



CODE OF ETHICS

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CONTENTS

1	INTRODUCTION	3
1.1	Introduction to the Code of Ethics of Mitsubishi Electric Klimat Transportation Systems S.p.A.	3
1.2	The Company and the Group	3
1.3	Scope of application and Addressees of the Code of Ethics	3
1.4	Mission and values	4
2	ETHICAL AND BEHAVIOURAL PRINCIPLES FOR INTERNAL STAKEHOLDERS	5
2.1	General principles and the Company's guiding values	5
2.2	Corporate ethics and declaration of compliance	5
2.3	Principle of integrity and loyalty	6
2.3.1	Conflict of interests	6
2.3.2	Responsible use of time and company assets	7
2.3.3	Gifts and Favours	7
2.4	Confidentiality and Privacy	7
2.5	Protecting and respecting people	7
2.6	Relationships among and with employees	8
2.6.1	Staff recruitment and development	8
2.6.2	Establishing the employment relationship	8
2.6.3	HR management	8
2.6.4	Smoking and alcohol or drug use	8
2.6.5	Esteem and respect	9
2.6.6	Communication and collaboration	9
2.6.7	Team/Project Work	9
2.7	Environmental protection	9
2.8	Management conduct	9
3	ETHICAL STANDARDS FOR EXTERNAL STAKEHOLDERS	10
3.1	Customers	10
3.2	Suppliers	10
3.3	Competition	11
3.4	Public administration and institutions	11
3.5	Relations with public supervisory authorities	12
3.6	Relations with the board of statutory auditors, the audit firm and other company bodies	12
3.7	Political organisations and trade unions	12
3.8	Relations with other organisations	13
3.9	Antitrust laws	13
3.10	Temporary groupings of companies	13

3.11	Media relations	13
3.12	Copyright	14
3.13	Use of internal information	14
4	IMPLEMENTATION AND MONITORING	15
4.1	Checks and accounting transparency.....	15
4.2	Internal auditing	15
4.3	Anti-money laundering	16
4.4	Breaches of the Code of Ethics	16
4.5	Entry into force and amendments.....	16

1 INTRODUCTION

1.1 Introduction to the Code of Ethics of Mitsubishi Electric Klimat Transportation Systems S.p.A.

In line with the project by Mitsubishi Electric Group's Corporate Compliance committee, based on the code of conduct of Mitsubishi Electric Group, Mitsubishi Electric Klimat Transportation Systems S.p.A. (hereinafter also the "Company" or "MEKT") has adopted its own "Regional Code" (hereinafter, "Code of Ethics"), in relation to the nature and area of its activities and to the laws and provisions, ethics and/or business practices in the place where it operates.

This Code of Ethics expresses the commitments and ethical responsibilities undertaken by all those who have any kind of relationship with the Company as part of business transactions and company activities.

The Code of Ethics groups together the values, principles and conduct guidelines on which all stakeholders of Mitsubishi Electric Klimat Transportation Systems S.p.A. must base their work.

The objective of the Code of Ethics is to make intra-company relationships (top management, management, employees) and the company's external relationships (companies and the market) more ethical and value-for-money, in order to promote clear behavioural guidelines and boost the financial benefits that come from having a consolidated, positive company reputation.

The Code of Ethics also defines the Company's ethical and moral standards, indicating the conduct guidelines that all staff must follow.

As part of the internal audit system, the Code of Ethics represents a key tool to monitor economic, financial, social and interpersonal relationships, with a particular focus on conflicts of interests and relationships with the competition, with customers, with suppliers and with the public administration; the Code of Ethics also forms an integral part of the Organisational, Management and Control Model (together with the disciplinary system in place should any rules contained therein be breached) adopted by the Company in accordance with articles 6 and 7 of Italian Legislative Decree no. 231 of 2001 (hereinafter, the "Decree") and is based on the code of conduct drawn up by Confindustria pursuant to art. 6, paragraph 3, of the aforementioned Decree.

1.2 The Company and the Group

Mitsubishi Electric Klimat Transportation Systems S.p.A. was created following the merger between Mitsubishi Electric Corporation and Klimat-Fer S.p.A..

Thanks to its consolidated leadership position in Italy, Klimat-Fer had held a position of authority in the European market for a long time, completing extremely important and prestigious projects regarding the manufacturing and sale of air-conditioning systems and equipment to be used for cross-country rail transport, underground trains and trams.

Boasting over 90 years of experience in supplying high-tech and reliable products, Mitsubishi Electric Corporation is recognised as being a global leader for the production, marketing and sale of electric and electronic equipment for a wide range of sectors: computing and telecommunications, space research and satellite communications, consumer electronics, technology for industrial applications, energy, transport and construction.

1.3 Scope of application and Addressees of the Code of Ethics

The principles and provisions of this Code of Ethics are addressed to the following individuals (hereinafter also "Stakeholders"): members of the Board of Directors, members of the other company bodies, senior managers, employees and anyone who directly or indirectly acts in the name or on behalf of the company, in any capacity and regardless of whether on a permanent or temporary basis (for example, consultants, agents, temporary workers, associated or investee companies, suppliers, contractors and subcontractors), without prejudice to the need to respect each person's specific religious, cultural and social needs.

The Company prefers stakeholders whose conduct is aligned with acceptable ethical principles that are in line with those expressed in this Code of Ethics.

The provisions stated in this Code of Ethics integrate the rules of conduct that members of staff are obliged to follow, in compliance with the level of due diligence that all workers must guarantee and with employment legislation.

Under no circumstances may pursuing the interest of Mitsubishi Electric Klimat Transportation Systems S.p.A. be used as justification for conduct that goes against this Code of Ethics and applicable laws.

1.4 Mission and values

In the spirit of its “Changes for the better” corporate statement, which reflects the inclination to seek continuous improvement and make all the necessary changes to achieve this, and in accordance with its “Eco Changes” environmental statement, representing the company's environmental commitment and the effort being made to work with customers in order to improve the global environment, Mitsubishi Electric Corporation (of which MEKT is part) aims to become a leading green company on a global scale, enriching the Company through the use of technology.

Mitsubishi Electric Group’s corporate mission is to continuously improve its technology and services by applying creativity to all aspects of its work. with the aim of improving the quality of life for society as a whole.

2 ETHICAL AND BEHAVIOURAL PRINCIPLES FOR INTERNAL STAKEHOLDERS

2.1 General principles and the Company's guiding values

Mitsubishi Electric Group is guided by the following seven principles:

- 1) **Trust.** Establish strong trust-based relationships with all partners, based on mutual respect.
- 2) **Quality.** Provide the best products and services, with unbeatable quality.
- 3) **Technology.** Pave the way into new markets by promoting research, development and technological innovation.
- 4) **Community.** As a global operator, contribute to the development of communities and society as a whole.
- 5) **Ethics and compliance.** Always comply with applicable regulations and maintain high ethical standards in all situations.
- 6) **Environment.** Respect nature and undertake to protect and improve the environment on a global basis.
- 7) **Growth.** Ensure equitable earnings in order to build the basis for future growth.

Relationships and conduct, at all levels, must be based on the principles of honesty, correctness, moral integrity, fairness, transparency and mutual respect, as well as being open to checks and based on accurate and complete information.

All company activities must also be carried out in compliance with applicable laws and company procedures and regulations, as well as in accordance with this Code of Ethics.

Senior executives, the management team and department supervisors shall set an example and the standard for all employees, demonstrating impeccable behaviour when carrying out their roles and duties and constantly promoting a spirit of cooperation, trust, mutual respect, unity and teamwork in order to systematically protect and improve the corporate climate and the Company's reputation and standing.

For the purposes of this Code of Ethics, please find below the principles of conduct on which each Addressee must base their own behaviour when carrying out their duties.

2.2 Corporate ethics and declaration of compliance

In all countries and regions where the Company operates, conduct must comply with the following principles:

- **Comply with the law**

Always work in compliance with applicable legislation and pay the utmost attention to the development of social ethics or local practices.

Never set targets or enter into commitments that may be reached through conduct that goes against applicable legislation or business ethics and practices.

- **Respect human rights**
Always respect human rights. Never discriminate based on nationality, race, religion, gender, disability or on any other grounds forbidden by applicable legislation, and do not break the international laws that ensure the protection of individual and human rights, nor any other convention that guarantees such protection and that has been adopted in a country where one of our companies is based.
- **Contribute to society**
As well as working towards a reasonable profit, our conduct is always based on an awareness of our Group's social responsibility, in order to promote progress for society as a whole.
- **Co-operate and ensure harmony with the community**
As a company and as socially responsible individuals, we support organisations and activities that promote public-spiritedness and benefit the communities in which we live and work and which we believe can contribute to developing society.
- **Care for environmental issues**
When pursuing our goal of creating a society geared towards recycling, we must take care of and respect the global environment in every aspect of our work.
- **Be aware of personal integrity**
Always behave with the utmost integrity, making a suitable distinction between public and private matters and only using company resources, including money, time and information, for legitimate business purposes. Use the company computers and the various networks and online services, including e-mails and internet access, mainly to carry out business activities.

2.3 Principle of integrity and loyalty

The Company's relationships with each of its employees are based on integrity and mutual loyalty.

In this regard, employees, when completing their tasks, must act for the good and in the best interests of the Company, avoiding any actions that may go against the company's interests or may be incompatible with their duties.

Each employee, as part of their work, is also obliged to promptly provide precise and accurate information that may be requested by the Company on a case-by-case basis.

2.3.1 Conflict of interests

MEKT employees are forbidden from carrying out work for the competition and from carrying out, without the Company's written consent, professional activities for a third party as an employee, consultant, member of the Board of Directors or Board of Statutory Auditors; they may also not act or work on behalf of one of Mitsubishi Electric Klimat Transportation Systems S.p.A.'s suppliers or customers.

For example, the following may constitute a conflict of interests:

- if an employee or collaborator, or one of their relatives, has economic or financial interests in the business of a supplier, customer or competitor - whether clear or hidden, direct or indirect;
- if an employee or collaborator exploits their role in order to pursue interests that may even only potentially go against those of the Company;
- if an employee or collaborator uses information acquired as part of his/her normal work to benefit himself/herself or third parties, going against the interests of the Company;
- if an employee or collaborator carries out work of any kind (work and intellectual services) for customers, suppliers, competitors and/or third parties in conflict with the Company's interests;

- if an employee or collaborator concludes, completes or enters into negotiations and/or agreements in the name and/or on behalf of the Company when the counterparty is his/her family member or business partner, or any other legal entity that he/she owns or has an interest in;
- if an employee or collaborator receives money or another benefit or favour from natural or legal persons who have, or intend to enter into, a business relationship with the Company.

More generally speaking, Mitsubishi Electric Klimat Transportation Systems S.p.A. employees must avoid situations and/or activities that may lead to a conflict of interests with the Company or that may affect their impartiality with regard to important company decisions. All employees are required to act in compliance with ethical standards and legal provisions.

2.3.2 Responsible use of time and company assets

MEKT's internal stakeholders are obliged to complete their duties by fulfilling the obligations stated in their work or collaboration contracts, and by ensuring that they provide the requested services in a fair way and in good faith, as well as respecting the ethical standards contained in this Code of Ethics.

Each Mitsubishi Electric Klimat Transportation Systems S.p.A. employee must only use the tools made available by the Company for the purposes of their work, as they are necessary to carry out their activities. Each employee shall therefore be directly and personally responsible for the protection and preservation of the company's assets, such as the Company's premises, equipment and confidential information.

Working hours must be used in a responsible manner and in the interest of the Company: during their working hours, employees may only carry out activities that are strictly linked to their duties.

2.3.3 Gifts and Favours

MEKT employees must not directly or indirectly offer nor accept, on their own behalf or on behalf of others, recommendations, favourable treatment, gifts or other benefits from counterparties; they must avoid receiving any kind of benefits that may, or may appear to, influence their independence of judgement and impartiality.

Without prejudice to the foregoing, acts of business courtesy are allowed, as long as they are of modest value and do not compromise the integrity and reputation of the person receiving them and do not influence said person's independence of judgement. Offering money to the Company's employees or employees of customers, suppliers or third parties constitutes an offence and legal action may be taken as a result.

2.4 Confidentiality and Privacy

Confidential information, data and knowledge that is acquired, developed and managed by employees as part of their work must be kept strictly confidential and must not be acquired, used, disclosed or disseminated, neither inside or outside the Company, unless to authorised people in compliance with applicable legislation and company procedures.

Purely by means of example, confidential information may include: company projects (business, strategic, industrial, operational plans, etc.), investments and divestments, employee data, information relating to technological know-how and processes, databases regarding suppliers, customers and collaborators, technological innovation activities, plans for mergers or acquisitions and company agreements.

Furthermore, also in compliance with data protection legislation, recipients of information must pay the utmost attention and ensure the utmost confidentiality when protecting the information generated or acquired, in order to avoid any improper or unauthorised use.

2.5 Protecting and respecting people

Relationships between Mitsubishi Electric Klimat Transportation Systems S.p.A. employees must be based on the principles of tolerance, equality and civilised coexistence and must ensure mutual respect for people's rights and freedom.

No-one within the Company must feel rejected or excluded because of their nationality, language, gender, age, skin colour, religious beliefs, political affiliation or trade union membership, or physical disability. MEKT will not tolerate any form of sexual harassment or physical or psychological abuse whatsoever.

Everyone must show sensitivity and respect for others and must refrain from any conduct that may be considered offensive.

In compliance with applicable health and safety legislation, Mitsubishi Electric Klimat Transportation Systems S.p.A. undertakes to spread and consolidate a culture of workplace health and safety by raising awareness of risks and promoting responsible behaviour among all stakeholders; the Company also works towards protecting the health and safety of its workers, also through training plans, preventive actions and regular inspections.

2.6 Relationships among and with employees

2.6.1 Staff recruitment and development

When selecting, hiring and supporting the career development of collaborators, appraisals are carried out based on the expected profiles and on objective, transparent and verifiable merit-based criteria, avoiding any form of patronage and discrimination. The Company undertakes to offer equal work and career development opportunities to all of its collaborators, respecting their skills and performance. Identical employment and/or professional growth opportunities are therefore offered to each collaborator, without any kind of discrimination, right from the initial recruitment phase.

Public and private corruption, illegal favours and collusion are not acceptable and are therefore prohibited. The Company does not tolerate any kind of favouritism with regard to people and/or their family members. Company employees are forbidden from putting pressure on and soliciting others, even through third parties, where this may be aimed at influencing the normal and transparent selection and career development process defined by the Company.

2.6.2 Establishing the employment relationship

Collaborators are hired with standard employment contracts in compliance with applicable laws. Illegal employment is not tolerated in any way. Mitsubishi Electric Klimat Transportation Systems S.p.A. does not hire foreign collaborators who do not have a residence permit or whose permit has been revoked or has expired and for which no renewal request has been submitted.

At the beginning of their employment, each collaborator is informed of the terms and conditions of their role. The Company provides equal and reasonable pay and conditions; employees' salaries and benefits meet all legal requirements, at the very least.

2.6.3 HR management

Mitsubishi Electric Klimat Transportation Systems S.p.A. employees with the same characteristics shall have the same career opportunities to advance to more senior roles, tasks and/or profiles, without any form of discrimination, and such promotions shall be based on strictly professional criteria, such as merit-based criteria, to measure the professional skills reached.

Staff training and ongoing refresher courses on specific topics (for example, workplace health and safety and hygiene) are a priority for the Company.

Mitsubishi Electric Klimat Transportation Systems S.p.A. undertakes to develop a spirit of team work and mutual cooperation and expects employees at all levels to work together to maintain an atmosphere of mutual respect for the dignity and reputation of each person.

2.6.4 Smoking and alcohol or drug use

All employees and collaborators are strictly forbidden from carrying out work while under the influence of alcohol or other drugs, hallucinogenics or any other substance which may affect their ability to normally carry out their duties. In any case, Mitsubishi Electric Klimat Transportation Systems S.p.A. dissuades all of its stakeholders from abusing alcohol or using drugs also outside of working hours, regardless of the effects that such conduct may have on their work.

Furthermore, the Company undertakes to guarantee the health and safety of its workers, respecting all legally imposed smoking bans in the places where smoking could endanger the safety of people and the healthiness of the environment.

2.6.5 Esteem and respect

Mitsubishi Electric Klimat Transportation Systems S.p.A. encourages all employees to share the key principles of esteem and respect: these principles must form the basis of daily interactions at work, creating an open, friendly and professional working environment.

2.6.6 Communication and collaboration

Each employee must be able to easily receive the information they need to carry out their work, ensuring that knowledge is shared within the Company, as this is essential for the business to grow.

All employees are obliged to share and disclose essential information within their department or as part of the project they are involved in. Sharing our knowledge with others who need it leads to better results and greater efficiency, allowing colleagues to fully use their skills in a shorter amount of time.

2.6.7 Team/Project Work

Members of a team must work together and stay focused on the shared objective; they must also be able to contribute their respective strengths and skills to the Company's various other projects. Project work involves Mitsubishi Electric Klimat Transportation Systems S.p.A. employees engaging in continuously evolving environments, structures or teams: this requires flexible relationships that are free from prejudice and based on continuous collaboration, esteem and mutual respect.

2.7 Environmental protection

Protecting the environment and preventing any form of pollution, as well as ensuring health and safety when carrying out the Company's activities, are considered a priority commitment for Mitsubishi Electric Klimat Transportation Systems S.p.A. All of the Company's activities are carried out in full compliance with applicable legislation regarding environmental protection and workers' health and safety in the workplace.

When carrying out their tasks, MEKT employees therefore undertake to comply with this legislation and also ensure that their work is based on the correct use of resources and respect for the environment.

2.8 Management conduct

Each Manager must create a motivational working environment and an atmosphere in which all employees are able to fully develop their potential. Each Mitsubishi Electric Klimat Transportation Systems S.p.A. manager must guide their team, provide their collaborators with an adequate level of independence to reach their objectives and discuss their results with them.

Mitsubishi Electric Klimat Transportation Systems S.p.A. undertakes to develop the talent and potential of each employee in carrying out their duties, ensuring that each person's skills and legitimate aspirations are fully realized while achieving the company's objectives.

3 ETHICAL STANDARDS FOR EXTERNAL STAKEHOLDERS

When doing business with third parties, Mitsubishi Electric Klimat Transportation Systems S.p.A. is obliged to behave in an ethical way and in compliance with the law, basing itself on the principles of the utmost transparency and correctness. These principles also apply to customers, suppliers, consultants and, more generally, anyone who carries out any activity directly for the Company or on behalf of the latter.

Mitsubishi Electric Klimat Transportation Systems S.p.A. must not create negative impressions, provide false or tendentious information and must avoid deceptive behaviour. Clear communications form the basis of ethical conduct and the resulting level of trust is key to building healthy and long-lasting relationships.

Mitsubishi Electric Klimat Transportation Systems S.p.A.'s good reputation and image represent an essential, intangible resource. The Company's employees undertake to act in compliance with the principles stated in this Code of Ethics in their relationships with colleagues, customers, suppliers and third parties in general, maintaining a respectable demeanour in compliance with the standards shared by companies of the same size and significance as MEKT.

3.1 Customers

When managing relationships with customers in accordance with internal procedures, Mitsubishi Electric Klimat Transportation Systems S.p.A. must ensure that customers are satisfied to the full, following the guiding principles of professionalism, expertise, helpfulness, fairness and courtesy. Mitsubishi Electric Klimat Transportation Systems S.p.A. must not promise or offer payments or assets aimed at promoting or favouring the interests of the Company. Gifts or offers of hospitality are only allowed if they have just symbolic value (for example, corporate gadgets), in line with applicable laws and best practices.

Mitsubishi Electric Klimat Transportation Systems S.p.A. in turn expects its customers to be guided by values linked to professionalism, integrity, expertise, reliability and respect for contractual clauses, also based on compliance with the principles contained in this Code of Ethics.

3.2 Suppliers

Suppliers play a key role in improving Mitsubishi Electric Klimat Transportation Systems S.p.A.'s overall competitiveness. With regard to its relationships with suppliers, the Company promotes conduct based on honesty, diligence, transparency and cooperation. At the same time, MEKT encourages its suppliers to apply the same criteria, with the aim of both parties benefiting from the positive effects that a stable, long-term and trust-based relationship can bring.

The selection of competing suppliers is subject to an objective and transparent assessment of the quality and price offered, as well as the procedures followed to carry out the service and delivery: Mitsubishi Electric Klimat Transportation Systems S.p.A. therefore weighs up its choices in an impartial way. The Company may not accept gifts, presents, etc. and, in any case, it must not be influenced by pressures aimed at obtaining “preferential treatment” or reciprocity conditions that may undermine correct competition between suppliers.

Choosing a supplier is a crucial decision and the company departments involved in these decision-making processes must:

- ensure equal opportunities for suppliers meeting the necessary requirements to take part in the selection process;
- check that suppliers meet subjective criteria relating to their professionalism and respectability, also by requesting and obtaining suitable documentation in this regard;
- check that suppliers taking part in the selection process have the appropriate means, also financial means, organisational structures, skills, know-how, quality control systems and resources in place to meet the company's requirements and uphold its reputation, also by requesting and obtaining suitable documentation in this regard.

Mitsubishi Electric Klimat Transportation Systems S.p.A. is committed to making its suppliers aware of the topics covered by this Code of Ethics, in order to raise awareness and promote compliance with rules of conduct in line with those stated in this document, above all with reference to respect for human rights and the rights of workers, and to sustainable and responsible management of the environmental and social impacts of activities. All information provided by Mitsubishi Electric Klimat Transportation Systems S.p.A. on the requested products and services shall be accurate and exhaustive, ensuring that suppliers are able to prepare well-informed and knowledgeable offers. Any complaints and reports of inconsistencies regarding goods and/or services supplied must be truthful and must not be used to create an unfair advantage for the Company.

Suppliers are selected and authorised based on adequate and objective criteria, based on their ability to provide the requested goods and/or services and in accordance with the principles of impartiality, fairness and quality. The Company balances the need to obtain value for money with the need to guarantee levels of quality in the supply of goods and services. Furthermore, any significant discrepancies compared with their authorisation requirements are promptly reported to suppliers, as they are allowed to take action in this regard, in the interest of maintaining ongoing relationships with the Company.

MEKT negotiates and draws up contracts with its suppliers in a fair, complete and transparent way, undertaking to make provisions for circumstances that may significantly affect the relationship established. If unexpected situations or events arise, the Company shall undertake not to exploit any conditions of weakness or information asymmetry in which counterparties may find themselves.

The results of inspections on goods and services received and on the overall performance of suppliers are shared with the suppliers themselves. The aim of this is to make it easier for them to progressively improve, in the common interest.

Remuneration to suppliers must always be in proportion to the services and conditions stated in the contract, and payments must only be made to those stated in the relative agreement.

If a supplier asks the Company to accept its own code of ethics, then the Company shall comply with the provisions contained therein, as long as they are not in conflict with those stated in this Code of Ethics.

3.3 Competition

Mitsubishi Electric Klimat Transportation Systems S.p.A. must compete with its competitors in accordance with the ethical principles of correct and legally valid behaviour; it therefore undertakes to sell its services focusing on their value for money and quality, without disparaging the competition. Mitsubishi Electric Klimat Transportation Systems S.p.A. will not use illegal means to acquire trade secrets or other confidential information belonging to competitors and will avoid applying prices and unusual contractual conditions whose sole purpose is to exclude competitors from negotiations.

MEKT in turn expects its competitors to respect the values of professionalism, integrity, reliability and compliance with contractual clauses, in order to foster a competitive market.

3.4 Public administration and institutions

‘Public administration’ is understood to mean all government departments, including institutes and schools of all levels and state educational institutions, companies and administrations that are independent, regional authorities, provinces, municipalities, mountain communities and their consortia and associations, university institutions, independent council housing institutes, the chambers of commerce, industry, crafts and agriculture and their associations, all non-economic public bodies in Italy (regional and local), administrations, companies and organisations forming part of the national health service.

The Company may not be represented by collaborators and/or by third parties in its relations with the public administration, if this could constitute a conflict of interests, even only potentially.

Mitsubishi Electric Klimat Transportation Systems S.p.A. condemns any conduct by anyone, on its behalf or in its interest, aimed at directly or indirectly promising or offering money or other benefits to public officials and those appointed to carry out a public service, whether Italian or foreign, or to their relatives and family members, on the basis of which an interest or advantage may be obtained for the Company. The aforementioned conduct shall be considered as an act of corruption, whether carried out directly by the Company or completed through individuals

acting on behalf of or in the interest of the Company, for example: consultants, contract workers, attorneys and third parties linked to the Company through similar or equivalent relationships.

Individuals appointed by the Company to complete any business negotiations, request or institutional relationship with the Italian, EU or non-EU Public Administration, must not, for any reason, try to inappropriately influence, through their actions or omissions, the decisions that public officials and those appointed to carry out a public service make on behalf of the Public Administration.

It is forbidden to maintain relationships with public officials or hire ex-public officials, or their relatives or family members, who personally participate or who have actively participated in business negotiations or endorsed requests sent to the Public Administration by the Company. This shall be the case unless, in consideration of the specific circumstances characterising the working relationship in question, there is considered to be no link between the functions performed for the Public Administration and the working relationship.

If a Public Administration is a customer or supplier of the Company, then the latter must act in full compliance with the laws and regulations governing such a relationship.

MEKT condemns any conduct aimed at obtaining any kind of grant, financing, subsidised loan or other similar type of subsidy from the Italian government, European Union or another Italian or foreign public body, through altered or false declarations and/or documents, or by omitting information or, more in general, through artifices or deceptions, aimed at misleading the issuing entity.

3.5 Relations with public supervisory authorities

Relations with the judiciary and with other institutional authorities are exclusively managed by the duly appointed company departments.

Mitsubishi Electric Klimat Transportation Systems S.p.A. undertakes to fully and scrupulously comply with the rules imposed by public supervisory authorities to ensure that the Company complies with all applicable legislation, ensuring the utmost collaboration and transparency.

The Company shall not deny, hide or delay in providing any information or notification that the public supervisory authorities may request, also when the latter carry out their inspections, and shall actively work together with them as part of their investigations.

Furthermore, the Company undertakes not to enter into situations presenting a conflict of interests with employees of any public supervisory authority, and nor with their relatives.

The Company recognises that doubts may sometimes arise regarding the correct interpretation of laws and regulations; in this case, employees must ask the department supervisor in charge for their opinion, using the appropriate channels. Mitsubishi Electric Klimat Transportation Systems S.p.A. in turn expects the public supervisory authorities to respect the values of professionalism, integrity, transparency and fairness, in order to ensure that laws and regulations can be clearly interpreted.

3.6 Relations with the board of statutory auditors, the audit firm and other company bodies

Company employees are obliged to guarantee the utmost collaboration and transparency in the relations that they may be called upon to hold with the Board of Statutory Auditors, the audit firm and the shareholders, relating to the audit activities carried out.

In particular, Company employees must refrain from any conduct, whether acts or omissions, that may result in refusing a request of a statutory auditor, auditor or shareholder or that impedes research or distracts the attention of the statutory auditors, auditors or shareholders when carrying out their respective auditing activities.

3.7 Political organisations and trade unions

Relations between company departments and political organisations and trade unions must be characterised by the principles of transparency, independence and integrity. In principle, the Company does not make direct or indirect contributions to political parties, committees and political and trade union organisations.

In order to best protect workers' rights and the growth of economic democracy, the Company also undertakes to encourage solid and ongoing relationships with trade unions and organisations for the protection of workers.

3.8 Relations with other organisations

MEKT believes that liaising with associations is of strategic importance, allowing for its business to develop correctly.

To this end, it has established a stable communications channel with associations representing the Company's non-commercial stakeholders (where present), that are interested in the ongoing success of the company's activities for various reasons. The purpose of this is to cooperate respecting each other's mutual interests, to present the positions and opinions of Mitsubishi Electric Klimat Transportation Systems S.p.A. and to prevent any possible situations of conflict.

To this end, the Company:

- ensures adequate responses to any observations made by the associations;
- where possible, is oriented towards informing and engaging the most qualified and representative trade associations on issues regarding specific categories of stakeholders.

As part of relations with stakeholder associations, no addressee may promise or pay sums of money, promise or transfer assets in kind or other benefits on a personal basis, in order to promote or favour the Company's interests, even after unlawful pressure.

Any contribution must be made in strict compliance with laws and applicable regulations and must be adequately documented.

3.9 Antitrust laws

MEKT is committed to respecting antitrust laws governing the correct functioning of the competitive market. Said laws forbid monopoly or cartel agreements and ban any form of interference with regulation mechanisms regarding competition. Based on these laws, Mitsubishi Electric Klimat Transportation Systems S.p.A. will not sign agreements, not even informal agreements, with other companies in order to alter market competition and undertakes not to breach antitrust laws, even without working together with other companies.

3.10 Temporary groupings of companies

Temporary groupings of companies (*in Italian: 'Raggruppamento Temporaneo d'Impresa', or 'RTI'*) are a kind of temporary and non-competitive collaboration between companies in order to take part in an invitation to tender or to carry out a specific project or order, which they would otherwise not have been able to take part in alone.

As part of temporary groupings of companies, the businesses involved must cooperate, undertaking not to directly or indirectly send to the Customer in the tender process their own offers in competition with the activities carried out by the temporary grouping.

Businesses taking part in a temporary grouping of companies must also undertake to comply with applicable legislation and the common principles of professional ethics.

3.11 Media relations

Specifically appointed company departments are responsible for handling relations between the Company and the mass media. All media relations must be managed in compliance with the Company's policies and programmes.

The Company's external communications must be truthful, clear and transparent, must not be ambiguous or misleading and must all be consistent.

Declarations made on behalf of Mitsubishi Electric Klimat Transportation Systems S.p.A. must be authorised in advance by the company department in charge.

Marketing documentation shall be prepared by the Company (brochures, leaflets, etc.), undertaking to only provide information that corresponds to reality.

The Company's websites shall be developed in compliance with the Code of Ethics, undertaking not to publish any information that does not correspond with reality or is defamatory.

3.12 Copyright

Mitsubishi Electric Klimat Transportation Systems S.p.A. undertakes to comply with all applicable copyright legislation.

3.13 Use of internal information

When carrying out the company activities involved with their role, Mitsubishi Electric Klimat Transportation Systems S.p.A. employees may become aware - as already described above - of confidential information relating to the Company. Using this information for personal, private or financial purposes not only represents a moral and ethical problem, but also constitutes a breach of current legislation and legal action may therefore be taken.

4 IMPLEMENTATION AND MONITORING

Mitsubishi Electric Klimat Transportation Systems S.p.A. has adopted an Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231 of 8 June 2001 and, in accordance with legal provisions on the administrative liability of legal entities, it has also established a Supervisory Board. The Supervisory Board is in charge of overseeing that the Organisational Model works correctly, is duly complied with and is correctly updated, as well as making sure that all of the Company's ethical standards and compliance procedures are correctly applied.

The Company's employees may contact the Supervisory Board for help with interpreting the standards contained in this Code of Ethics.

4.1 Checks and accounting transparency

Addressees undertake to ensure that facts relating to the running of the Company are represented in an accurate and truthful manner in MEKT's accounting system, depending on their role and duties.

Adequate support documentation for the work carried out must be filed in the Company's records for every single transaction, thereby facilitating the relative bookkeeping, identifying the various levels of accountability and granting the possibility to accurately reconstruct the transaction.

With respect to their roles and duties, addressees are also obliged to check the accuracy and truthfulness of accounting records and to flag up any errors, omissions and/or falsifications to the person in charge.

Mitsubishi Electric Klimat Transportation Systems S.p.A. trains its senior managers, employees and collaborators to ensure that accurate, complete, clear and timely information is guaranteed at all times, both inside and outside the company, as well as the utmost attention to detail when processing data and information.

To this end, all operations or transactions must be correctly and promptly recorded in the company's accounting system in accordance with the criteria indicated by the law and based on applicable accounting standards; each operation or transaction must be authorised, verifiable, legitimate, coherent and reasonable.

To ensure that accounting records meet the requirements of truthfulness, completeness and transparency with regard to the data recorded, adequate and complete support documentation must be filed with the company's records regarding the activities carried out; this allows for:

- each transaction to be accurately accounted for;
- the characteristics of and reasons behind each transaction to be immediately determined;
- each transaction to be easily and formally reconstructed, also from a chronological point of view;
- the decision-making, authorisation and implementation process to be verified, and for the various levels of responsibility and control to be identified.

Each accounting record must precisely reflect the contents of the support documentation. Each employee (or collaborator appointed to do so) is therefore responsible for ensuring that support documentation is easy to find and is logically stored away in compliance with company provisions and procedures.

4.2 Internal auditing

“Internal auditing” refers to all the necessary and useful tools to guide, check and pursue the Company’s activities, with the aim of ensuring compliance with the law and the Company's procedures, protecting the Company’s assets, efficiently managing the Company's activities in an ethical way and clearly providing truthful and accurate information regarding the Company’s balance sheet and financial position and result for the year, as well as identifying and preventing any risks that may arise.

Mitsubishi Electric Klimat Transportation Systems S.p.A. seeks to use the highest internal audit standards and its task is to spread an in-house culture that is characterised by awareness of the existence of checks, as well as being oriented towards carrying out said checks, at all levels.

As part of their roles and duties, the senior managers at Mitsubishi Electric Klimat Transportation Systems S.p.A. are obliged to contribute to creating and implementing an efficient internal audit system and to duly involve their subordinates.

The MEKT internal audit system is regularly subject to formal inspections, and the results of these checks are reported to top management.

Company employees must, for the areas falling under their responsibility:

- contribute to the correct functioning of the internal audit system;
- responsibly safeguard the company's tangible and intangible assets that are necessary for their work, and not misuse them.

4.3 Anti-money laundering

Under no circumstances must Mitsubishi Electric Klimat Transportation Systems S.p.A. employees and collaborators receive or accept, in any way, promises of payments in cash, and nor must they run the risk of being involved with the laundering of money resulting from illegal or criminal activities.

Before establishing relations or signing contracts with regular suppliers and other partners as part of long-term business relationships, they must ensure that the counterparty has moral integrity, a solid reputation and good standing.

The Company is committed to respecting all standards and regulations relating to anti-money laundering, both in Italy and abroad.

4.4 Breaches of the Code of Ethics

Any breaches of the principles stated in this Code of Ethics shall damage the trust-based relationship in place with Mitsubishi Electric Klimat Transportation Systems S.p.A. and may lead to disciplinary, legal or criminal action being taken. In fact, the Company intends to sanction any collaborators whose conduct is not in line and does not comply with the values and principles stated in the Code of Ethics, depending on the seriousness of the breaches and how the person in question has behaved.

Compliance with the Code of Ethics forms an essential part of the contractual obligations of anyone who works with the Company. Any breach shall therefore represent a failure to fulfil the obligations deriving from the employment relationship or a disciplinary offence, which may prevent the employment relationship from continuing and may lead to action being taken to claim compensation for any damages.

For addressees who are not employees, complying with the Code of Ethics represents a prerequisite for the professional/collaboration relationship in place with the Company; therefore, any breach of this Code of Ethics shall constitute a failure to fulfil their contractual obligations, with all the legal consequences that this entails, also with reference to termination of the contract and/or assigned task, and may lead to the Company claiming compensation for damages.

Once the breach has been verified, disciplinary measures will be taken against the person in question, after consulting with the Supervisory Board, in proportion to the seriousness of said breach.

4.5 Entry into force and amendments

This Code of Ethics came into force on 20/11/2019.

The Code of Ethics is subject to periodic reviews; any changes or integrations must be approved by the MEKT Supervisory Board.

In order to ensure that the Code of Ethics is correctly understood by all of MEKT's employees and collaborators, whatever their role, the Supervisory Board prepares a training plan aimed at raising awareness of the principles and ethical standards stated in the Code of Ethics, and submits this plan to the Board of Directors for approval.

Training initiatives differ depending on the roles and responsibilities held by employees or collaborators.