



CAVALLERETTI

# Business Ethics Document

## Chapter 1: Fundamental Principles

### 1.1 Introduction and Commitment

This Code of Ethics and Conduct (hereinafter "Code") is based on and enhanced by a fundamental principle that the Company is inspired by and undertakes to respect in carrying out its activities. Integrity, unity, transparency, and compliance with principles and regulations are the cornerstones of our business conduct.

### 1.2 Purpose and Recipients

**Purpose:** To provide clear and binding guidance on expected behaviors and absolute prohibitions to prevent unlawful or ethically questionable conduct. **Intended Audience:** The Code applies to the entire organization: Directors, Officers, Employees, Consultants, Collaborators, Business Partners, and Suppliers (collectively, the "Recipients").

## Chapter 2: Financial Integrity and Compliance

### 2.1 Anti-Corruption and Anti-Money Laundering

The Company adopts a zero-tolerance policy towards corruption, money laundering and any form of terrorist financing.

- **Anti-Corruption:** It is absolutely forbidden to offer, promise, give or accept money, gifts, services, or other benefits to improperly influence a commercial, public, or private decision. All interactions with Public Officials must be conducted with maximum transparency and in compliance with applicable laws.
- **Gift and Hospitality Management:** The offering or acceptance of donations occurs only in modest amounts and occasionally, and may temporarily influence business decisions.
- **Anti-Money Laundering:** All Recipients must make every effort to ensure that the Company is not involved in operations aimed at laundering the proceeds of criminal activities. This includes the obligation to verify the reliability and legitimate origin of business partners' funds and suspicious transactions.

### 2.2 Financial Responsibility (Accurate Records) and Tax Responsibility

Devon's transactions are fully documented, accurately, and verified.

- **Accuracy:** Every accounting record must reflect the economic reality of the transaction and must be supported by appropriate documentation.



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- **Traceability:** You can create or manage the records of unregistered companies, with Security registrations or false or future registrations. The tax procedure is based on full compliance with national and international regulations.

## 2.3 Disclosure of information

Financial and operational information is distributed worldwide (annual reports, official notices, regulatory documents) to be complete, accurate, truthful and timely, so as to enable stakeholders to make informed decisions.

# Chapter 3: Resource Protection and Security

## 3.1 Data protection and security

The Company is committed to protecting the confidentiality of personal data and the storage of user information.

- **Confidential Data:** Confidential company information (know-how, trade secrets, strategic plans) must be handled with the utmost care and must not be disclosed to unauthorized third parties.
- **Personal Data:** The processing of personal data (of employees, customers, suppliers, etc.) must comply with current privacy regulations (e.g. GDPR), guaranteeing integrity, availability and confidentiality.

## 3.2 Intellectual property

The Company respects and protects its own Intellectual Property (IP) and that of third parties.

- **Corporate Protection:** Recipients must protect patents, trademarks, copyrights and software property of the Company.
- **Respect for**

**Third Parties:** Unauthorized use of others' materials, software or IP is prohibited, including reproduction or unlicensed distribution.

## 3.3 Counterfeit Parts

It is a separate, distributed, acquired, or used product of used or falsified components, materials, or products. The goal is to prevent abuse in the supply chain, mitigating the risk of counterfeit materials entering the market that could compromise the quality, safety, or integrity of products.

# Chapter 4: Market and Trade Relations

## 4.1 Fair Competition and Antitrust

The Company competes fairly and honestly in the marketplace, in full compliance with all antitrust and competition laws.



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- **Prohibition of Cartels:** Agreements with competitors aimed at limiting the

competition (e.g. price fixing, southern division of markets, boycotts).

- **Fair behavior:** Recipients must not abuse any potential

Dominant position, not maintaining commercial information about competitors through illegitimate or unethical means.

#### 4.2 Conflicts of Interest

Each Recipient has the duty to act in the exclusive interest of the Company and avoid situations of Conflict of Interest.

- **Definition:** A conflict of interest is based on personal interests, family, or financial interests in a destination that interfere or interfere with the ability to make decisions based on the Company's interests.
- **Reporting Obligation:** Any situation of potential, perceived or actual Conflict of interests must be promptly reported to one's hierarchical superior or to the Supervisory Body for evaluation and management.

#### 4.3 Export Controls and Economic Sanctions

The aim is to draw careful attention to national and international legislation relating to international trade.

- **Export Control:** It is mandatory to raise the export control regulations.

Exports, particularly for "dual-use" (civilian and military) products, obtaining the necessary licenses before proceeding with any cross-border transfer. • **Economic Sanctions:**

It is forbidden to engage in commercial relations with countries,

Entities or individuals subject to economic sanctions, embargoes, or trade restrictions imposed by supranational bodies or competent governments (e.g., EU, USA, UN).

## Chapter 5: Monitoring, Reporting and Sanctions

#### 5.1 Reporting of Illegal Activities

To encourage integrity, the Company has established secure reporting channels for reporting, in good faith, suspected violations of this Code, laws, or internal policies. • **Channels:** (Clearly indicate

channels: e.g. dedicated web platform, email to OdV/Compliance Manager, Telephone).

- **Anonymity and Confidentiality:** The Company guarantees maximum confidentiality regarding the identity of the Reporting, handling the report confidentially.

#### 5.2 Protection from Retaliation

It is absolutely forbidden to undertake, threaten or encourage any form of retaliation, discrimination or penalization without confronting anyone who makes a



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**Report in good faith. The Company will take immediate disciplinary action against anyone who violates this fundamental guarantee.**

### **5.3 Violations and Sanctions**

**Violation of this Code of Ethics constitutes a breach of contractual or legal obligations and will be sanctioned with disciplinary measures commensurate with the seriousness of the offense, which may include dismissal, without prejudice to the application of civil or criminal sanctions.**



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