

# CODE OF ETHICS

- 2025 -



EXPERIENCE  
THE IMPOSSIBLE



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MAGICMOTORSPORT

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## INTRODUCTION **COMPANY HISTORY**

Magicmotorsport began in Poland in 1996 from an idea of the Skutkiewicz brothers. The company's team consisted of a small group of mechanics, engineers and software developers who provided technical support to racing teams.

The first headquarters were founded in Gdansk, and we gradually expanded from the racing world to focus on the development of hardware and software solutions for the automotive sector, with particular attention to the performance area.

Today the company is based in Partinico, Sicily, and exports goods with "Made in Italy" quality all over the world, offering innovative solutions to the mechatronics sector.

*Passion and courage guides Magicmotorsport's activities, alongside respect, efficiency, innovation: the company's three core values!*

The company offers its customers and mechatronic engineers the opportunity to attend technical-professional training courses for the use of equipment and periodically hosts meetings in different countries throughout the world.

The company team participates in international car shows, giving customers and fans of the sector the opportunity to get to know the company up-close. Furthermore, we have dozens of official distributors who promote our brand internationally.

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## RECIPIENTS OF THE CODE OF ETHICS

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### Recipients

### RECIPIENTS OF THE CODE OF ETHICS

One element that is fundamental to the company is maintaining a relationship of trust with the subjects with whom it has relations by committing to competing fairly and honestly.

The Code of Ethics applies to all company representatives, without exception, as well as all those who, directly or indirectly, permanently or temporarily, establish relationships or relations with the company and work to pursue its objectives.

The recipients include:

- Employees who adapt their actions to the principles contained in this code;
- Internal and external consultants and collaborators who work in the interest or on behalf of the company;
- Economic operators who act in the name and on behalf of the company in Italy and abroad;
- Continuous and occasional suppliers of goods and services;
- The Sole Director
- The managers charged with representing the company internally and externally;
- The members of the supervisory body.

Magicomotorsport trusts that the recipients will always act in line with the values and principles of the Code; claims of acting in the interest of the company by adopting behaviours contrary to those expressed are not justified in any case.

The company also ensures an adequate training and awareness programme for employees and corporate bodies on compliance with the Code of Ethics and related issues.

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## OUR VALUES

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### Company principles

#### OUR COMPANY PRINCIPLES ARE:

##### INNOVATION

We believe in the power of innovation as a driver of economic and social progress, and we pursue its development with courage and passion so that we can always offer concrete solutions with high added value..

##### RESPECT

Inclusiveness and team spirit are pillars of our essence. We are humble, loyal, always positive and empathetic. We make listening to one another and altruism a fundamental component of our work, both among ourselves and with our customers.

##### EFFICIENCY

We are ambitious and responsible professionals and we believe in meritocratic and accurate work, in order to tangibly improve our customers' performance within their business.

##### BRAVERY

Starting from our love for our area and the choice to innovate in Sicily, as a company, and including the ambition of every single member of our team, we believe the world cannot be changed without a healthy dose of madness.

##### PASSION

We believe in our work and we always tackle it while motivated by the enthusiasm, curiosity and determination of those who want to leave a mark in the future, with the certainty of those who know, in their hearts, that they can do it.

##### AMBITION

We aim at excellence and transform every challenge into a new opportunity. We nurture talent, encourage commitment, and invest on tangible, measurable results: dreaming big, achieving even bigger.

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# THE IMPORTANCE OF HUMAN RESOURCES

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Human resources

## STAFF RECRUITMENT AND TRAINING

The staff to be included in the company are evaluated on the basis of matching the profiles of the candidates examined with those defined and requested, in compliance with equal opportunities for all interested parties, while also respecting current regulations.

The recruiting of staff at Magicmotorsport takes place through various steps (cognitive interview, psycho-aptitude test, in-depth interview) in which subjective and objective tools are used that allow the company to identify both hard and soft skills.

Beyond the purely technical skills, the company focuses its attention on multi-disciplinary skills, for example organisational abilities, focus on results, a spirit of initiative and determination. If enhanced, all these characteristics allow the staff member selected to successfully perform the functions required by the role in question.

Magicmotorsport believes that every individual has talents; in fact, it is essential for MMS to be able to intercept those that fit together with it in synergy and that consequently allow it to expand. At the same time, however, the company intends to help the employee progress to victory by achieving their professional and personal goals.

Magicmotorsport applies a "WIN-WIN" philosophy where both the company and the employee win; there can be no corporate victory for MMS that does not include an individual victory.

This is why Magicmotorsport uses a human resources management and development system that sees training as an indispensable tool, which allows each employee

to be offered opportunities to improve on the level of performance and professional growth.

For each individual newly hired employee, the company creates an action plan to facilitate their inclusion within the company team and to guide them through initial training, coaching and progress monitoring.

## ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

Staff shall always be hired with the relevant formal employment agreement or with legally admissible contracts; no form of undeclared employment will be tolerated.

When entering into the employment relationship, the person receives the following detailed information:

- characteristics of their role and duties to be performed;
- regulatory and pay aspects;
- the rules and procedures to adopt to avoid possible health risks associated with the work.

It is an abuse of the position of authority to request, by asking the hierarchical superior, services, personal

favours and to engage in any behaviour that constitutes a violation of this Code. In the case of work reorganisation, the value of human resources is safeguarded by providing professional training and/or retraining where necessary.

Magimotorsport therefore adheres to the following criteria:

- the costs for the reorganisation of work must be distributed as evenly as possible among all the people, in order to carry out the activity effectively and efficiently;
- in case of new or unforeseen events, which must be made explicit in any case, the person can be assigned to tasks other than those carried out previously, taking care to safeguard their professional skills.

## EQUALITY

In accordance with Article 3 of the Italian Constitution, Magimotorsport does not discriminate against its staff by virtue of individual political opinions, religious beliefs, gender status, skin colour, sexual orientation, race, language and particular personal and social conditions. In addition, it guarantees equal opportunities for all employees and collaborators of all levels. The company is committed to combatting all forms of mobbing and labour exploitation, both direct and indirect.

Magimotorsport protects its employees' right to health and well-being by guaranteeing health care and also by implementing welfare initiatives, with services and benefits that meet the needs of its employees.

## SAFE WORKING ENVIRONMENT

The company ensures compliance with the technical-structural standards of the law regarding equipment, systems and workplaces; worker information and training; the acquisition of the documents and certifications required by law; supervisory activities in reference to workers' compliance with the procedures and instructions for working safely.

The employer shall be alert to the need to adjust these measures to take account of changing circumstances and aim to improve existing situations.

To implement this, the company draws on the following general principles of prevention:

- a) avoid risks;
- b) assess risks where these cannot be avoided;
- c) tackle risks at their source;
- d) adapt the role to the individual, especially as regards the design of work places, the choice of work equipment and the choice of working and production methods, with a particular view to alleviating monotonous and repetitive posts and reducing the effect of such work on health;
- e) take technical developments into account;
- f) replace anything risky with something not dangerous or which is less harmful;
- g) plan prevention, aiming at a

coherent overall prevention policy that covers technology, organisation of work, working conditions, social relationships and the influence of factors related to the working environment;

- h) give the utmost priority to collective protective measures with respect to individual protective measures;
- i) provide workers with adequate instructions.

Taking into account the nature of the business and/or establishment, the employer:

1. assesses the risks for the health and safety of workers, including in the choice of work equipment and chemical substances or preparations used and in the arrangement of workplaces. Subsequent to this evaluation and as necessary, the preventive measures and the working and production methods implemented by the employer must:
  - assure an improvement in the level of protection afforded to workers with regard to safety and health;
  - be integrated into all the activities of the business and/or establishment and at all hierarchical levels;
2. where tasks are entrusted to a worker, take the worker's capabilities into account with regard to health and safety;
3. ensure that the planning and introduction of new technologies are the subject of consultation with the workers and/or their representatives with regard to the consequences of the choice of equipment, the working conditions and the working environment for the safety and health of workers;
4. take appropriate measures so that only the workers



who have received adequate instructions can access areas presenting a serious and specific risk.

## **HARASSMENT AND ABUSE**

Magimotorsport prohibits any kind of harassment in working relationships between its employees and collaborators.

Pursuant to the Framework Agreement on harassment and violence in the workplace of 26 April 2007 and the Confindustria/CGIL-CISL-UIL document of 25 January 2016, "Harassment occurs when one or more individuals repeatedly and deliberately suffer abuse, threats and/or humiliation in the context of work.

Violence occurs when one or more individuals are aggressive in the work environment. Harassment and violence can be exercised by one or more superiors, or by one or more workers, with the purpose or effect of violating the dignity of the individual, harming their health and/or creating a hostile working environment".

Magimotorsport also ensures that employees do not work under the influence of alcohol, drugs or substances with a similar effect and do not consume or sell such substances for any reason in the course of their work.

## **PROTECTION OF PRIVACY**

Compliance with the special regulations governed by Legislative Decree no. 81/08 "Protection of health and safety in the workplace" and its subsequent amendments and by the Legislative Decree no. 101/2018 "Code of Privacy".

Worker privacy is protected by adopting standards that specify the information that the company requests from the employee and the relative methods for processing and storage.

Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees and collaborators is not permitted.

Aside from the exceptions provided for by law, these standards enforce the prohibition on communicating or disseminating personal data without the prior consent of the interested party and establish the rules for the monitoring the

standards for the protection of privacy on the part of each collaborator.

Monitoring tools may be adopted in relation to the use of company means and tools, in compliance with current legislation.

## **TRANSPARENCY AND LEGALITY**

The company promotes a corporate culture based on ethics and legality.

In order to ensure compliance with the principles set out in this Code of Ethics, a whistleblowing system is in place that allows for the confidential and secure reporting of any violations of regulations or conduct not aligned with the company's values. Reports can be submitted at <https://www.magicmotorsport.com/en/whistleblowing/>, in accordance with applicable laws and the company's dedicated procedure.

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## RULES OF CONDUCT WITHIN THE COMPANY

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### Rules of conduct

#### STAFF DUTIES

Magnum Motorsport employees are required to act loyally, respecting the obligations signed in the employment contract and the provisions of the code of ethics.

#### CLOTHING

The Dress Code is an integral part of the corporate identity. MMS employees and collaborators are required to wear appropriate, decent and plain clothing while working in the company. When required, they must wear branded clothing.

#### CONFLICT OF INTEREST

Magnum Motorsport opposes any behaviour that could be configured as a conflict of interest. Conflict of interest is a situation in which a person's secondary (financial or non-financial) interest tends to interfere with the primary interest of the company, in relation to which the former has specific duties and responsibilities.

In the event that so much as the appearance of a conflict of interest occurs, the person is required to inform:

- the Board of Directors (if a director);
- the Human Resources Department (if an employee);
- the internal contact person (if an employee).

Directors and employees who carry out any paid secondary activity that could lead to a situation of conflict of interest must notify the company (Human Resources Department).

If the company believes that this activity jeopardises or violates the obligations deriving from the employment

relationship, the employee is required to suspend it.

#### BONUSES AND GIFTS

Magnum Motorsport staff is prohibited from accepting or receiving any gift, bonus or other direct and/or indirect present while carrying out their work duties.

Any employee who is offered or receives donations or gifts from third parties must immediately report this to the Manager, who will give their evaluation on whether it can be accepted and its intended use.

Non-employee external collaborators (consultants, agents, service providers) must also comply with the principles contained in this Code of Ethics.

#### CONFIDENTIALITY OF COMPANY INFORMATION

The recipients of this Code of Ethics are required to comply with all the precepts of Legislative Decree 101/2018 to maintain the strictest and most absolute confidentiality for all information relating to the Company and/or its employees of which they become aware by virtue of their work activities.

Each collaborator is obliged to ensure the utmost confidentiality with regard to any information learned due to their work function, also in order to safeguard Magnum Motorsport's technical, financial, legal, administrative, managerial and commercial know-how.

In particular, each recipient must:

1. acquire and process only the information and data

necessary and appropriate for the purposes of the department to which they belong and in direct connection with the latter;

2. acquire and process the information and data themselves within the limits of the specific procedures adopted by the company;

3. keep data and information in such a way as to prevent unauthorised people from gaining knowledge of them;

4. communicate data and information in the context of pre-established procedures or with the explicit authorisation of hierarchical superiors and, in any case, in the event of doubt or uncertainty, after making sure whether the data or information in the specific case may be disclosed;

5. Company personnel must refrain from using illegal means in order to acquire confidential information on companies and third parties. Those who become aware of confidential information on other subjects within the framework of a contractual relationship are required to use it exclusively as envisaged in the existing relationship;

6. In the management of information, in no case can insider trading behaviours be adopted, nor is it permitted to use data, news or business opportunities learned while carrying out an assignment or adopt other behaviours that result in the depletion of corporate assets or are aimed at causing undue personal or third-party advantages.

With regard to IT applications, each person is required to:

- follow the provisions of the company security policies, in order to avoid compromising the functionality and protection of the IT systems;
- refrain from sending threatening or insulting email messages, or from using low-level language, or from making inappropriate comments that may offend people and/or damage the corporate image;
- refrain from browsing Internet sites with indecent and offensive content and those in any case not related to professional activities;
- use the company tools according to the indications provided by the Company and in general for non-personal purposes;

The Company reserves the right to prevent the inappropriate use of its assets and infrastructures through the use of control reporting and analysis systems and risk prevention, without prejudice to the compliance with the laws in force.

## USE OF COMPANY ASSETS

The Recipients of this Code are required to work diligently to protect company assets, through responsible behaviour and in line with the operating procedures established to regulate their use, accurately documenting their use.

In particular, each person must:

- use all the goods entrusted to them with the utmost care
- avoid any illegitimate use of company goods which may cause damage or reduce efficiency, or which, in any event, are in a conflict of interest with the Company;
- adequately guard the resources entrusted to them and promptly inform the units in charge of any threats or damaging events for the company;
- follow the instructions provided by the Company in this regard.

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# THE ETHICS OF BUSINESS MANAGEMENT

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Business management

## ACCOUNTING TRANSPARENCY

One of the company's fundamental values is based on ensuring the transparency and completeness of its accounting information. To achieve this, it is necessary for the documentation of the facts to be reported in the accounts in support of the registration to be clear, complete and correct, and that it is archived for any checks.

The related registration must reflect what is described in the supporting documentation and must specify the criteria adopted when determining the economic elements based on valuations. Each registration must reflect exactly what can be found in the supporting documentation.

All documentation must be promptly and systematically filed so that the related accounting framework can be reconstructed at any time. In addition to filing in the appropriate paper binders, if required, the documents must also be stored in electronic media from which they can be quickly traced and displayed with specific software for documents.

Each employee is required to cooperate so that the company affairs are represented correctly and promptly in the accounts; their task is to ensure that the documentation relating to their activity is easily traceable and ordered according to logical criteria. The use of company funds for illegal or improper purposes is strictly prohibited. Any negligence, omission or falsification of which employees become aware must be promptly reported to the person in charge.

## PREVENTION OF MONEY LAUNDERING

The Recipients of this Code of Ethics have the task of carrying out advance checks on the information available relating to commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and

the legitimacy of their activity before establishing business relationships, moreover they must operate in such a way as to avoid any involvement in operations that may even potentially favour the laundering of money deriving from illegal or criminal activities, acting in full compliance with current anti-money laundering legislation, the provisions issued by the competent Authorities and internal monitoring procedures.

To this end, Magicmotorsport undertakes to refuse to engage in any transactions that are suspicious in terms of fairness and transparency.

## PARTICIPATION IN ANTISOCIAL AND CRIMINAL ACTIVITIES

Magicmotorsport rejects antisocial and criminal processes and activities and declares its firm intention not to have any part in these phenomena.

Company personnel are prohibited from having relations of any kind with organisations and elements involved in antisocial and criminal activities that threaten society or the lives of citizens.

When faced with extortion requests from antisocial and criminal subjects, staff must refuse and report the incident to the competent Office.

## PROTECTION OF COMPETITION

Magicmotorsport is aware that a healthy and fair competitive system contributes to continuous improvement and development. As such, the company undertakes to observe the current rules on competition and refrain from implementing or encouraging conduct that could involve forms of unfair competition.

All actions aimed at altering the conditions of fair competition are contrary to company policy and are prohibited to any person acting on behalf of the company.

## **PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY**

In implementing the principle of compliance with the law, the Magicmotorsport ensures compliance with internal, EU and international laws on intellectual and industrial property.

The company promotes the correct use of trademarks, distinctive signs and all intellectual works of a creative nature, for any purpose and in any form, including computer programs and databases, to protect the author's moral and property rights.

It is forbidden to behave in any manner with the aim of counterfeiting, altering, duplicating, reproducing or disseminating the work of others, in any form and without rights.

While carrying out their activities, all Recipients must refrain from:

- any conduct that could constitute usurpation of industrial property deeds, alteration or counterfeiting of distinctive signs of industrial products, or of patents, designs or industrial models, both national and foreign;
- importing, marketing or putting into circulation industrial products with counterfeit, false or altered distinctive signs or those made by usurping the rights of third parties;
- using works of intellectual property or part of them protected by current legislation on copyright infringement in an improper or illicit way, in the interest of the company or their own personal interest.



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## RELATIONS WITH OUR **PARTNERS**

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### Our Partners

#### EXTERNAL COMMUNICATION

External communication follows the guiding principles of truth, correctness, transparency and prudence, in order not to lead to partial, distorted, ambiguous or misleading interpretations.

Any form of pressure or assuming any favouring attitude by the media is hereby prohibited. To ensure the completeness and consistency of information, the company's relations with the mass media are reserved exclusively for the departments in charge of them and previously agreed with them.

Employees may not disclose information or opinions or make statements on behalf of the company without a mandate or consent from the company.

Any request for news from the mass media received by the recipients of this Code of Ethics must be communicated to the company department responsible for this, which will take care of divulging non-confidential information.

#### RELATIONS WITH THE PUBLIC AUTHORITIES

The term Public Authorities means any person, party or interlocutor qualifiable as a public officer or person in charge of a public service, acting on behalf of the Public Authorities, whether central or peripheral, or of public supervisory bodies, independent authorities or EU institutions, together with private subjects who are concessionaires of a public service.

#### INITIATIVES REGARDING PUBLIC AUTHORITIES

If it deems it appropriate, Magicmotorsport can support programmes by public bodies aimed at achieving utility and benefits for the community, as well as activities by foundations and associations, while always remaining in compliance with current regulations and the principles of this

code.

#### FAIRNESS AND LOYALTY

The company intends to conduct relations with the Public Authorities with the utmost transparency and ethical behaviour. These relations, which must take place in compliance with current legislation, are inspired by the general principles of correctness and loyalty, so as not to compromise the integrity of both parties.

The staff must refrain from any behaviour that could damage the impartiality and independence of judgement of the Public Authorities.

Particular caution must be taken in transactions related to any tender procedures, contracts, authorisations, permits, licences and requests for public (i.e., Government or EU) funding.

In the event that Magicmotorsport needs to make use of the professional services of Public Authority employees as consultants, the legislation in force must be respected.

#### BONUSES, BENEFITS AND GIFTS

No company employee and/or collaborator may donate money or offer financial advantages or other types of benefits to subjects of the Public Authorities, in order to obtain assignments or other advantages, whether personal or for the company.

No form of gift is permitted if it can be interpreted as exceeding normal business practices or courtesy, or in any case aimed at acquiring favourable treatment in the conduct of any activity connected to the company. In particular, no form of gift is permitted to public officials or their family members that could influence their independence of judgment in order to obtain more favourable treatments or undue benefits or advantages of various kinds. The above

cannot be circumvented by resorting to third parties.

Magicomotorsport refrains from hiring, in its employ or as consultants, former employees of the Public Authorities or their relatives who have personally and actively participated in a business negotiation, or who have contributed to endorsing requests made by the company to the Public Authorities, for a period of at least two years, starting from the conclusion of the deal, or from the forwarding of the request by the company.

The gifts offered must be adequately documented to allow for checks and authorisations by the department manager or contact persons. A copy of the relevant documentation (for example, the transport document) must be kept.

If an employee of Magicomotorsport receives explicit or implicit requests for benefits from a member of the Public Authorities, except in the case of gifts of commercial use and of modest value, they must immediately inform their superior or the person to whom they report in order to adopt appropriate initiatives.

## RELATIONS WITH CUSTOMERS

Contracts and communications to the Company's customers must comply with current regulations. They must be complete and transparent so that they do not lead to elusive or otherwise incorrect practices, and so that they do not overlook any element that is relevant for the purposes of the customer's decision.

Magicomotorsport maintains a transparent and fair relationship with all customers, providing accurate and comprehensive information about products and services so that the customer can make informed decisions.

To do this, it implements clear communication with customers that, above all, complies with the company's marketing and business policies.

## BEHAVIOUR TOWARDS CUSTOMERS

The company assumes an open attitude towards customers based on respect and courtesy, activating mechanisms that allow customers to have complete assistance for the products sold and committing itself to efficiently supplying high quality products/services that meet the customer's expectations.

## CUSTOMER SATISFACTION

Magicomotorsport's primary purpose is complete customer satisfaction. To ensure this, it has activated tools that allow the company to verify the quality of the products/services as perceived by customers, who can send reports indicating the reasons for their dissatisfaction, allowing the company to verify and resolve the problem and thus foster an improvement to the quality of the services rendered.

## RELATIONS WITH SUPPLIERS

The selection of suppliers and the determination of purchase conditions take place on the basis of internal protocols, in writing and in compliance with the organisational structure, as well as on the basis of assessments based on the quality and price of goods and services, on the supplier's capacity and efficiency, on the guarantees provided by them and on the sharing of common principles.

Magicomotorsport manages relations with suppliers with loyalty, correctness, professionalism and transparency, encouraging on-going collaborations and solid and lasting relationships of trust while avoiding prejudicial behaviour and reporting any circumstances that may affect the continuation of the relationship itself.

Transparency in relations with suppliers is guaranteed through:

- the adoption of predetermined rules and mechanisms for the selection and management of suppliers, taking into account the technical, economic and capital reliability of the latter, as well as the criteria of social responsibility;
- the definition of standard management methods to ensure equal dignity and opportunities for all suppliers;
- the definition and application of criteria and systems for the constant monitoring of the quality of performance and goods/services supplied;
- the exchange of suitably filed documents with suppliers: in particular, those of an accounting and/or tax nature must be kept for the periods established by current legislation.

Suppliers must ensure:

- compliance with the labour law in force in their country;
- the prohibition of any discrimination based on race, nationality, sex and religion;
- the prohibition on the use of child labour;
- the protection of workers' health and safety.

## **ECONOMIC RELATIONS WITH POLITICAL PARTIES, TRADE UNION ORGANISATIONS AND ASSOCIATIONS**

Magickmotorsport does not finance parties, either in Italy or abroad, their representatives or candidates nor does it sponsor conventions or celebrations that have an exclusive purpose of political propaganda.

The company refrains from subjecting itself to any direct or indirect pressure from politicians. For example, it does not accept recommendations for hiring, nor does it sign consultancy contracts for similar purposes.

Furthermore, the company does not make contributions to organisations with which a conflict of interest may arise (for example, trade unions).

However, it is possible to cooperate, even financially, with these organisations for specific projects, in compliance with the following conditions:

- clear and documented destination of resources;
- express authorisation by the relevant departments within the company.

## **CONTRIBUTIONS AND SPONSORSHIP BY THE COMPANY TO THIRD PARTIES**

Magickmotorsport agrees to requests for contributions within the limits of proposals from organisations and associations declared to be non-profit and with regular statutes and articles of association, which are of high cultural, social or beneficial value or in any case involve a significant number of citizens.

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## SOCIETY, ENVIRONMENT AND INNOVATION

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### SOCIAL COMMITMENT

Magimotorsport supports the territory in which it operates through sponsorships and donations aimed at contributing to the growth and promotion of local activities: from social issues to culture, from music to sport. Several associations receive financial support from the company to purchase the equipment and tools necessary for carrying out their activities.

Magimotorsport's goal is to help keep organisations that are committed to the development and protection of the territory alive.

The initiatives that support the local and Sicilian community include the donation of about 150,000 disposable surgical masks during the COVID-19 pandemic - which were distributed in particular to hospitals and law enforcement agencies - and the delivery of a multidisciplinary ultrasound system to the Civic Hospital of Partinico (COVID-Hospital), the town where the company has its head office.

### IMPORTANCE OF ENVIRONMENTAL POLICY

The company has included 17 Sustainable Development Goals in the agenda of its Board of Directors, to link the objectives of the UN2030 agenda to the company's strategic objectives, as the latter are closely connected and dependent on environmental risks.

Magimotorsport considers ethical sustainability to be a strategic lever for success. As such, it has included all the elements that may be relevant for the company's sustainable success in its business strategy.

It is oriented towards investments and activities that respond to the principles of sustainable development. In particular, the company implements the following actions:

- Reduction of all forms of waste of resources, disposal management oriented towards the recycling and reuse of raw materials, implementing solutions that make it possible to allocate some materials to other functional uses in the production cycle;
- Implementation of separate waste collection programmes within the offices;
- Upgrading of plants aimed at promoting a reduction in pollution factors;
- Compliance with anti-pollution regulations, giving the utmost cooperation to the Public Authorities responsible for verifying, monitoring and protecting the environment;
- Development of research and technological innovation projects for the realisation of technological solutions that are more compatible with the environment.

Magimotorsport implements environmental awareness and training activities for collaborators. These latter are required to:

- Use energy resources correctly and avoid waste;
- Operate in such a way as to facilitate the separation of waste materials to allow for correct disposal and recycling.

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## METHOD OF IMPLEMENTING AND **MONITORING THE CODE OF ETHICS**

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### Monitoring of the code of ethics

#### **DISSEMINATION OF THE CODE OF ETHICS**

Magicomotorsport undertakes to spread the code of ethics by using all the means of communication and the opportunities available, such as:

- the company website;
- information meetings and staff training;
- posting on the bulletin board;
- publication on the company app.

In order to ensure the correct understanding of the code, a series of information and/or training plans are prepared by the Human Resources Department with the aim of promoting knowledge of the principles and ethical standards with any appropriate training sessions.

#### **OBLIGATIONS OF DEPARTMENT MANAGERS IN RELATION TO THE CODE OF ETHICS**

Each department manager identified as such in the organisation chart, in the job descriptions and/or in the system of delegations has the obligation to:

- ensure compliance with the Code of Ethics on the part of subjects directly or indirectly under their responsibility;
- represent an example for their employees/collaborators with their behaviour;
- make every effort to ensure that employees understand that the provisions contained in this Code of Ethics are an integral part of their work performance;
- promptly report to the Human Resources office manager
- or to the Supervisory Body with any reports or special needs from employees.

Non-compliance with the obligations referred to in this article

on the part of department heads may result in the application of disciplinary sanctions, as envisaged by the sanction system.

#### **OBLIGATIONS OF EMPLOYEES IN RELATION TO THE CODE OF ETHICS**

Each employee is required to be aware of the provisions contained in the Code of Ethics or referred to by it, as well as the relevant legal regulations governing the activity carried out within the scope of their role, which are an integral part of each person's work performance.

Collaborators are required to:

- refrain from all and any conduct not complying with these provisions and rules;
- contact their superiors for the necessary clarifications on how to apply the Code of Ethics or the reference regulations;
- promptly report any news regarding possible violations of the Code of Ethics to their superiors in the manner prescribed by the internal system;
- collaborate with the company in case of any investigations aimed at verifying and possibly sanctioning possible violations.

These behavioural standards are also required of external consultants and collaborators of all kinds.

#### **SUPERVISION OF THE CODE OF ETHICS**

Magicomotorsport promotes the creation of a work environment inspired by principles of integrity and transparency, dedicating particular attention to the prevention of unlawful conduct.

The company encourages the Recipients to promptly use the



Whistleblowing Procedure to inform the Head of the Human Resources Department of any activity contrary to this Code and to the procedures drawn up by the company

## **SANCTIONS**

The rules contained in the Code of Ethics include the behaviour that the employee is required to observe, by virtue of the civil and criminal laws in force and the obligations established by collective bargaining.

Any violation of the rules of the Code damages the relationship of trust established with the company and, if it is assessed as non-fulfilment of the contractual obligations of the employment relationship or professional collaboration, pursuant to Art. 2104 of the Civil Code, can lead to disciplinary, legal or criminal actions; in the most serious cases, the violation can lead to the termination of the employment relationship.

### **Measures in relation to department managers**

In the event that any of the department managers violate the provisions of the Model and/or Code of Ethics in carrying out the activities in the areas at risk, or conduct themselves in a manner that does not comply with the provisions of the Model itself, or in cases in which the manager allows collaborators who are hierarchically or functionally dependent on them to adopt behaviours that do not comply with the Model and/or are in violation thereof, the measures provided for by the Company's Disciplinary Code will be applied.

### **Measures in relation to consultants, external collaborators and suppliers**

Any behaviour carried out by consultants, external collaborators and suppliers that go against the lines of conduct indicated in this Code of Ethics such as to constitute a violation of the provisions of the Code of Ethics adopted by Magicmotorsport may, in accordance with the provisions of the specifications contractual clauses included in the contracts and/or in the relative letters of appointment, result in the termination of the contractual relationship or any other contractual sanction specifically provided for.

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