



# IMPALA S.R.L.

## CODE OF ETHICS

### LIST OF REVISION

| REV. | DATE | NATURE OF CHANGES | APPROVAL           |
|------|------|-------------------|--------------------|
| 00   |      | Adoption          | Board of Directors |

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**1. INTRODUCTION**

Impala Srl (hereinafter also referred to as “the Company”) has prepared this Code of Ethics to establish the principles of conduct and corporate ethical values that the company recognises, accepts, shares, and applies. This document also defines the responsibilities that the company, its employees, and collaborators assume in internal and external relations.

Through the adoption of the Code of Ethics, the Company addresses the legitimate expectations of its stakeholders, promoting a high level of professionalism and condemning behaviours that, in addition to violating current regulations, contradict the company’s values.

The Code of Ethics also emphasises the importance of sustainable development, considered fundamental for Impala as it believes that only through the pursuit of social, economic, and environmental sustainability do behaviours become increasingly ethical and responsible.

**2. RECIPIENTS OF THE CODE OF ETHICS**

The rules and provisions of this Code of Ethics apply to partners, directors, employees, and extend, as far as compatible, to third-party recipients (collaborators, consultants, suppliers, and any other entity that may act in the name and on behalf of Impala Srl).

The Company promotes the broadest possible dissemination of the principles and standards of conduct outlined in the Code of Ethics and requires compliance with them by the aforementioned recipients.

The Code of Ethics is available on the company website at the address <https://impala-srl.com/>. Each recipient is required to be familiar with the Code of Ethics, actively contribute to its implementation, and report any violations or non-compliance, within their remit, including through the Company’s designated “Whistleblowing” channels.

With regard to third parties subject to this Code, the Company undertakes to introduce contractual clauses and/or obtain signed statements that formalise their acknowledgment, adherence, and explicit commitment to comply with the principles of conduct outlined herein. Impala Srl promotes the monitoring of compliance with the provisions of the Code of Ethics to ensure the proper conduct of individuals and the operational compliance of the company and its collaborators.

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**3. STRUCTURE OF THE CODE OF ETHICS**

The Code of Ethics is divided into several sections:

- Ethical principles
- Criteria of conduct
- Implementation and dissemination system

**4. ETHICAL PRINCIPLES****Respect for the Law**

The Company requires the recipients of this Code of Ethics to comply with the laws and regulations in force at both national and supranational levels.

Anyone working for Impala in any capacity commits to and is obliged to conduct themselves in accordance with constitutional principles, laws, and all regulations.

**Integrity and Honesty**

Honesty and integrity constitute a fundamental principle in all of Impala's activities; under no circumstances can the pursuit of Impala's interest justify dishonest conduct.

The Company ensures that all individuals acting in its interest adhere to the principles of fairness, impartiality, and integrity in their functions, both internal and external, in order to maintain the Company's image and the trust relationship established with the stakeholders.

**Sustainability, Responsibility Towards Stakeholders, and Environmental Protection**

Impala is committed to conducting its activities in compliance with the principles of sustainable development. The Company is indeed aware that its activities form a basis for the fundamental rights of individuals and have an impact, even indirectly, on the living conditions of people, the economic and social development of the area in which it operates, and the general well-being of the community. For these reasons, investments and activities are oriented towards sustainability in the medium to long term.

The Company ensures the involvement of stakeholders through dialogue and discussion in order to identify their needs and promote mutual collaboration while respecting their respective roles.

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Impala contributes to the enhancement of the territory by supporting cultural initiatives, social utility projects, and projects that promote community well-being and the protection of the natural environment.

The Company seeks a balance between economic initiatives and essential environmental needs, committing to the protection and care of the environment, focusing on the prevention of pollution and the reduction of environmental risks and impacts.

**Centrality of Human Resources and Respect for the Individual**

Impala recognises the central role of human resources and is committed to ensuring the respect of their rights by promoting their social, professional, and personal development.

The Company ensures that no acts of physical or psychological violence occur, including bullying, and any harassing behaviour, as well as any discriminatory or damaging attitudes or actions towards individuals, their beliefs, and their preferences.

Anyone, in any capacity, working for Impala Srl as an employee, collaborator, supplier, or partner, must respect the dignity of individuals and avoid any form of discrimination, direct or indirect, based on union, political, religious, racial, nationality, gender reasons, and any other form of diversity.

The Company does not engage in abuses regarding working hours, tasks, salary, child labour exploitation, forced and compulsory labour.

The company is committed to not prohibiting, hindering, or penalising union activities, ensuring that personnel have suitable conditions to exercise this right in the workplace.

**Transparency, Completeness, and Confidentiality of Information**

The Company is guided in all its actions by principles of maximum transparency, reliability, and clarity, providing its stakeholders, customers, and third parties with complete and truthful information. This commitment must also apply to consultants, suppliers, customers, and anyone who has dealings with the Company.

Relations with the media are reserved exclusively for the company functions and representatives designated for this purpose.

In managing accounting and tax obligations, Impala is committed to ensuring the transparency and accuracy of the information contained in accounting documents and tax-relevant

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declarations, striving to guarantee both the objective and subjective truthfulness of the transactions carried out and reflected in those declarations, as well as the completeness and correctness of the accounting and tax documents.

Any contributions must, in any case, be decided and disbursed in accordance with current regulations and adequately recorded and documented.

Each member of the corporate bodies, management, or employee is required to collaborate, within the scope of their responsibilities, to ensure that management activities are accurately and promptly reflected in the accounting records.

The company is committed to reporting information on the total number of political contributions, both financial and in-kind, made directly and indirectly by the organisation by country and by recipient/beneficiary.

### **Health and Safety Protection**

The Company places the protection of its workers at the centre of its business activities and is committed to ensuring adequate working conditions and safe and healthy work environments. Impala is committed to spreading and consolidating a culture of health and safety at work, developing awareness of the risks associated with business activities, and promoting responsible behaviour by workers and collaborators.

Impala is also committed to promoting initiatives that facilitate work-life balance and other activities aimed at enhancing inclusion, engagement, and the organisational and personal well-being of its employees.

### **Protection of Competition**

Impala recognises that fair and honest competition is a fundamental element for the development of the company. The Company refrains from collusive and anti-competitive practices, as well as from behaviours that may disrupt the proper functioning of market dynamics.

### **Protection of Industrial Property**

The Company invests in research, recognising the crucial importance of new ideas and patents for sustainable industrial development. The Company is committed to complying with industrial

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property, trademark, and patent regulations in the context of new projects that may involve the creation of new patents, trademarks, or other forms of protection for the benefit of third parties.

**Fight Against Bribery**

Impala prohibits any form of bribery, and the belief that one is acting in the Company's interest can in no way justify corrupt conduct

The violation of this prohibition is unacceptable and incompatible with the company's values. The Company is committed to complying with all applicable anti-bribery regulations, from the OECD Convention to national and international regulations, as well as all laws and regulations applicable in the countries where it operates.

The company has adopted a specific Anti-Bribery Policy, which is part of its commitment to ethics and to regulatory compliance.

**Confidentiality and Protection of Personal Data**

Impala is committed to using the data it possesses responsibly, ensuring high standards of security in the management of personal data of its employees, customers, and stakeholders, guaranteeing full respect for the rights of the people with whom it interacts. To this end, it is committed to ensuring the confidentiality of personal and sensitive data in its possession, in accordance with current legislation and specifically Regulation (EU) 2016/679.

## **5. CRITERIA OF CONDUCT**

### **SHAREHOLDERS AND DIRECTORS**

The corporate governance system is inspired by the principles of transparency and fairness in business management and is aimed at ensuring sustainable success through the creation of medium to long-term value for partners and stakeholders, the identification and control of business risks, and transparency towards the market.

The Company ensures the accuracy and truthfulness of social communications. For each operation, adequate traceability is guaranteed to allow for the identification of the rationale and the individuals who authorised, executed, recorded, and verified the operation itself.

Shareholders and directors are required to:

- uphold behaviour inspired by integrity, loyalty, and a sense of responsibility in mutual relationships and towards the Company as a whole;
- uphold behaviour inspired by autonomy, independence, and fairness with Public Institutions, private entities, economic associations, trade unions, and any other stakeholders;
- ensure diligent and informed participation in meetings and activities of the corporate bodies;
- make confidential use of the information they become aware of, avoiding using their position to gain direct or indirect personal advantages.

### **RELATIONS WITH PERSONNEL**

#### **Selection of Personnel**

The selection and evaluation of personnel to be hired is carried out based on the match between the candidates' profiles and those expected, as well as the company's needs, ensuring equal opportunities and fair treatment for all interested parties, avoiding any form of discrimination. The information requested is strictly related to verifying the aspects outlined in the professional and psychological profile, while respecting the candidate's privacy.

Within the processes of personnel management and development, Impala avoids any form of discrimination and evaluates the skills, talents, potential, and commitment of collaborators, using objective and documented criteria, ensuring fairness and meritocracy.



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**Compliance with Health and Safety Regulations in the Workplace and Environmental Protection**

Impala recognises the health and safety of workers as priority objectives to be maintained on a daily basis through a corporate policy focused on making the necessary investments.

Personnel are required to comply with the regulations for the protection of health and safety in the workplace and the environment.

Within the scope of their duties and responsibilities, personnel participate in the process of assessing and preventing risks to health, safety, and the environment.

Hygiene and safety issues and environmental protection concerns identified within the Company's premises or during the stages of the production process are discussed and shared; this fosters a constructive attitude aimed at formulating concrete operational proposals to improve the prevention of injuries and environmental incidents.

Personnel are committed to making their utmost contribution and paying attention during the execution of their tasks, adhering to the instructions provided as outlined in the procedures and guidelines issued by the Company.

**Use of Company Assets**

The use of the Company's assets, means, and equipment must be based on principles of professionalism and correctness; personal and distorted uses of company assets are prohibited. Staff are required to comply with any procedures established for the correct use of company assets. Within the limits of possibility and without ever jeopardising their own safety, staff must operate to reduce the risk of theft, damage, or other threats to the assets and resources assigned, promptly informing the designated functions in case of abnormal situations.

**Use of Information Systems**

The Company is committed to conducting its activities in compliance with the current regulations regarding the use and management of information systems and ensuring their correct use by its employees.

Impala prohibits the use of IT or network resources for purposes other than those strictly related to the performance of work duties, and even more so, for committing computer-related crimes, altering or damaging third-party information systems (individuals, private entities, or public entities), or illegally obtaining confidential information.

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It is also prohibited to install unlicensed software on the company's equipment or to use and/or duplicate documents or material protected by intellectual property rights (recordings and audiovisual, electronic, paper, or photographic reproductions, software).

**Conflict of Interest**

A conflict of interest situation occurs when, during the work activity carried out by Impala personnel, the ability to judge and objectivity are threatened by personal interests or those related to connected persons.

The Company's personnel must not overlap corporate duties and roles with personal and/or family economic activities and interests.

In the event of a conflict of interest situation, even potential, and in any other case where there are significant reasons of convenience, each involved party is required to refrain from engaging in the related conduct and must promptly inform their superiors or contacts of the aforementioned situations that may concern the same involved party or their close relatives.

**Gifts and Other Utilities**

It is prohibited to accept, offer, or promise, directly or indirectly, favours, gifts, and benefits from and to anyone (public or private entities, customers, contractors, subcontractors, suppliers, any counterpart of the Company).

Acts of courtesy, such as gifts or forms of hospitality, to and from public officials, representatives of public administration, or businesses in dealings with Impala, are permitted within the limits of and in accordance with the corporate procedures that regulate them, provided they are of modest value and can be considered usual, and in no way comparable to practices of bribery, nor capable of compromising the integrity and reputation of the parties involved, or influencing the recipient's autonomy of judgement.

**Respect for Confidentiality**

The Company is committed to respecting privacy protection regarding data related to the private sphere and the opinions of workers.

Any investigation into the ideas, preferences, personal tastes, and, in general, the private life of the collaborator is prohibited.

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The acquisition, processing, and storage of such information occur within specific procedures aimed at ensuring that unauthorised persons cannot become aware of it and full compliance with privacy protection regulations.

The personnel is required to keep confidential the information they have become aware of in the performance of their duties in accordance with the law, regulations, and circumstances, carefully safeguarding the data entrusted to them.

**RELATIONS WITH SUPPLIERS**

The relationships that the Company maintains with suppliers are based on the respect of the fundamental principles recalled by this Code of Ethics, and all personnel are required to avoid situations that could compromise the supplier's activity and trust.

All commercial transactions are conducted according to the criteria of transparency and fairness, ensuring compliance with the requirements set and requested for the selection of suppliers.

The choice of suppliers is made exclusively through objective selection and evaluation criteria, aimed at ensuring equal opportunities, loyalty, and impartiality.

The Company requires its suppliers and partners to share the values and principles contained in this Code of Ethics, which should guide their conduct in order to establish and maintain a proper contractual and/or commercial relationship. To this end, specific contractual clauses are provided through which suppliers declare their acceptance of the provisions of the Code of Ethics and undertake to comply with them. In the event of a violation of the principles established in the Code of Ethics by the suppliers, Impala will take the necessary measures, including the termination of the contract.

Impala expects its suppliers to promote behaviours aimed at safeguarding the human rights of their employees, with particular attention to decent working conditions, health and safety, and environmental protection. It is also essential that they ensure the quality of goods, services, and performance, as well as respect for privacy.

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**RELATIONS WITH CUSTOMERS**

Impala considers its customers a fundamental element for the success of the Company and, to this end, is committed to meeting their needs in terms of the quality of products and services offered, adapting them to the expectations and needs of the market in which it operates.

The Company adopts fair and non-discriminatory behaviours, serving its customers to meet their needs with transparency, professionalism, courtesy, and efficiency. This includes the clear disclosure of the economic, social, and environmental impacts of its products and services. The company aims to avoid misleading, false, or discriminatory statements, ensuring that all information is accurate and accessible.

Contracts and communications with customers must be clear and understandable, must comply with current regulations, avoiding misleading, aggressive, or otherwise unfair practices. It is essential that they are comprehensive, so as not to omit any relevant element for the customer's decisions.

Customer data is treated confidentially and in compliance with regulations on competition and privacy protection.

**RELATIONS WITH THE PUBLIC ADMINISTRATION**

The Company maintains transparent relationships with the Public Administration and, in general, with public institutions, characterised by maximum collaboration and fairness.

In every relationship with the Public Administration, respect for the law, rules, regulations, and directives governing these relationships is fundamental.

All employees and collaborators of Impala are required to provide maximum cooperation in dealings with Public Institutions. Relations with public officials are reserved exclusively for the corporate functions designated for this purpose.

The data and information transmitted to Public Institutions must be accurate, complete, and truthful.

Staff are expressly prohibited from engaging in behaviours that may give rise to ambiguity or that may conceal a lack of transparency, such as:

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- giving or promising money, gifts, or other benefits to Public Officials and/or Public Service Officers with the aim of influencing their decisions in view of favourable treatments or undue performances;
- conduct that could, if only by mere interpretation, appear to be of a collusive nature or that could in any way be likely to undermine the principles of this Code of Ethics;
- submission of false statements to public bodies, in order to obtain public disbursements, facilitated contributions/financing, or concessions, authorisations, licenses, or other administrative acts;
- solicitation of confidential information that could compromise the integrity or reputation of both parties.

**RELATIONS WITH POLITICAL ASSOCIATIONS, TRADE UNIONS, AND MEDIA**

Impala neither favours nor discriminates, directly or indirectly, against any political or trade union organisation, and it does not provide contributions to organisations with which a conflict of interest could arise. Any contributions must, in any case, be decided and disbursed in accordance with current regulations and adequately recorded and documented.

Employees refrain from engaging in behaviours aimed at exerting pressure, whether direct or indirect, on political representatives, union officials, or representatives of organisations in potential conflict of interest, in order to obtain personal or business advantages.

Impala considers it important to contribute with cultural and social initiatives in the communities where it operates, financially supporting projects promoted by networks of businesses, institutions, entities, associations, universities, and research centres. In the selection of projects to support, it ensures transparency and traceability of resources, avoiding conflicts of interest, improper conduct, and undue influences.

Relations with the press and media, concerning the dissemination of information related to Impala's activities, must be handled only by individuals expressly designated by the Company. Communications to any media outlet must be truthful, clear, transparent, non-ambiguous, or instrumental; the information must be consistent, homogeneous, and accurate.

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**6. IMPLEMENTATION AND DISSEMINATION OF THE CODE OF ETHICS****Dissemination, Information, and Training**

The Code of Ethics is brought to the attention of all interested parties, both internal and external to the Company, through specific information and training activities.

The Company prepares and implements a periodic plan for dissemination, information, and training activities aimed at promoting awareness of the ethical principles and standards of conduct outlined in the Code of Ethics.

**Reports**

The recipients of this Code of Ethics are required to report any violations, including suspected breaches, of the behavioural standards prescribed by the Code of Ethics.

To this end, the Company adopts specific channels for the management of reports (“whistleblowing”) in accordance with the provisions of Legislative Decree 24/2023 and Directive (EU) 2019/1937 and identifies individuals designated for managing the reports.

In managing the reports, the utmost confidentiality of the reporting persons is guaranteed, except as required by law.

The Company protects the reporting person from retaliatory or discriminatory actions related to reports made in good faith (disciplinary sanctions, demotion, suspension, dismissal, or termination of collaboration relationships).

**Violations of the Code of Ethics**

Violations of the principles and rules outlined in this Code of Ethics by employees and managers constitute a breach of the primary obligations of the employment relationship or a disciplinary offence and will be addressed by the relevant authorities in accordance with the current National Collective Labour Agreement.

Third-party recipients (suppliers, consultants, partners, etc.) are required to adhere to the provisions of this Code of Ethics, and compliance with it is a prerequisite for the continuation of the existing commercial or collaborative relationship with the Company. To this end, Impala includes in appointment letters and contracts the obligation to comply with the provisions contained in the Code of Ethics, under penalty of contract termination and/or revocation of the appointment.

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Violating this obligation constitutes a breach of contract and, therefore, may be grounds for termination of the contract, without prejudice to any compensation for damages incurred by the Company as a result of such a violation.