



Corporate Ethics Policy

Chapter 1: Fundamental Principles

1.1 Preamble and Commitment

This Code of Ethics and Conduct (hereinafter the "Code") expresses the fundamental values and principles by which the Company is inspired and which it undertakes to respect in the performance of its activities. Integrity, honesty, transparency, and compliance with laws and regulations are the pillars of our business conduct.

1.2 Purpose and Recipients

Scope: To provide a clear and binding guide on expected behaviors and absolute prohibitions in order to prevent unlawful or ethically questionable conduct. **Recipients:** The Code applies to all levels of the organization: Directors, Officers, Employees, Consultants, Collaborators, Business Partners, and Suppliers (collectively, the 'Recipients').

Chapter 2: Integrity and Financial Compliance

2.1 Anti-Corruption and Anti-Money Laundering (AML)

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

- **Anti-Corruption:** It is strictly prohibited to offer, promise, give, or accept money, gifts, services, or other benefits to improperly influence a business decision, whether public or private. Any interaction with Public Officials must be conducted with the utmost transparency and in compliance with all applicable laws.
- **Gifts and Hospitality Management:** The offering or acceptance of gifts is permitted only if they are of modest value and occasional, and never as an attempt to 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 unlawful activities. This includes the obligation to verify the reliability and legitimate origin of business partners' funds and to report suspicious transactions.

2.2 Financial Responsibility (Accurate Record-Keeping) and Taxation

All business transactions must be documented in a complete, accurate, and truthful manner.





- **Accuracy:** Every accounting entry must reflect the economic reality of the transaction and must be supported by appropriate documentation.
- **Traceability:** The creation or maintenance of unrecorded funds, secret accounts, or false or misleading accounting entries is prohibited. Tax management must be carried out in full compliance with national and international regulations.

2.3 📢 Disclosure of Information

Financial and operational information disclosed externally (annual reports, press releases, regulatory filings) must be **clear, complete, accurate, truthful, and timely, in order** to enable stakeholders to make informed decisions.

Chapter 3: Protection of Resources and Safety

3.1 🗝️ Data Protection and Security

The Company is committed to protecting the privacy of personal data and the confidentiality of corporate information.

- **Confidential Data:** Confidential corporate 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), ensuring integrity, availability, and confidentiality.

3.2 💡 Intellectual Property (IP)

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

- **Corporate Protection:** Recipients must protect the patents, trademarks, copyrights, and software owned by the Company.
- **Respect for Third Parties:** The unauthorized use of materials, software, or IP belonging to others, including unlicensed reproduction or distribution, is prohibited.

3.3 🚫 Counterfeit Parts

The production, distribution, purchase, or use of counterfeit or falsified components, materials, or products is strictly prohibited. The Company is committed to implementing preventive measures within the supply chain to mitigate the risk of **counterfeit materials** entering the system, which could compromise product quality, safety, or integrity.

Chapter 4: Market and Business Relations





4.1 ⚖️ Fair Competition and Antitrust

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

- **Prohibition of Cartels:** Agreements with competitors aimed at restricting competition (e.g., price-fixing, market allocation, boycotts) are prohibited.
- **Fair Conduct:** Recipients must not abuse a dominant position, nor obtain confidential business information about competitors through illegitimate or unethical means.

4.2 ❤️ Conflicts of Interest

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

- **Definition:** A Conflict of Interest exists when a Recipient's personal, family, or financial interests interfere, or appear to interfere, with the ability to make objective decisions in the interest of the Company.
- **Reporting Obligation:** Any situation of potential, perceived, or actual Conflict of Interest 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 Company is committed to scrupulously complying with all national and international laws regarding international trade.

- **Export Controls:** It is mandatory to comply with export control regulations, particularly for 'dual-use' products (civil and military), by obtaining the necessary licenses before proceeding with any cross-border transfer.
- **Economic Sanctions:** It is prohibited to engage in business relationships with countries, entities, or individuals subject to economic sanctions, embargoes, or trade restrictions imposed by supranational bodies or relevant governments (e.g., EU, USA, UN).

Chapter 5: Monitoring, Reporting, and Sanctions

5.1 🗣️ Segnalazione di Illeciti (Whistleblowing)

To encourage integrity, the Company has established secure reporting channels for reporting, in good faith, suspected violations of this Code, laws, or internal regulations.

- **Channels:** (Clearly state the channels: e.g., Dedicated web platform, E-mail to the Supervisory Body/Compliance Officer, Telephone).
- **Anonymity and Confidentiality:** The Company guarantees the utmost confidentiality regarding the Whistleblower's identity, handling the report in a strictly confidential manner.



5.2 Protection Against Retaliation

Any act of retaliation, discrimination, or penalty—whether undertaken, threatened, or encouraged—against anyone who submits a report in good faith is strictly prohibited. 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 subject to disciplinary measures proportionate to the severity of the violation, which may include dismissal, without prejudice to any applicable civil or criminal sanctions.