CODE OF ETHICS

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1. INTRODUCTION

1.1 Purposes and recipients

The purpose of this Code of Ethics is to define and formalize the values and ethical principles that the Company Management of GB Ricambi s.p.a. (hereinafter referred to as "GB Ricambi", the "Company" or the "Company") intends to pursue and disseminate within its organization so that what is specified in this document is a guide and reference in the context of all company activities.

As an element of application of the provisions of Article 6 of Legislative Decree no. 231 of 8 June 2001, the Code of Ethics integrates the regulatory framework to which *GB Ricambi* is subject.

With the adoption of the Code of Ethics, an essential nucleus of values and principles has been defined, already inherent in the company's actions, as fundamental rules of action in daily activities.

The purpose of this Code of Ethics is:

- define the principles and rules of conduct that inform its activities and relations with employees, collaborators, business partners, institutions and in general with any other stakeholder;

- indicate the principles of conduct to be observed by the recipients of this Code of Ethics;

- make those who operate within GB Ricambi's sphere of action responsible for compliance with these principles, reinforcing the awareness and commitment of facility managers in the application of the sanctions in force, in order to ensure the effectiveness and effectiveness of this Code of Ethics

GB Ricambi's Code of Ethics is an official document, approved by the Board of Directors, which expresses the ethical commitments and responsibilities pursued and implemented in carrying out all activities aimed at achieving the company's objectives, in compliance with all stakeholders, by directors, statutory auditors, employees, collaborators and suppliers.

The purpose of this Code is to ethically guide the company's actions and its provisions are consequently binding for the conduct of all the company's directors, managers, employees, consultants and anyone who establishes, for any reason, a collaborative relationship.

The Code is widely disseminated internally by posting it in a place accessible to all, published and downloadable from the company website and made available to any of the company's interlocutors.

The company also undertakes to ensure compliance with the provisions of this Code in all economic relations established by it.

1.2 GB Ricambi's mission

The mission that Gb Ricambi sets itself is:

"Our mission is to be the essential support for every farmer, offering highly professional services backed by our extensive experience in the sector. We are committed to providing high-level professionalism and the ability to quickly integrate hundreds of new items into our catalog. Production efficiency is the basis of GB Ricambi, which with over 60 years of experience in the spare parts sector and a research and

development team made up of technicians-designers and mechanical designers, guarantee the highest product quality and customer satisfaction. "

1.3 Relationship with stakeholders

In particular, the Code intends to direct the company's conduct towards cooperation and trust towards the interested parties, i.e. those categories of individuals, groups and institutions whose contribution is necessary for the achievement of the corporate mission and/or whose interests are directly or indirectly influenced by the activity.

1.4 The value of corporate reputation and credibility

Reputation and credibility are fundamental intangible assets. The company's good reputation and credibility favour investments, relations with local institutions, customer loyalty, human resources development, and the fairness and reliability of suppliers.

In the performance of any business activity, unethical behaviour compromises the relationship of trust between the company and its stakeholders. To this end, the conduct and attitudes of anyone, individual or organization, belonging to or in an external collaboration relationship with the company, who seeks to procure an undue advantage or interest for himself, for GB Ricambi or for a company controlled or participated by it or subject to the same control, are unethical and encourage the establishment of hostile and non-transparent behavior towards GB Ricambi.

Unethical conduct includes both those that violate legal regulations and those that are in contrast with internal regulations and procedures.

1.5 The contents of the Code of Ethics

The Code of Ethics consists of:

- the general ethical principles that identify the reference values in the company's activities;
- the criteria of conduct towards each stakeholder, which provide the guidelines and rules to which the recipients of the Code are required to comply;
- the implementation mechanisms that outline the control system for the correct application of the Code of Ethics and its continuous improvement.

1.6 Contractual value of the Code

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of the company's employees pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code.

Serious and persistent violation of the provisions of this Code damages the relationship of trust established with the company and may lead to disciplinary actions and compensation for damages, without prejudice, for employees, to compliance with the procedures provided for by art. 7 of Law 300/1970 (Workers' Statute) and collective labour agreements.

1.7. Updates to the Code

By resolution of the Board of Directors, the Code may be amended and supplemented, also on the basis of suggestions and indications from the Supervisory Body.

2. GENERAL PRINCIPLES

The Code of Ethics represents a set of principles and guidelines whose observance is of fundamental importance in order to achieve the company's objectives, the regular performance of activities, the reliability of management and the image of GB Ricambi. Activities, behaviours and relationships, both internal and external to the company, are inspired by these principles and guidelines.
GB Ricambi undertakes to encourage the adoption of a Code of Ethics similar to that of its subsidiaries or associated companies, or in any case, to require them to operate in accordance with the provisions of this Code.

2.1. Liability

In carrying out the company's mission, the conduct of all recipients of this Code must be inspired by the ethics of responsibility.
The company has as an essential principle the compliance with the laws and regulations in force in Italy.
The recipients of the Code are required to comply with current legislation; Under no circumstances is it permissible to pursue or realize the interest of the company in violation of the law.
GB Ricambi is committed to ensuring that interested parties have an adequate programme of information and continuous training on the Code of Ethics.

2.2. Transparency

The principle of transparency is based on truthfulness, accuracy and completeness and sharing of information both outside and inside the company.
In the formulation of contracts with its Customers and Suppliers, the company elaborates the clauses in a clear and understandable way, always ensuring the maintenance of the condition of equality.

2.3. Fairness

The principle of fairness implies respect for the rights, also in terms of privacy and opportunities, of all those involved in work and professional activities.
This also requires the elimination of any discrimination and any possible conflict of interest between employees and the company.
Relations with the outside world, relations with one's own collaborators and those between the latter, must be based on the utmost loyalty, in acting with a sense of responsibility, in the enhancement and protection of the company's assets and in the application of an attitude of good faith in every activity or decision.
GB Ricambi therefore undertakes to act in a fair and impartial manner, adopting the same behaviour towards all the interlocutors with whom it comes into contact, even in the different forms of relationship and communication required by the nature and institutional role of the various interlocutors.

2.4. Efficiency

The principle of efficiency requires that in every work activity the economical management of the resources used in the performance of business processes is achieved and the commitment is made to offer services adequate to the needs of customers and according to the most advanced standards.
GB Ricambi is committed to constantly guaranteeing the effectiveness and efficiency of business processes, through the preparation and compliance with programs for the continuous improvement of the quality of the

services provided through the adoption of technological and organizational solutions aimed at combining the satisfaction of the needs of its customers with the efficiency and cost-effectiveness of management.

2.5. The Spirit of Service

The principle of the spirit of service implies that each recipient of the Code is always oriented, in his or her conduct, towards collaboration and sharing the company's mission.

2.6. Competition

The company intends to develop the value of competition by adopting principles of fairness, fair competition and transparency towards all operators on the market.

2.7. Customer Satisfaction

Customer centricity is a key principle in GB Ricambi and the entire organization aims to pursue customer satisfaction. The service is rendered to generate added value to the customer, through the production of excellent and innovative products in compliance with the required timelines, sustainability and contractual provisions.

2.8. Relations with the community, environmental protection and safe work

GB Ricambi in carrying out its activities is committed to safeguarding the surrounding environment and contributing to the sustainable development of the territory.

GB Ricambi, sensitive to the issues of sustainable development and environmental protection, considers among its primary objectives the commitment to research and continuous improvement of production processes in compliance with current legislation, environmental needs and the common interest by applying the best available economically viable technologies in order to minimize direct and indirect environmental impact.

GB Ricambi is also always committed to guaranteeing its employees and collaborators maximum safety in the workplace by applying, also in this case, the best available and economically viable solutions.

2.9. Enhancement of Human Resources

Human resources are a fundamental factor for the development of the company. Therefore, GB Ricambi protects and promotes their professional growth in order to increase the wealth of skills possessed.

2.10. Confidentiality

GB Ricambi ensures the utmost confidentiality in relation to the information in its possession and refrains from seeking confidential data, except in the case of express and conscious authorization and in any case in compliance with the legal regulations in force.
All recipients of this code of ethics are required not to use confidential information for purposes unrelated to the exercise of their business and to maintain the strictest confidentiality regarding the information obtained in the course of their work, whether internal (e.g. company know-how) and/or owned by customers, suppliers and third parties in general.

3. COMPANY GOVERNANCE SYSTEM

The governance system adopted by the company complies with current legislation and is in line with best practices; At present, GB Ricambi's governance system is made up as follows:

- Shareholders' Meeting;
- Board of Directors;
- Chairman of the Board of Directors;
- CEO;

This system is aimed at ensuring responsible and transparent management of the company towards the market, with a view to creating value for shareholders and pursuing corporate objectives.

The members of the corporate bodies must conform their activities to the principles of fairness and integrity, refraining from acting in situations of conflict of interest in the context of the activity they carry out in the company.

The members of the bodies are also required to behave in a manner inspired by the principles of autonomy, independence and respect for the guidelines that GB Ricambi provides in the relations they have, on behalf of the same, with public institutions and with any private subject.
Their assiduous and informed participation in the company's activities is required; they are required to make confidential use of the information of which they become aware for official reasons and may not use their position to obtain gifts and personal advantages, direct or indirect; Any communication activity must comply with laws and good conduct practices and must be aimed at safeguarding confidential information.

The Board of Directors carries out its functions with professionalism, autonomy, independence and with a sense of duty and responsibility towards the company, property and third parties.
The Board of Directors must be aware of its role, its responsibilities and the role of example it performs towards other subjects operating in the company.
The directors must not impede or hinder the exercise of control activities by the bodies in charge, and, in addition to their own competences, they are committed to scrupulously enforcing the values set out in the Code of Ethics, promoting their sharing and dissemination also to third parties.
The members of the company's bodies are required to comply with current legislation.
The obligations of loyalty and confidentiality bind these subjects even after the termination of the relationship with the company.
GB Ricambi adopts, due to its activities and organizational complexity, a system of delegation of powers and functions that provides, in explicit and specific terms, for the assignment of tasks to persons with suitable ability and competence.

4. INTERNAL CONTROL SYSTEM

In compliance with current legislation and with a view to planning and managing company activities aimed at efficiency, fairness, transparency and quality, GB Ricambi adopts suitable organizational and management measures to prevent unlawful conduct or in any case contrary to the rules of this Code by any person acting for the company.
In relation to the extension of delegated powers, the company implements organisational, management and control models that provide for suitable measures to ensure that activities are carried out in compliance with the law and the rules of conduct set out in this Code, and to detect and promptly eliminate risk situations.
A special Supervisory Body is established for the verification and application of the rules contained in this Code.
The Supervisory Body assists the Board of Directors in setting and updating the guidelines of the internal control system, in assessing its adequacy and effective functioning and in analysing corporate risks, and carries out the additional tasks subsequently indicated in this Code.
The organisational models, in order to prevent the risk of committing offences from which the company's liability may arise pursuant to Legislative Decree 231/2001, provide that:

a) all the business activities attributable to the main processes and support processes are identified as activities in the context of which crimes may be committed;

b) responsibilities for implementation and monitoring are defined;
c) the Audit functions are assigned to the Supervisory Body, to which reports, any violations, and the results of audits are reported.

The Supervisory Body periodically verifies the adequacy and effective functioning of the internal control system and carries out the actions deemed necessary and appropriate to ensure its best functioning.
This system makes use of a control activity carried out by the individual functions with respect to the procedures and activities within their competence and the activity of the Audit functions attributed to the Supervisory Body within the scope of their specific competences.
They have the task of assessing and contributing to the improvement of risk management and governance processes, verifying the internal control system in terms of effectiveness and efficiency of operations, safeguarding company assets as well as compliance with laws, regulations and internal procedures.

5. RELATIONSHIP WITH MEMBERS

GB Ricambi, aware of the importance of the role played by the shareholder, undertakes to provide accurate, truthful and timely information and to improve the conditions of his participation, within the scope of his prerogatives, in corporate decisions.
It is the company's commitment to protect and increase the value of its business, in return for the commitment made by the shareholders with their investments, through the enhancement of management, the pursuit of high standards in production uses and the solidity of the assets. The company is also committed to safeguarding and safeguarding the company's resources and assets.
In particular, the company undertakes to ensure the regular participation of the directors in the work of the shareholders' meeting as well as to guarantee the orderly and functional conduct of the shareholders' meetings, in compliance with the fundamental right of each shareholder to request clarification on the various topics under discussion and to express his or her opinion.

6. STAFF RELATIONS

6.1. Relations with staff

GB Ricambi recognizes the value of human resources, respect for the individuality of workers and the importance of their contribution to the company's activities.
The company ensures compliance with collective labour agreements and social security, insurance and welfare regulations in the sector. The management of the employment relationship is aimed at promoting the professional growth and skills of each employee.
Any discrimination based on race, sex, nationality, religion, language, trade union or political affiliation, remuneration, promotion or dismissal, as well as any form of favouritism, is prohibited.

6.2. Personnel Selection

The selection of personnel is carried out exclusively on the basis of criteria for assessing the qualifications, skills and professional skills of the person in relation to the specific business needs of the case, respecting the dignity, personality, private sphere and opinions of the candidate.
GB Ricambi offers the same opportunities without any discrimination (for example, for reasons of sex, race, language, religion, political opinions, trade union membership), starting from the moment of personnel selection.
The person who selects or participates in the selection must not be in situations of potential conflict of interest with the candidate, just as there must not be situations of personal favoritism regarding the choice of the candidate.

6.3. Recruitment

The recruitment of personnel takes place on the basis of regular employment contracts, as no form of employment relationship that does not comply with or in any case eludes the provisions in force is permitted.

6.4 Personnel Management

GB Ricambi offers the same career opportunities to those who possess the characteristics required for access to superior functions, assignments and/or profiles, without any discrimination and on the basis of meritocratic criteria, acquired professional competence and, in any case, on the basis of strictly professional parameters.

6.5. Safety and health

The company is committed to protecting the moral and physical integrity of its employees, consultants and customers. To this end, it promotes responsible and safe behaviour and adopts all the safety measures required by technological evolution to ensure a safe and healthy working environment, in full compliance with current legislation on prevention and protection.
In particular, for the management of aspects relating to health and safety in the workplace, GB Ricambi has adopted and implemented an organization and management model in accordance with art. 30 of Legislative Decree 81/2008,

6.6. Protection of the person

GB Ricambi undertakes to ensure compliance with the conditions necessary for the existence of a non-hostile collaborative work environment free of any discriminatory behaviour regarding race, religion, sex, political and trade union opinions, sexual inclinations, age, origin, disability or other factors, which have nothing to do with the work performance of the staff.
The company requires everyone's collaboration in order to maintain a climate of respect for everyone's dignity, honour and reputation. Harassment of any kind, including sexual harassment, is not allowed in employment relationships.
Other behaviors prohibited as they would have a negative impact on the work environment are, but are not limited to, the following:

- Threats;
- violent behavior;
- Possession of weapons of any kind;
- Use of recorders, including video phones or cameras, for purposes other than those approved by department heads;
- Use, distribution, sale or possession of drugs or other narcotic substances, which are not to be taken for medical reasons;

In addition, the worker must not remain on GB Ricambi premises or in a GB Ricambi working environment if he or she is under the influence of alcoholic beverages or drugs or other narcotic substances taken not for medical use.
Gb Ricambi imposes compliance with the prohibitions provided for by the legislation on smoking and in any case in all company workplaces.
GB Ricambi does not tolerate any intimidating or discriminatory attitude and will take appropriate disciplinary measures against those who assume such attitudes or abuse their position of authority within the company.
Employees who believe they have been discriminated against can report the incident to the appropriate Supervisory Body.
Heads of departments who "have knowledge" or "suspect" the violation of the provisions of this Code must report "promptly" to the Supervisory Body.
Those responsible must also be vigilant to prevent any type of retaliation against anyone who provides information regarding the violation of ethical rules and/or internal procedures or collaborators in the investigations carried out for this purpose.

6.7. Duties of staff

Personnel must undertake to comply with the obligations set out in this Code, comply with the law in the performance of their duties and base their conduct on the principles of integrity, fairness, fidelity and good faith.
Personnel who "have knowledge" or "suspect" the violation of the provisions of this Code, must report in the first instance to their manager, in his absence or if the report remains disregarded, directly (verbally or in writing) to the Supervisory Body.

6.8. Additional Duties. Accounting entries and entries

Those entrusted with the task of keeping accounting records are required to make each record accurately, completely, truthfully and transparently and to allow any checks by parties, including external ones, in charge of this.
Accounting evidence must be based on accurate and verifiable information and must fully comply with internal accounting procedures.
Each writing must make it possible to reconstruct the relevant operation and must be accompanied by adequate documentation.
All actions concerning the company's activities must result from adequate records that allow checks and controls to be carried out on the decision-making, authorization and performance process. Anyone who becomes aware of any omissions, errors or falsifications is required to notify the appropriate Supervisory Body.

6.9. Conflict of interest

The employee must maintain a position of autonomy and integrity in order to avoid taking decisions or carrying out activities in situations, even if only apparent, of conflict of interest with respect to the company's activity.
Any activity that conflicts with the proper performance of one's duties or that may harm the interests and image of the company must be avoided.
Any situation of conflict of interest, actual or potential, must be communicated in advance to the Supervisory Body.

6.10. Company Assets

The employee carefully uses and safeguards the assets at his disposal for official reasons. Any misuse of the company's assets and resources is not permitted.
Each employee is directly and personally responsible for the protection and lawful use of the assets and resources entrusted to him or her for the performance of his or her duties.
GB Ricambi, in compliance with the laws in force, adopts the necessary measures in order to prevent distorted use of the same.

6.11. Use of Information Systems

With respect to the use of computer systems, each employee is responsible for the security of the systems used and is subject to the regulations in force and the conditions of the license agreements. Except as provided for by civil and criminal laws, the improper use of company assets and resources includes the use of network connections for purposes other than those inherent in the employment relationship or to send offensive messages or messages that may cause damage to the company's image.
Each employee is also required to make the necessary commitment in order to prevent the possible commission of crimes through the use of IT tools.

6.12. Gifts, Gifts and Other Benefits

The employee may not ask for gifts or other benefits for himself or for others, nor may he accept the latter, except for those of modest value or in accordance with normal commercial practices and courtesy, from anyone who has drawn or who may in any case benefit from the company's activities.
The employee may also not offer gifts or other benefits to all those subjects from whom he/she may acquire preferential treatment in the conduct of any activity related to Gb Ricambi.

No unlawful advantages may be attributed to public and private customers or suppliers.
Gifts and benefits offered but not accepted, which exceed the modest value, must be reported to allow an adequate evaluation to the company's Supervisory Body.

6.13. Protection of confidentiality

The company protects the privacy of its employees, in accordance with the regulations in force on the subject, committing itself not to communicate or disseminate, without prejudice to legal obligations, the related personal data without the prior consent of the interested party.
The acquisition, processing and storage of such information take place within specific procedures aimed at preventing unauthorized persons from becoming aware of it and ensuring that all privacy protection regulations are fully complied with.

6.14. Confidentiality and Information Management

Each employee is required to keep confidential the information learned in the performance of his or her duties in accordance with laws, regulations and circumstances.
Each employee must comply with this duty of confidentiality even after the termination of the employment relationship, ensuring that the obligations provided for by current privacy regulations are respected. He must also take care of the documents entrusted to him.

6.15. Information requirements

All employees are required to promptly and confidentially report to the person directly responsible any information they have become aware of in the course of their work activities, regarding violations of legal regulations, the Code of Ethics or other company provisions that may, for any reason, involve the company.
The Managers must supervise the work of the assigned collaborators and must inform the Supervisory Body of any possible violation of the aforementioned rules.

6.16. Obligations of Employees

The provisions referred to in the previous points are extended to all employees, consultants, agents and agents of the company.

7. CUSTOMER RELATIONS

7.1. Equality and impartiality

Gb Ricambi undertakes to satisfy its customers in fulfilment of the obligations set out in the relevant contract, without any discrimination.
GB Ricambi establishes a highly professional relationship with its customers, based on availability, respect, courtesy, research and the offer of maximum collaboration.
The satisfaction of its customers is a fundamental objective for GB Ricambi and, to this end, the company is committed to guaranteeing the quality of the services provided.
GB Ricambi undertakes to adopt a style of conduct towards customers based on efficiency, collaboration and courtesy, providing, in a clear and transparent manner, accurate, complete and truthful information about the characteristics of the services offered, using simple and understandable language and ensuring equal treatment of all customers.

7.2. Contracts and Communications

Contracts and communications with Clients must be:

- clear and simple, formulated in the language closest possible to that of the general clientele;
- comply with current regulations.

The company undertakes to promptly and appropriately communicate any information relating to any changes and variations in the provision of the service provided.

7.3. Quality and Customer Satisfaction

The company undertakes to ensure the achievement of the required quality and safety standards and to periodically monitor the quality of the service provided to the customer.

7.4. Interaction with Customers

The company is committed to fostering interaction with customers through the management and rapid resolution of any complaints and/or by using appropriate communication systems.
GB Ricambi repudiates litigation as a tool aimed at obtaining undue advantages and resorts to it on its own initiative only when its legitimate claims do not find due satisfaction in the interlocutor.
The company protects the privacy of its customers, in accordance with the regulations in force on the subject, committing itself not to communicate, or disseminate, the related personal, economic and consumer data, without prejudice to legal obligations.

8. SUPPLIER RELATIONS

8.1. Choice of supplier

The methods of choosing the supplier must comply with the regulations in force and with the company's internal procedures provided for this purpose. The choice of supplier and the purchase of goods and services of any kind must be made in compliance with the principles of competition and equal conditions of the tenderers and on the basis of objective assessments relating to competitiveness, quality, usefulness and price of supply.
In the selection, GB Ricambi adopts objective and transparent criteria provided for by current legislation and internal regulations and does not preclude any supplier company, in possession of the required requirements, as deemed necessary, from competing for the completion of a contract with it.
In selecting the supplier, the company must also take into account the ability to ensure the implementation of adequate corporate quality systems, where required, the availability of means and organizational structures and the need to meet confidentiality obligations.
Any selection procedure must be carried out in accordance with the broadest conditions of competition and any derogation from this principle must be authorised and justified.

8.2 Transparency

Relations with the company's suppliers, including financial and consultancy contracts, are governed by the provisions of this Code and are subject to constant and careful monitoring by the company, also in terms of the adequacy of the services or goods supplied with respect to the agreed price.
GB Ricambi prepares appropriate procedures to ensure maximum transparency in the selection of the supplier and the purchase of goods and services.
Through its management information system and existing organizational procedures, GB Ricambi is able to document the entire selection and purchase procedure in such a way as to allow the reconstruction of each operation.

8.3 Fairness and diligence in the performance of contracts

The company and the supplier must work in order to build a collaborative relationship of mutual trust. GB Ricambi undertakes to inform the supplier correctly and promptly about the characteristics of the activity, the forms and times of payment in compliance with the regulations in force and the expectations of the counterparty, considering the circumstances, the negotiations carried out, the content of the contract stipulated.
The fulfilment of contractual services by the supplier must comply with the principles of fairness, fairness, diligence and good faith and must be carried out in compliance with current legislation.

8.4. Environmental Protection and Ethical Profiles

The company undertakes to promote, as part of its procurement activities, compliance with environmental conditions as well as to ensure that they are carried out in accordance with the ethical principles set out in this Code.

9. RELATIONS WITH PUBLIC BODIES

9.1. Corporate Mission and General Interest

The company pursues its objectives in line with its mission and collaborates effectively with the public bodies responsible for the regulation and control of tax, accounting, administrative and legal compliance.
GB Ricambi pursues these objectives by combining them with its mission and with the need for organizational and managerial autonomy typical of any economic operator.

9.2 Integrity and independence in relationships

In order to ensure maximum clarity in institutional relations, these are maintained exclusively through representatives who have received an explicit mandate from the corporate bodies and who are not in situations of conflict of interest with respect to the representatives of the institutions themselves. In the context of relations maintained in various capacities with Institutions and Public Administrations, those who represent Gb Ricambi must operate with the utmost transparency, clarity, correctness, in order not to induce partial, false, ambiguous or misleading interpretations by institutional subjects.

10. METHODS OF IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

10.1. Establishment of the Supervisory Body

The Supervisory Body for internal control is hereby established with the task of supervising the implementation and compliance with this Code and the organisational and management models, their effectiveness, adequacy and ability to maintain the functionality and solidity requirements required by law over time. In particular, the Supervisory Body:

- is responsible for expressing binding opinions regarding ethical issues that may arise in the context of company decisions and alleged violations of the Code of Ethics referred to it by the Data Processors;
- it must follow the periodic review of the Code of Ethics and its implementation mechanisms, also through the submission of proposals for adjustment;
- It has the task of setting up and approving the communication and ethical training plan.

10.2 Composition of the Supervisory Body

GB Ricambi has set up the Supervisory Body, with the task of supervising the implementation and compliance with this Code of Ethics and the organisational, management and control models, referred to in Legislative Decree 231/2001, implemented in accordance with the Code itself.
The Supervisory Body is a body endowed with independence, full autonomy of action and control, whose activity is characterized by professionalism and impartiality, to which this office is attributed through a specific resolution of the Board of Directors.
The members of the Supervisory Board remain in office in accordance with the provisions of the act of appointment of the Board of Directors and may be dismissed by the Board only for just cause.

10.3. Audit Function

The Audit functions are assigned to the Supervisory Body. This Body prepares the audit calendar and may delegate the execution to the same external professionals or company managers/experts. The Area Managers who receive any reports, coming from the reference structure, of any violations of the Code of Ethics, report them to the Supervisory Body. The Supervisory Body has free access to data, documentation and information useful for carrying out its activities.
The Area Company Managers are required to collaborate effectively in carrying out the activities indicated above.

10.4. Reporting

All interested parties, internal and external, are required to report verbally or in writing (with respect to the nature of the violation) and in a non-anonymous form, any non-compliance with this Code.
Internal authors of manifestly unfounded reports are subject to disciplinary sanctions, while external authors of manifestly unfounded reports are subject to the sanctions provided for by current legislation.
The company protects whistleblowers against any retaliation they may face for reporting misconduct and keeps their identity confidential, without prejudice to legal obligations.

10.5. Disciplinary System

Violation of the rules of the Code of Ethics by its recipients damages the relationship of trust established with the company and may result in the imposition of disciplinary sanctions, graduated with the "seriousness of the violation"; without prejudice to any claim for damages.
With respect to employees, compliance with the rules of the Code of Ethics is an essential part of the contractual obligations pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code and the CCNL of the category and individual contracts.
The sanctioning system complies with the provisions of Law no. 300 of 20 May 1970, specific sector regulations, collective bargaining and current company provisions.
The recipients of sanctions may be:

- CHAIRMAN or members of the Board of Directors, directors, auditors;
- EMPLOYEES (managers, middle managers, white-collar workers, blue-collar workers);
- THIRD PARTY RECIPIENTS (External Collaborators, Consultants, Partners, Suppliers...);
- SB MEMBERS;

Disciplinary offences are collected (directly or indirectly) by the SB, which, after the appropriate investigations to verify the infringements, will propose the application of the sanctions provided for in the following form to the body in charge which is responsible for the final decision on the sanction to be applied.

11. RELATIONS WITH COMPETITORS

GB Ricambi, in the management of business and business relations, is inspired by the principles of loyalty, legality, fairness, transparency, efficiency and openness to national and international markets.
GB Ricambi pursues its business success in particular through the offer of quality products and services and in compliance with all national and international regulations to protect fair competition. In particular, within the framework of the current national and international regulations on competition, the activities of GB Ricambi and the conduct of its Employees, Directors, Managers, and Collaborators, whose actions may be in some way attributable to GB Ricambi itself, must be inspired by the most complete autonomy and independence with respect to the conduct of GB Ricambi's competitors in the domestic and foreign markets.
In particular, GB Ricambi complies with all regulations on the protection of intellectual property, such as in particular, but not exclusively, the regulations relating to the protection of trademarks and patents and/or relating to the protection of know-how, industrial and intellectual property.

12. CONFIDENTIAL INFORMATION AND PRIVACY POLICY

GB Ricambi's activity may require the acquisition, storage, processing, communication and dissemination of data, documents and information relating to negotiations, procedures, operations and contracts. GB Ricambi's databases may also contain personal and corporate data protected by privacy protection legislation, data that cannot be disclosed externally and finally data whose disclosure could cause damage to customers, the market or GB Ricambi itself. Each Recipient is therefore required to protect the confidentiality and confidentiality of the information learned by reason of their job function.
All information, knowledge and data acquired or processed by the Recipients through their duties may not be used, communicated or disclosed, except in accordance with the provisions of the legislation on the protection of personal data and the internal procedures and directives relating to the privacy of GB Ricambi.

Each Recipient shall:

- acquire and process only the data and information necessary and directly related to its business;
- store such data and information in such a way as to prevent third parties from becoming aware of it;
- communicate and disclose data and information as part of the procedures adopted by GB Ricambi;
- evaluate and determine the confidential and confidential nature of the information;
- comply with confidentiality obligations even after the termination of the relationship with GB Ricambi, in accordance with current legislation and/or contractual commitments previously assumed.

GB Ricambi, in turn, undertakes to protect the information and data relating to its Recipients and third parties, and to avoid any improper use of the same.

Specific security measures are observed to prevent the loss, illicit or incorrect use of the data processed by GB Ricambi and/or unauthorized access to the website and IT facilities of GB Ricambi.