



CODE OF ETHICS

JOBS SPA

LEGAL AND OPERATIONAL HEADQUARTERS
VIA EMILIA PARMENSE 164 - 29122 PIACENZA, ITALY

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0. INTRODUCTION

JOBS deals with design, manufacture, assembly, testing, repair, maintenance and trade of machine tools.

While performing its business, Jobs considers it of primary importance to have a constantly respected organisational system based on ethical and moral values. This Code is disclosed to all parties concerned.

This Code expresses the principles of 'corporate ethics' that JOBS recognises as its own and which it calls upon all employees and stakeholders to observe. The Company conducts its internal and external activities in compliance with the contents of this Code, in the conviction that ethics in the conduct of business, in the management of the business, in the management of relations with employees are to be pursued jointly with the success of the Company.

The Code of Ethics forms an integral part of the "Management and Organisation Model" implemented by Jobs under Legislative Decree no. 231 on the "discipline of administrative liability of legal persons, companies and associations without legal personality".

1. CODE APPLICATION SCOPE

All parties working to achieve the business goals, such as directors, employees, collaborators, and external consultants, are required to comply with this Code. Any conduct contrary to the principles outlined in the Code will be sanctioned in accordance with the provisions of the disciplinary system.

2. GOALS AND VALUES

JOBS's primary goal is the creation of value for its Shareholders and more generally for its Stakeholders¹.

To this end, industrial and financial strategies and the resulting operating practices are oriented, inspired by the efficiency of resource utilization.

While pursuing this goal, JOBS inevitably complies with the following behavioral principles:

- **Lawfulness:** JOBS, as an active and responsible component of the community in which it works, is committed to complying with, and enforcing in its internal relations and relations with the outside world, the laws in force in the States in which it works and the ethical principles commonly accepted and sanctioned in the International business management standards;
- **Fairness:** JOBS rejects and stigmatizes the use of unlawful or inadequate behaviors (towards the community, public authorities, customers, workers, suppliers, investors and competitors) to achieve its economic goals, which are purely pursued with the excellence of performance in terms of the quality and convenience of products and services, thanks to the multi-year experience in the field, the customer care and the constant search for the best innovations available on the market;
- **Integrity:** JOBS relies on organisational tools to prevent the violation of the principles of legality and fairness by its employees and partners and supervises their observance and concrete implementation;
- **Transparency:** JOBS assures the market, investors and the community at large, while safeguarding the competitiveness of their businesses, full transparency on their actions;
- **Fair competition:** JOBS is committed to promoting fair competition, which considers it functional to its very own interest as well as to all market players, customers and stakeholders at large;
- **Quality:** JOBS pursues excellence and competitiveness in the market by providing its customers with quality services that meet efficiently their needs;
- **Safety:** JOBS is committed to protecting workers' safety by monitoring the corporate accident rate, analysing the causes of accidents and near misses, and involving trade union representatives, workers' safety representatives, supervisors and workers in decisions to improve corporate safety.

¹ Parties who come into contact with the company and bear autonomous interests to be respected and enhanced. This category includes shareholders, collaborators-employees, customers, suppliers, the community and the market.

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- **Rispetto:** JOBS protects and enhances the human resources it employs;
- **Environment and Sustainable Development:** JOBS monitors its environmental impact ('carbon footprint') and undertakes the necessary measures to reduce emissions, resource consumption, non-recyclable waste and possible environmental accidents.

3. INTERNAL RELATIONSHIPS

3.1 EMPLOYEES

JOBS adopts the Metalworking and Mechanical Engineering Industry Collective Agreement

JOBS undertakes to comply with the regulations of the above mentioned Agreement (in particular working hours, wages, freedom of association, women's rights, etc.), immigration regulations, regulations on the status of foreigners and regulations on illegal employment prevention.

JOBS complies with human and labour rights conventions, including specific conventions on children, discrimination, harassment, forced labour and respect for diversity.

3.1.1 HUMAN RESOURCES

JOBS acknowledges the centrality of human resources in the belief that the main success factor of each Company is the professional contribution of people working there, in a framework of mutual loyalty and trust.

The Company protects health and safety in the workplace and considers respect for workers' rights to be fundamental in carrying out its business activities.

Work relationship management is aimed at ensuring equal opportunities and fostering the professional growth of each individual

When coordinating hierarchical relations, authority must be applied with fairness and equity, and any conduct that may be deemed detrimental to the dignity and autonomy of the employees is prohibited. JOBS, on behalf of all employees, undertakes to comply with the legal obligations regarding labour protection, workplace safety, trade union rights and health, hygiene conditions and child labour.

3.1.2 HEALTH AND SAFETY

JOBS is committed to spreading the importance of observing workplace safety standards by supervising and monitoring the application of the planned prevention and protection measures.

JOBS assesses all detectable risks and takes, through appropriate planning, actions to counter, prevent and eliminate them as far as possible.

Workers must not create situations that endanger their own safety or that of their colleagues, they must comply with internal regulations and collaborate in improving control and prevention systems.

3.1.3 WORKPLACE

JOBS provides an adequate healthy working environment in compliance with workplace standards. Employees are provided with adequate equipment for carrying out their assigned tasks and duties. The equipment provided complies with current standards and is regularly maintained.

Employees are required to use the provided equipment diligently.

The use of Company equipment for private purposes unrelated to business activities is prohibited.

3.1.4 WORK ORGANISATION

Notifications of any temporary or definitive change of work location will be sent to the worker concerned, with the appropriate modalities.

When scheduling work shifts, work requirements are balanced as far as possible with respect for workers' rest time and quality of life.

3.1.5 RELATIONSHIP MANAGEMENT

In managing and organising activities, JOBS ensures the adequacy and competence of human resources.

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Considering this purpose, top management defines the functional organisation chart and safety roles in the workplace.

Relationship management with workers is carried out on fairness and equity principles.

Every worker must collaborate actively by sharing their own ideas to create a working environment geared towards growth, updating and positive evolution.

3.1.6 NON-DISCRIMINATION

Any discrimination on the grounds of race, nationality, gender, age, disability, political or trade union opinions, religious beliefs, health status, sexual orientation, against any person inside or outside the Company is prohibited.

3.1.7 EMPLOYMENT PROMOTION AND PROTECTION

Top management adopts strategies that combine business growth and profitability with the protection and development of employment, especially of young people.

3.1.8 PERSONNEL RECRUITMENT

Workers are chosen with respect for equal opportunities and the whole person.

The job candidates are explained the selection procedure, the Company organisation and the position for which they will be assessed.

3.1.9 INTEGRATION

JOBS schedules the new employee integration in a collaborative and fruitful working environment.

The Company representatives are in charge of explaining the necessary information and the rules of conduct in force.

3.1.10 TRAINING

Aiming at continuous professional improvement, JOBS is committed to defining training programmes aimed at providing better tools to carry out work activities efficiently.

Furthermore, in accordance with current legislation, JOBS establishes a workplace safety training plan to inform, educate and train workers on the risks related to their jobs.

3.1.11 GROWTH

JOBS enhances everyone's contribution, guaranteeing equal opportunities for growth, assigning responsibilities in line with training, role and skills, recognising - in terms of organisational autonomy - the experience gained.

Professional evaluation is carried out according to meritocracy by applying principles of fairness and human resource enhancement.

The workers undertake to establish harmonious and collaborative relations, avoiding frictions, quarrels and conflictual situations.

3.1.12 CONFIDENTIALITY AND CORPORATE INFORMATION PROCESSING

JOBS, represented by all its employees, undertakes to ensure the strictest confidentiality of all information related to the Company.

Particular attention will be paid to confidential information, as it is not officially disclosed by the Company and could otherwise lead to negative consequences for the Company.

It is forbidden for the employees to disclose such information externally, regardless how they learned it..

Only authorised persons are allowed to handle the above-mentioned confidential information.

3.1.13 CONFLICT OF INTEREST

Employees shall avoid any involvement in situations where a conflict of interest with the Company can be identified.

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Employees shall avoid contexts that may affect their fairness and transparency. For instance, a conflict of interest may arise if employees hold corporate offices or work, of any kind, for JOBS' customers or suppliers.

3.1.14 PRIVACY

All data are processed in compliance with current GDPR regulations regarding privacy (UE Reg. 2016/679 and Italian Leg. Decree 196/2003, as amended and integrated by Leg. Decree 101/2018);

All data are processed lawfully, correctly and transparently towards the data subject, in accordance with the general principles laid down in Article 5 of the GDPR;

JOBS, ensures that the information and data acquired and managed by staff and collaborators while carrying out their activities and, if necessary, entered in special databases are used within the limits set by company procedures and in compliance with national privacy protection regulations.

Specific security measures are implemented to prevent data loss, illicit or incorrect use and unauthorised access (GDPR, Art.32).

The transmission of such data is prohibited outside of specific control rules and procedures.

3.1.15 WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

JOBS implemented appropriate measures to allow the reporting, also anonymously, of any wrongdoing involving JOBS or any of its employees.

The HR Manager is in charge of protecting the person who filed the report.

4. EXTERNAL RELATIONS

4.1 BUSINESS ETHICS

JOBS is committed to operating ethically in the following fields:

- Anti-corruption - rejection of all forms of corruption, and commitment that its employees or agents will not give, offer, accept bribes or donations or other benefits for the purpose of facilitating business.
- Import, export and economic sanction control - compliance with applicable laws on the import/export of goods, services and information.
- Anti-money laundering - compliance with applicable laws against money laundering in business operations.
- Fair competition
- Protection and security of personal data of customers, suppliers and agents.
- Compliance with the EU regulation on the import of minerals and metals containing tin, tungsten, tantalum and gold.

4.1.1 CONTRACT CONCLUSION

During contract negotiations, JOBS undertakes to communicate information useful for collaboration management in order to avoid conflicts and misunderstandings.

Both parties ensure good faith, fairness and loyalty in their conduct before and after the conclusion of the contract.

4.1.2 RELATIONSHIP MANAGEMENT

Should the business partner's conduct be particularly deplorable from a moral, social or environmental point of view and in clear conflict with JOBS policy, JOBS is entitled to reconsider the existing relationship in order to protect its corporate image.

4.1.3 BUSINESS GIFTS AND COURTESIES

JOBS rejects corruption, collusion, illegitimate favours and solicitations aimed at obtaining personal benefits.

Any kind of gratuity, offer, promise of money or goods that might be interpreted as exceeding the normal manifestations of courtesy allowed in business practice and aimed at influencing decisions or behaviour is prohibited.

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4.1.4 INFORMATION AND CONFIDENTIALITY

JOBS undertakes to keep strictly confidential all information, news and data of which it becomes aware during or in connection with any contractual activity and/or business relationship with customers and/or suppliers.

Access to such information is limited only to those JOBS employees who need it to perform their duties. For this purpose, when necessary, JOBS signs (and has signed) specific NDAs to formalise the commitment.

JOBS manages access rights to information on Company servers through a system of permissions and authorisations linked to each employee's role in the organisation chart.

JOBS pays the utmost attention to avoid such information being used to promote or favour its own interests or those of others.

4.2 CUSTOMERS

4.2.1 SERVICE PROVIDED

JOBS builds the excellence of its products and services on the care and attention paid to customer demands and needs. The business activity goal is to guarantee an immediate, qualified and professional response to customers' needs, offering an always efficient service and providing operators who make courtesy and competence their strong points on the market.

4.2.2 STARTING THE RELATIONSHIP

JOBS undertakes to clearly and precisely define object and modalities of the service supplied by providing transparent, easy-to-understand contracts/sales orders in order to avoid misunderstandings and difficulties in concrete application. Customers are required to provide the same level of cooperation.

The Company believes that commercial relations should be based on principles of fairness and transparency and, therefore, clauses or conditions that might be open to interpretation shall be avoided.

JOBS is available to meet any extraordinary Customer requests after analysing their feasibility in due time and manner.

4.2.3 RELATIONSHIP DEVELOPMENT

The policy implemented by JOBS is based on care and attention to customer relationships.

All communications, interactions and operations must be carried out according to principles of professionalism, competence and fairness.

Commercial agreements shall include clauses stipulating the parties' obligation to comply with the provisions of this Code.

Should difficulties occur during the performance of the service, JOBS offers its full cooperation and willingness to solve the problem.

4.2.4 PROTECTION OF INTELLECTUAL PROPERTY, TRADEMARKS AND PATENTS

JOBS is committed to providing products for which it has complete availability and ownership of trademarks, patents or intellectual property rights in general, including copyright aspects for software

4.3 SUPPLIERS

4.3.1 DEALING WITH SUPPLIERS

Every purchasing operation must be carried out by the office in charge according to the internal procedures in force and must comply with the principles of fairness, transparency and consistency.

Any attempt to change normal business relations must be promptly reported to the supervisory authority.

4.3.2 SUPPLIER SELECTION

When selecting suppliers, JOBS takes ethical aspects into account, in addition to the technical-economic aspects, such as:

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- compliance with human and labour rights, including specific rights on children, discrimination and diversity;
- compliance with the collective agreement in force and the regulations on immigration, status of foreigners, and prevention of illegal work
- compliance with the regulations established to ensure adequate levels of health and safety for workers, collaborators and those involved in the supply
- commitment to notify JOBS of any substances, articles and/or complex products containing substances of very high concern (SVHC) on the candidate list in a concentration above 0.1%
- compliance with the EU regulation on import of ores and metals containing tin, tungsten, tantalum and gold.

4.3.3 PURCHASING OPERATIONS

To ensure fairness and transparency in the procurement of goods and services, the documentation must be properly filed, in accordance with approved internal procedures in force.

In the case of competing bids, suppliers will be evaluated taking into account objective evaluation parameters and procedures, aimed at obtaining the most suitable solution for the Company.

4.4 FINANCIAL MARKET

4.4.1 SHAREHOLDERS

JOBS is committed to ensuring equal treatment to all shareholders, avoiding preferential behaviours. The mutual benefits deriving from group membership are pursued in compliance with the applicable regulations and with each Company's independent interest in creating value.

4.4.2 INFORMATION

JOBS is aware of the importance of accurate information concerning its activities for the market, investors and the community at large. The Company adopts transparency as its objective in relationships with all stakeholders, while observing the confidentiality needs required in conducting business. In particular, JOBS communicates with market and investors in accordance with the criteria of fairness, clarity and equal access to information. Every operation and transaction must be correctly authorised, executed, recorded, verifiable, legitimate and appropriate. Every operation must be adequately documented in order to allow inspections to be carried out at any time to certify its features, motivations and to identify the stages and parties involved.

4.4.3 EXTERNAL COMMUNICATION

Communication must be based on respect for the right to information, all disclosure activities must comply with the principles set out in current legislation and regulations on professional conduct, and must be carried out with clarity and transparency. The media relationship management is exclusively to be handled by the corporate offices in charge.

4.4.4 INFORMATION TRANSPARENCY

JOBS collaborators are required to provide complete, correct, transparent information aimed at enabling recipients to develop transparent and balanced relationships.

4.4.5 RELATIONSHIP WITH GROUP COMPANIES

When acquiring a Company, top management undertakes to verify that the activities and organisation of the hypothetical Company to be acquired are consistent with the principles expressed in the Group's policy.

4.4.6 RELATIONSHIP WITH THE FINANCIAL COMMUNITY

JOBS is committed to conveying Company-related information, aware of its importance, in the most appropriate and adequate manner in accordance with possible market repercussions.

JOBS guarantees transparency and reliability in its dealings with shareholders and other financial system parties.

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4.5 RELATIONSHIP WITH SUPERVISORY AUTHORITIES

JOBS undertakes to ensure availability and a profitable contribution in the implementation of the inspection activities carried out by the designated authorities. The Company undertakes to submit all the information requested by these authorities and, in case of an on-site inspection, will ensure the availability and cooperation of its personnel both in accessing the facilities and consulting the documentation.

Should the authority report observations and provide instructions to be implemented, JOBS will carry out all useful activities accordingly.

The relationship with the authority will be managed according to principles of cooperation and respect, taking into consideration JOBS's ultimate goal of conducting business in accordance with current legislation.

4.6 RELATIONSHIPS WITH THE COMMUNITY

JOBS aims to contribute to the economic well-being and growth of the communities in which it operates through the provision of efficient and technologically advanced products and services.

According to these objectives and to the responsibilities towards the stakeholders, JOBS identifies research and innovation as priority conditions for growth and success.

JOBS maintains relations with local, national and supranational public authorities, based on full and active cooperation and transparency, respecting each other's autonomy, economic objectives and the values contained in this Code.

JOBS encourages and, where appropriate, provides support for social, cultural and educational initiatives aimed at promoting the individuals and improving their living conditions.

JOBS does not provide contributions, advantages or other benefits to political parties and trade union organisations, nor to their representatives or candidates, subject to compliance with applicable law.

4.7 ENVIRONMENT

JOBS believes in sustainable global growth in the common interest of all stakeholders, current and future. Investment and business choices are therefore geared towards respect for environment and public health.

In compliance with the specific regulations, when operationally and economically feasible, the Company takes environmental issues into account while defining its choices, also through the adoption of special technologies and production methods that allow a reduction of the environmental impact of its activities, even beyond the standard limits.

4.7.1 RELATIONSHIP WITH THE ENVIRONMENT

JOBS is committed to conducting business in compliance with current environmental regulations, minimising environmental impact.

The entire production cycle is structured to avoid negative repercussions on the outside. Potential structural changes will be implemented by assessing the possible consequences for the environment.

JOBS aims to demonstrate that pursuing business profit can be reconciled with enhancing the environment.

JOBS is committed to operating in an environmentally friendly manner by monitoring its energy efficiency and environmental impact (carbon footprint) and adopting behaviour for the responsible use of natural resources (water, air, minerals from conflict zones, non-renewable raw materials).

JOBS is committed to implementing appropriate measures to reduce air emissions, including greenhouse gas emissions, which represent a risk to the environment and health.

JOBS undertakes to implement appropriate measures to avoid the use of substances and materials with negative environmental or health effects (e.g. carcinogenic, mutagenic and reprotoxic substances), in accordance with the respective applicable laws.

JOBS undertakes to notify any substances, articles and/or complex products containing substances of very high concern (SVHC) on the candidate list in a concentration above 0.1%.

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5. CODE COMPLIANCE

The corporate bodies, management and employees of JOBS, as well as all external collaborators, such as consultants, agents, suppliers, etc., must comply with this Code.

JOBS undertakes to implement appropriate procedures, regulations or instructions to ensure that the values affirmed herein are reflected in the concrete conduct of each of the above mentioned subjects, providing, when necessary, appropriate sanctioning systems for possible violations

6. CODE OF ETHICS ADOPTION AND MONITORING

The Code of Ethics and any future updates are approved by the Legal Representative.

7. CODE OF ETHICS DISCLOSURE

This Code of Ethics is made accessible to all stakeholders through publication on the JOBS website.