



Document Code	Rev	Data	Corporate Code of Ethics
COD-ETI	01	04.02.2023	Corporate Code of Ethics
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Edition 2 – 04/02/2023

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0 Premise

L.M. GIANETTI, founded in 1966, has been working for more than 50 years in the field of racing cars, prototypes and small series cars.

Our expertise:

- Special parts for official racing teams in F1, WRC, Endurance
- Engineering and development of prototype cars
- Cars Design and engineering
- Prototype cars and small series
- One Off Cars
- Test & development
- Homologation procedures

Born in the firm belief that the quality of design, the high commitment to the project and the absolute respect of deadlines are key competitive factors, our team of engineers offers multidisciplinary skills and competences coming from both research and the industrial environment. Complete racing cars, vehicle prototypes, high-performance hybrid powertrains, mechatronic systems.

Our technical department has been successfully involved in many projects

- *COMPLETE VEHICLES AND SUBSYSTEMS DESIGN*
- *MODELING AND DIGITAL MOCK-UP*
- *STRUCTURAL ANALYSIS*
- *VEHICLE DYNAMICS*
- *ELECTRONICS AND CONTROLS*
- *HYBRID AND ELECTRIC POWERTRAIN*
- *COMPUTATION FLUID DYNAMICS*
- *TESTING, DEVELOPMENT, HOMOLOGATION*
- *TRACK SUPPORT*

The international context in which L.M. Gianetti operates, the multicultural work environment, the high degree of specialization and professionalism required make it appropriate to define the principles, values and responsibilities on which the organization has founded the results of growth and success of **L.M. Gianetti**.

For these reasons, the Code of Ethics (hereinafter, for the sake of brevity, also "**Code**") has been introduced, the observance of which by the Directors, Auditors, employees, including managers, and collaborators of **L.M. Gianetti**, customers and suppliers, each within the scope of their functions and responsibilities, is of fundamental importance.

Employees undertake to promote, inside and outside the Company, conduct inspired by the principles contained in this Code, implementing - to this end - all appropriate actions to ensure its full implementation. In this perspective, they actively commit themselves to the knowledge of the Code of Ethics towards customers, suppliers and all third parties with whom they will come into contact.

The Management of **L.M. GIANETTI** is assigned the functions of guarantor of the Code of Ethics.

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The adoption of the Code is an expression of the Company's commitment to the prevention of crimes referred to in Legislative Decree no. 231 of 8 June 2001, on the regulation of the administrative liability of companies, and in general for the prevention of illegality.

The Code can be consulted and freely downloaded on **the website of L.M. Gianetti**

1 Principles and values

Compliance with the laws and regulations, the statutory provisions and this Code constitute a commitment and duty of all subjects who, for any reason, have contractual and/or employment relationships, even occasional, with **L.M. Gianetti**.

To this end, **L.M. Gianetti** undertakes to maintain a management system of its organizational structure in compliance with the principles of transparency, honesty, fairness, good faith, according to the canons of conduct referred to in this Code.

Human Rights – Equal opportunities – Product conformity and product safety – Environmental protection

In fully implementing its corporate purpose, **L.M. Gianetti** repudiates all kinds of discrimination and corruption and is inspired by the protection and promotion of human rights, civil and political rights, social, economic and cultural rights. We protect human rights, children's rights as a fundamental and we reject all use of child's labor and forced and compulsory labour as well as all forms of modern slavery and human trafficking.

The dignity, freedom and equality of human beings, the protection of labour and trade union freedoms, the health and safety of workers, the environment and the system of values and principles on energy efficiency and sustainable development are recognised and safeguarded.

We offer equal opportunity for everyone.

We do not discriminate or tolerate discrimination on grounds of ethic or national origin, sex, religion, views, age, disability, sexual orientation, skin colour, political views, social background or any other characteristics protected by law. We embrace diversity and active encourage inclusion.

We have responsibility for preventing, to the extent possible, any risks, detrimental effects and hazards to the health, safety, environment and assets of our customers or any third party arising from the handling and use of these products and services. Our duty and our mission are to comply with the laws and regulations

Our company as part of the society bears the responsibility for the environmental compatibility and sustainability of our products, locations and services.

We focus on environmentally friendly, advanced and efficient technologies, which we implement throughout the entire lifecycle of our products. Starting with the early phases of development and production, we make sure we manage natural resources carefully and steadily reduce the environmental impact to comply with environmental protection laws and regulations.

All employees, without distinction or exception, act in accordance with the principles and contents of the Code, in the knowledge that compliance with the Code is an essential part of the professional services required. Relations between colleagues, at all levels, must be based on criteria and behaviors of honesty, fairness, collaboration, loyalty and mutual respect.

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2 Canons of behavior

2.1 Integrity

Everyone, employee or occasional collaborator, **of L.M. Gianetti** must demonstrate their integrity or their honesty and respect for the laws, loyalty and respect towards work colleagues and people with whom they have professional relationships. In particular, relations between colleagues must be based on mutual respect, transparency, fairness and good faith, as well as the ethical principles of this Code.

2.2 Responsibility

Everyone, in addition to respecting the Code, in the event that it is violated or behaviors contrary to the principles set by the Code are carried out, must immediately notify the Company Management.

L.M. Gianetti believes that the involvement of all employees in the application of the Code is an essential tool and requirement within the company organization.

2.3 Sensitization

Managers of management functions must be role models of moral conduct and must ensure that business decisions are both legally and ethically appropriate. They undertake to create and maintain by their example and behavior a working environment that complies with the rules and ethical principles of this Code.

2.4 Protection of personal data protection

L.M. Gianetti in carrying out its activities, protects the personal data of its employees and collaborators, as well as its customers and suppliers, avoiding any improper use of the information acquired, as required by the laws in force and internal company procedures.

Privacy is protected by adopting specific procedures that specify the information requested from employees, collaborators and contractors of the Company and the related methods of processing and storage.

Any investigation of the opinions and, in general, of the private life of collaborators and employees is prohibited. It is also prohibited, except for the cases provided for by law, to communicate and / or disseminate personal data without the prior consent of the interested party.

Each employee or collaborator is required to protect the confidentiality and confidentiality of information learned by reason of his or her job function.

All information, data, knowledge acquired, processed and managed by collaborators and employees in the exercise of work are the property **of L.M. Gianetti** and are strictly confidential and appropriately protected and may not be used, communicated or disclosed either internally or externally unless this is permitted by the laws in force or by company procedures.

Each employee and collaborator must:

- acquire and process only the data necessary and directly related to its functions;
- keep such data in such a way as to prevent third parties from becoming aware of them;
- communicate and disclose data exclusively within the framework of internal company procedures;
- ensure that there are no confidentiality obligations by virtue of relationships of any kind with third parties.

2.5 Transparency

The widespread presence on national and international markets, the operations in different contexts, makes maximum transparency in relations with all interlocutors of primary importance, whether they are public or private, Italian or foreign, individuals, groups or companies.

2.6 Conflict of interest

Any situation that could potentially involve a conflict between **the interest of L.M. Gianetti** and personal interest must always be avoided.

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The conflict can concern interests of any kind, including non-patrimonial ones, such as those deriving from political, trade union or hierarchical superiors.

In particular, employees and collaborators must refrain from participating in the adoption of decisions or activities that involve their own interests, or of relatives, relatives within the second degree, of the spouse or cohabitants, or of persons with whom they have habitual relationships.

Outside the cases listed above in the event that a conflict of interest occurs, even potential, the interested party must promptly notify the Company Management which will assess, case by case, the actual existence.

2.7 Accounting documentation

L.M. Gianetti carries out its activities ensuring full transparency and the possibility of verifying the choices made. Accounting records must be made, archived and transmitted with the utmost accuracy and honesty and reflect exactly what results from the supporting documentation.

All accounting books, records, financial statements and attached reports must report in a transparent and truthful manner the economic, equity and financial situation of **L.M. Gianetti** must comply with the accounting standards applicable in the individual countries.

Company documentation and correspondence must be drafted in a clear, concise and truthful manner.

Documents may not be destroyed in the presence or expectation of an internal or external verification, or in the course of it. These operations must be carried out in full compliance with the applicable legislation on the keeping and registration of company documentation, as well as company procedures.

2.8 Protection of Company Assets

The employees or collaborators who use, the company assets. They have the responsibility to make a conscious, responsible and targeted use of the company's activities only. No goods may be distracted from such purpose or use. The computer equipment cannot be used for access, transmission or receipt of material contrary to company principles and / or laws. The unauthorized reproduction of *software*, books and other material protected by copyright, constitutes a violation that exposes **L.M. Gianetti** to legal liability and employees, aware of this, must not engage in activities falling within these cases. Therefore, it is forbidden to engage in conduct that results in theft, fraud, theft, distraction or misappropriation of any company asset.

Each employee and / or collaborator is required to work diligently to protect company assets, through responsible behavior and in line with the provisions of the respective employment contracts and with the operating procedures and instructions prepared to regulate their use, accurately documenting their use. In particular, each collaborator must:

- use scrupulously and sparingly the goods entrusted to him;
- avoid improper use of company assets that may cause damage or reduction in efficiency, or in any case in contrast with the interest of **L.M. Gianetti**.

Each employee and/or collaborator is responsible for protecting the company resources entrusted to him and has the duty to promptly inform the direct superior of any threats or risks of harmful events.

With regard to computer applications, employees are required to:

- adopt the provisions of company security policies, in order not to compromise the functionality and protection of IT systems;
- do not send threatening and abusive e-mail messages, do not resort to obscenity, do not express inappropriate comments that may cause offense to the person and / or damage to the corporate image;
- Do not browse websites with indecent and offensive content.

2.9 Confidentiality

Employees, collaborators, as well as third parties who, for any reason, have contractual relations with **L.M. Gianetti** must keep confidential all information relating to data, strategies, commercial and industrial plans, and

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industrial objectives. Access to such information is limited only to employees and collaborators who objectively need it within the limits strictly necessary for the performance of their duties.

Confidential information is also to be considered that relating to products, their development, production processes, strategies and commercial conditions, customers, technological and industrial know-how, purchase prices, logistical aspects and IT solutions and anything else that is part of **L.M. Gianetti's** assets.

It is absolutely forbidden for all employees and collaborators to discuss confidential topics in public places and on mobile phones.

The obligation of confidentiality continues even if the employment relationship is terminated.

L.M. Gianetti undertakes to keep confidential the information concerning its contractors and to use such information according to the terms and methods permitted by the laws in force. Likewise, the contractors of **L.M. Gianetti** are required to ensure confidentiality with regard to information, documents and personal data relating to **L.M. Gianetti** or its collaborators and employees.

2.10 Gifts

No form of gift is allowed that can even be interpreted as exceeding normal commercial practices or courtesy, or in any case aimed at acquiring preferential treatment in the conduct of any activity connected to **L.M. Gianetti**. In particular, any form of gift that may influence independence of judgment or induce any advantage to be granted is prohibited.

This rule concerns both gifts promised or offered and those received, having to be understood as a gift any type of benefit. In any case, **L.M. Gianetti** refrains from practices not permitted by law, commercial customs or codes of ethics - if known - of the companies or entities with which it has relations.

Gifts or other benefits that exceed normal commercial or courtesy practices are those with a value greater than 50 euros.

Employees and collaborators who receive gifts or benefits exceeding this value, are required, according to the established procedures, to notify the Company Management which will assess their adequacy and, if not, arrange for the acquisition of the same gifts to the company's assets and notify the sender of the Company's policy on the matter.

2.11 Protection of quality and corporate image

The quality and efficiency of **L.M. Gianetti's** organization, the strategy focused on customer satisfaction and the good reputation acquired in over 50 years of activity, are invaluable assets for the Company. Any conduct that does not comply with the ethical values of this Code may in itself prejudice the image and reputation gained by **L.M. Gianetti** in Italy and abroad, therefore all recipients of the Code are required with their conduct to preserve this reputation and the quality expectations linked to the reputation of **L.M. Gianetti** both in the workplace and outside them.

2.12 Relations with suppliers

Suppliers undertake to sign the Code and to observe its principles and rules of conduct, since compliance with the rules of the Code must be considered an essential part of the contractual obligations assumed. Suppliers are considered important partners, therefore contracts concluded with suppliers must be based on relationships of extreme clarity and transparency as well as on respect for the principles of free competition, equal treatment and non-discrimination.

2.13 Relations with the Public Administration

With the term Public Administration ("the **P.A.**") means those subjects, under public or private law, who perform a public function or a public service, with whom **L.M. Gianetti** and employees and collaborators interact (also in

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order to obtain, by way of example, authorizations and / or concessions and / or acts of consent however denominated).

The assumption of commitments and the management of relations with the P.A. are reserved exclusively for the company departments in charge of this and for specifically authorized personnel. As part of the relations established with the P.A. , the recipients of this Code are required to abstain:

- from offering, even through an intermediary, money or other benefits to the public official involved, to his family members or to subjects in any way connected to him;
- from establishing (or attempting to establish) personal relationships of favor, influence, interference capable of conditioning, directly or indirectly, the outcome of the relationship.

2.14 Customer Relations

The objective to which **L.M. Gianetti** continuously strives is the satisfaction of the needs and requests of customers. Awareness of the importance of relationships with customers can only be achieved through respect for ethical values and corporate procedures that inspire them.

2.15 Intellectual property

L.M. Gianetti respects intellectual property, patents, copyrights and trademarks. It therefore undertakes not to disseminate or misuse projects, symbols, names and images protected by Intellectual Property rights without having the right.

2.16 Institutional relations

In institutional relations **L.M. Gianetti** undertakes to:

- establish, without any kind of discrimination, stable channels of communication with all institutional interlocutors at international, national and territorial level;
- represent the interests and positions of **L.M. Gianetti** in a transparent, rigorous and consistent manner.

2.17 Economic relations with parties, trade unions and associations

The Company does not provide contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organizations, associations with interests, nor to their representatives or candidates, both in Italy and abroad, with the exception of contributions due on the basis of specific regulations.

2.18 Relations with the press

L.M. Gianetti ensures truthful, transparent and timely information.

Relations with the media are reserved exclusively for the corporate functions and responsibilities delegated to do so.

3 Employees and collaborators

3.1 Relations with employees and collaborators

Employees and collaborators are the indispensable factor in the success of **L.M. Gianetti**, for this reason the company protects and promotes the value of human resources in order to improve and increase their professional skills.

Each department manager undertakes to enhance the human resources entrusted to him and ensures that:

- each employee and/or collaborator, for whatever reason, of his function has adequate knowledge of his duties;

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- the professional activity takes place in a climate of motivation, participation and responsibility, such as to allow the implementation of the best possible management policies, according to rewarding criteria, based on principles of individual meritocracy, without any form of discrimination.

In hierarchical relations, **L.M. Gianetti** is committed to ensuring that authority is exercised with fairness and balance, avoiding any abuse. In particular, it undertakes to ensure that authority does not become the exercise of power detrimental to the dignity and autonomy of the employee and/or collaborator, and that the choices of work organization safeguard human value and dignity.

3.2 Employment relationships

L.M. Gianetti undertakes to maintain the utmost diligence in respecting and observing the rules governing employment relationships, ensuring full respect for the human rights of employees and collaborators, as well as its contractors in any capacity.

L.M. Gianetti worldwide supports and applies the rules that aim to prevent and punish any unjustified discrimination based on issues of ethnicity, skin color, sex, country of origin, age, religion, state of health, marital status and any other condition in which its employees or those who participate in selections aimed at recruitment may find themselves, the latter will be evaluated on the basis of professional qualifications and skills demonstrated.

3.3 Protection of health and safety in the workplace

L.M. Gianetti in its factories and offices undertakes to maintain a healthy and safe working environment for its employees and collaborators, as well as for all third parties who, as visitors or contractors of the Company, still have access to the offices.

All regulations on health and safety at work must be scrupulously observed, pursuing the continuous improvement of health and safety conditions at work.

Each employee and/or collaborator, as part of their duties, must actively participate in the process of risk prevention, environmental protection and public safety and protection of health and safety towards themselves, colleagues and third parties.

3.4 Personnel selection

The evaluation of the profiles of the candidates to be recruited is carried out according to transparent and non-discriminatory rules, in compliance with the laws in force.

The information requested is closely linked to the verification of the skills required by the professional and aptitude profile, respecting the private sphere and the opinions of the candidate.

The personnel department shall take appropriate measures to avoid favouritism or forms of cronyism during the selection and recruitment phases.

4 Implementation and internal control for the application of the Code of Ethics

4.1 Knowledge and communication of the Code

The code is brought to the attention of all employees and collaborators, as well as its contractors, through specific forms of communication.

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The violation of the principles and contents of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences also with regard to the employment relationship, and involve compensation for damages deriving from it.

4.2 Reports

In order to guarantee the effectiveness of the Code, **L.M. Gianetti** guarantees to all those who become aware of any conduct in violation of the same the possibility of reporting freely, directly and confidentially, to the Company Management.

Reports to the Company Management can be sent by e-mail to the segnalazioni@lmdigianetti.it address or, by ordinary mail, to the address "Reports Code of Ethics at L.M. GIANETTI S.p.A. Strada del Cascinotto 106/A 10156 TORINO – ITALY with the word RESERVED on the envelope.

The Company Management is responsible for examining the information received, in order to subject the existing case to the application of any disciplinary sanctions.

The Management undertakes to ensure the secrecy of the identity of the whistleblower, without prejudice to legal obligations.

4.3 Functions of the Guarantor

The following specific tasks are assigned to the Company Management:

- promote the implementation of the Code and the issuance of reference procedures; report and propose useful initiatives for greater dissemination and knowledge of the Code;
- promote communication and specific training programmes;
- examine the news of possible violations of the Code, promoting the most appropriate verifications; intervene, in cases of news of possible violations of the Code deemed not duly addressed;
- communicate to the competent structures the results of the relevant checks for the adoption of any sanctioning measures.

4.4 Sanctioning system

Any violation of the Code, committed by employees and / or collaborators, will result in the adoption of disciplinary measures, proportionate to the violation committed, any recidivism and the degree of guilt.

The provisions of the Code also apply to any temporary workers who will be required to respect its principles and values. Violations of the Code of Ethics are sanctioned with disciplinary measures adopted against them by the respective employment companies that are required to do so on the basis of a specific contractual agreement.

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5 Changes

N. Rev.	data	Nature of the change*		Reference paragraph
01	04.02.2023	I	Second issue	Everybody

Legend:

E=Deleted

I=Inserted

M=Modified

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