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<i>Revisio</i>	<i>Date</i>	<i>Check CEO</i>	<i>Approval CEO</i>	<i>Changes</i>
0	03/02/2013			1° issue
1	28/02/2014			Adjustment to the new company organization chart
2	16/07/2020			Addition of policies for equal opportunities

G.M.A. asks all employees to be aware of, share, and diligently adhere to the following company principles, as well as to promote the application of these principles among collaborators, business partners, and suppliers.

General principles

G.M.A. operates in compliance with national, international, and EU regulations, refraining from engaging in illegal practices. The Company discourages and sanctions any behavior that is contrary to current regulations, this Code of Ethics, or internal policies, whether such actions are taken by management, administration, or any other employee or collaborator in the performance of their duties, even if motivated by the pursuit of the Company's interest.

G.M.A. requires its employees and collaborators to perform their duties and assigned tasks with loyalty, diligence, and professionalism, in order to maintain the Company's high reputation and, most importantly, to provide clients with a service of high technical value.

All operations and transactions must be authorized, documented, legitimate, and consistent to allow verification of the decision-making, authorization, and execution processes at any time.

The Company adheres to the fundamental principle of impartiality in all internal and external relationships. In G.M.A.'s view, the professional and personal qualities of individuals are assets to be valued and protected. The Company considers its image and reputation as values that must be protected and developed, not only as a common asset but also through the full dissemination, sharing, and observance of the ethical principles and behaviors outlined in this code.

1.1. Value of the code of ethics

Compliance with the rules contained in this Code of Ethics is to be considered an integral and essential part of the contractual obligations for the Company's employees, as well as for the contractual obligations of non-subordinate collaborators.

The violation of these rules is considered a breach of the obligations arising from the employment or collaboration relationship, with all legal or contractual consequences. The Company sanctions violations of the Code of Ethics with consistency, impartiality, uniformity, and proportionality.

1.2. The Quality System

The Company constantly monitors the quality indicators of its processes and services to ensure their standard and enable continuous improvement.

The rules of the Code of Ethics apply both to employees and to all those who cooperate in pursuing the Company's objectives within the context of their relationships with the Company. The principles of the Code of Ethics should guide the Company's management in any decision or action related to its administration; likewise, executives, in carrying out the Company's activities, must be guided by these same principles.

Employees and all those who maintain collaborative relationships with G.M.A. are required to align their behavior with the provisions and principles of the Code of Ethics and must refrain from taking actions that conflict with it. Specifically, the recipients of the Code of Ethics are obligated to comply with the provisions and principles it contains, even when these are expressed as behavioral guidelines for the Company rather than direct instructions to the recipients themselves.

2. Specific activities

Production, purchase, sale, and application of products for industrial anti-corrosion maintenance

G.M.A., in both the direct and indirect performance of activities related to the application and sale of products for industrial anti-corrosion maintenance, places the utmost attention and consideration on complying with the applicable regulations. In conducting its activities, G.M.A. aims to achieve the best possible conditions for safety and the protection of people and the environment, by prioritizing and favoring, whenever possible, products and processing methods with low environmental impact in terms of their production, application, and the disposal of any waste. The constant reference point is the needs of the customer, to which the production activity is primarily directed.

2.1. Different activities

G.M.A. applies the same level of attention to compliance with applicable regulations and adherence to safety rules and proper execution in the performance of other activities different from the main ones.

3. General activities

3.1. Relations with employees

G.M.A. ensures the broad dissemination of the Code of Ethics among its employees. The Company requires its employees to be familiar with and adhere to the provisions of the Code of Ethics relevant to them and to promote its understanding and dissemination among their collaborators and colleagues, with particular attention to newly hired employees, as well as to third parties affected by the application of the Code of Ethics with whom they come into contact for work-related reasons. Employees are required to report any violations of the Code of Ethics by colleagues, collaborators, and consultants to Management. The Company will consider any unfounded reports made in bad faith to harm colleagues and/or collaborators as a disciplinary offense.

G.M.A. places the utmost and constant attention on the development of human resources. To this end, it considers the criteria of merit, competence, honesty, and proper conduct as key foundations for every decision concerning career advancement and any other aspect related to employees. The Company is committed to protecting employees both physically and mentally, respecting their personality and culture. G.M.A. also provides specific training and information activities for newly hired employees and, periodically, for all personnel. Employees are required to consistently conduct themselves in a manner that respects the rights and dignity of their colleagues, collaborators, and third parties, regardless of their hierarchical position within the Company. Employees must use company assets made available to them correctly, safeguarding, in general, the value of the company's assets.

3.2. Relations with clients

G.M.A. rejects any behavior that may constitute a violation of the confidential relationship with the client. For this reason, employees must operate using the data and technical drawings received from the client, necessary for performing their work, in full compliance with current regulations on scientific or industrial secrecy, as well as the company's internal procedures. In particular, employees must adhere to the conduct rules in force on construction sites regarding the prohibition of audio and video recording. To prevent the theft and disclosure of the client's scientific and technical data stored in its archives, G.M.A. also implements both technical and organizational security measures.

3.3. Relations with collaborators and consultants

G.M.A. carries out the identification and selection of collaborators and consultants with absolute impartiality, autonomy, and independence of judgment. Behaviors contrary to the principles expressed in the Code of Ethics may be considered by the Company as a serious breach of the duties of fairness and good faith in the execution of the contract, leading to a violation of the trust relationship and just cause for the termination of contractual relationships.

3.4. Relations with suppliers

In the supply of goods and provision of services, G.M.A. operates in compliance with regulations, the principles of this Code, and internal procedures. Employees involved in relationships with suppliers must select and manage these relationships while avoiding situations of actual or potential conflicts of interest, and must report to the Company the existence or emergence of such situations.

Similarly to the relationships with clients, and for the same purposes, G.M.A. ensures the evaluation, through the controls outlined in point 3.3, of the moral, commercial, and professional reliability of its suppliers.

3.5. Accounting records

G.M.A. adheres to the rules of correct, complete, and transparent accounting, according to the criteria set by the law and Italian and international accounting principles. In the accounting activities related to the management of the Company, employees and collaborators are required to scrupulously comply with current regulations and internal procedures, ensuring that each operation is not only correctly recorded but also authorized, verifiable, lawful, consistent, and appropriate

3.6. Relations with Public Authorities and Entities Engaged in Public Utility or Public Interest Activities

G.M.A. adopts the strictest adherence to applicable European, national, and company regulations in its dealings with Public Authorities and entities engaged in public utility or public interest activities, or in any case related to public law relationships.

The management of negotiations, commitments, and execution of any kind of relationships with Public Authorities, entities engaged in public utility or public interest activities, or otherwise related to public law relationships, is reserved exclusively for the company functions specifically assigned and/or authorized for such purposes.

In dealings with Public Authorities, the Company, and on its behalf, every employee, collaborator, or consultant, must not attempt to improperly influence the decisions of the relevant Institution in order to obtain actions that are either in compliance with or contrary to official duties, particularly by offering or promising, directly or indirectly, gifts, money, favors, or any other benefits.

3.6. Relations with Public Administration and Entities that perform activities of public utility or public interest

G.M.A. shapes its relations with supervisory and control authorities with the utmost collaboration, fully respecting their institutional role, and is committed to promptly implementing their directives.

3.7. Privacy

G.M.A. safeguards the privacy and confidentiality of information and data belonging to employees, collaborators, or third parties, collected in connection with or during the performance of work activities. Every employee and collaborator is required to adhere to these principles. G.M.A. complies with the current legal requirements applicable to the processing of personal data.

4. Relations with third part and community

4.4. Environmental policy

G.M.A. places the utmost importance on respecting the interests of the community and considers it each individual's duty to collaborate in improving the quality of life and civil living standards. The company views the environment and nature as fundamental values and shared assets that must be protected and defended. To this end, it is fully committed to directing its activities in accordance with these principles.

4.5. Local Authorities and Communities

G.M.A. is particularly attentive to the needs of local authorities and other entities representing collective interests. It recognizes the importance of engaging in dialogue and collaboration with these entities to avoid or mitigate the consequences and impacts of the company's activities on the community and the environment. In this context, the company works with these entities to promote and develop sporting, cultural, recreational, and leisure events.

4.6. Labor Unions

G.M.A. does not provide any form of contributions, directly or indirectly, to trade unions or their representatives or candidates, except in the forms and manners provided by current regulations. It shapes its relationships with these entities based on principles of fairness and collaboration in the interest of the company and its employees.

4.7. The press and the other mass media

G.M.A. communicates with the press and mass media exclusively through the company's designated corporate and business functions, maintaining the highest standards of correctness, availability, and transparency, in accordance with the communication policy established by the company.

4.8. Equal opportunity policy

G.M.A. offers equal opportunities to all employees, without discrimination in any aspect of the employment relationship based on race, religion, color, ethnicity or national origin, age, disability, sexual orientation, political opinions, gender, or marital status. No employee should be subjected to physical, sexual, racial, psychological, verbal, or any other form of violence or harassment.

The company is committed to maintaining an inclusive work environment, adheres to equal opportunity regulations, and will ensure that procedures are in place to detect violations and respond effectively.

Prohibited Behaviors under this Policy:

1. Discrimination:
 - Discrimination in the offering of employment opportunities, benefits, or privileges;
 - Creating discriminatory working conditions;
 - Using discriminatory evaluation standards, wholly or partially.
 - G.M.A. is committed to fully complying with local labor legislation, including laws on discrimination.
 - Discrimination occurring in violation of this policy will be punished with severe sanctions, which may include termination of employment.
2. Harassment:
 - This policy prohibits all forms of harassment, and any violations will be properly addressed by the company.
3. Sexual Harassment:
 - This policy prohibits sexual harassment in any form.
 - G.M.A. encourages all employees to report, even anonymously, any acts of discrimination and/or harassment directly to the Human Resources office.

4.9. Forced Labor and Human Trafficking

We prohibit the use of any type of forced labor and any form of human trafficking

4.10. Child Labor

We do not use child labor and do not employ individuals younger than the minimum age for employment established by the local legislation where the work is performed. Furthermore, we are committed to not establishing or maintaining working relationships with suppliers who use child labor.

5. Principles for managing workplace safety and employee health

G.M.A. conducts its activities with particular attention to the work environment, and the health and safety of its personnel and third parties, aiming for the continuous improvement of working conditions and performance in these areas. The company ensures prompt compliance with current regulations on workplace safety and hygiene. The company adheres to and is committed to respecting the applicable regulations concerning health and safety in the workplace. Each recipient must exercise the utmost care in performing their duties, strictly following all established safety and prevention measures to avoid any possible risks to themselves, their collaborators and colleagues, and third parties. Recipients are therefore required to follow the instructions and directives provided by the individuals to whom the company has delegated the responsibilities for health and safety obligations in the workplace.

6. Recipients

This document is available on the server (X:), in the "Quality/Accessible Documents" folder, for all personnel. The code will be circulated among all relevant parties, both internal and external, through appropriate communication initiatives. Training sessions will be held to ensure that the Policy is thoroughly understood by all employees.