

Aesys S.p.A.
Code of Business Conduct

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1 Purpose and scope of the Code

Aesys S.p.A. (hereinafter also "Aesys" or "Company"), is a world leader in the development of information systems. The Company, fully aware of the responsibilities towards its customers and the communities in which it operates, has adopted a series of ethical standards as guide in the exercise of its activities and promotes compliance with the same ethical standards among its partners.

This Code of Business Conduct (hereinafter also the "Code") aims to represent externally the corporate ethics that shapes our way of doing business and the moral responsibility that innervates strategic decisions in conducting negotiations and commercial relations. Specifically, the Code includes principles, guidelines and rules of conduct and defines internal responsibilities that the members of the Company (employees, managers, directors, collaborators and partners of the Company) expressly assume towards all those subjects with whom they interact in carrying out their business.

2 Ethical behaviour and integrity

The Company only operates with business partners who comply with all applicable laws and regulations for the proper conduct of its business in its jurisdiction as well as the principles contained in the Universal Declaration of Human Rights established by the United Nations Organization and those indicated in the Declaration on principles and fundamental rights at work enacted in 1998 by the International Labour Organization, as implemented by the legislation and legal practices in use in various nations.

3 Principles and rules of conduct

Loyalty, honesty and a sense of duty have been the founding values of the Company since its foundation. People who are part of the Company are selected from those who demonstrate the highest standards of ethics and dedication to their work and are used to maintaining relationships of respect, loyalty and transparency towards colleagues, suppliers and customers all over the world.

3.1 HUMAN RIGHTS AND FAIR LABOUR PRACTICES: CHILD LABOUR, FORCED LABOUR, FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING, NON-DISCRIMINATION

In conducting its business, Aesys pursues the protection of human rights according to the principles stated in the Universal Declaration of Human Rights dated 1948 and recognizes the principles established by the Conventions of the International Labour Organization with particular reference to:

- (i) The right of association and collective negotiation. Aesys requires its partners to guarantee similar rights to its workers.
- (ii) The prohibition of child and forced labour. Aesys works with partners who do not make use of collaborators under the minimum age of employment established by the law in force. Furthermore, Aesys expressly prohibits partners from taking advantage of forced, bonded or involuntary labour.
- (iii) The protection of equality and non-discrimination at work. Partners must promote a supportive work environment valuing employee diversity; they will not be able to discriminate against their employees and, in the same way, they will not be able to tolerate any discrimination and form of unfairness for reasons of sex, race, language, religion, age, disability, sexual orientation, national origin, pregnancy, personal beliefs or any other characteristic foreseen and protected by law.

The Company requires its commercial partners to recognize the value of protecting human rights in their approach to business and a constant social commitment in raising awareness and promoting compliance with these issues along its supply chain, developing initiatives aimed at creating positive impacts in the local communities of reference.

As regards the number of daily working hours, overtime hours, the remuneration due to each worker and the payment of contributions, the partners must comply with applicable laws and mandatory sector regulations.

3.2 HEALTH & SAFETY

The Company ensures high standards of health and safety in the workplace, increasing awareness of risks and promoting responsible behaviour. The processes, the premises and the production means must correspond to the internal provisions and to those foreseen by the law regarding health and safety in the workplace, fire prevention and environmental protection.

Aesys requires its commercial counterparts to fully comply with these principles in working relationships with its employees and to implement suitable improvement and preventive measures and control of dangers. Employees must be properly educated and trained in health and safety matters.

4 Commercial regulation - customs activities

The laws on export control and customs activity regulate the ways and places in which Aesys can sell goods, technology and exchange information.

The Company undertakes to act in compliance with the provisions of the law and regulations regarding export control, customs activities and tax obligations; likewise, the Company requires its business partners to ensure that all applicable tax and customs law provisions are strictly observed.

Aesys observes and requires its business partners to comply with all regulatory provisions regarding trade restrictions that may be applicable to the export of Aesys products.

5 Responsible sourcing - supply chain

The Company promotes a "Responsible Sourcing" path to ensure that all supply chains are fair, sustainable and transparent.

Aesys requires suppliers to implement responsible practices in the supply chain in the relevant sector and to meet environmental, social and governance standards, in particular those relating to Conflict Minerals to ensure that such materials do not come from areas where there is a high risk of human rights violations and environmental degradation.

6 Ethics and integrity in the conduct of business: competition and fair trading principles

The Company recognizes the importance of a competitive market and a commercial conduct based on honesty, transparency, collaboration and reciprocity which allows Aesys to strengthen its reputation and trust on the part of customers, suppliers, employees, institutions and of the territory in which it operates.

The Company undertakes to comply with all competition and antitrust laws in force in distinct countries. All business partners act in strict compliance with the laws in force on competition and the principle of "fair trading", acting in good faith, respecting reciprocity and maximizing value, avoiding creating unfair conditions, hindering trade, making excessive risks and costs on other partners, mutually respecting trademark and intellectual property rights.

The purpose of antitrust rules is to promote and protect fair competition to ensure customers the widest choice of products and services at competitive prices. Aesys, therefore, undertakes to compete and not collude with its competitors. Aesys employees must avoid contact with competitors, unless there is a clear justification for such contacts and antitrust law are not violated.

Aesys prohibits price agreements and abuses of market dominance to unfairly disadvantage competitors and customers.

7 Anti-money laundering

The Company ensures full compliance with the regulations regarding the fight against money laundering and self-laundering and refrains from establishing relationships with specific categories of subjects considered to be at greater risk. Aesys prohibits money laundering or any activity that facilitates money laundering or the financing of terrorist or other criminal activities.

Aesys requires its business partners to commit to respecting the same principles.

8 Environmental Protection

The Company considers that environmental protection is a decisive aspect to be promoted in the overall approach to business. Aesys undertakes to constantly improve the environmental performance of its activities and to comply with the provisions contained in the laws and regulations in force and, for this purpose, has implemented an effective system aimed at identifying, managing and reducing potential risks for the environment.

The Company encourages its partners to do everything possible to support the climate protection and environment goals and consequently to adopt and implement sustainable practices and improve their environmental policies, in order to reduce the use of resources and minimize the impact on the environment.

9 Control and monitoring

The Company reserves the right to verify the compliance of its business partners with this Code. If Aesys becomes aware of any circumstance, action or conduct that does not comply with this Code, may request corrective measures and reserves the right to terminate existing commercial relations with the commercial partner with immediate effect and to undertake any further initiatives to protect its reputation.

10 Violation of the Code

The Company allows all Recipients to report violations of this Code.

The Company ensures discretion and confidentiality in the entire process of managing reports, according to the so-called "whistleblowing" procedure (through the IT platform accessible via link - <https://aesys.openblow.it/#/> - on the company website <http://www.aesys.com/it/>; once logged in, simply enter your report by simply filling in the pre-established form. Reporting and subsequent management are regulated according to the Whistleblowing policy available at the link indicated above) which guarantees all whistle-blowers against any form of retaliation.

Only if expressly required by law, data concerning the identity of the reporting person may be transmitted to the public authorities involved in the investigation or in the judicial proceedings that may ensue.

11 Diffusion

The Company undertakes to ensure the maximum dissemination of this Code to all internal and external subjects interested in the corporate mission through specific communication activities.

12 Amendments to the Code

Any changes and/or additions to this Code must be approved by the Administrative Body.