TECNOSYS ITALIA S.R.L.

Code of Ethics

Values, principles and rules of conduct

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1. Introduction and scope

This Code of Ethics sets out the values, principles and rules of conduct that guide the activities of **Tecnosys Italia S.r.l.** (the "Company"). It applies to directors, managers, employees, other staff, consultants, suppliers and anyone acting in the name of or on behalf of the Company.

It forms an integral part of the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001, where adopted.

2. Core values

Integrity and honesty
We act fairly, transparently and consistently towards customers, colleagues and institutions.

Expertise and quality
We ensure that our services and solutions meet our commitments and reflect the state of the art.

Responsibility
We are accountable for our technical and organisational decisions.

Respect for individuals
We reject all forms of discrimination, harassment and abuse.

Security and confidentiality
We protect the data and systems entrusted to us.

3. Compliance with laws

The Company operates in compliance with applicable laws and regulations, particularly those concerning personal data protection (GDPR and Italian Legislative Decree No. 196/2003), copyright and software licences, cybersecurity, taxation, employment law and public procurement.

4. Customer relations

- Proposals are truthful, clear and complete: no promises are made regarding features, performance or delivery times that cannot realistically be achieved.
- Contractual commitments and service level agreements (SLAs) are honoured; any issues are communicated promptly.
- Customer information and data are used solely for contractual purposes.
- Personnel avoid conflicts of interest with customers.

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5. Relations with public authorities

- Relations with public bodies are conducted with the utmost transparency and fairness.
- Offering or accepting money, gifts, favours or other benefits to obtain undue advantages is prohibited.
- Participation in tenders and contract award procedures complies with competition requirements and public procurement rules; collusive agreements and the use of confidential information are prohibited.
- Statements, documents and reports are always truthful and verifiable.

6. Data protection and information security

- Personal data are processed in accordance with the principles of lawfulness, data minimisation, purpose limitation and security (privacy by design and by default).
- Access to data and systems follows the principle of least privilege and is logged.
- Credentials, keys and certificates are personal and must not be shared.
- Security incidents and personal data breaches must be reported immediately to the relevant person responsible, so that notifications required by law can be made.
- Technical personnel do not access customer data or environments beyond what is necessary for their assignment.

7. Software quality and responsible use of technology

- Development follows quality practices, including code review, testing, vulnerability management and traceability of changes.
- Inserting hidden functions, backdoors or malicious code into software is prohibited.
- Software, libraries and components, including open-source components, are used only in accordance with their respective licences.
- Artificial intelligence systems are used with human oversight, attention to bias and transparency, and a prohibition on entering confidential or personal data into unauthorised tools.

8. Intellectual property

The Company protects its own intellectual property and respects that of others. Unauthorised copying or use of software, documentation and protected materials is prohibited.

9. Human resources

- Recruitment and professional development are based on merit and skills, with respect for equal opportunities.
- The Company ensures a safe, healthy and respectful working environment, in compliance with Italian Legislative Decree No. 81/2008.
- All forms of workplace bullying, harassment and discrimination are prohibited.
- Everyone must use company tools, resources and devices properly.

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10. Conflicts of interest and gifts

Those to whom this Code applies must avoid situations in which personal interests could interfere with the Company's interests. Gifts and hospitality are permitted only if they are of modest value, occasional and unlikely to influence decisions. Any potential conflict must be reported to one's manager.

11. Suppliers and partners

Suppliers and partners are selected on the basis of objective criteria of quality, value for money and reliability, and are required to comply with the principles of this Code, including rules on data security and working conditions.

12. Accounting transparency and protection of assets

Every transaction is recorded accurately, completely and in a verifiable manner. The creation of hidden funds and any conduct aimed at falsifying accounting records or facilitating money laundering or tax evasion are prohibited.

13. Sustainability

The Company promotes efficient use of resources, design that takes account of the energy impact of data centres and infrastructure, and the reduction of electronic waste.

14. Reporting concerns (whistleblowing)

Anyone may report breaches of this Code or unlawful conduct through the dedicated channels, pursuant to Italian Legislative Decree No. 24/2023. The Company ensures confidentiality and protection against retaliation for those who report in good faith.

15. Implementation, oversight and sanctions

- The Code is distributed to all those to whom it applies and is covered by periodic training.
- Oversight is entrusted to the Supervisory Body or, in its absence, to a person designated by Management.
- A breach constitutes a failure to fulfil contractual obligations and may lead to disciplinary measures or termination of the relationship, in accordance with applicable legislation and national collective bargaining agreements (CCNL).
- The Code is approved by the Board of Directors and reviewed periodically.

This Code of Ethics is published on the Company's official website (www.tecnosysitalia.eu) and is available to all those to whom it applies.

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