



CODE OF ETHICS

ELETTRONICA S.P.A.



CHARTER OF
VALUES

CHARTER OF
COMMITMENTS



The political and social transformations of our time, along with the growing complexity of economic relations between companies operating in national and foreign markets, make it more than ever essential and indispensable today to focus attention on the ethics of conduct, both within and outside corporate structures. In particular, the shift in the global scenario has called for renewed attention towards the ethical and value system of Elettronica S.p.A. in order to direct and sustain the Company in its continuous evolution and development process.

We therefore chose to pursue our objective through the development of a new Code of Ethics consisting of:

- ♦ *the Charter of Values, the general ethical principles at the foundation of the Company's actions, in keeping with the Company Vision;*

- ♦ *the Charter of Commitments, a set of rules of conduct that orients the Company's daily operations and all those who are involved in the realization of the Company Mission.*

We are strongly convinced that the promotion of ethical principles in which we believe generates added value and contributes to increasing employee welfare, customer satisfaction and, more generally, benefiting all stakeholders. To achieve the desired results, we strive for these "intangible" values to be widely disseminated within Elettronica S.p.A. and be internalized by everyone who is part of it, because no organizational model and no form of control can ever achieve them completely in the absence of real sharing by everyone. In this respect, the Company undertakes to respect and promote the principles contained in the Code of Ethics, both internally and externally, and requires the staff to do likewise, each with their own conduct and actions.

Domitilla Benigni
CEO&COO
Elettronica S.p.a.

CHARTER OF VALUES

Our values are reflected in what we are and do, in our products and our business relations, at all levels. For us, these can be summed up in a single word: **Coherence**.

Sharing this value system is a rich source of unity, strength and pride guiding of us, together, towards a more aware future.



INNOVATION

The experience acquired working with our clients makes us solid, hands-on innovators, capable of foreseeing the challenges of tomorrow through ongoing research and the development of technologically advanced solutions. Our constantly evolving business is characterised by the enthusiasm with which we explore reality and by our ability to integrate scientific and industrial collaboration, methods and processes.



RELIABILITY

In our field, excellence is an absolute duty. Design, production and assistance are subject to stringent control procedures and continual improvements, all aimed at ensuring that each client's specific requirements are met correctly and at guaranteeing the maximum reliability of our products in every operational scenario.



SENSE OF BELONGING

People are our most important asset. We believe in sharing and integration, in diversity, in ongoing professional development, in growth based on merit achieved by valuing commitment and talent. We act to ensure that everyone realises his or her full potential and actively achieves success in our company and in their own lives



CORRECTNESS

We firmly believe that the best way of guaranteeing stable and lasting relations in the countries where we operate is by respecting the rules. Our approach is based on the core values of honesty, transparency and responsibility, both within the company and when engaging with business partners and clients, because for us mutual trust is a vital asset to be nurtured and protected.



DYNAMISM

We combine respect for the rules and procedures with a spirit of initiative, enterprise and flexibility, balancing rapid decision-making processes with effective control mechanisms. The fluidity of the framework in which we operate and our propensity for innovation keep our organisation lean and streamlined in its work practices and proactive in its relations with partners and clients. Ours is a dynamic equilibrium, made up of coordination and movement.

CHARTER OF COMMITMENTS

PEOPLE SUPPLIERS

CUSTOMERS HEALTH & SAFETY

SOCIAL RESPONSIBILITY

ECOLOGY AND ENVIRONMENT

WELFARE TRAINING

AWARENESS CONFIDENTIALITY

PRIVACY INCLUSION



1. PURPOSES AND EXTENSION OF THE CODE OF ETHICS

2. PRINCIPLES OF CONDUCT WITH RESPECT TO STAKEHOLDERS

2.1 PERSONNEL

- A) *Personnel Policies*
- B) *Gender Equality, Diversity, Equity and Inclusion*
- C) *Privacy Policy*
- D) *Health & Safety at work*

2.2 COLLECTIVITY

- A) *Social Responsibility*
- B) *Ecology, Environment and Energy*

2.3 PUBLIC INSTITUTIONS

2.4 CUSTOMERS

2.5 SUPPLIERS

2.6 MASS MEDIA

2.7 POLITICAL ORGANIZATIONS AND TRADE UNIONS

3. INTERNAL PRINCIPLES OF CONDUCT

3.1 RULE OF LAW

3.2 DECISION-MAKING PROCESS

3.3 CORPORATE DISCLOSURES

3.4 ACCOUNTING TRANSPARENCY

3.5 PROTECTION OF CONFIDENTIALITY, AVAILABILITY AND INTEGRITY OF INFORMATION

3.6 CONFLICT OF INTEREST

3.7 USE OF CORPORATE ASSETS

3.8 ANTI-CORRUPTION POLICY

3.9 ANTITRUST AND REGULATORY BODIES

3.10 INTERNAL CONTROL SYSTEM AND RISK MANAGEMENT

4. INFRINGEMENTS OF THE CODE OF ETHICS

1. PURPOSE AND EXTENSION OF THE CODE OF ETHICS

The Code of Ethics of Elettronica S.p.A. aims to direct the actions of its Recipients (from Corporate Bodies to Employees) towards ethical conduct based on principles such as loyalty, integrity, professional rigour, confidentiality and transparency through the introduction of rules of conduct that are complementary and additional to the obligations of applicable law.

In pursuit of this aim, of primary importance is the commitment of the Board of Directors of the Company to ensuring that strategic business objectives are in line with the values of the Code of Ethics and that of the Board of Statutory Auditors in carrying out its control activities.

Equally, the commitment to full implementation of the Code of Ethics applies to all Employees and those who deal with the Company in any capacity.

The Company is also committed to disseminating the Code of Ethics herewith to all subsidiaries and all those with whom they have business relations, through specific contractual or pre-negotiation reminders.

Elettronica S.p.A. respects the independence of its subsidiaries, requiring them to comply with the values outlined in the Code of Ethics. Elettronica S.p.A. undertakes to ensure that the principles of this Code are also adopted by companies in which it has non-controlling interests. Those who, under the designation of Elettronica S.p.A., hold social positions within the Company or within the Companies they participate in, are required to attend the meetings they are called to, to fulfill the assignments given with loyalty and fairness, to promote communication between the Group companies and to stimulate and exploit intra-group synergies by cooperating in the interest of common objectives. The dissemination of information within the Group, in particular for the purposes of preparing the consolidated financial statements, the half-yearly financial report and other communications, must be carried out in accordance with the principles of truthfulness, clarity, transparency and consistency, while respecting the autonomy of each company and specific areas of activity.

2. PRINCIPLES OF CONDUCT WITH RESPECT TO STAKEHOLDERS

2.1. PERSONNEL

a) Personnel Policies

Elettronica S.p.A. considers people the most important asset. Based on this principle, it adopts Personnel Policies designed to encourage **their professional satisfaction and workplace welfare**, in the certainty that these conditions are fundamental for the full realization of all those who work at and for the Company individually and as corporate components, and, ultimately, for the Company's growth and improvement of its productivity.

In this respect, the Company: defines and implements policies for the selection, recruitment and management of staff based on recognition of merit and compliance with the principle of equal opportunities; promotes, in line with business development opportunities, the professional growth and valorization of its employees, having regard to the skills and competences of each and offering to all, with a view to continuous training, programs and instruments suitable for ensuring enhancement of skills and adequate professional updating; summarizes the processes described in a fully digitized "HR environment" that offers Employees the opportunity to play an active role in managing their own path at the Company and contributes to the dissemination of "organizational culture".

In assigning duties, the Company promotes an **awareness policy** to ensure that everyone fully understands the importance of carrying out their duties in a responsible manner, in consideration of the actual impact of the same on business activities.

With respect to welfare at work Elettronica S.p.A.: realizes - also thanks to the involvement of Trade Union Organizations - measures and actions aimed at ensuring its continuous improvement and is always careful to evaluate its appreciation by the staff; as part of this Welfare strategy, provides a comfortable and welcoming physical environment, promotes personal relationships among colleagues by stimulating the sense of corporate “community” and incentivizing the reconciliation between work and private life, through flexible management of work activities and a policy always attentive to the needs of people, both as Employees and as members of their family.

All company policies are based on a **solid core of values** that condemns any form of discrimination or harassment, direct or indirect, related to gender, age, sexual orientation, gender identity, disability, health, ethnic origin, nationality, political or trade union opinion, social category, religious faith, not admitting any form of prejudice and intimidation.

b) Gender Equality, Diversity, Equity and Inclusion

The Company promotes the sharing of inclusive values and behaviour in every process and at every level of the organisation, supporting a culture that enhances the uniqueness of people and guarantees access to the same opportunities for professional growth. In this sense, the Company has formalised its commitment within the Diversity & Inclusion Policy, in order to make transparent the objectives and lines of action that aim to promote inclusion.

Elettronica S.p.a. recognizes the centrality of human resources, in the conviction that the main factor of success of any company is represented by the human and professional contribution of the people who work there. This contribution can only be fully expressed in a context based on values of respect, loyalty, mutual trust and inclusion.

In the selection, recruitment and career advancement phases, the Company adopts criteria exclusively based on the correspondence between expected profiles and the skills actually demonstrated, according to objective, transparent and verifiable merit principles. Every decision in the field of human resources is oriented to guarantee equal opportunities of access and development, without any form of favouritism, clientelism or direct or indirect discrimination.

Corrupt practices, granting or receiving undue favors, collusive behavior and any form of solicitation - even by an intermediary person - of personal or professional benefits for oneself or third parties are expressly prohibited. Such conduct, as damaging to the integrity and credibility of the company, will result in the sanctions provided for by internal regulations and, where appropriate, the reporting to the competent authorities.

The Society rejects all forms of discrimination based on race, ethnicity, religion, culture, politics, sexual orientation, gender identity or expression, age, disability or any other personal or social condition. No acts of propaganda or incitement to hatred and violence, nor verbal or non-verbal behaviors - including micro-aggressions - that may offend, marginalize or exclude are allowed.

The Company believes that communication, internal and external, is not only an operational tool, but a central element in building a fair, respectful and inclusive corporate culture. The use of inclusive and gender-neutral language is an integral part of the individual and collective responsibility of each employee and represents a concrete signal of the organization’s commitment to counter stereotypes, inequalities and subtle forms of discrimination.

Elettronica S.p.a. also actively promotes the equal and meaningful participation of all people in corporate life, progressively overcoming the structural and cultural barriers that still limit equal opportunities.

In this way, the Company intends to build a truly participative working environment, where each individual can contribute actively, on an equal footing, to collective development and success.

b) Privacy Policy

Elettronica S.p.A. considers a priority the protection of personal data of its employees and of any individual who deals with it in any capacity. On the basis of as established by the relevant laws, it implements and updates adequate organizational measures and procedures to ensure that the data of employees and third parties acquired in the conduct of work activities is actually protected in terms of confidentiality.

In order to preserve the **“disclosure self-determination”** of each (i.e. the right to decide whether or not to provide data and under what conditions), it adopts and promotes a clear and unambiguous communication style that facilitates the full understanding of any request for data and related purposes.

c) Health & Safety at work

The Company undertakes to carry out its activities, paying particular attention to the work environment and the safety of its staff, ensuring that work organization and operational aspects thereof are carried out in such a way as to safeguard the health of workers, also aiming to implement high conditions and levels of safety and health, based on compliance with applicable legislation. Health and safety at work are, in fact, a priority for Elettronica S.p.A., which is committed to safeguarding it through an internal organization with technical expertise, resources - instrumental and economic - and adequate powers to ensure that the verification, evaluation and management of risks are performed in compliance with the highest standards.

In particular activity managers monitor compliance with preventive measures by resources coordinated by them and receive staff reports to improve safety and health protection; in general, all employees are committed to scrupulously executing the provisions applicable to them and to being sensors of any possible risk situation to allow appropriate initiatives. The peculiar element of the system is the **prevention of accidents and occupational illnesses**, which is implemented through a comprehensive risk control network as well as training, information and awareness programs for employees, with a view to developing a strong and rooted “safety culture” and promoting its value.

Elettronica S.p.A., within the management of its own processes, therefore undertakes to ensure full compliance with current health, safety and environmental (HSE) regulations, as well as to maintain the commitments made with the parties concerned. In addition, it is voluntarily dedicated to the implementation and continuous improvement of HSE Management Systems compliant with UNI EN ISO 45001:2023 standards.

2.2. COLLECTIVITY

a) Social Responsibility

Elettronica S.p.A. is attentive to the impact of its business activity within its sphere of influence and therefore recognizes and adopts socially responsible conduct to meet the economic, environmental and social expectations of all stakeholders. To this end, **it has a significant impact on the economic, employment and social fabric of the territory**, creating and maintaining stable relations with entities and companies and acting as a reference point for the valorization of their expertise in technology.

b) Ecology, Environment and Energy

The Company, having among its aims protection of the environment as a **“common interest”**, implements strategies to ensure the right balance between company and ecology needs. In view of this, it is committed to the **efficiency** of industrial processes in order to place on the market products with **low environmental impact** and optimize the use of natural resources.

To reduce the cost of the environment, Elettronica S.p.A. ensures, among other things, the careful procurement of energy resources and constant consumption control and, with the same purpose, invests in the periodic renewal of plants and machinery and in the purchase of new technologies.

Elettronica S.p.A. therefore considered it essential to adopt an environmental policy that integrates ecological aspects into the company's activities, with the aim of ensuring the long-term maintenance of sustainability, profitability and competitiveness.

Environmental protection is a specific training objective for employees who, according to their role, apply the principles defined in the environmental policy by promoting actions aimed at controlling the environmental impacts of their activities.

The Company undertakes to verify, through its own structures and organizations, the application of the environmental policy, establishing ecological objectives and targets and implementing systems for monitoring, reporting and periodic review.

2.3 PUBLIC INSTITUTIONS

The Company deals with Public Institutions with **integrity and fairness**, in the firm belief that the protection and respect of the principles of impartiality and independence of the Public Administration also constitute own interest.

All dealings with Public Institutions, always inspired by criteria of collaboration and transparency, are solely attributed to the **corporate functions assigned**, whose staff is made aware of all applicable regulations and the correct conduct practices of the sector.

In addition, for all dealings with Institutions of particular sensibility and regulation, such as institutions regarding public procurement, government authorizations and licenses, social security and taxation, the Company has set up complex structures, overseen and managed by qualified and competent personnel required to guide internal articulations towards **full compliance with all applicable sector regulations**.

The Company condemns any practice of active or passive corruption and collusive conduct of any form and nature.

In consideration of the above, it is forbidden for staff to promise or offer to those who work as employees or on behalf of Public Administrations - Italian or foreign - or to accept from the same money, utility, goods, services, provisions or unpaid benefits, in order to influence decisions to obtain more favourable treatment or undue provisions and in general for any other purpose.

Gifts and courtesies of modest value that fall within commercial use are permitted to the extent that they are not prohibited from specific regulations - even local - and only if unambiguously not interpreted as seeking favours or trying to exert undue influence.

2.4 CUSTOMERS

In the conduct of business negotiations, the Company undertakes to act with loyalty and fairness, in full respect of the rules and principles for a fair, transparent and competitive market pursuing as the ultimate objective **the full satisfaction of the customer's needs**. In this light, it does not implement initiatives that might induce the other party to an incorrect perception of the products and services offered and ensures the careful and scrupulous evaluation of the feasibility of the services requested. All contacts and communications with customers are guided by principles of maximum **transparency, clarity and professionalism** to provide timely, qualified and competent responses without ever neglecting any essential element, so that the decision to stipulate is made with full awareness.

The execution of the contract is conducted with the aim of fully respecting the obligations undertaken with the aim of guaranteeing to the customer **full correspondence between what is agreed and realized**, ensuring in any case technological solutions in line with the highest sector standards.

The care and attention of the Company for the technical-design aspects of the products placed on the market also extends to the **profile of the safety** of the same. To this end, Elettronica S.p.A. guarantees compliance with current product safety regulations by means of a **preventive approach** that involves all phases of the life cycle of products, right from their design.

Customer satisfaction, both in terms of product quality and service excellence, is a priority for Elettronica S.p.A. and is therefore constantly monitored through structured **customer satisfaction procedures**.

These principles also apply to business partners with whom they jointly explore commercial initiatives and whose compliance with ethical and legal principles in contractual activities, including those relating to competition and the free market, are intangible values for Elettronica S.p.a.

2.5 SUPPLIERS

Any decision of the Company regarding procurement, whether necessary for business management or for the realization of products and services, is based on assessments of the **utility, quality, competitiveness** and price of the supply.

Elettronica S.p.A. observes strict internal procedures for the selection of Suppliers in compliance with the principles of **transparency and competition** adopting objective evaluation criteria such as competence, availability of appropriate means and structures, fairness and reliability.

Specifically, already in pre-selection phase of the Supplier, Elettronica S.p.A. verifies as minimum requirement the possession of adequate levels of ISO certification to guarantee the quality of the supply and requires the Supplier to undertake, if selected, in addition to respecting all applicable standards, to observe the values and principles of the specific **Code of Conduct - Suppliers** issued by the Company and also to ensure compliance by subcontractors, promoting and encouraging “responsible” social, environmental and ethical conduct.

Each employee of the Company, in relation to his duties, shall:

- observe the legal regulations, principles and internal procedures for the selection and management of the relationship with suppliers, partners and the market;
- assess and manage reputational risk and associated impacts related to the use of the supplier;
- include in the supply contracts, when required by the procedures, the express obligation to comply with the principles of the Code.

In any case, the amount of payment must correspond to that indicated in the contract and payments may not be made to an entity other than the contractual partner or in a third country other than the parties or execution of the contract.

2.6 MASS MEDIA

Elettronica S.p.A. manages its relations with the mass media, taking into account the necessary reconciliation between commercial confidentiality and information needs, while ensuring that all communications to them are always correct and truthful.

The transfer of any information regarding Elettronica S.p.A. to mass media is the responsibility of specially appointed company functions; apart from this, all employees are required to acquire the related authorization prior to making any communication to journalists or to responding to any requests they may have.

2.7 POLITICAL ORGANIZATIONS AND TRADE UNIONS

All dealings of Elettronica S.p.A. with Political and Trade Union Organizations are based on criteria of correctness, in a logic of dialogue and direct confrontation between the parties, in compliance with current regulations, with a view to pursuing objectives of the company and of the country and of the interests of workers.

Elettronica S.p.A. does not directly or indirectly support or discriminate against any political or trade union organisation. The Company shall refrain from making any direct or indirect contribution to political and trade union parties, movements, committees and organisations, as well as their representatives and/or candidates.

However, any initiatives of solidarity that Elettronica S.p.A. considers a fundamental value are excluded from this scope, as it actively and sensitively engages with subjects working in the social sector.

3. INTERNAL PRINCIPLES OF CONDUCT

3.1. RULE OF LAW

Elettronica S.p.A. acts in full and absolute compliance with the rules in force in the territories where its activities are developed, in line with this Code of Ethics and the company's rules and procedures.

Elettronica S.p.A. puts into practice processes of prevention of corruption, fairness and freedom of the market in anti-trust function and fight against fraud, through an articulated management process and appropriate training of its personnel, accompanied by the warning system defined by D. Lgs. 24/2023 and the continuous improvement of the culture of transparency, legality and compliance with the founding principles of this Code of Ethics, with an operating management model based on a risk management system and internal controls.

The Company also requires maximum transparency in commercial operations and relations with third parties, in full compliance with national and international regulations on the fight against self-cycling and recycling, including those requiring the reporting of suspicious transactions in cash or otherwise.

The Recipients of this Code of Ethics may not therefore enter into business relations on behalf of Elettronica S.p.A. with partners, suppliers or third parties who do not give adequate guarantees of good repute and do not enjoy a good reputation or whose name is associated with events related to laundering activities as well as self-trafficking and in any case to legality, central for the Society.

3.2. DECISION-MAKING PROCESS

The Company ensures stakeholders the proper use of corporate resources and the pursuit of corporate goals through the introduction of specific **mechanisms of internal accountability and control**. In particular, the **accountability policy** of Elettronica S.p.A. is implemented through internal regulations aimed at ensuring that any initiative and/or decision adopted by the Company is always an expression of a transversal and collegial evaluation of the various business functions concerned by competence on the matter, according to the rules of the "internal decision-making process".

This way, all the corporate functions involved are required to share the responsibility of the decision by providing a contribution of specific professionalism, attention and accuracy in analyzes and thereby avoiding any form of arbitrariness and approximation.

The Company also ensures complete and transparent traceability of the internal decision-making process through specific IT tools that allow quickly and accurately performing any verifications that may be needed to detect facts that are not aligned with current procedures, of the parties that caused them, the reasons that led to the decision taken and any further relevant information.

3.3. CORPORATE DISCLOSURES

The Company ensures that communications to Shareholders and to Corporate Bodies, in accordance with the statutory procedures provided, guarantee the truthfulness and the most complete representation of corporate performance. To this end, the transfer of all relevant information, whether of economic-financial and strategic-business nature, is based on principles of utmost and absolute transparency and timeliness.

3.4. ACCOUNTING TRANSPARENCY

Elettronica S.p.A. ensures that all financial and economic evaluations are carried out in compliance with criteria of reasonableness and congruity and that each accounting record expresses with truthfulness and completeness as actually resulting from the genuine documentation of each operation carried out, ensuring, inter alia, the proper retention of the documentation itself in accordance with the law.

Elettronica S.p.A. acts in full and absolute compliance with the rules in force and the Recipients, within the scope of their respective responsibilities and functions, are bound to strict compliance with company procedures. The proper implementation of procedures makes it possible to identify the corporate entities responsible for decision-making, authorisation and execution of transactions. To this end - in accordance with the principle of control resulting from the separation of tasks - the Company ensures that each operation is carried out at different stages by separate entities, whose competences are clearly defined and known within the organization, in order to avoid the attribution of unlimited and/or excessive powers to individuals.

3.5. PROTECTION OF CONFIDENTIALITY, AVAILABILITY AND INTEGRITY OF INFORMATION

The Company is well aware that certain information (whether technical, commercial, economic, etc.) constitutes a **strategic and fundamental asset** and that unauthorized disclosure thereof could result in damage of inestimable value. All Employees are constantly reminded of this awareness and to keep in mind in their daily work the confidentiality of information and the significant risks associated with use or improper dissemination thereof. Analogous attention and care is reserved to information from external entities, individuals and companies as well as from structures of public administration and institutional entities with which Elettronica S.p.A. has business dealings.

The confidentiality of information is respected through the provision and adoption of appropriate measures and procedures that ensure compliance with **authorized use, non-disclosure** to third parties and proper retention of information on the basis of their degree of **external sensitivity** (that is, the interest that the document might cause in third parties) and the **potential damage** that dissemination could cause.

Documents identified as confidential may be disseminated within the Company exclusively “**on a strictly need to know basis**” for actual work needs and, in any case, always with the degree of confidentiality attributed, so that all those required to manage them are in the condition to comply with internal rules and procedures.

More generally, the Company requires Employees to abstain from discussing with people outside the Company, and beyond strictly professional reasons, issues related to technologies being developed, features of products that are not in the public domain, marketing strategies, profits, procurement plans, business volumes and financial data.

The obligation not to disclose or misuse the confidential information of the Company must be respected by Employees even after termination of employment.

Elettronica S.p.a., ensures full compliance with the regulatory provisions for the protection of classified information for National Security and compliance with Trade Compliance regarding export control, Import and transit of dual-use and military equipment.

In this respect, the Company makes all its staff aware, through specific periodic training, of the requirements provided for by the applicable sector legislation and the consequences expected in cases of violations of these rules.

More generally, the Company, for its purpose and for the characterization of its function, is committed to comply with binding legislation on information security and to promote the principles of business continuity, as essential elements of the protection of corporate and collective interests, of the protection of intellectual property, as well as enabling element for the consolidation of trust towards Elettronica S.p.A. institutions, workers, stakeholders, through its own organisational structures and system of internal controls and risk management.

3.6. CONFLICT OF INTEREST

All Recipients are required to carry out their work activities in pursuit of the general interest of Elettronica S.p.A. in compliance with current regulations and the Code herewith.

In view of the above, it is necessary to avoid any situation and to refrain from any activity that, in the performance of duties or outside the work context, implies - in fact or even merely potentially - a contrast, immediate or deferred, between own interests (or of family members and acquaintances) and those of the Company, or that may hinder, in any way and in any capacity, the requirement that all decisions relating to the duty carried out be made with respect to the company's interest¹.

Likewise, Recipients are required to refrain from taking advantage of the position held, the privileged information acquired during the conduct of work activities and discretion, if any, related to their function.

Any situation of real or potential conflict of interest must be communicated by employees to their Manager, who will inform the relevant functions according to internal regulations.

3.7. USE OF CORPORATE ASSETS

Elettronica S.p.A. provides each Employee with the **resources necessary** to carry out their work (computer tools, telephones, credit cards, etc.), the use of which is permitted solely within the limits of assigned duties and in the manner prescribed by applicable internal regulations.

All **information** contained in the tools assigned to users, if related to work, is to be regarded as Elettronica S.p.A. property and, as such, all employees are obliged to ensure their security by observing the precise rules of conduct governing their proper use.

Employees can use the **email system and Internet services** exclusively for work purposes within the limits defined by the Web Filtering system in order to not expose the Company to external risks (viruses, industrial espionage, sabotage, illegal dissemination of corporate data, etc.) and not compromise the security of computer networks.

¹ In compliance with the provisions of art. 2391 of the Civil Code, the Directors observe, in the performance of their duties, the provisions on own interest or on behalf of third parties by providing, among other things, notice to the other Directors and to the supervisory board of any interest that, have in certain transactions of the Company.

3.8. ANTI-CORRUPTION POLICY

The Company actively contributes to preventing and combating any illegal conduct of a corruptive nature.

Therefore, it is not permitted to give, offer, promise, receive, accept, demand or solicit money or other favours in order to obtain or maintain an undue advantage in the performance of work activities; irrespective of whether the addressee of such an act is a public official or a private person, and regardless of whether there has been any actual undue advantage.

The Company has initiated a process of adaptation to the management system for the prevention of corruption to the requirements of ISO 37001 and reduction of the risk of corruptibility, orienting production activity towards increasingly conscious models of corporate social responsibility or through the identification of measures and controls to monitor its business activities in order to prevent the phenomenon.

3.9. ANTITRUST AND REGULATORY BODIES

The Company recognizes the value of freedom of enterprise and free competition as an aspect of corporate culture and policy and the commitment to respect it through a careful analysis of the risk of anti-competitive conduct.

Based on the principles of fairness and propriety, it counteracts any form of unlawful restriction of competition by scrupulously complying with the provisions of Law 287/90 to protect competition and the market and the rules issued by the sector authorities.

Elettronica S.p.A is committed to ensuring, through its own behaviour and in the definition of commercial strategies, full compliance with and effectiveness of the restrictions and limits set by national and international regulations; does not deny or conceal, does not delay any information required by the Antitrust Authority and other regulatory bodies in their inspection functions and cooperates actively during the investigation procedures, avoiding preventing or hindering the performance of control activities.

3.10. INTERNAL CONTROL SYSTEM AND RISK MANAGEMENT

Elettronica S.p.A. has established an internal control and risk management system, consisting of all the rules, procedures and organisational structures designed to identify, measure, manage and monitor the main risks, as well as the necessary tools to identify and prevent risks that the Company may incur, to direct and verify the activities of the Company in order to ensure compliance with laws and corporate procedures, protect the company's assets, Effectively manage corporate activities and provide clear, truthful and accurate information on the financial, economic and financial situation.

The effectiveness and functionality of the internal control system and risk management are guaranteed by the supervision and control activities carried out by the responsible corporate structures/figures.

4. INFRINGEMENTS OF THE CODE OF ETHICS

The employees of Elettronica S.p.A. are required to read, understand and apply the following Code of Ethics having the right to consult it at any time within the corporate document system ECM and the corporate intranet.

The Company guarantees periodic and continuous training on the principles of this document and at the time of recruitment, delivers the Code of Ethics, with the commitment of the recipients to view it and comply with the rules contained therein, and with an awareness of the importance of ethical behaviour in all circumstances and, more particularly, of having to carry out the task entrusted to them in a responsible manner, in view of the concrete impact on the community and business.

Non-compliance with or violation of the principles contained in the Code of Ethics of Elettronica S.p.A. compromises, at all levels, the trust relationship with the Company and it is sanctioned by resorting to the extremes and forms permitted by current regulations and the National Collective Agreement, in disciplinary terms, obviously without prejudice to any further civil and criminal consequence.

Reports regarding violations of the Code of Ethics must be addressed to the Whistleblowing Committee, established by the Company, pursuant to Legislative Decree no. 24/2023 and governed by the company whistleblowing policy, which can be viewed on the ECM corporate document system. The Management Committee will verify, in the first instance, the merit of the report and will assess its compliance with the definition of violation as described in the procedure.

In the event that the report does not fall within the scope of the violations envisaged by the whistleblowing system, it must be addressed to the Human Resources Function and to the Legal Function, as far as they are concerned.

With reference to the above, the management of disciplinary proceedings and the application of the relevant sanctions are under the responsibility of the Human Resources Function, appointed and delegated for this purpose, in compliance with the law and the Collective Agreement in force.

Finally, non-compliance or violation by collaborators or third parties associated with a non-employee contractual relationship may be considered as non-fulfilment of contractual obligations, with any consequence of law, also with respect to termination of the contract and/or assignment and may involve compensation actions if such conduct results in damages to the Company.



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