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1. PURPOSE AND APPLICATION OF CODE OF ETHICS

The code of ethics defines the principles and requirements of conduct that Aignep employees must observe and promote within their respective competences and in relation to the position held in the company organization. This code it is a effective instrument to prevent irresponsible or illegal behavior by those who work in the name or on behalf of the company and which could damage Aignep's good reputation.

Through the code of ethics, Aignep intends in particular:

- Define and clarify the values and ethical principles that characterize their business and relationship with customers, supplies, partners, employees, collaborators, administrators, public institution and any other person involved in the business.
- Formalize the commitment to behave on the basis of the ethical principles of moral legitimacy, equity and equality, personal protection, diligence, transparency, honesty, confidentiality, impartiality, health protection.
- Indicate to their employees, collaborators and administrators the principles of conduct, values and responsibilities that must be strictly observed in the course of the provision of work.

2. ADDRESSEES OF THE CODE

This code applies to:

1. Corporate bodies (administrative body, delegated bodies, board of statutory auditors);
2. Company personnel (managers, employees, workers, etc.);
3. Consultants, suppliers, sub-suppliers, partners and anyone who carries out activities for Aignep.

3. ETHICAL PRINCIPLES

3.1 HONESTY AND LEGALITY

In carrying out the professional activity, Aignep collaborators are required to diligently comply with the laws in force, this code of ethics and internal regulations.

In no case can the pursuit of Aignep's interest justify dishonest conduct.

3.2 FAIRNESS

In decisions that affect relations, (the choice of customers, the management of personnel or the organization of work, the selection and management of suppliers) Aignep offers equal opportunities without discrimination based on ethnicity, religion, opinions, nationality, sex, age, physical and social conditions.

3.3 CONFIDENTIALITY

The employee is required to maintain the strictest and most absolute confidentiality on all informations relating to the company and / or its employees of which he is aware by virtue of his work. This is in order to avoid the disclosure of confidential information relating to the organization, production methods and any other information whose disclosure could cause damage to the company.

3.4 CONFLICT OF INTEREST

Employees must refrain from participating in any activity that may generate a conflict of interest in compliance with the principles of legality, loyalty, fairness and transparency:

- Without prejudice to the provisions of the contractual rules on the subject, the personnel must not take on external assignments in companies or commercial enterprises whose interests are directly or even

potentially conflicting or interfering with those of Aignep and, in any case, must submit to the attention of the company any situation that could be considered a conflict of interest.

- The staff does not accept wages or other benefits from parties other than Aignep for services to which they are required in the performance of their office duties.
- Any situation that may constitute or determine a conflict of interest must be promptly communicated to the Management.

3.5 OCCUPATIONAL SAFETY

The company is required to comply with the laws and regulations in force regarding the protection of the health and safety of workers and also aims to prevent and reduce the risks to the health and safety of workers and maintain an adequate and safe working environment, in which all employees can be satisfied and in which professional growth is stimulated.

3.6 ENVIROMENT

The company promotes a culture of sustainable development and environmental protection by supporting actions aimed at optimizing energy consumption, reducing emissions and promoting waste management aimed at their reduction and reuse.

3.7 MATERIALS CONFORMITY AND CONFLICT MINERALS

Aignep pays a lot of attention to the materials used in its products and verifies that these comply with the legal requirements of international standards (eg. Reach, RoHS).

Aignep keeps up to date with the guidelines, laws and standards in force, so as not to use prohibited substances or pay attention to the related restrictions and report them.

Aignep is committed to doing everything in its power to prevent the use of so-called conflict minerals. This applies to raw materials such as tantalum, tin, gold, tungsten from conflict-affected or high-risk areas.

4. RELATIONSHIP WITH EMPLOYEES AND COLLABORATORS

4.1. EMPLOYEES SELECTION

- The evaluation of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles to the company needs, safeguarding equal opportunities for all interested parties. The information requested is strictly connected to the professional and psycho-aptitude profile requested, respecting the private sphere and the opinions of the candidate.
- The company, within the limits of the information available, takes appropriate measures to avoid favoritism, nepotism or forms of patronage in the selection and recruitment phases of personnel.
- The company bases the selection, hiring, remuneration and management of human resources on the basis of merit and competence, in the most rigorous respect of the applicable reference legislation.
- The staff is hired with an employment contract in the manner provided for by the legislation and collective bargaining in force. No irregular working position is allowed.
- Before the establishment of the employment relationship, each employee receives adequate information relating to the regulatory and salary content of the relationship itself so that acceptance of the assignment guarantees awareness of its contents.

EMPLOYEES MANAGEMENT

- The company offers equal opportunities to all employees based on the professional qualifications and individual skills of each, without any kind of discrimination (age, religion, ethnic origin, sexual, political or trade union orientation). Behaviors that have a discriminatory content based on political and trade union opinions, religion, racial or ethnic origins, nationality, age, sex, sexual orientation, state of health and in general any intimate characteristic of the human person are not allowed.
- The company is committed to ensuring a safe, healthy and productive work environment, spreading a culture of safety, awareness of risks by employees and encouraging responsible behavior on the part of the latter.
- The company undertakes to protect the moral integrity of its collaborators by guaranteeing the right to working conditions that respect the dignity of the person. The company undertakes to ensure that no behaviors or initiatives are adopted in working relationships, both internal and external, that create an intimidating, hostile or isolating work environment towards individuals or work groups.
- The managers establish relationships with their collaborators based on mutual respect and fruitful cooperation, each Manager supports the professional growth of the assigned resources, taking into consideration the attitudes of each in the assignment of tasks, in order to achieve real efficiency in operational scope. All without distinction are guaranteed the same opportunities to express their professional potential.

5. RELATIONSHIP WITH OTHER STAKEHOLDERS**5.1. RELATIONSHIP WITH SUPPLIER**

In procurement relationships and, in general, the supply of goods and / or services, employees are obliged to:

- Observe internal procedures for selecting and managing relationships with suppliers.
- Observe and ensure compliance with the contractual conditions.
- Maintain a fair and open dialogue with suppliers, in line with good business practices.

In relations with suppliers, contractors and sub-contractors, Aignep employees, directors and collaborators:

- They must require compliance with the ethical principles contained in this Code and, to this end, the contracts must recall the obligation to know its contents and apply the principles correctly;
- They must select suppliers on the basis of objective criteria such as the price and quality of the service and products, in compliance with the principles of legality, transparency, competition and equal conditions of the offers and in order to ensure the maximum competitive advantage for Aignep.

Suppliers, contractors and subcontractors are required to:

- Establish efficient, transparent and collaborative relationships, maintaining an open and frank dialogue in line with the best commercial practices;
- Constantly ensure the most convenient relationship between quality, cost and delivery times;
- Respect the contractual conditions and comply with the principles of this code of ethics;
- Operate within the framework of current legislation on contractual, social security contributions, occupational safety and hygiene and environmental protection;
- Do not use child labor or foreign personnel in carrying out their business without a regular residence or work permit.

5.2. RELATIONSHIP WITH CUSTOMER

Aignep manifests a constant sensitivity and a concrete commitment to safeguarding and improving the quality of relations with customers. The objectives of primary corporate interest are the full and constant satisfaction of the customer who is the recipient of the services; every relationship is based on fairness, transparency, efficiency and courtesy.

Aignep employees are required to:

- imprint the style of behavior with a view to a collaborative and highly professional relationship oriented towards customer satisfaction;
- provide accurate and exhaustive information so that the customer can make informed decisions;
- supply, with efficiency and courtesy, within the limits of the contractual provisions, quality products in line with the reasonable expectations of the customer, periodically monitoring the quality of the service offered;
- in the relationship with the customer maximum confidentiality must be constantly guaranteed and all the rules on privacy must be respected.

6. CONTRACTUAL VALUE OF THE CODE OF ETHICS

The violation of the principles established in this code of ethics and in the internal procedures compromises the fiduciary relationship between the company and its directors, employees, suppliers, collaborators, customers. Such violations will be prosecuted by Aignep through the adoption of adequate and proportionate disciplinary measures.