the credibility of the accounting information, all accounting entries must be true, accurate, and complete. Each employee must work together to ensure that Prima Electro's transactions are represented correctly, promptly and leave no doubt as to their credibility. For this purpose, for each accounting entry, proper supporting documentation must be stored in the file so that it is possible to adequately reconstruct the operation and verify the proper accounting.

### 3.3. Confidentiality of information

Prima Electro has adopted procedures aimed at ensuring the confidentiality of the information in its possession and the observance of legislation on personal data and prohibits seeking confidential information through illegal means.

Recipients of the Code are prohibited from using confidential information for purposes unrelated to Prima Electro business.

### 3.4. Respect for the Individual


Prima Electro respects the physical and cultural integrity of the individual and an individual's relationship with others. Prima Electro ensures that working conditions are respectful of personal dignity and safe. Prima Electro is committed to providing its workers with employment contracts that comply with current legislation.

Prima Electro does not tolerate demands or threats aimed at inducing people to act against the law or against the Code, or any conduct detrimental to the moral and personal beliefs and preferences of others.

Prima Electro prohibits harassment in internal and external work relationships, such as:

- creating a work environment which is intimidating, hostile or that insulates individuals or groups of workers;
- interfering unjustifiably with the work performed by others;
- hindering the work of others, merely for reasons of personal competitiveness;
- creating unjustified obstacles to professional and career growth;
- sexual harassment;
- using unsuitable, indecent or offensive language;
- making inappropriate comments that might offend someone.

All employees must work together to maintain a climate of mutual respect for the dignity, honour and reputation of each.

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### 3.5. Impartiality and Equal Opportunity

Prima Electro prohibits discrimination based on age, gender, sexual orientation, health status, race, nationality, political and trade union opinions, or religious beliefs.

### 3.6. Fair Competition

Prima Electro recognizes that fair competition is essential for business and market development. All business must be conducted in compliance with applicable anti-trust, fair competition, competitive bidding, and similar laws.

### 3.7. Safety, Environmental Protection and Sustainable Development

Prima Electro is committed to upholding the highest standards of health, safety, and environmental protection in all its activities. We actively promote sustainable development by minimizing environmental impact and managing resources responsibly throughout the product lifecycle.

We strictly comply with all applicable regulations, including Regulation EC No. 1907/2006 "REACH" and its subsequent amendments, as well as the RoHS directives and other laws governing hazardous substances. The company continuously monitors regulatory developments to ensure full compliance not only within our organization but also with respect to the obligations affecting downstream users of our products.

We require our suppliers and partners to adhere to the same principles, ensuring transparency and traceability throughout the supply chain. Through continuous improvement and innovation, we aim to reduce risks, prevent pollution, and contribute to a safer and more sustainable future.

To reinforce these principles, Prima Electro require our suppliers and partners to adhere to our Supplier Code of Conduct, which addresses sustainability, ethical business practices, and environmental responsibility. This Code of Conduct, attached to this document, sets clear expectations for compliance with applicable laws, reduction of environmental impact, and promotion of safe and sustainable practices throughout the supply chain.

Through continuous improvement and innovation, we aim to reduce risks, prevent pollution, and contribute to a safer and more sustainable future.

## 4. Rules of conduct

### 4.1. Human Resources


#### 4.1.1. Loyalty

Prima Electro recognizes:

- the importance to employees/partners and associates of achieving their own professional goals; and
- the importance to establish and maintain with employees/partners and associates' relationships based on loyalty and mutual trust.

The Company is therefore committed to act fairly towards all employees and partners and associates and equally expects them to perform their services in line with the obligations undertaken in their employment collaboration contract and with this Code.

Employees/Partners and associates cannot offer their services for the benefit of customers and suppliers outside of the working hours and outside the trade agreements that exist between Prima Electro and these parties.

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#### **4.1.2. Personnel Selection and Development**

The recruitment of personnel is carried out by comparing the qualifications of candidates with the expectations and needs of Prima Electro, according to the principles of impartiality and equal opportunity for all parties involved.

Even before beginning work, the potential employee/collaborator shall receive comprehensive information about the characteristics of the tasks and of the department, about the local regulations and wages, and about the regulations and conduct for the management of risks to personal health and safety. All of this is done in furtherance of transparency.

All personnel should be hired with regular employment contracts in accordance with applicable law. Any form of unlawful discrimination is prohibited.

All decisions regarding the management and development of human resources, including access to different positions or roles, are to be based on considerations of merit.

Authority must be exercised fairly and appropriately considering the hierarchical relationship of Prima Electro's management, avoiding any abuse. It is an abuse of authority to use one's position to require personal favors or any behavior that constitutes a violation of this Code.

Human resources should be enhanced by providing incentives to encourage their development and growth. The departments concerned (HR and Management) must therefore:

- recruit, hire, train, compensate and manage employees or partners and associates without any unlawful discrimination.
- create a work environment in which personal characteristics do not give rise to discrimination; and
- always act professionally in all decisions relating to an employee or collaborator and base those decisions on merit and ability.

The privacy of employees and partners and associates is protected in compliance with relevant legislation and through operational standards that specify the information received and the associated method of processing and preservation. Any investigation of political, trade union and religious ideas, sexual preferences, personal tastes and private matters of individuals is prohibited.

#### **4.1.3. Employment Regularity and Protection of Workers' Rights**

Prima Electro rejects any form of irregular, hidden, or undeclared work.


The Company is committed to hiring personnel exclusively through formal employment relationships, in full compliance with current labor, social security, and insurance regulations, as well as the protection of workers' rights.

Furthermore, the use of forced or child labor is strictly prohibited, whether directly or indirectly, including through third parties, suppliers, partners, or collaborators.

#### **4.1.4. Safety, Health and Environment**

Prima Electro is committed to ensuring a working environment that complies with current health and safety regulations while promoting responsible behaviour. Prima Electro is also committed to the management and prevention of risks related to the health and safety of all employees and partners and associates.

All employees, partners and associates are required to strictly observe the rules and obligations concerning health, safety and the environment, and must respect all the measures required by internal procedures and

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regulations to protect their own and others' safety.

Employees and partners and associates, in the scope of their duties, must participate in the process of risk prevention, environmental protection, and health and safety protection towards themselves, their colleagues and others.

#### 4.1.5. Conflicts of interest

Each director/employee/collaborator of Prima Electro shall avoid all situations and activities that may create a conflict of interest with Prima Electro. This includes situations that may interfere with their capacity to make impartial decisions in the best interests of Prima Electro and in full compliance with the Code. They must also refrain from taking personal advantage of Prima Electro's assets or business opportunities.

Any situation that may constitute or give rise to a conflict of interest must be promptly reported by any director/employee/collaborator to their manager or Prima Electro representative, or to the Supervisory Board. All directors, employees, partners and associates of Prima Electro are required to avoid conflicts of interest between personal and family business activities and their role within Prima Electro.

#### 4.1.6. Gifts and Entertainment

Prima Electro has specific criteria and procedures for giving and receiving gifts and entertainment.

Prima Electro requires its suppliers to limit or eliminate the practice of giving gifts to employees.

It is not permissible to give or receive any form of gift or entertainment that exceeds normal business practices, that is aimed at gaining preferential treatment, or that could reasonably be interpreted as a means of procuring illegal or inappropriate favours.

Gifts are permitted only if they are of limited value. It is not permissible to give gifts of cash or cash equivalents. Entertainment is permitted only if it is within normal and customary business practices for the area.


All employees are required to comply with more restrictive local gift and entertainment policies or limits established by their respective subsidiary, but in no event can they violate the principles in this Code.

Gifts involving Public Officials are generally prohibited. Any such gifts must be pre-approved in advance in writing by the Trade Compliance Officer. A "Public Official" includes all the following:

- Federal, state, or local government officers or employees;
- Officers or employees of government instrumentalities, which includes government-owned and government-controlled entities (in some countries, some of our customers may qualify as government instrumentalities, often referred to as "State Owned Enterprises" or "SOEs");
- Employees of a public international organization;
- Political party officials;
- Members of a royal family; and
- Candidates for public office.

In sum, other than for Public Officials, giving or receiving gifts is allowed when they:

- comply with this Code, any applicable local policies, and all laws;
- are reasonable and customary for the location;
- do not disturb the sensitivity of the recipient;
- do not compromise the integrity or reputation of a party;
- would not be construed, by an impartial observer, as aimed at obtaining undue advantages; and
- do not affect the decision-making autonomy, the independence of judgment or the impartiality

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of a party (e.g., it would be inappropriate to accept a gift from a Supplier during a selection process).

Those who receive gifts or entertainment prohibited by the Code are required to give notice to their Manager who will decide whether to consult the Supervisory Board.

## 4.2. Shareholders and Communication Bodies

One of the primary goals of Prima Electro is enhancing the value of its shareholders' investment by pursuing an industrial policy with the aim of achieving satisfactory economic performance over time.

Prima Electro is committed to creating conditions so that the participation of shareholders in decisions within their competence is widespread and informed, while also promoting equal access and completeness of information and protection of their interests.

Prima Electro is committed to communicate to the outside, truthful and transparent information. Confidential information is treated with appropriate internal procedures, in accordance with current regulations. In the belief that the business activities and results should be closely linked to responsible business conduct, the advertising promotion of Prima Electro must be truthful and accurate.

## 4.3. Customers

Customers are one of the most important assets of Prima Electro, which pursues its mission by offering quality products and services, under competitive conditions and in accordance with the rules aimed at protecting fair competition and safety.

Prima Electro conducts itself towards customers with flexibility and respect, and as expected in a professional relationship.

Employees, partners and associates of Prima Electro are required to:

- supply, with efficiency, courtesy and promptly, within the limits set in the contracts, products and services of high quality, meeting the reasonable expectations and needs of the Customer;
- provide, where necessary and in the style and form required by company policies, accurate and extensive information about products and services offered, so the Customer can make informed decisions;
- adhere to truth in advertising or other communications; and
- not reveal any information about other Clients to third parties.

## 4.4. Suppliers

### 4.4.1. Selection of Suppliers


Suppliers should be selected based on their alignment with the values and principles set out in this Code, their formal acceptance and compliance with it, and their mandatory subscription to the "Supplier Code of Conduct." Selected suppliers must also offer the highest competitive advantage for Prima Electro.

The selection of Suppliers and the determination of purchase conditions are based on an objective assessment of quality, price and ability to provide and guarantee goods and services with the required level of performance, quality, and safety assurance. The selection process should be conducted with fairness and impartiality, with equal opportunities to potential suppliers.

The following criteria for supplier selection should be considered:

- the supplier's professionalism, culture of compliance, and experience;
- the availability, properly documented, of appropriate resources, including financial capacity,



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- operational capability, relevant skills and expertise, know-how, etc; and
- the existence of appropriate quality, safety and environmental protection systems.

#### 4.4.2. Contractual relationships

Prima Electro requires its suppliers and external partners and associates to comply with this Code, considering this as an issue of fundamental importance for establishing and maintaining a business relationship. Each supplier, trading partner or external consultant must be aware of the Code and agree to adhere to the related commitments as part of the contract (or materially similar requirements in the supplier's own code).

In contracts for the purchase of goods and services Prima Electro's employees, partners and associates are required to:

- adopt, in the selection of the supplier, the evaluation criteria set by local existing procedures and apply them in an objective and transparent way;
- allow anyone who possesses the necessary qualifications to compete;
- apply objective and documented criteria in the selection of candidates;
- ensure adequate competition commensurate with the scope and nature of the contract;
- comply with the conditions set forth in the contracts; and
- require suppliers to abide by the principles of conduct set out in this Code (or to abide by materially similar requirements in the suppliers' own code).

The signing of a contract with a supplier and the related relationship management must be based on principles of clarity and transparency.

To ensure maximum transparency and efficiency of the purchasing process, Prima Electro commits to prearrange:

- a proper record of the decisions made; and
- storage of relevant information, including the official request for proposals (where applicable) and contract documents for the periods established by law.

#### 4.5. Political, Trade Union and Non-Profit Organizations


Prima Electro does not make contributions, directly or indirectly, in any form to political or trade union parties, movements, committees and organizations, or to their representatives and candidates, except those due according to specific regulations.

Prima Electro instead supports charitable initiatives aimed at social improvement, consistent with its business and that are sustainable over time.

#### 4.6. Export Controls and Sanctions Compliance

Prima Electro is committed to full compliance with all applicable export control laws and sanctions where we operate. This includes the EU regulation (EU) No 952/2013, the EU Regulation (EU) No. 821/2021, the U.S. Export Administration Regulations ("EAR"), the International Traffic in Arms Regulations ("ITAR"), sanctions regulations administered by the U.S. Treasury Department, Office of Foreign Assets Control ("OFAC"), the Italian military control Law (ex. L.185/90) as well as any other applicable export control laws. It is both illegal and against Prima Electro policy to violate such regulations and engaging in conduct prohibited by this policy can subject you and Prima Electro to severe criminal and civil penalties.

Starting in 2022, Prima Electro has implemented an Export Compliance Management System, formally adopting the EIFEC EC1001 International Standards for the management of all transactions subject to export-related controls (for "Export," this includes any transaction or interaction subject to legal control in accordance with the definitions of the applicable jurisdiction) as required by national, European, and international regulations—including laws, rules, and local policies applicable to subsidiaries or affiliated companies.

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The Company has established an internal Export Compliance Administration Program (ECAP). This program operates in accordance with the Export Compliance Code (EIFEC Standard EC1001.01:EU-CEC), which serves as the reference standard for the company's Export policy, and is integrated with other internal control and governance systems already in place (Quality System, Code of Ethics, Model 231), in line with the company's internal regulatory framework.

Compliance with the terms and conditions of this program by all parties interacting with Prima Electro is therefore an essential requirement for maintaining any commercial relationship with the Company.

All Prima Electro personnel will adhere strictly to the requirements of Prima Electro's export controls and economic sanctions policies and procedures. If there are any questions regarding your role or responsibility, please refer to the Trade Compliance Officer for guidance.

## 4.7. Anti-Bribery and Anti-Corruption

Prima Electro is committed to the highest standards of ethics and full compliance with all anti-corruption and anti-bribery laws where we operate. This includes the Italian Legislative Decree 231, the U.S. Foreign Corrupt Practices Act ("FCPA"), and all other applicable anti-corruption laws. It is both illegal and against Prima Electro policy to pay or receive bribes, or to participate in any bribery scheme. Engaging in conduct prohibited by this policy can subject you and Prima Electro to severe criminal and civil penalties.

### 4.7.1. Prohibition

This Code, as well as various anti-corruption laws, prohibit corruptly offering, giving, receiving, promising, authorizing, or paying anything of value, directly or indirectly, to influence someone or secure an improper advantage.


There are several important parts of this prohibition to be aware of:

- Offering or promising an improper payment can violate bribery laws, even if the payment is never made. In fact, taking any action in furtherance of a bribe violates the law and this Code.
- Anything of value can be used as a bribe—not just money or cash. For example, providing gifts or entertainment, making political or charitable contributions, paying for travel, or even hiring someone's relative can all be considered bribes if done for a corrupt purpose, i.e., to improperly influence business decisions.
- Both direct and indirect bribes are prohibited. If you know or have reason to know that a payment you made to another party will be used for a bribe, it does not matter that you are not directly paying the bribe. For example, you cannot pay a commission to a sales agent if you know, or have reason to know, that the sales agent will use part of the commission to pay a bribe.

Bribery to obtain any type of improper benefit is prohibited. This can include bribes paid to:

- persuade someone to purchase Prima Electro's products (sometimes called a kickback, or in the case of competitive procurements, bid rigging);
- obtain licenses, permits, or other regulatory approvals;
- reduce customs or taxes; or
- bypass laws or regulations (such as inspections).

Bribery is prohibited in both commercial and government business. In other words, the prohibition against bribery is not limited to situations involving Public Officials. However, certain laws provide particularly harsh penalties for bribes involving Public Officials. You must exercise additional caution when dealing with Public Officials and remember that all gifts or entertainment involving Public Officials must be pre-approved by the Trade Compliance Officer.

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#### ***4.7.2. Third Party Sales Representatives, Agents, Resellers, Distributors, or other Intermediaries with potential Public Official Contacts***

The Trade Compliance Officer must pre-approve any agreement or contract with third parties who will be involved in the sales process, or who may interact with Public Officials in relation to Prima Electro's business. This includes an agreement to pay a commission to a third party.

Third parties can present significant corruption and bribery risks, and Prima Electro will implement appropriate measures to mitigate that risk depending on each circumstance.

Third parties who will be involved in the sales process include:

- sales representatives or agents;
- resellers; and
- distributors.

Third parties who may interact with Public Officials in relation to Prima Electro's business include:

- consultants who assist with obtaining permits, licenses, or regulatory approvals;
- customs agents and freight forwarders; and
- lobbyists or other political or governmental liaisons.

The Trade Compliance Officer will ensure that due diligence is performed on the third party and that the contract contains appropriate anti-corruption and other clauses to protect Prima Electro.

#### ***4.7.3. Facilitating or Expediting Payments***

Facilitating or expediting payments are those made to expedite or secure the performance of a routine government action by a Public Official. These payments are prohibited.

Routine government action means something which is ordinarily and commonly performed by a Public Official in:


- obtaining permits, licenses, or other official documents to qualify to do business;
- processing governmental papers, such as visas and work orders;
- providing police protection, mail pick-up and delivery, or scheduling inspections associated with contract performance or inspections related to transit of goods across country;
- providing phone service, power and water supply, loading and unloading cargo, or protecting perishable products or commodities from deterioration; or
- similar actions.

If a Public Official demands a facilitation payment, and failing to immediately make the payment would result in imminent risk to your safety or that of others, you will not violate this Code by making the payment. You must contact the Trade Compliance Officer as soon as possible thereafter to report the incident. This limited exception only applies to threats against your safety; mere economic threats, such as refusal by a Public Official to award a contract or a permit unless an unlawful payment is made, are not permissible grounds to make payments prohibited by this Code.

Instead, these situations should be immediately reported to the Trade Compliance Officer.

#### ***4.7.4. Travel and Lodging Expenses for Public Officials***

As part of Prima Electro's normal business operations, it may be appropriate at times to pay for the reasonable and bona fide travel and lodging expenses of customers in connection with marketing or contract performance. In some cases, the customers may be Public Officials who represent a government entity or a government end user.

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Any agreement to pay travel and lodging expenses for Public Officials, or to enter contracts where such expenses are required to be reimbursed, must be pre-approved by the Trade Compliance Officer, who will confirm that such expenditures are:

- reasonable and bona fide (i.e., consistent with the locally applicable travel, meal, and lodging expense limits, and represent actual expenses);
- directly related to either:
  - the promotion, demonstration, or explanation of products or services; or
  - the execution or performance of a contract;
- not being paid in whole or part to reimburse unrelated side trips, vacations, sightseeing excursions, etc;
- limited to Public Officials or others appointed by the respective government entity;
- expressly agreed to in writing with the government entity;
- paid directly to the service provider or to the government entity;
- permissible under the laws and regulations of the countries involved, and in compliance with any applicable reporting obligations; and
- otherwise in compliance with this Code.

#### 4.8. Internal Control System

Prima Electro aims to promote a culture of awareness of the usefulness of audits and a mentality supportive of the audit process in the conviction that these audits can make a positive contribution to improving the Company efficiency and compliance.

Internal audits are necessary and useful to direct, manage and verify the activities of Prima Electro, with the aim of ensuring:

- compliance with laws and procedures;
- compliance with company policy and of the relating provisions;
- effectiveness and efficiency in the company operations;
- protection of Prima Electro assets;
- integrity and reliability of the information and accounting system; and
- proper corporate risk management.

The responsibility for implementing and ensuring an effective internal audit system is shared at all levels of the organization; therefore, all Employees, within their duties, are responsible for the establishment and proper functioning of the audit system.


Each employee shall be held responsible for Prima Electro's assets (tangible and intangible) within his or her control. No Employee may make improper use of assets and resources of the Company or permit others to do so.

#### 4.9. Obligations of Recipients

Every employee/collaborator or entity that in any way carries out activities for Prima Electro is required to know and comply with the rules contained in the Code and the laws and regulations that apply to the activities performed within their duties. Every employee/collaborator must also explicitly accept their commitments arising from this Code at the time of establishment of the employment relationship and must subsequently agree to any relevant amendment or supplement to it.

Employees/Collaborators are also required to:

- refrain from conduct contrary to the rules contained in the Code;
- consult their Heads, company contacts, or SB in case of a request for clarifications on the modalities of implementing them;
- immediately report (not anonymously) to their Heads, company contacts or SB, any information, obtained directly or reported by others, about possible violations to them and any requests or impositions they have received to violate them;

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C4: non riservato/unreserved

- cooperate with the departments responsible for investigating possible violations;
- adequately inform all third parties with which they are connected in the sphere of the work activity about the existence of the Code and the commitments and obligations imposed by it to external parties;
- demand compliance with the obligations directly relating to their activities;
- take appropriate internal actions and, if authorized, external actions in case a third party fails to fulfil with the obligation to comply with the rules of the Code.

Each Prima Electro manager (directors, managers, executives, officers and branch managers) has the obligation to:

- represent, through their behaviour, an example for others;
- emphasize to those under their responsibility that compliance with the Code is an essential part of each person's work;
- monitor the proper implementation of the Code for the areas under their responsibility;
- adopt, as appropriate for each context, prompt corrective measures; and
- prevent any type of retaliation.

## 5. Method of Implementation

### 5.1. Supervisory Board

Prima Electro has established the Supervisory Board (hereinafter "**SB**") which shall carry out the following tasks to implement the Code:

- monitor compliance through the operation of specific compliance programs and by reviewing any reports of potential violations provided by the internal and external stakeholders;
- periodically report to the Board of Directors the results of the activities carried out, identifying any important violations of the Code;
- provide recommendations on the revision or creation of policies and procedures, to ensure compliance with the Code; and
- propose, if needed, periodic review of the Code and recommend updates when appropriate.

The SB, which has autonomous powers for intervention and control, is responsible for supervising operations and compliance with the company's organizational, management and control model as set out in Legislative Decree 231/2001, as well as overseeing its update.

### 5.2. Communication and Training


The Code is communicated to all internal and external Recipients through specific and traceable communication.

The Code is published on the website [www.primaelectro.com](http://www.primaelectro.com)

To ensure proper understanding of the Code, the Human Resources Department (HR) prepares and implements, in accordance with any directions of the SB, a periodic communication/training plan aimed at promoting awareness of ethical principles and standards contained in the Code.

### 5.3. Violations of the Code

Violations of the Code can result in disciplinary measures, including termination and potentially seeking compensation for damages suffered. The desire to act for the benefit of Prima Electro shall in no case justify behaviour contrary to the principles of this Code.

231CET	Code of Ethics		 GROUPE SYNOV
Rev 00	Class C4	Date	January 2026
		Depts. HR, BoD	

Class: C1: riservato ente/department reserved      C2: interno/internal only      C3: interno gruppo/internal group only      C4: non riservato/unreserved

Interested parties must report, in writing and not anonymously, any violation or suspected violation of the Code to the SB, which will analyse the report, interviewing separately, if necessary, the author of the report and the person responsible for the alleged violation.

You should report suspected violations of the Code to the following email address:  
[odv@primaelectro.com](mailto:odv@primaelectro.com)

The Supervisory Board will act to protect the reporting party against any kind of retaliation. The confidentiality of the reporting party will be protected to the extent possible, except to the extent required by law or to appropriately complete the investigation.

The Supervisory Board communicates the reporting and any recommendations deemed necessary to the Chief Executive Officer and, in the most significant cases, to the Board of Directors. If these violations involve one or more members of the BoD or the Chief Executive Officer (CEO), the SB will inform the Board of Directors as a collegial body and the Statutory Auditors. The relevant bodies will then define and implement the measures to be taken and will report their findings to the Supervisory Board.

Prima Electro's internal review procedure and imposition of penalties is independent of any pending criminal proceedings.

Penalties for violations of the Code vary from verbal reprimands to termination of employment and possibly legal action to recover damages, or other appropriate measures. Penalties will be determined based on the totality of the circumstances, including:

- the intentionality of the behaviour or the degree of negligence, recklessness, or incompetence;
- the conduct of the employee in the past, including previous disciplinary actions;
- the employee's duties; and
- any other relevant circumstances.