



Miglio
Group

COMPANY CODE OF ETHICS

(rev. 1 of 08.06.2026)

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INTRODUCTION

Miglio Emilio srl has been operating since 1971 in the field of mould manufacturing, stamping and sheet metal processing, providing turnkey solutions for custom-designed products across a wide range of industries.

Miglio Emilio srl has always guaranteed the highest standards of fairness and transparency in managing its activities; this Code clearly defines the set of values and principles that shape its relationships with all stakeholders, with employees first and foremost. Professional integrity, honesty and respect for commitments are behaviours that build trust in the company.

Violation of these values, as well as incorrect or unlawful actions, can cause various types of damage – reputational and credibility damage in particular – which may jeopardise the trust of customers, suppliers and the people who work at Miglio Emilio.

The company's reputation and success are the result of the attention and conduct of each and every one of us, together.

The Code serves as a guide and support for pursuing the Company's mission as effectively as possible.

Miglio Emilio recognises the protection of the environment, occupational health and safety and the sustainability of production processes as fundamental elements of its corporate responsibility. The company operates in compliance with applicable legislation and promotes continuous improvement of its performance in quality, environment and safety, also through the principles of the adopted management systems.

The Company carefully monitors compliance with the Code of Ethics, providing adequate tools for information, prevention and control, ensuring transparency in all operations and conduct, and intervening with corrective actions and, where necessary, sanctions in the event of violations.



An aerial photograph of a large, modern industrial building with a distinctive curved, white roof. The building features multiple rows of solar panels integrated into the roof structure. The facade is light-colored with large windows and red-framed doors. A red fire escape is visible on the left side. The building is situated in a green area with trees and grass. In the foreground, there is a paved area with a few parked cars and a small structure. Other industrial buildings are visible in the background.



- ❖ What is the Code of Ethics?
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What is the Code of Ethics?

The Company Code of Ethics is a document that defines the rules of conduct based on the company's values.

Who must comply with the Code?

This Code is binding on all employees and on those who work and collaborate with Miglio Emilio.

This document does not modify the terms and conditions of employees' employment relationships.

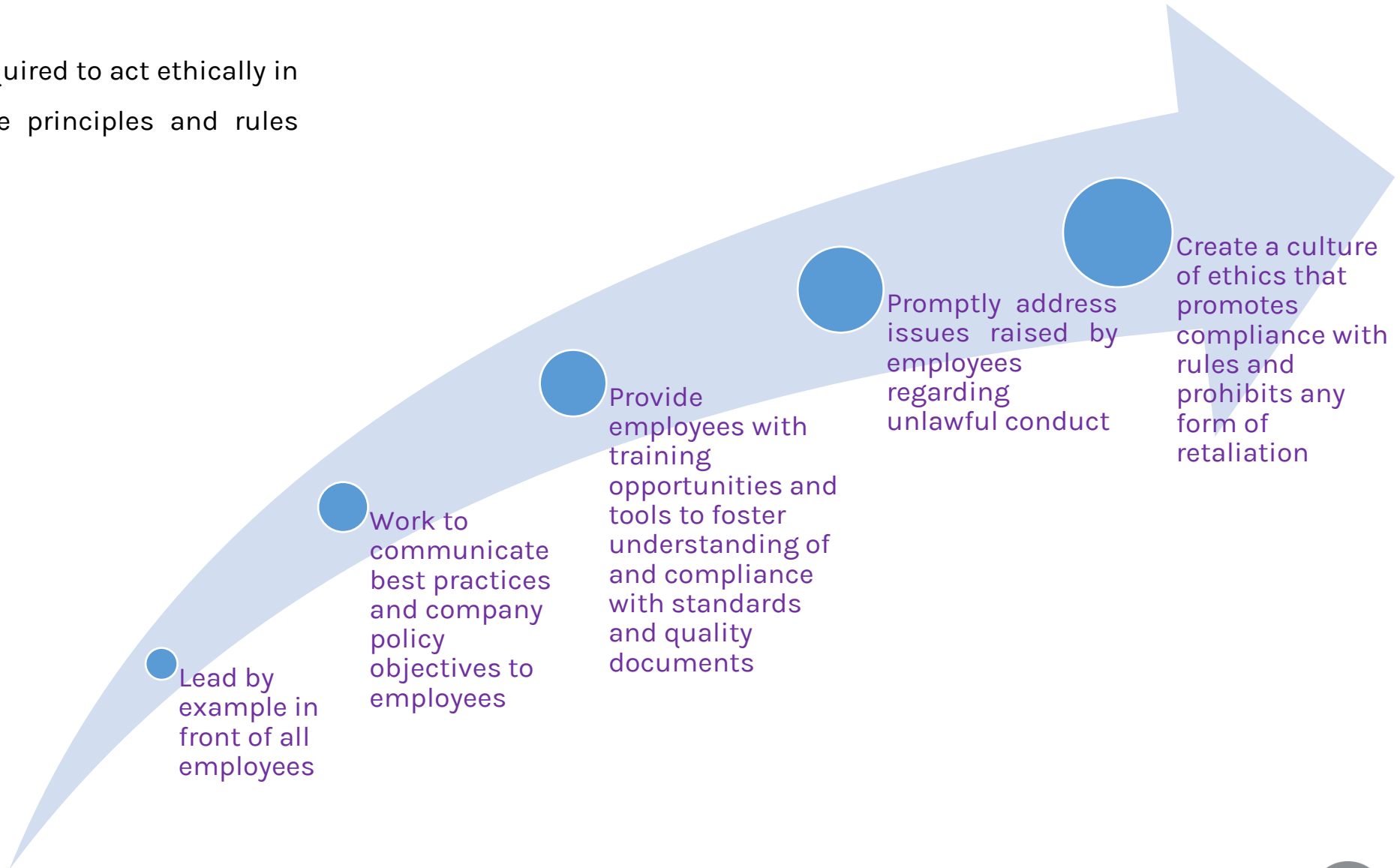
This Code is in line with applicable laws and legal obligations, but in the event of any discrepancy between the Code and the law and/or collective bargaining agreements, the latter shall prevail.



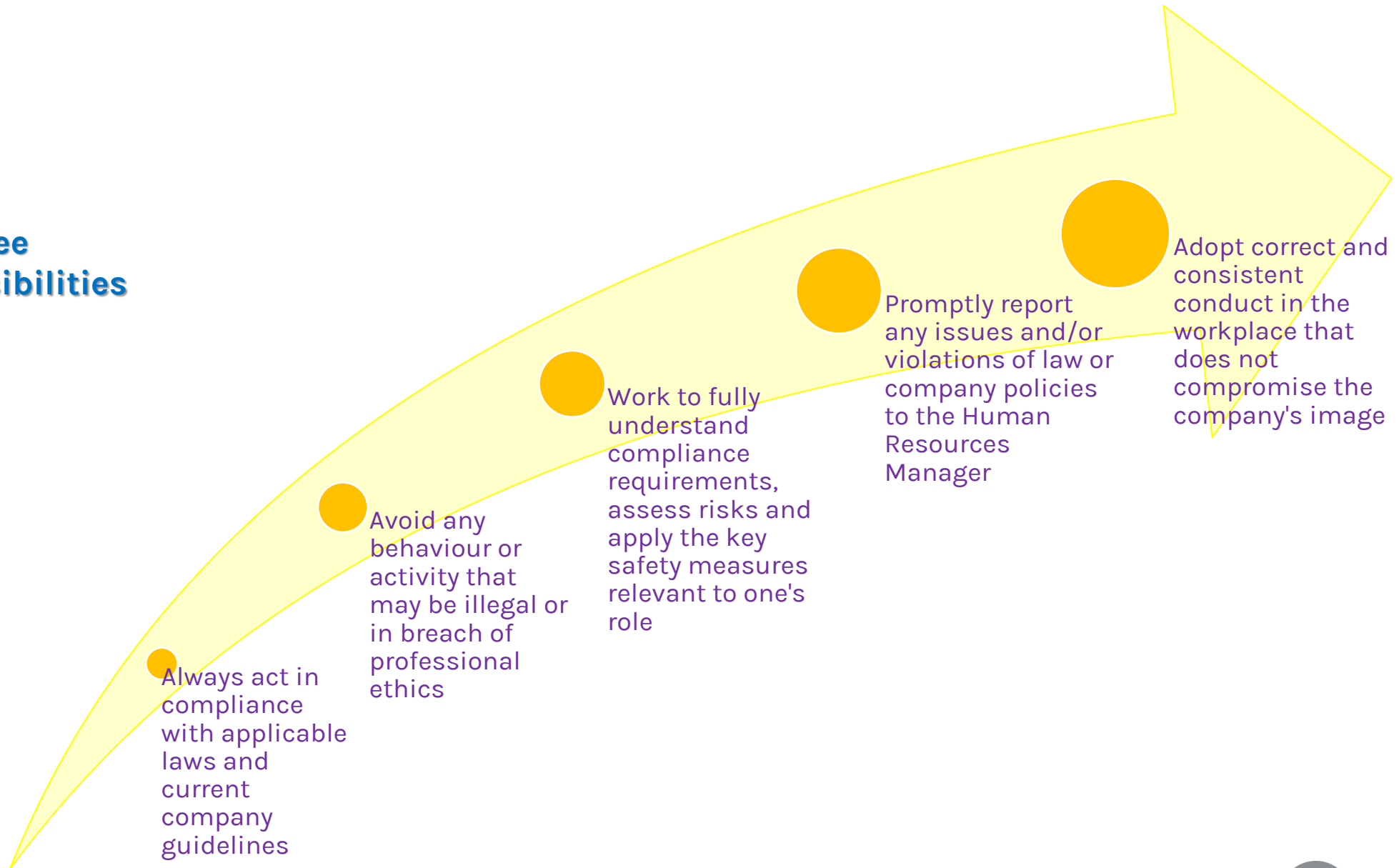
...in practice...

All employees are required to act ethically in compliance with the principles and rules set out in this Code.

Managerial responsibilities



Employee responsibilities



The values of Miglio Emilio are:

SHARING INFORMATION

Sharing information – with customers and among colleagues – is fundamental to the success of Miglio's projects. Sharing experiences and passions is also what binds colleagues to one another and to company management

SYNERGY

Miglio works with customers who believe in synergy with their suppliers, and in turn promotes synergy both externally and internally within the company

INNOVATION

Product and process innovation by Miglio, together with innovative customers who are always future-oriented.

MOTIVATION

It is the drive that keeps Miglio always moving forward, both towards customers and towards its employees, whose importance and value the company fully recognises

PEOPLE

People at the centre: customer satisfaction and employee well-being

and they are expressed in:

Recognition and safeguarding of the dignity, freedom and equality of all human beings

Protection of labour rights and trade union freedoms, health, safety, the environment and biodiversity

Protection and promotion of human rights

Prohibition of engaging in and/or maintaining conduct contrary to the provisions of the Code

Relations with stakeholders characterised by fairness, loyalty and transparency

Prohibition of corrupt practices, illegitimate favours, collusive behaviour and solicitation of personal benefits

Protection of the environment, pollution prevention and sustainable use of resources

Promotion of occupational health and safety through accident prevention, prevention of occupational diseases and active employee participation

Attention to environmental and social aspects throughout the lifecycle of products and company processes

RESPECT AND PROTECTION OF PERSONNEL



- ❖ Person-centred approach, mutual respect
- ❖ People involvement
- ❖ Integrity and sense of responsibility
- ❖ Child and juvenile labour
- ❖ Protection of trade union freedom
- ❖ Regular employment, remuneration and working hours

- ❖ Equal opportunities
- ❖ Harassment, violence and bullying
- ❖ Health and safety

Le persone al centro: la soddisfazione dei clienti
e il benessere dei collaboratori

Person-centred approach, mutual respect

The achievement of company activities cannot be separated from the comprehensive development – both professional and personal – of each individual.

Miglio Emilio

- values all employees by fostering their professional growth through, for example, on-the-job training and courses (both mandatory and optional);
- achieves its objectives by promoting a healthy and safe working environment, with full respect for the people who work there and their needs (health protection, work-life balance, skills development...).

Respect is also expressed through the protection of each person's physical and moral integrity.

People involvement

The involvement of staff in the conduct of work is ensured, with opportunities for participation in discussions and decisions aimed at achieving company objectives.



Integrity and sense of responsibility

The relationship between Miglio Emilio and its employees is founded on mutual trust: employees are therefore required to act in a way that promotes the interests of the company, in accordance with the values described in this Code.

Child and juvenile labour

Miglio Emilio does not use and rejects child labour, and does not employ underage workers.

Protection of trade union freedom

Miglio Emilio guarantees its employees and collaborators full freedom to join trade unions without any interference. Company trade union representatives must not suffer any form of discrimination as a result of their role, and they are guaranteed the time and use of company premises to carry out trade union activities in accordance with current legislation and collective bargaining agreements.

Regular employment, remuneration and working hours

All workers must be hired on the basis of a regular employment contract, in compliance with the forms provided for by national legislation.

The use of irregular or undeclared work is prohibited. Miglio Emilio, recognising the value of collective bargaining, guarantees its employees remuneration in line with the applicable National Collective Labour Agreement (CCNL) in force at the company.

With regard to working hours, the Company guarantees compliance with the regulatory limits and those of the applicable collective bargaining agreement.

Equal opportunities

Miglio Emilio promotes an inclusive company culture.

Decisions are never made on the basis of factors such as creed, religion, sex, age, national origin, marital status, citizenship, sexual orientation, gender identity, ethnicity, genetics, disability, handicap or status.

This entails equal treatment in matters of recruitment, hiring, training, promotions, performance evaluation and disciplinary actions.



Harassment, violence and bullying

Any conduct involving harassment, sexual and moral harassment, psychological violence, mobbing or discrimination constitutes an intolerable violation of the dignity of employees and collaborators; it compromises the physical and psychological integrity, trust and work motivation of those who suffer it, and may constitute a disciplinary offence.

Miglio Emilio guarantees every employee and collaborator the right to protection from any act or conduct contrary to this Code, and takes initiatives to promote mutual respect for the inviolability of the person through training, information and prevention. Those who engage in conduct contrary to this Code breaches a specific duty of office.

Health and safety

Miglio Emilio is committed to ensuring a safe, healthy working environment that complies with current legislation, promoting the prevention of accidents and occupational diseases.

The company operates through an approach based on hazard identification, risk assessment, elimination of hazards where possible, and the adoption of adequate prevention and protection measures.

Miglio Emilio promotes consultation and active participation of workers and their representatives in the processes of improving occupational health and safety, in line with the principles of ISO 45001.

CORRECT CONDUCT AND CAUTION ARE A FUNDAMENTAL DEFENCE AGAINST ACCIDENTS AND FORM THE BASIS FOR ENSURING ONE'S OWN SAFETY AND THAT OF COLLEAGUES

DO NOT USE MACHINERY WITHOUT AUTHORISATION AND DO NOT CARRY OUT OPERATIONS WITHOUT ADEQUATE TRAINING

EMPLOYEES WORKING IN PRODUCTION, WAREHOUSE AND TOOLING AREAS ARE REQUIRED TO WEAR THE COMPANY UNIFORM PROVIDED TO THEM AT THE START OF EMPLOYMENT

WORK IN FULL COLLABORATION WITH COLLEAGUES

ALWAYS USE THE REQUIRED PPE AND OTHER PRESCRIBED PROTECTIVE DEVICES

COMPLY WITH SAFETY RULES

REPORT TO SUPERVISORS AND THE HEALTH AND SAFETY MANAGER (RSPP) ANY DEFICIENCIES OR WEAR OF SAFETY AND PROTECTIVE DEVICES, AND ANY HAZARDOUS SITUATIONS THAT COME TO YOUR ATTENTION

DO NOT REMOVE OR MODIFY SAFETY AND/OR PROTECTIVE DEVICES ON YOUR OWN INITIATIVE

EMPLOYEES ARE PROHIBITED FROM CONSUMING, DISTRIBUTING OR SELLING PSYCHOTROPIC SUBSTANCES DURING WORKING HOURS (ALCOHOL AND DRUGS)

DATA AND RESOURCES

- ❖ Data confidentiality
- ❖ EU Transparency Directive
2019/1152 notice
- ❖ Privacy protection
- ❖ Intellectual property
- ❖ Use of IT Systems
- ❖ Company property



Data confidentiality

All employees are required to maintain confidentiality regarding news and information of a confidential nature obtained from customers, suppliers, competitors, or which they hold by virtue of their role, in order to ensure the highest level of confidentiality with respect to Miglio Emilio's documents and information.

They must therefore not disclose confidential information they have come to know to competitors of the company they work for, to unrelated third parties, or make improper use of such information.

This obligation remains in force even after the termination, for any reason, of the employment relationship.

Information is processed by Miglio Emilio with full respect for the confidentiality and privacy of those concerned, in compliance with applicable legislation. Where it is necessary to discuss relevant, confidential or economic matters, the counterparty will be asked to sign a confidentiality agreement drawn up in accordance with company standards, or alternatively the necessary measures will be adopted according to the nature of the matters involved.

EU Transparency Directive 2019/1152 notice

Legislative Decree no. 104 of 27/06/2022 (Official Gazette no. 176 of 29/07/2022), which implemented EU Transparency Directive 2019/1152, provides that the employer must furnish the employee with a series of information regarding the employment relationship and the provisions of the applicable national/territorial/company collective agreement.

Miglio Emilio provides all employees with the applicable collective agreement (Metalworkers – Small Industry – Confapi).

Privacy protection

In processing the personal data of its personnel, Miglio Emilio complies with the provisions of EU Regulation 2016/679 (GDPR) and subsequent updates.

Intellectual property

Miglio Emilio, to the extent permitted by law, owns the intellectual property created by its employees or stakeholders during the period of their employment or engagement with the company.

It is equally important to respect and protect the intellectual property rights of others, including our customers, competing companies and third parties. Any inappropriate use of the intellectual property of other parties may expose Miglio Emilio and its employees to fines and civil and criminal penalties.

Use of IT systems

Miglio Emilio allows its employees and other authorised personnel to access and use (responsibly and securely) IT systems for business purposes. To prevent security incidents such as unauthorised access or data theft, Miglio Emilio adopts adequate measures.

Software may not be downloaded without authorisation.

Personal use of company computers is not permitted, and browsing websites with indecent or offensive content is strictly prohibited.

Files and programmes on company computers may not be copied for personal use.

Sending messages that may cause harm to the company is prohibited.

Any security incidents and suspicious emails must be reported.

Company property

Each employee is responsible for the company assets entrusted to them and must use them in a manner consistent with the interests of Miglio Emilio.

All employees must treat their workstations, tools, machinery and premises in an appropriate and respectful manner.

Company assets may not be used improperly or for activities outside working hours without the authorisation of the Plant Manager.

Each operator must keep their workstation clean and tidy, and must strive to make proper use of energy resources and avoid waste through simple actions (such as turning off lights and equipment when work is finished, checking that water taps are closed, and printing paper documents – we are eco-friendly – only when strictly necessary).

ACTING RESPONSIBLY



- ❖ Social media
- ❖ Procurement
- ❖ Environment
- ❖ Relations with Customers

Social media

Social media allow individuals and companies to provide and share information and express opinions.

While a useful tool, social media can have a negative impact if not used with due caution, as the boundaries between professional and personal life are often unclear.

Miglio Emilio asks its employees to ensure that their actions and behaviour on social media are consistent with the commitment they show every day in the workplace in protecting the company's shared interests.

EVERYONE IS RESPONSIBLE FOR
WHAT THEY PUBLISH ON THEIR
OWN PROFILE

WHAT IS PUBLISHED REMAINS
ONLINE FOR A LONG TIME

DO NOT DISCLOSE INTERNAL
COMPANY INFORMATION

ANY POST OR COMMENT
RELATING TO THE WORKPLACE
CANNOT BE SEPARATED FROM A
SENSE OF RESPONSIBILITY AND
RESPECT

Procurement

Miglio's relationships with its suppliers are based on transparency, equal opportunities, fairness, quality and mutual respect; they are therefore asked to comply with labour and environmental laws and regulations, not to discriminate against their staff, not to resort to the exploitation of child labour, to read this Code of Ethics and to commit to complying with it. Most suppliers have collaborated with Miglio Emilio for many years, which ensures their awareness of and adherence to the principles set out in this document.

Miglio Emilio critically reviews its procurement process, seeking to enable a supply chain that is sustainable from both an environmental and social perspective.

Where possible, Miglio Emilio gives preference to suppliers that demonstrate attention to environmental, ethical and occupational health and safety aspects.

The selection of suppliers is a key factor in ensuring innovation and excellence in the production and marketing of its products.



Environment

Miglio Emilio recognises environmental protection as a fundamental principle of its activities.

The company operates in compliance with applicable environmental legislation and other subscribed requirements, promoting continuous improvement of its environmental performance.

Miglio Emilio adopts conduct aimed at preventing pollution, making efficient use of natural resources, and reducing energy consumption, waste and the production of refuse.

The organisation considers the environmental aspects associated with its activities, production processes and products throughout the various stages of their lifecycle, to the extent applicable to its role in the value chain, in line with the principles of ISO 14001.



Product lifecycle

Miglio Emilio considers the lifecycle of its products as a fundamental element for the responsible management of environmental impacts and for the pursuit of corporate sustainability objectives.

In developing its activities, the environmental aspects associated with the various stages of the product lifecycle are considered, where applicable:

- ✓ design and development;
- ✓ prototyping and process development;
- ✓ manufacture of moulds and tooling;
- ✓ production and assembly;
- ✓ maintenance of equipment;
- ✓ recovery, recycling and end of life.

1. Design and development

- analysis of customer requirements;
- research into the best technical and economic solutions.

Environmental aspect:

- evaluation of solutions that allow for efficient use of resources.

2. Prototyping and process development

mould design;

definition of the production process;

product optimisation.

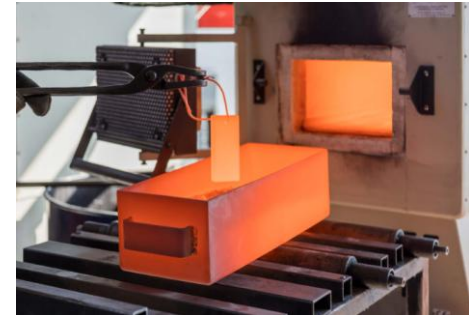
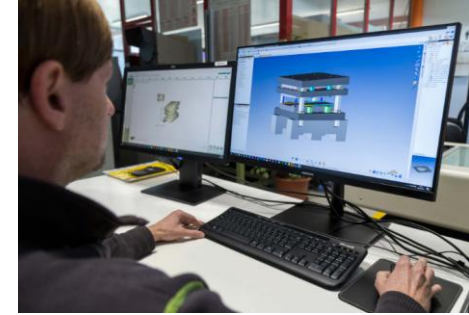
Environmental aspect:

- reduction of material and energy waste.

3. Manufacture of moulds and tooling

Environmental aspects:

- energy consumption;
- use of raw materials;
- generation of scrap.



4. Production

Activities:

- bending;
- blanking/punching;
- rework operations;
- assembly;
- any surface treatments.

Environmental aspects:

- energy consumption;
- use of raw materials;
- generation of scrap and waste.



5. Equipment maintenance

Objectives:

- extending service life;
- reducing waste;
- miglioramento dell'efficienza.

6. End of life

Environmental aspects:

- recovery and recycling of materials;
- proper waste management;
- reduction of overall environmental impacts.



Relations with Customers

At the heart of the company's values, and fundamental to the continuity of the business, is customer satisfaction through the provision of products and services that meet their expectations.

Miglio Emilio promotes relationships with Customers based on attentiveness, credibility, honesty, transparency, integrity and courtesy, and employees are therefore required to:

- ❖ provide high-quality products and services that meet the reasonable expectations of the Customer and protect their safety and well-being; honour obligations and commitments made towards them;
- ❖ provide accurate, complete and truthful information;
- ❖ be consistent in all communications of any kind.

The company promotes continuous improvement of its processes and services in order to enhance customer satisfaction and the quality of the services offered.



ACTING WITH INTEGRITY

**“INTEGRITY,
THE CHOICE BETWEEN
WHAT'S CONVENIENT
AND WHAT'S RIGHT.”**

- ❖ Conflict of interest
- ❖ Fair and honest treatment
- ❖ Donations and political activities
- ❖ Company accounting documents

Conflict of interest

Fairness and moral integrity are absolute duties for all Miglio Emilio employees.

All employees have an obligation to act objectively and in the best interests of the company; they are therefore required not to establish any preferential relationship (arising from external solicitations aimed at obtaining improper advantages) with third parties.

In carrying out their activities, all employees are required to:

- ❖ not accept gifts, favours or benefits of any kind and, in general, not to accept any consideration in order to improperly grant advantages to third parties;
- ❖ not make cash or in-kind donations to third parties, or otherwise offer any type of illicit benefit or favour in connection with the activities they carry out on behalf of Miglio Emilio.

Acts of commercial courtesy, such as gifts or hospitality, are permitted exclusively when of modest value.

The intrinsic belief that one is acting in the interest of the Company does not exempt employees from the obligation to strictly comply with the rules and principles of this Code.

In cases of violation, the Company will adopt every appropriate measure to put an end to the conflict of interest, reserving the right to take action in its own defence.

Fair and honest treatment

Miglio Emilio seeks to maintain fair and honest relationships with all stakeholders.

Miglio Emilio works in an open and transparent manner and does not take advantage of unjust benefits: it commits only to what it can deliver and honours its contractual obligations.

Donations and political activities

Everyone is free to participate in political life as private citizens during their own time and at their own expense.

It is not permitted to offer political contributions on behalf of Miglio Emilio or to support a political party, candidate or campaign using company funds or resources.

The Company may contribute to proposals/campaigns from entities and associations that are explicitly non-profit-making, with regular articles of association and incorporation documents, and that are of sporting, cultural or charitable value or that involve a large number of citizens.

Sponsorship activities are permissible where they relate to social, environmental, sporting, entertainment, arts and culture themes in general.



Company accounting documents

The law requires financial documents to be managed accurately.

Inaccurate financial documents could undermine the trust and reputation that Miglio Emilio enjoys among its employees, customers and other stakeholders.

Miglio Emilio has the responsibility to record every financial transaction accurately, completely and in a timely manner.

The company's financial statements must faithfully and accurately reflect the financial position of the company.

It is strictly prohibited to intentionally report false financial information, make false accounting entries, tamper with the company's accounting records, or destroy them before their due retention period.

All items recorded in the accounts must therefore be supported by complete, clear and valid documentation.



COMPLYING WITH THE LAW



- ❖ Anti-corruption
- ❖ Business compliance
- ❖ Anti-money laundering
- ❖ Fair competition

Anti-corruption

Miglio Emilio strictly prohibits offering, requesting, giving or receiving bribes.

It is not permitted to pay or offer, directly or indirectly, payments, material benefits or other advantages of any kind to third parties (for example, to company representatives in order to influence a decision).

Acts of commercial courtesy, such as gifts or hospitality, are permitted exclusively if of modest value and in any case such that they do not compromise the integrity or reputation of either party and cannot be interpreted by an impartial observer as aimed at improperly obtaining advantages.

The acceptance of money from persons or companies that are, or intend to enter into, business relationships with Miglio Emilio is prohibited.

Miglio Emilio si impegna a lavorare con soggetti terzi con cui condivide values and commitment to integrity and compliance with the law.



Business Compliance

Miglio Emilio complies with all applicable commercial laws, including economic sanctions against third parties, export controls and anti-boycott legislation.

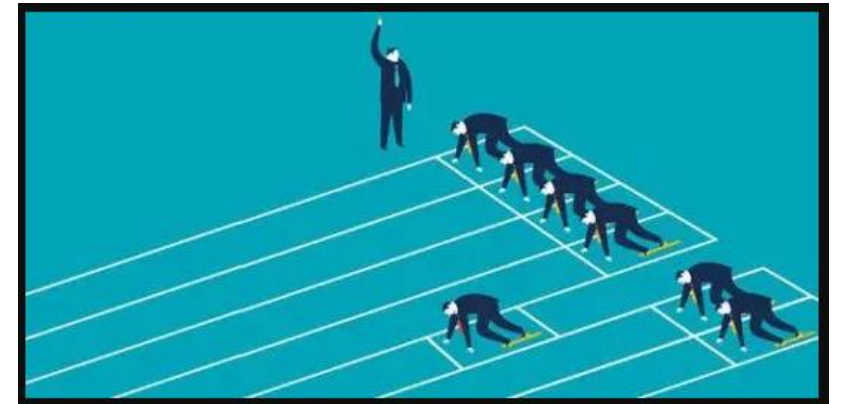
Non-compliance with such laws could compromise the company's reputation and result in lost revenue and serious civil and criminal penalties imposed on the company and its employees.

Anti-money laundering

Miglio Emilio is committed to complying with all national and international rules and regulations on anti-money laundering. Employees must never, under any circumstances, receive or accept the promise of cash payments or risk being involved in money laundering from illegal or criminal activities. Before establishing relationships or entering into contracts with suppliers and other business partners, Miglio Emilio ensures the moral integrity, reputation and good standing of the counterparty.

Fair competition

Miglio Emilio works to acquire new customers and to honour the trust of existing ones, and is committed to doing so in an ethical manner. This means complying with all competition laws and antitrust regulations applicable to its activities.



IMPLEMENTATION, VIOLATION AND SANCTIONS OF THE CODE OF ETHICS



- ❖ Implementation of the Code of Ethics
- ❖ Violation of the Code of Ethics and sanctions

Implementation of the Code of Ethics

Anyone acting in the name of or on behalf of Miglio Emilio who comes into contact with companies with which Miglio Emilio intends to establish business relationships, or with which it already has a commercial or working relationship, is required to:

- ❖ inform them of the commitments and obligations imposed by the Code;
- ❖ require compliance with the obligations of the Code in the conduct of their activities;
- ❖ take the necessary internal steps in the event of complete or partial refusal on their part to comply with this document.

The Code of Ethics is brought to the attention of internal and external parties through specific communication and information activities (such as its inclusion on the company website, distribution to employees, and sending to suppliers).

In order to ensure the effective implementation of this Code, Miglio Emilio has designated the Human Resources Manager as the point of contact for reporting unlawful conduct. Miglio Emilio is committed to ensuring the confidentiality of the reporting person's identity and to protecting them from any form of retaliation, undue influence, hardship, or discrimination in the workplace, whether physical or moral, resulting from having reported a violation of the provisions of this Code.

All interested parties are obliged to report, without delay, any conduct that does not comply with the principles of the Code and any shortcomings in the document.

This Code of Ethics supports the Company's policies regarding quality, environmental protection, occupational health and safety, and is consistent with the principles of the management systems adopted by the organization, including the Management Systems certified in accordance with ISO 9001, ISO 14001 and ISO 45001 standards.

Violation of the Code of Ethics and sanctions

I responsabili di funzione are required to monitor employees' compliance with the Code, adopting the necessary controls for this purpose.

Any violations of this Code of Ethics must be promptly reported to the Human Resources Manager: they will then be assessed by Management