

Code of Conduct

Parma, April 15th 2025

1. Introduction

This Code of Conduct represents IAP GLOBE Abrasivi S.r.l.'s commitment to ethical, responsible and transparent behavior in all its activities. The goal is to promote a corporate culture based on integrity, respect, legality and social responsibility. This document establishes behavioral guidelines for all those involved in the company's activities. Each employee is called upon to contribute to a healthy, safe and respectful working environment, reporting any violations in a constructive manner. The Code is binding and represents a fundamental tool for preventing unethical behavior or behavior that is contrary to current legislation.

2. Mission, Vision and Corporate Values

The mission of IAP GLOBE Abrasivi is to provide superior abrasive solutions that meet the specific needs of customers in various industrial sectors. Through continuous innovation, attention to quality and a strong work ethic, the company aims to consolidate its position in the global market.

Vision: To build a modern, sustainable enterprise that is internationally recognized for its technical excellence and human value. IAP GLOBE intends to be a protagonist in the transition to a greener, more efficient and responsible industry.

Values:

- Integrity: Act honestly and transparently.
- Quality: Pursue continuous improvement.
- Innovation: Adopt cutting-edge technologies and ideas.
- Respect: Value people and diversity.
- Safety: Protect workers and the environment.
- Responsibility: Take responsibility for your actions.

3. Scope of Application

The Code of Conduct applies to all those who operate on behalf or in the interest of IAP GLOBE Abrasivi S.r.l., in any capacity. The scope of application includes:

- Temporary and permanent employees
- External collaborators and consultants
- Suppliers and subcontractors
- Partners and customers
- Members of the Board of Directors and managers

Adherence to the Code is an essential condition for maintaining relationships with the company.

4. Fundamental Ethical Principles

The ethical principles that guide the company's activities are:

****Legality****: all company operations must be conducted in compliance with current regulations, both nationally and internationally.

****Integrity****: consistent, correct and transparent behavior is required, even in the absence of direct controls.

****Confidentiality****: sensitive company information must be protected and not disclosed to unauthorized third parties.

****Fairness****: every decision must be taken in compliance with the rights of the people involved and the principles of impartiality.

5. Workplace Behavior

IAP GLOBE is committed to ensuring a professional environment in which everyone can work in conditions of respect and safety. Each employee is required to actively contribute to maintaining a climate of trust and collaboration. In particular, it is forbidden to:

- Adopt harassing or offensive behavior
- Discriminate based on gender, ethnicity, age, disability, sexual orientation or religious beliefs
- Use of illicit substances

The company also promotes psychological well-being and the reconciliation of private and professional life.

6. Management of Conflicts of Interest

Conflicts of interest, even potential ones, must be avoided. Any situation in which a personal interest could interfere with that of the company must be communicated immediately. Examples include:

- Participation in decisions involving relatives or friends
- Acceptance of gifts or benefits from suppliers
- External work activities that could create unfair competition

Transparency is essential to protect the integrity of the company and its members.

7. Use of Company Resources

Company resources (machinery, IT devices, production tools, company means) must be used diligently and for exclusively professional purposes. Improper use, waste or voluntary damage to resources is prohibited. The company promotes efficient and environmentally friendly use of available technologies and materials.

8. External Relations

Relationships with customers, suppliers, public bodies and competitors must be based on fairness and transparency. In particular:

- Customers: offering reliable products, technical support and compliance with contractual terms
- Suppliers: selected according to ethical, environmental and quality criteria
- Competition: compliance with competition regulations and rejection of unfair practices or cartels

Each employee represents the company and reflects its image: personal behavior has a direct impact on reputation.

9. Environment and Sustainability

IAP GLOBE is committed to reducing the environmental impact of its activities, adopting a sustainability policy that includes:

- Reduction of energy consumption
- Responsible waste management
- Use of raw materials with low environmental impact
- Collaboration with ecologically sustainable suppliers

Each employee is called upon to contribute with conscious and responsible behavior.

10. Anti-corruption and Anti-money laundering

The company adopts a zero-tolerance policy towards any form of corruption or money laundering. It is forbidden to offer, promise, receive or solicit undue payments or other advantages in exchange for favors. Every financial transaction must be traceable and documented. In case of doubt, it is necessary to contact the Compliance Office or Management.

11. Violations of the Code and Disciplinary System

Violation of the provisions of the Code may result in disciplinary sanctions up to dismissal or termination of the business relationship. A reporting channel (whistleblowing) is active to allow the communication of improper behavior in a confidential manner. The company guarantees the protection of the identity of the whistleblower and the prohibition of retaliation.

12. Training and Dissemination

IAP GLOBE promotes knowledge of the Code through periodic training activities, information meetings and documentary support. Each new hire will receive a copy of the Code during the onboarding process and will be required to sign acknowledging its acknowledgement.

13. Approval, Monitoring and Updating

The Code is approved by the General Management and is subject to periodic review. Any changes will be communicated promptly. The responsibility for monitoring is entrusted to the Compliance Manager.

Signature for acknowledgement and acceptance
Name and Surname: Dr Ing Paolo Ficai

Role: Chief Executive Officer

