

WEGGER

quality air / quality life

Code of Ethics and Conduct

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1. FOREWORD

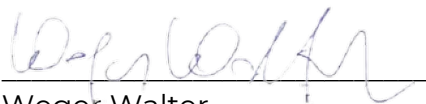
As a South Tyrolean family business, we have become one of the global leaders in the field of air conditioning and ventilation systems.

In our state-of-the-art production facilities, we manufacture advanced air conditioning and ventilation equipment for a wide range of sectors and requirements. We have excellent references both at home and abroad. We owe this to our highly qualified and motivated employees, as well as our environmentally friendly approach. When it comes to sustainability and energy efficiency, for example through heat recovery, we are a benchmark in the industry.

The company aims to create high added value for its customers, to be a preferred employer for its employees, and to be a recognized company in society. Other interest groups include government and regulatory authorities, competitors, the media, and society as a whole.

It is therefore essential that both the continuous improvement of the integrated management system and the employees attach the utmost importance to compliance with legal requirements and internal standards and recognize and follow the core values.

We, the managers of WEGER, are committed to creating the basic conditions that offer employees and suppliers optimal conditions for compliance with the code of ethics in their daily work.



Weger Walter

Chief Executive Officer

Chienes, 16.10.2025

2. PRINCIPLES

The Code of Ethics and Conduct aims to ensure that WEGER's business is conducted in an ethical and sustainable manner, taking into account social responsibility and the following fundamental principles:



2.1 Trust and reliability

Our responsible corporate management aims to establish long-term partnerships with employees, customers, and business partners. Responsible corporate management also means supporting employees and their needs in difficult economic times. With their skills, commitment, and constant drive for innovation, employees are the guarantors of the company's success. We strengthen the sense of responsibility of individuals and teams by creating areas of expertise and space for individual development.

2.2 Integrity

Our company does not tolerate any form of corruption or blackmail through abuse of power, nor any other form of blackmail or similar payment made to or received from third parties. All individuals and interest groups acting in the name of or on behalf of WEGER are required to behave in a proper manner.

2.3 Social and civil responsibility

All activities must be carried out with respect for human dignity and human rights. We reject any form of forced labor, child labor, or discrimination based on social class, race, age, nationality, language, religion, disability, gender, sexual orientation, ethnicity, union membership, political affiliation, or any other factor. We require the same from our suppliers and partners.

WEGER protects the personal rights of its employees, as well as their physical and mental integrity. Every employee is required to prevent offensive or defamatory behavior. Management expects employees to cooperate with each other and with external partners in order to create an atmosphere within the company in which the dignity, honor, and reputation of each individual is guaranteed.

2.4 Quality and efficiency

Thanks to excellent organization, the employment of highly qualified personnel, and the constant improvement and professional development of our employees, we guarantee the quality of our products and optimize internal processes while maintaining flexibility. In order to guarantee performance and quality throughout the entire value chain, WEGER pursues quality management in accordance with the international DIN ISO 9001 standards and the principle of market-oriented quality. Suppliers and subcontractors must be selected according to company requirements in order to achieve the best possible quality, safety, and costs. To ensure the best possible cooperation, we maintain a direct and open dialogue.

2.5 Health and safety in the workplace

The company is committed to ensuring a safe and healthy working environment. To this end, WEGER promotes a company policy aimed at achieving the goal of “zero accidents.” To this end, we apply regular and systematic assessment strategies:

- / On risks and hazards in the workplace
- / Safety, health protection, and hygiene in the workplace
- / Workplace risk management
- / Management of risks relating to safety and health protection in the workplace

All workplaces and processes must be designed in compliance with applicable health and safety standards, laws, and regulations, and are ensured through the continuous development and application of the STOP principle. In order to minimize risks, it is prohibited to consume alcohol or other intoxicating and addictive substances during working hours or to perform work under the influence of such substances. In addition, smoking is strictly prohibited in the workplace.

To this end, through an occupational health and safety management system compliant with ISO 45001, in collaboration with external consultants, appropriate measures are proposed to closely monitor and ensure the development of applicable legal provisions and changes to the company's organization. The regularity of occupational health and safety procedures and their compliance are regularly verified as part of an external audit and through internal controls. Thanks to the election of a safety officer, employees can actively participate in workplace health and safety.

2.6 Environmental protection

Respect for the environment is fundamental and represents a primary objective of the company, in order to limit the negative impact of its activities.

To this end, we are committed to implementing measures to improve the environmental performance of our business activities, prevent pollution, and comply with all applicable legal and regulatory requirements. To this end, we pay particular attention to water and energy management, emissions reduction, prudent waste management, combating climate change, and protecting nature and biodiversity. We train and encourage our employees to avoid waste, to sort it, and to use resources efficiently and respectfully. When we hire external service providers, we ensure that they are authorized to dispose of the waste entrusted to them in accordance with current legislation.

Through an ISO 14001-certified environmental management system, our company is committed to spreading and consolidating a culture of environmental protection in the form of prevention. Evaluation and analysis are carried out regularly and form the basis for constant and continuous development.

2.7 Data protection and security

We are all required to treat personal data confidentially and discreetly, in accordance with company procedures and applicable regulations. All individuals and interest groups working for WEGER are bound to confidentiality and secrecy regarding information and data obtained in the course of their work. With regard to data security, our company has installed well-functioning electronic security systems. As a matter of principle, the use of electronic and telematic operating resources must always comply with the principles of diligence and fairness.

3. RESPONSABILITY OF THE COMPANY MANAGEMENT

3.1 Proper management of the company

The company management undertakes to conduct all business operations and transactions in a legally correct, transparent, verified, and documented manner, to fulfill the company's corporate purpose, and to ensure the protection of the shareholders' property rights and participation rights.

It is not permitted to influence a shareholder in order to change the resolutions or requests of the shareholders.

The company undertakes to prepare annual financial statements and reports in accordance with applicable laws and regulations and guarantees the accuracy of these documents.

All members of the company have a duty to make themselves available for any checks by various bodies and to guarantee the supervisory bodies access to all areas of the company.

3.2 Transparency and accounting

The principle of transparency in accounting records applies not only to the activities of management and employees in administrative offices, but also to the activities of every employee in every area of the company. Each entry must accurately reflect the underlying documents. Every member of management and every employee is responsible for ensuring that documents are easily accessible and stored according to logical criteria, in accordance with the procedures established by the company.

4. BEHAVIOR TOWARD THIRD PARTIES AND IN BUSINESS RELATIONSHIPS

4.1 Relations with public authorities

Relations with authorities and public administration must be based on maximum clarity, transparency, and cooperation, in full compliance with the law and in accordance with the highest moral and professional standards. When applying for public subsidies, tax breaks, or social security benefits, there is an explicit obligation to act truthfully, correctly, transparently, and in full compliance with the provisions of the law in force. Corruption, unlawful preferential treatment, illegal agreements, and direct and/or indirect requests for personal and career advantages for oneself, for WEGER, or for third parties are strictly prohibited and may be punished.

4.2 Relationships with service providers and consultants

When hiring consultants, the general terms and conditions of the business relationship must be set out in a written agreement in accordance with applicable laws, and remuneration must be reasonable and appropriate.

4.3 Customer relations

Meeting customer needs is the foundation of the company's business. All individuals and interest groups working for WEGER are required to provide their customers with timely, high-quality services, limiting any type of interruption or delay in order to maximize customer satisfaction.

4.4 Relationships with suppliers and subcontractors

Our employees are required, within the scope of their responsibilities, to verify that suppliers and subcontractors also comply with the ethical guidelines of this Code. We only work with reliable, reputable individuals and companies, and we verify the information available about them in advance. We ensure the transparency of our agreements and do not enter into contracts that violate the law. In the event of reasonable doubts about ethical behavior, WEGER will immediately take appropriate measures.

4.5 Relationships with competitors

Our company emphasizes that it bases its business relationships on the principles of fairness, legality, correctness, transparency, efficiency, and market openness. In this regard, the activities and conduct of individuals and interest groups acting in the name and on behalf of the company must be characterized by complete autonomy and independence from the conduct of competitors in the domestic and foreign markets.

4.6 Relations with the press, media, professional associations, and similar bodies

Information disclosed externally that relates directly or indirectly to our company must be complete, truthful, and transparent. Data and information relating to WEGER are communicated externally exclusively by company management or by persons officially appointed to deal with the media and other information centers.

5. COMPLIANCE WITH THE CODE OF ETHICS AND ITS MONITORING – THE SUPERVISORY BODY

5.1 Responsibility and monitoring

Responsibility for compliance with the rules of the Code of Ethics lies in principle with the company's management, executives, and employees.

The supervisory body plays a key role in verifying compliance with the Code of Ethics. The supervisory body of WEGER has been appointed and established in accordance with Legislative Decree 231/2001. It is responsible for monitoring, controlling, and enforcing the organizational model in accordance with Legislative Decree 231/2001 and this Code of Ethics. The tasks and responsibilities of the supervisory body are defined in FB 1.6.2 Organizational, Administrative, and Control Model and in the relevant internal regulations.

Management and executives ensure that the employees concerned comply with the relevant laws and regulations. These principles, and in particular those contained in this Code of Ethics, are communicated to all employees of the company through regular.

5.2 Reporting violations

All members of the company are required to report any violations of the Code of Ethics and Conduct in writing or verbally:

- / To the company's supervisory body, including by email to the address created specifically for this purpose: **odv@weger.it**
- / Anonymous: **<https://forms.gle/BnbVnCuGZ8BcUdja7>**
- / To superiors and internal contact persons at WEGER

Reports made by employees do not entail any disciplinary, civil, or criminal liability. Exceptions are cases in which, at the end of the investigation by the supervisory body, it appears that there has been malice or bad faith towards other employees. This will be punished as abuse of the supervisory body with all the consequences that this entails.

5.3 Disciplinary proceedings and sanctions

In the event of a violation of the principles of conduct set out herein and of the provisions of law, disciplinary and labor law measures (ranging from warnings to dismissal) will be taken in order to respond appropriately to the violations ascertained and to prevent future violations, regardless of the criminal consequences.

Failure to comply with the provisions of the code of ethics by consultants, business partners, subcontractors, and suppliers may result in the termination of the contractual relationship.

Approval by company management

Chienes, 16.10.2025

Weger Walter

