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DRAFTING:	QUALITY SYSTEM MANAGER		DATE:
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List of Revisions

Revision #	Issue Date	Modified Chapters	Subject of the Modification
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SECTION I - INTRODUCTION

SIM s.r.l. is a company operating in the ceramics and industrial heating resistors sector. It specializes in the production of technological products for high-temperature applications in various industries, including ceramics, jewelry, and dental technology, as well as the foundry and metallurgical industries, wire drawing and metal annealing, glass manufacturing, the food industry, and the petrochemical industry.

The Mission of *SIM s.r.l.* is to become an “international benchmark” in the field of industrial electric heating. Always focused on achieving full customer satisfaction, the company aims to provide a complete range of spare parts necessary for the construction and operation of industrial electric furnaces, while fully respecting individuals and the environment.

Employee training, communication, and attentiveness to customer needs are the foundations upon which *SIM s.r.l.* builds its future strategies.

SIM s.r.l. is ISO 9001:2015 Quality certified and is implementing a gender equality and corporate sustainability management system.

Recipients and Scope of Application of the Code of Ethics

SIM s.r.l. adopts this Code of Ethics (hereinafter referred to as the “Code”), which defines the principles of conduct to be followed by the company’s Board of Directors, all employees, all individuals or companies acting in the name and on behalf of *SIM s.r.l.*, as well as all entities engaging in any type of relationship with the company.

These entities are collectively referred to as “recipients”.

The Code is approved by the Sole Director and is made available to all recipients through publication on the company’s website (www.sim-cdm.it), where it can be freely downloaded, and through the company’s internal network.

Compliance with the Code of Ethics is an integral part of the contractual obligations of the recipients.

Based on regulatory developments, international best practices, and the experience gained in the application of the Code by *SIM s.r.l.*, the document is subject to periodic review by Management, in collaboration with the Administrative Manager and the company RSPP (Prevention and Protection Service Manager).

It is part of the company’s philosophy to encourage and welcome constructive contributions regarding the contents of the Code from both employees and third parties. Furthermore, *SIM s.r.l.* does not establish or continue business relationships with anyone who expressly refuses to comply with the principles outlined in this Code.

It is also important to note that this Code is an integral part of the Quality Management System (QMS) adopted by *SIM s.r.l.*, which is committed to its continuous implementation and updating.

SECTION II – IMPLEMENTATION METHODS

Article 1: ADOPTION AND UPDATES

The most recent update of the Code of Ethics was adopted by decision of the Management of *SIM s.r.l.* on March 1, 2015. This Code aims to ensure full alignment between the guiding values recognized as the fundamental principles of *SIM s.r.l.* and the expected behaviors outlined in the document.



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Article 2: CODE OF ETHICS AND SGI

The Quality System (QMS) of *SIM s.r.l.* complies with the requirements set forth by the applicable regulatory standards.

In this regard:

- *The Code of Ethics is voluntarily adopted by SIM s.r.l. and defines the values and principles of conduct that all the recipients must uphold. It serves as the primary tool for preventing unlawful acts;*
- *The Quality Management System (QSM), inspired by the principles of the Code of Ethics, adheres to specific regulatory requirements.*

SIM s.r.l. is committed to the continuous improvement of its operations and internal procedures to enhance business management efficiency and effectiveness, ensuring timely and precise fulfillment of customer and user requests.

SECTION III – GENERAL PRINCIPLES

Article 3: VALUES

The actions, operations, transactions and, in general, all behaviors of the recipients in carrying out their respective duties and responsibilities must be guided by the highest standards of integrity, honesty, fairness, loyalty, transparency, equity, objectivity, as well as respect for individuals and responsibility in the prudent use of corporate, environmental and social resources.

Fostering a sense of belonging to *SIM s.r.l.* and enhancing the company's reputation are common goals for all recipients of this Code of Ethics.

Article 4: INTEGRITY, HONESTY, FAIRNESS, AND LOYALTY

Adherence to the values of integrity, honesty, fairness, and loyalty requires that, in corporate and accounting management, *SIM S.r.l.* is committed to::

- *Promoting and enforcing compliance with internal procedures and all applicable laws by employees, collaborators, clients, suppliers, and any other third party with whom it has a legal relationship.*
- *Strictly adhering to anti-money laundering regulations, ensuring that any transaction suspected of lacking fairness and transparency is refused.;*
- *Fostering practices at all levels to prevent corruption, whether at the local, national, or international level.*
- *Ensuring and promoting compliance with all regulations, organizational rules, and the Quality Management System (QMS) within the company.*
- *Recording every operation and transaction only when supported by appropriate documentation, allowing for auditability at any time. This ensures that each transaction's characteristics and reasons can be verified, along with identifying who authorized, executed, recorded, and reviewed it. Consequently, requiring employees and collaborators to maintain accurate, timely, and complete accounting records, in strict compliance with civil and tax laws as well as internal accounting procedures. Each entry must precisely reflect the data in the supporting documentation, which must be carefully preserved for any potential audit.*



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The reliability of business transactions and accurate, timely record-keeping, which enable a retrospective reconstruction of the company's overall situation, are fundamental objectives consistently pursued by *SIM S.r.l.* This commitment includes:

- *Preventing the formation of groups of three or more individuals within the company whose specific intent is to engage in unlawful conduct.*
- *Ensuring behaviors that fully respect gender equality, including avoiding any conduct that could be misinterpreted, as well as preventing any form of harassment, including verbal harassment.*

Article 5: EQUITY, OBJECTIVITY, AND PROTECTION OF INDIVIDUALS

SIM s.r.l. upholds the protection of personal safety, freedom, and individual dignity as an essential and non-negotiable value.

To ensure full respect for individuals, *SIM S.r.l.* is committed to:

- *Creating working conditions that safeguard the physical and psychological well-being of employees and respect their individuality.*
- *Ensuring that all activities conducted on its behalf are based on risk prevention and the protection of the health and safety of workers and third parties.*

Furthermore, in adherence to the values of equity and objectivity, *SIM S.r.l.* is committed to:

- *Avoiding all forms of discrimination, particularly those based on race, nationality, gender, age, disability, sexual orientation, political or union affiliation, philosophical beliefs, or religious convictions.*
- *Not tolerating sexual harassment or physical or psychological abuse, in any form or context.*

All relationships must be based on mutual respect, civil coexistence, and the recognition of individual rights and freedoms. More broadly, any behavior intended to violate a person's dignity or create an intimidating, hostile, degrading, humiliating, or offensive environment must be avoided.

Article 6: GENDER EQUALITY

SIM s.r.l. guarantees equal dignity and equal opportunities for all individuals, regardless of their country of origin, cultural or religious background, gender, sexual orientation, political opinions, or any other personal characteristic or lifestyle.

The company's gender equality policy aims to gradually but rigorously reduce pay gaps and career advancement disparities that may have arisen throughout its long history.

SIM s.r.l. believes that diversity and inclusion are sources of new and innovative ideas, capable of generating solutions that contribute to building a sustainable society. For this reason, the company strives to create a stimulating and inclusive work environment, offering career opportunities that foster innovation and professional growth.

SIM s.r.l. is committed to:

- *Promoting a culture of diversity and equal opportunities among employees and collaborators, ensuring that everyone is treated with dignity, respect, and fairness at all times.*
- *Creating a welcoming work environment, free from any form of direct or indirect discrimination and from any harmful behavior based on personal, social, political, or cultural differences.*



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- Regularly monitoring gender equality indicators to implement timely and effective actions that support the objectives outlined in this document.
- Applying specific HR policies that ensure fairness at every stage of employment, from hiring and role assignment to career management, performance evaluation, professional development, salary equity, and termination processes.
- Implementing internal and external communication policies that promote gender equality, celebrate diversity, and support women's empowerment.
- Recognizing the importance of work-life balance, by developing programs and initiatives to support parenting, caregiving responsibilities, and flexible working arrangements.
- Enforcing strict policies to prevent any form of physical, verbal, or digital abuse (harassment) in the workplace.

Furthermore, external collaborators, clients, and suppliers who interact with SIM S.r.l. are expected to respect the core principles of gender equality. Inappropriate behavior, including harassment (even verbal), will not be tolerated.

Article 7: TRANSPARENCY AND CONFIDENTIALITY

Adherence to the principles of transparency and confidentiality requires SIM S.r.l. to:

- Disseminate truthful, complete, transparent, and comprehensible information.
- Protect the confidentiality of data and information that recipients may have access to. Members of the administrative and supervisory bodies, employees, and collaborators must be fully aware that they are prohibited from engaging in trading or other transactions - directly or indirectly - or recommending such transactions based on privileged information acquired through their professional activities. More broadly, all recipients of this Code of Ethics must avoid behaviors that could constitute or facilitate insider trading, or any form of personal gain from confidential corporate information.
- Consider confidentiality as a cornerstone of corporate operations, essential to SIM S.r.l.'s reputation and the trust placed in it by users, clients, and stakeholders. Employees and collaborators of SIM S.r.l. must strictly adhere to this principle, even after the termination of their employment or collaboration. It is strictly forbidden to disclose, share, or improperly use confidential data, information, or news regarding third parties with whom SIM S.r.l. has, or is in the process of establishing, business relationships. Personal data may only be disclosed to those who genuinely require access for the performance of their specific duties. Anyone engaging with SIM S.r.l. must refrain from the unauthorized communication or dissemination of such data and/or information.

Therefore, it is expressly forbidden to:

- Include false material facts or omit information required by law in financial statements, reports, or other legally mandated corporate communications regarding SIM S.r.l.'s economic, asset, or financial situation. This includes information related to assets owned or managed by SIM S.r.l. on behalf of third parties, in a manner that could mislead stakeholders, potentially causing financial harm to shareholders or creditors, with the intent of deceiving them and obtaining an undue profit for oneself or others.



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- *Knowingly provide false statements or conceal information in reports or other corporate communications with the intent to mislead stakeholders regarding SIM S.r.l.'s financial, asset, or economic situation, in order to obtain an undue profit for oneself or others.*
- *Conceal documents or use any other deceptive methods to impede or obstruct legally mandated audit or supervisory activities conducted by shareholders or other corporate bodies.*

Recipients who become aware of omissions, falsifications, or negligence in accounting records or supporting documentation must report such incidents to the company's management.

8: RESPONSIBILITY

Respecting the value of responsibility means that SIM S.r.l.'s activities are carried out:

- *Inspired by the principles of sound and prudent management, with the goal of being a solid, reliable, and transparent cooperative, open to innovation, responsive to the ever-evolving needs of clients and users, attentive to management requirements, committed to the best development and utilization of human resources, and focused on achieving the most efficient corporate organization;*
- *Pursuing corporate interests in compliance with laws and regulations, acting with integrity and fairness, recognizing competition as a positive driver for continuous improvement in the quality of products and services offered to customers, and ensuring that all commercial conduct adheres to principles of loyalty and fairness;*
- *Protecting the company's reputation and assets;*
- *Striving for compatibility between economic initiatives and environmental needs, not only by complying with current regulations but also by considering best practices in the field;*
- *Supporting the social and economic growth of the regions where SIM S.r.l. is established, including through cultural, sports, and social initiatives aimed at disadvantaged groups;*
- *Promoting gender equality to ensure equal dignity and opportunities for all individuals, regardless of their country of origin, cultural and religious background, gender, sexual orientation, political opinions, or any other personal characteristic or lifestyle;*
- *Upholding the principles of corporate sustainability in ethical, environmental, and social terms.*

Article 9: MANAGEMENT OF RELATIONSHIPS REGARDING NEGLIGENT OFFENSES IN WORKPLACE SAFETY

SIM S.r.l. follows fundamental principles and criteria that guide decision-making at all levels concerning workplace health and safety.

These principles and criteria can be summarized as follows:

- *Avoid risks;*
- *Assess risks that cannot be avoided;*
- *Prevent risks at the source;*
- *Adapt work to people, particularly in the design of workplaces, the selection of work equipment, and work methods, with a focus on mitigating monotonous and repetitive tasks and reducing their impact on health;*



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- *Take into account technological advancements;*
- *Replace hazardous elements with non-hazardous or less hazardous alternatives;*
- *Plan prevention strategies by integrating technology, work organization, working conditions, social relationships, and environmental factors into a coherent system;*
- *Prioritize collective protective measures over individual protective measures;*
- *Provide workers with appropriate instructions and training.*

These principles guide the company in implementing necessary measures to protect workers' health and safety, including risk prevention, information and training activities, and the establishment of an appropriate organizational structure and resources.

SIM s.r.l., at both management and operational levels, must adhere to these principles, particularly when making decisions or choices and subsequently in their implementation.

Article 10: MANAGEMENT OF BUSINESS ACTIVITIES IN RELATION TO ENVIRONMENTAL OFFENSES

The Company is committed to environmental protection, with the goal of continuously improving its environmental performance.

To this end, its commitments include:

- *Compliance with national and EU environmental legislation and regulations;*
- *Prevention of pollution;*
- *Raising awareness among members, employees, and collaborators on environmental issues;*
- *A project-based approach aimed at minimizing environmental impacts resulting from design choices.*

Consequently, the recipients of this Code of Ethics are required to adhere to the following behaviors:

- *Not to kill, capture, or possess specimens of protected wild animal species, except in cases permitted by law;*
- *Not to destroy, collect, or possess specimens of protected wild plant species, except in cases permitted by law;*
- *Not to destroy or deteriorate habitats within a protected site in a way that compromises their conservation status, except in cases permitted by law;*
- *Not to discharge industrial wastewater without authorization or after an authorization has been suspended or revoked;*
- *Not to engage in the collection, transportation, recovery, disposal, trade, or brokerage of waste without the required authorization;*
- *Not to cause soil, subsoil, surface water, or groundwater pollution by exceeding risk threshold concentrations, and to carry out remediation if necessary;*
- *When preparing a waste analysis certificate, to provide accurate information on the nature, composition, and chemical-physical characteristics of the waste;*
- *Not to engage in illegal waste trafficking;*
- *Not to exceed the emission limits for air quality set by authorizations, regulations, and applicable laws;*
- *Not to import, export, transport, possess, use for profit, purchase, sell, display, or hold for sale or commercial purposes any specimens listed in EC Regulation No. 338/97 without the required certifications or licenses, or in violation of their terms; not to offer for sale or transfer such specimens without the required documentation;*



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- *Not to possess live specimens of wild mammals and reptiles or captive-bred mammals and reptiles that pose a risk to public health and safety.*

SECTION IV – CODE OF CONDUCT

Article 11: RELATIONS WITH PERSONNEL

Recognizing its personnel as a fundamental and indispensable factor for corporate development, *SIM S.r.l.* considers it essential to establish and maintain relationships with worker-members, employees, and collaborators based on mutual trust.

SIM S.r.l. is committed to ensuring that the skills and legitimate aspirations of individuals can be fully realized while achieving corporate objectives. This principle must guide the operations of all company departments, particularly those responsible for personnel management.

SIM s.r.l. is dedicated to offering equal employment and professional growth opportunities to all workers, collaborators, and employees based on their skills and professional qualifications, without any form of discrimination, nepotism, or favoritism.

Therefore, *SIM S.r.l.* requires that, in both internal and external work relationships, no form of harassment occurs. This includes creating a hostile work environment against individuals or groups, unjustified interference with others' work, or the imposition of obstacles hindering professional development.

Personnel are hired exclusively through regular employment contracts, and no form of irregular labor is tolerated.

Article 12: PERSONNEL OBLIGATIONS

Managers, employees, and collaborators must comply with the provisions of this Code of Ethics. In particular, they commit to diligently and loyally adhering to the following:

- *Any personal situation or activity that could lead to actual or potential conflicts of interest with the company, or that might interfere with the ability to make impartial decisions in the best interest of SIM S.r.l., must be avoided.*
- *Employees and collaborators have the right to engage in investments, business, or other activities outside of those performed for SIM S.r.l., provided they are lawful, contractually permitted, and compatible with their obligations as worker-members, employees, or collaborators. Any situation that may create or result in a conflict of interest must be promptly reported by the worker-member, employee, or collaborator to their supervisor, company contact, or the body responsible for overseeing the Code of Ethics. All members, employees, and collaborators must avoid conflicts of interest between their personal and family economic activities and their roles and duties within the company.*
- *Examples of conflicts of interest include, but are not limited to, holding executive positions (such as CEO, director, or department head) or having financial or economic interests in suppliers, customers, competitors, or business partners of SIM S.r.l.*
- *Personnel are prohibited from accepting, even indirectly, money, gifts, goods, services, favors, or benefits in connection with relationships with any third party with whom SIM S.r.l. has an ongoing business relationship, if the purpose is to influence decisions, obtain preferential treatment, secure undue advantages, or for any other reason.*

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- Any requests for or offers of money, gifts, or favors of any kind (except for symbolic gifts that are a normal part of interpersonal relationships), whether received from internal personnel or external parties, must be promptly reported to the employee's direct supervisor and the Supervisory Body.
- Every individual is responsible for diligently safeguarding company assets, using the resources entrusted to them carefully and responsibly. Improper use that may cause damage, reduce efficiency, or otherwise conflict with SIM S.r.l.'s interests - including unauthorized personal use - is strictly prohibited.

Articolo 13: RELATIONS WITH POLITICAL AND TRADE UNION ORGANIZATIONS

The principles of transparency, independence, and integrity must also characterize the relationships maintained by the company's relevant functions with political and trade union organizations. These relationships are conducted to foster proper dialogue, without any discrimination or differential treatment.

Relations with representatives of political and trade union organizations are reserved for the competent functions of SIM S.r.l. that are authorized for this purpose. Any contributions must be approved and disbursed in compliance with applicable regulations and must be properly recorded and documented.

The recipients of the Code of Ethics may participate in political organizations on a personal basis outside of working hours and without any connection to their role within SIM S.r.l. This participation must comply with applicable regulations.

Article 14: CONDUCT OF CORPORATE BODIES

Corporate bodies, fully aware of their responsibilities, must comply with the law, applicable regulations, and the company's bylaws, as well as adhere to the provisions and principles of this Code of Ethics.

In particular, their members are required:

- To conduct with autonomy, independence, and fairness in their relations with public institutions, private entities, economic associations, political forces, and all other national and international stakeholders.
- To act with integrity, loyalty, and a sense of responsibility.
- To ensure active and responsible participation in meetings and activities of the corporate bodies.
- To assess conflicts of interest or incompatibilities related to functions, positions, or roles inside and outside SIM S.r.l., refraining from actions in cases of conflicts of interest within their activities.
- To handle confidential information obtained in the course of their duties with discretion, avoiding the use of their position for personal gain, whether direct or indirect.
- To present only truthful, complete, and unaltered documents and records in meetings related to specific agenda items.

Article 15: RELATIONS WITH CUSTOMERS AND SUPPLIERS

SIM S.r.l. is committed to maintaining a strong focus on the quality of its relationships with customers and to continuously improving them, as this is a fundamental element of the company's value creation and distribution process. Customers are an integral part of SIM S.r.l.'s corporate assets.

In dealing with customers, each recipient of this Code represents SIM S.r.l. and must conduct their activities with professionalism, competence, availability, fairness, courtesy, and transparency. The excellence of services provided and the assurance of a prompt and qualified response to customer requests are key elements of SIM S.r.l.'s relationship with its clients.



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All conduct must respect professional confidentiality regarding information acquired in the course of business and comply with current personal data protection regulations.

Commercial relationships must always adhere to industry and trade regulations, avoiding any fraudulent or unlawful conduct, as well as actions that violate copyright laws.

To protect the image and reputation of *SIM s.r.l.* - built through the dedication, commitment, and professionalism of its personnel—relations with customers must be based on:

- *Full transparency and fairness, ensuring customers always understand the characteristics and value of the services they purchase or are offered.*
- *A thorough assessment of customers' risk profiles to offer services consistent with their needs.*
- *Maintaining high standards of service quality and maximizing customer satisfaction.*
- *Regularly monitoring customer satisfaction and loyalty objectives.*
- *Avoiding any discrimination in services provided based on nationality, religion, or gender.*
- *Promptly addressing complaints to achieve a substantial resolution of disputes.*
- *Developing a pricing policy aligned with the quality of the services offered.*
- *Ensuring accessibility for individuals with disabilities by eliminating architectural barriers.*
- *Complying with legal requirements, particularly regarding anti-money laundering regulations, as well as measures against receiving and using illicitly obtained funds, goods, or benefits.*
- *Maintaining independence from any improper internal or external influence.*

Furthermore, when initiating commercial relationships with new customers or managing existing ones, it is essential, based on available information, to avoid:

- *Engaging in direct or indirect relations with individuals known or suspected to be involved in illegal activities, particularly those related to arms trafficking, drug trafficking, money laundering, or terrorism, or with individuals lacking the necessary reliability and business integrity.*
- *Financing activities that produce or market highly polluting or environmentally hazardous products.*
- *Engaging in financial transactions with businesses that, directly or indirectly, hinder human development and violate fundamental human rights (e.g., by employing child labor).*
- *Engaging in conduct that violates copyright laws.*

The principles applied to customer relationships must also govern *SIM s.r.l.*'s commercial relationships with its suppliers, with whom it commits to developing fair and transparent interactions. In particular, *SIM s.r.l.* ensures:

- *Standardized procedures for the selection and management of suppliers, guaranteeing equal dignity and opportunities. The selection process considers objective and transparent evaluations of suppliers' professionalism, business structure, quality, pricing, service execution, and delivery methods. Additionally, the suppliers' market reputation, ability to maintain confidentiality, adherence to social responsibility criteria, and compatibility with *SIM s.r.l.*'s size and needs are taken into account.*
- *Criteria and continuous monitoring systems to assess the quality of goods and services provided.*
- *Fair supply contracts, particularly concerning payment terms and administrative obligations.*

Compliance with these principles is ensured through the adoption and adherence to internal procurement and supplier selection procedures. Suppliers are encouraged to conduct their business in accordance with the ethical standards outlined in this Code. Specifically, they must demonstrate business integrity, respect for workers' rights, investment in quality, and responsible management of environmental and social impacts.



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Article 16: RELATIONS WITH STAKEHOLDERS

SIM s.r.l. prioritizes enhancing the contributions of its stakeholders.

In line with its core values and with the aim of strengthening lasting and continuous relationships, *SIM s.r.l.* guarantees stakeholders:

- *Timely and transparent communication of the implementation status of SIM s.r.l.'s strategies and results, with the aim of providing clear, complete, and accurate information;*
- *Equal access to information, as outlined in the previous point, and the best and continuous attention to all stakeholders, without discrimination or preferential treatment.*

Article 17: RELATIONS WITH PUBLIC ADMINISTRATION

SIM s.r.l. identifies and defines communication channels with all Public Administration counterparts at the local, national, and international levels, as well as with private partners holding public service concessions.

In particular, commitments towards the Public Administration are reserved for the designated and authorized company functions, which are required to carry out their duties with integrity, independence, and fairness. Relations must also be based on maximum cooperation, avoiding any actions or attitudes that could be interpreted as an attempt to unduly influence decisions.

With regard to relations with the Public Administration, recipients are prohibited from promising or offering Public Officials, Public Service Officers, or any employees of the Public Administration gifts (not only monetary amounts but also goods), benefits, or other advantages to promote or favor the interests of *SIM s.r.l.* when making commitments and/or managing relationships of any kind with the Public Administration (e.g., in contract negotiations and execution, obtaining and managing authorizations, inspections, controls, or within judicial procedures).

Specifically, it is prohibited to:

- *Offer gifts to the above-mentioned parties, even during holiday periods, except for symbolic tokens of appreciation that are directly attributable to normal business courtesy;*
- *Exploit or propose employment opportunities for Public Administration employees (or their relatives and affiliates) and/or any other business opportunities that could unduly benefit them beyond the standard treatment granted to clients;*
- *Provide or promise to provide, solicit, or obtain confidential information and/or documents that could compromise the integrity or reputation of either party;*
- *Favor suppliers and subcontractors in procurement processes solely because they have been recommended by Public Administration employees as a condition for further business activities;*
- *Withhold required information to unduly influence Public Administration decisions in favor of oneself or one's clients.*

Anyone who receives explicit or implicit requests or proposals for benefits of any kind from Public Officials or Public Service Officers must immediately report the incident to their direct supervisor or company representative.

Article 18: RELATIONS WITH THE MEDIA

All communications from *SIM s.r.l.* to any media outlet must comply with the company's policies and programs.



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Relations with the press and other mass communication channels are the exclusive responsibility of the designated corporate bodies and functions.

Article 19: RELATIONS WITH COMPETITORS

SIM s.r.l. and its collaborators are committed to full compliance with competition and market protection laws in all jurisdictions.

No collaborator may engage in initiatives or contacts with competitors (e.g., price agreements) that could be perceived as a violation of competition and market protection regulations.

SECTION V – IMPLEMENTATION METHODS

Article 20: MANAGEMENT AND CODE OF ETHICS

The implementation and compliance with this Code of Ethics are entrusted to the management.

Article 21: DISSEMINATION AND REPORTING

SIM s.r.l. promotes the widest possible dissemination of the Code of Ethics among all relevant parties, ensures the correct interpretation of its contents, and provides the most appropriate tools to facilitate its application.

The Code of Ethics and its updates are communicated to all recipients through appropriate communication, training, and dissemination activities to ensure that the values and principles it contains are understood and applied, preventing individual initiatives from leading to behaviors inconsistent with the reputational profile pursued by *SIM s.r.l.*

Additionally, the Code of Ethics is published on the company's website, making it accessible to everyone.

A copy of the Code (in print or electronic format) is provided to each employee, worker, or collaborator upon their appointment, hiring, or the commencement of their relationship with *SIM s.r.l.*

All recipients of this Code are required to report any instructions received that conflict with the law, employment contracts, internal regulations, or this Code of Ethics. Failure to comply with the reporting obligation is explicitly subject to sanctions.

In particular, any violation of the principles and provisions contained in this Code of Ethics must be promptly reported to management by the recipients.

Recipients who become aware of omissions, falsifications, or negligence in accounting records or in the documentation on which accounting entries are based must report such facts to management.

SIM s.r.l. will not tolerate any form of retaliation, discrimination, or penalization against individuals who report in good faith, while ensuring compliance with legal obligations and the protection of the rights of those who may be wrongly or maliciously accused.



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By signing, the Collaborators confirm that they have received a copy of this document and have shared it with the Company's Management to ensure full understanding of all its elements.

DATE	LAST NAME AND FIRST NAME	SIGNATURE