ANTI-CORRUPTION POLICY

Approved by the Board of Directors of AMA Composites S.r.l. on 22 November 2024 - rev 00

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1. Objectives

The AMA Group carries out its activities with integrity, honesty, fairness and loyalty and is committed to promoting and requiring compliance with national and foreign laws and regulations relevant to the exercise of corporate activities. This Anti-corruption policy (hereinafter the "Policy") is aimed at providing an overview of the organisational measures adopted to prevent local and transnational corruption by shareholders, members of the Corporate Bodies, Top Management, employees, as well as all those who, although external to the Company, for any reason and regardless of the type of contractual relationship, operate in the name or on behalf of the company (Collaborators) and, as far as applicable, to consultants, suppliers as well as other third parties, including customers, who deal with the company (hereinafter "Third Parties").

The Supervisory Body of AMA Composites S.r.l. carries out regular control activities aimed at verifying compliance with anti-corruption legislation and the Policy.

2. Scope

On 22 November 2024, the Board of Directors of AMA Composites S.r.l. approved this Anti-corruption Policy, the adoption and implementation of which is mandatory for all companies of the AMA Group (hereinafter also referred to as 'AMA Group' or 'AMA'), and consequently binding for the conduct of all employees, directors, Collaborators and, as far as applicable, "Third Parties". It is the duty of each Group company to bring the aforementioned Guidelines to the attention of Collaborators and Third Parties, even in the event of discontinuous relationships with the Group, to require them, in the performance of their activities, to comply with the principles and obligations clarified in the Guidelines, to take the necessary measures in the event of non-performance or partial execution of the commitment, assumed by the Collaborators or Third Parties, to comply with the provisions contained in the Guidelines and referring to them or, in the event of refusal, to evaluate the appropriate actions, including the termination of the relationship.

3. Regulatory references

AMA Composites S.r.l. has its registered office in Italy and the employees, directors and collaborators of the company are required to comply with Italian law, with the provisions of Legislative Decree 231/2001 which regulates the administrative responsibility of entities for crimes, including corruption towards subjects of the Public Administration and towards private subjects.
Since the AMA Group is a multinational organization, all employees, directors, Collaborators and Third Parties are subject to the laws and regulations in force in the country in which they operate, including the rules contained in international conventions that prohibit corrupt acts against Public Officials or private subjects, including the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the Convention UN against corruption.
The anti-corruption laws and regulations in force in the countries in which the Group companies operate: - prohibit making payments, directly or indirectly, including payments made to anyone with the knowledge that that payment will be shared with a Public Official or a private individual, as well as offers or promises of a payment or other benefit for corrupt

purposes to Public Officials or private individuals. On the basis of the foregoing, the employees, directors and Collaborators of the AMA Group may be held liable for offers or payments made by anyone acting on behalf of the company in relation to the business activities, if the employees, directors and Collaborators are aware or reasonably should have known that such offer or payment is made improperly; - require companies to have and keep books, registers and accounting records that, with reasonable detail, accurately and correctly reflect the transactions, expenses (even if not "relevant" from an accounting point of view), acquisitions and disposals of assets. Individuals who violate Anti-Corruption Laws may face significant fines and be sentenced to prison or other sanctions. A violation of the rules by an AMA Group company could result in consequences, such as disqualification, confiscation of the proceeds of the crime or claims for damages. Even more importantly, the Group's reputation could be severely damaged.

4. Liability

4.1 The Board of Directors:
- approves the Policy and allocates the resources necessary for the implementation of corruption prevention systems;
- ensures that the Company's strategy and the Policy are always aligned, through continuous communication and monitoring actions, of which appropriate documentation is kept;
- supervises the implementation of the Policy and its effectiveness, also through the monitoring actions and information flows of the Supervisory Body;
- communicates the Policy internally and externally, emphasizing the importance of effective anti-corruption management;
- promotes an adequate anti-corruption culture within the organization;
- supports managers in exercising their leadership in the prevention and identification of corruption as applicable to their areas of responsibility;
- encourages the use of reporting procedures for suspected or actual acts of corruption, ensuring that no one is retaliated, discriminated against or disciplined for reporting.

4.2 Employees and Collaborators are required to:
- comply with the requirements contained in the Anti-corruption policy and the procedures relating to all applicable anti-corruption laws;
- report any case of corruption, actual or attempted, of which they have become aware, regardless of whether this consists of offering, giving or receiving, through the whistleblowing channels made available by the Company;
- identify and report potential signs of corruption.

4.3 Third Parties, i.e. any person, individual or member of an organisation, who works or performs a service for or on behalf of the Company - for example, contractors, consultants, lawyers, accountants, business consultants, suppliers, agents, distributors, joint venture partners worldwide are required to apply and comply with the provisions contained in this Policy.

5. AMA Group's Code of Ethics

The Policy represents an important addition to AMA Group's Code of Ethics, the adoption and implementation of which is mandatory for all Group companies, as well as a preventive protocol as part of Model 231. The Code of Ethics sets out a set of principles whose observance is of fundamental importance for the smooth operation, reliability of management and the image of the AMA Group. The principles contained in the Code of Ethics (available in Italian and English on the website) are disseminated and shared among all employees and business partners of the Group companies.

6. Principles of conduct

Hospitality, travel and representation expenses

AMA acknowledges that the incurrence or receipt, on behalf of or by customers, suppliers or Third Parties, of hospitality, travel or representation expenses is a typical aspect of business relationships. The directors, employees and Collaborators of the AMA Group may incur or receive such expenses exclusively in the context of normal commercial practices or commercial and professional courtesy and in any case, such as cannot compromise the integrity or reputation of one of the parties or be interpreted by an impartial third party, as aimed at acquiring preferential treatment in the conduct of any activity. The hospitality, travel or representation expenses incurred or received by Third Parties must not be in cash and of reasonable value and inherent to the institutional and commercial purposes underlying the relationship with the Third Party. The value of the expenses must comply with the internal rules and policies of each Group company regarding the recognition, to its employees and collaborators, of the normal travel and hospitality expenses incurred in the course of their business activities and must comply with the laws and regulations of the country of the offeror (guest, inviter) and the receiving country (guest, invited).

Gifts and gifts

Any form of gifts and gifts that could be interpreted as exceeding normal commercial practices or commercial courtesy, or in any case aimed at acquiring preferential treatment in the conduct of any activity, is prohibited. Any form of gift to Italian or foreign public officials, or to their family members, which may influence their independence of judgment or may induce the former to ensure any advantage to the Group and/or the Group Companies, is prohibited. It is clarified that gifts or gifts of a purely symbolic or personalized nature and in any case of a unit amount not exceeding Euro 100.00 can be accepted. Similarly, the only gifts allowed in favour of third parties are those characterised by their low value, and in any case of a unit amount not exceeding € 100.00 or aimed at promoting the brand image of the Companies of AMA Group. It is in any case forbidden to accept or make monetary gifts. Gifts offered or received – if the amount exceeds € 100.00 – must be documented in a suitable manner so that the Supervisory Body can carry out the appropriate checks.

Facilitation payments

AMA does not allow directors, employees, Collaborators and Third Parties, who carry out activities on behalf of AMA Group companies, to promise or offer money or other benefits to Public Officials or subjects attributable to entities belonging to the Public Administration in order to accelerate, encourage or ensure the performance of an activity or any activity envisaged in the context of public

or private functions.

Commercial relations with private partners and subjects connected to the Public Administration

In conducting business relationships and dealings, in line with the commitments undertaken with the adoption of the Code of Ethics, AMA prohibits illegal, collusive, or potentially unlawful practices and behaviours, illicit payments, incitement to corruption, corruption, favouritism, direct or indirect solicitations of personal and career advantages for oneself or for others, contrary to laws, regulations and/or internal company provisions. The directors, employees, and collaborators of the Group companies are required to behave ethically and in compliance with applicable laws, based on the utmost integrity, honesty, fairness and loyalty in business relations with Third Parties.

Sponsorships, donations and contributions to political associations

The companies of the AMA Group are allowed to sponsor local bodies or associations or in any case related to events within the orbit of AMA's activity, in compliance with company procedures. These procedures, in addition to defining the roles and responsibilities of the actors involved in the process, provide for a series of specific and concrete controls, namely:

1. safeguarding the principle of separation of responsibilities for the phases of: request/proposal, authorization, monitoring and control;
2. sponsorships are highlighted and a regular invoice is issued based on a contract. In the absence of a written contract, formal evidence of the letter requesting the donation and acceptance of the resolution (or other equivalent document) by the beneficiary entity;
3. approval of the donation, in compliance with the principle of segregation of functions, by the General Management/Board of Directors and according to the amount of the same;
4. definition, from time to time, of the reasons and criteria underlying the individual donations with regard to the object and amount of the contribution and the nature of the beneficiary entity;
5. possibility of sponsoring only events related to the activities and matters that revolve around the world of A.M.A. Group or linked to the territory in which AMA Group is located.

The request to donate must be approved in advance by the CEO/Board of Directors and the donations themselves must be made in favour of entities that are not recently established, well known, and reliable.

Conversely, in accordance with the provisions of the Group's Code of Ethics, "AMA abstains from any direct or indirect pressure on political representatives and does not allow the payment of direct or indirect contributions, in cash, in kind, or in any other form to political parties, movements, committees and political and trade union organizations, nor to their representatives or to associations with which a conflict of interest may be identified".

Relations with Public Officials and bodies belonging to the Public Administration

Relations with Public Officials, entities belonging to the Public Administration or subjects attributable to it must be conducted in compliance with the principles contained in the Code of Ethics. Any conduct, by anyone carried out, that consists in promising or offering, directly or indirectly, money or other benefits to Public Officials and/or Public Service Officers, local or foreign, from which an undue or unlawful interest or advantage may be obtained for the AMA Group is prohibited. Such conduct is prohibited both if it is carried out directly by the companies, through

its directors, employees, or collaborators, and if carried out through Third Parties acting on behalf of the AMA Group companies.

Professional services provided by third parties

Relations with intermediaries and third-party professionals must be based on compliance with the principles contained in the Code of Ethics to prevent AMA from being held responsible for corrupt conduct carried out by entities or third parties acting in the name and on behalf of the company. Professional services relating to agency relationships, business procurement activities, commercial consultancy and brokerage with clients, and external legal or tax representation services required by the law of some countries, must be documented by a preliminary assessment that takes into adequate consideration the requirements of reliability, professionalism and integrity of the counterparty. If the professional services have an intellectual content of any kind, it is required to verify the reputation in terms of reliability and professional integrity.

7. Additional guarantees and safeguards of the AMA Group

The Group's Internal Audit Function, with the support of the Company's management, ensures the updating and effective implementation of this Policy and, if necessary, assesses issues of particular importance in the field of anti-corruption. AMA has also provided that any suspected or known violation of the provisions of this policy and of the anti-corruption regulations in force in the countries in which the Group operates must be immediately communicated through the appropriate dedicated channels, reported in the Group Whistleblowing procedure. The Group will, if necessary, impose any sanctions and disciplinary measures against the employees and collaborators of the Group companies, in accordance with the relevant collective agreements or applicable national regulations. Finally, to raise awareness and train the employees and collaborators of the AMA Group with respect to the issue of corruption, the AMA Group organizes and encourages training courses to be provided to all employees and collaborators of the Group with particular regard to those figures who, due to the nature of their work, are more exposed to activities potentially sensitive to corruption crimes.