



CODE OF ETHICS AND PROFESSIONAL CONDUCT

EUROSYSTEM2000 S.R.L.

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*Headquarters: Strada Ponte Alto Sud, 74
41123 Modena (MO)
Tel: 059.452094
www.es2000.it*

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Introduction and Purpose

The Code of Ethics and Professional Conduct (hereinafter called the “Code”) is the document that defines the whole set of values, principles, commitments and rules of conduct to which all the internal members of an organisation must adhere and conform when carrying out their functions and work activities. Furthermore, it is identified as a tool that strengthens the organisation and gives continuity to the approach adopted so far whereby acting according to the rules is not a constraint, but an opportunity.

Therefore, the first and foremost objective of the present Code is to underline EUROSISTEM2000 SRL's commitment to adopting and maintaining ethical behaviour, operating in full compliance with the provisions of the law in force, as well as the commitment of each individual member of the organisation to carry out their role with professionalism and moral integrity, with competence and honesty, strengthening cohesion and a spirit of mutual cooperation with all those who are involved, directly or indirectly, in the company's daily activities.

The vision and values here declared not only contribute to enriching the corporate identity, but are shared and guide the behaviour, both in internal relations and in relations with third parties, of all those people who, with their skills, ideas and characteristics, have become a fundamental part of EUROSISTEM2000 SRL (hereinafter called the “Company”).

Our commitment and values

The Company has always been focused on the needs of its customers, ensuring continuous technological innovation, supporting them in the realisation of their projects and, in a broad sense, of their potential, and fostering their digital transformation, corporate security and operational efficiency.

This Code is intended to share and divulge the commitment and the constancy of the entire Company in operating with integrity, attention and concreteness which, together with a

passion for research and innovation, constitute the fundamental principles of our conduct in pursuing corporate objectives.

Respect, compliance with laws, transparency, confidentiality, wellbeing and dignity of the individual, valorisation of human resources, honesty and fairness, quality, environment preservation and sustainability are just some of the values that have always been part of the Company and its resources.

Legality and integrity

Operating in accordance with internal regulations, applicable standards, and applicable legal provisions is a strongly rooted principle in our organisation. No violation of this primary principle is justified.

Respect

Respect, understood first and foremost as absolute attention to the law, but also as full consideration of the individual and his ideas and needs, of protection and safety, of property and confidentiality, as well as of contractual commitments with customers, suppliers and all the stakeholders that come into play in the company's day-to-day business, is the main factor needed to create a sense of belonging and trust, to relate to others in the best possible way and to create a balance within the company. The creation of a working environment based on respect has a great direct impact on the services and goods provided by the company.

Transparency and honesty

The company is committed to acting and operating with absolute transparency. Transparency is the cornerstone of reliability and credibility towards all those involved internally and externally with the company. The communication used must be clear, accessible to all,

truthful and timely. The principle of transparency is inevitably linked to the principle of honesty, which makes it possible to establish relationships of trust with all stakeholders.

Sustainability

Sustainability does not only mean the Company's commitment to safeguarding and protecting the environment. Sustainability is not just about the daily choices that are made to reduce environmental impact or the use of renewable energy.

Social and economic sustainability also take on great importance for the company: social, for the way the company relates to the social fabric in which it operates, paying attention to the wellbeing and inclusion of people, equality, rights and safety of all workers, and economic, for the continuous investment in innovation, research, technology, with the creation of products and services that are useful and able to improve the working life of customers.

In this way, the company also works for future generations, through activities aimed at combining and favouring the improvement of environmental, economic and social needs, to make itself sustainable in the long term and to avoid jeopardising, with choices that aim at short-term results, the possibility for future generations to be able to satisfy their needs.

Rules and Code of behaviour

Relations with employees

Considering as employee and/or collaborator any person who has a working relationship with the Company aimed at achieving the corporate mission, EUROSISTEM2000 SRL undertakes to:

- not to use, not even indirectly, child labour or forms of forced or compulsory labour;
- guarantee the physical integrity of all employees/collaborators, ensuring a safe and healthy work environment in compliance with the regulations in force;

- ensure the moral integrity of all employees/collaborators and their right to working conditions that respect the dignity of the person, avoiding abuses and demands that are intended to induce people to act against the law and/or the Code, or to adopt behaviour that is detrimental to the moral and personal convictions of each person;
- ensure that each employee/collaborator is informed of all regulations in force within the company;
- protect the privacy of individuals by ensuring compliance with the regulations in force;
- not apply in the management of human resources, and starting from the personnel selection process, any discriminatory criteria based on ethnicity, nationality, gender, religion, age, sexual orientation, disability, skin colour, political orientation, social extraction or any other aspect protected by law. The company is actively committed to spreading inclusion and promoting individuality on the basis of skills, merit, work performance and professionalism.

On the other hand, each employee and/or collaborator of the Company is in turn committed to:

- comply with laws and regulations and operate in a transparent manner;
- base their work on efficiency;
- adapt their conduct to this Code;
- pursue the company's objectives and share its mission;
- employ and use the assets and tools made available to carry out one's work to the best of one's ability;
- use one's social networks in a responsible manner, avoiding actions that may harm the corporate image.

Relations with customers

The customer is the resource with a central role within the business, and the Company is committed to offering them satisfaction and attention, always referring to the basic principles that inspire it.

The company and all its employees promote relations with customers based on:

- transparency in contractual terms and commitments;
- satisfaction of needs and expectations;
- clarity and security in the use of products of services and good offered and employed;
- courtesy and respect from every resource of the company;
- consistency and attention in communications.

Relations with suppliers and partners

In its relations with suppliers of goods and/or services, the Company focuses on their transparency and fairness, committing itself to enter into business relations only with parties that carry out lawful and legal activities. Competition, objectivity, impartiality, fairness, price, quality of the good and/or service, after-sales service warranty and a careful and precise evaluation of the offer based on uniformity of treatment are the values and parameters that determine the selection of suppliers and the formulation of conditions for the purchase of goods and services.

Employees therefore undertake to carefully comply with current legislation and the principles established in this Code when selecting and managing relations with suppliers, in order to ensure that customer requirements and needs in terms of characteristics, cost and delivery times are met.

Under no circumstances will undue pressure from suppliers be allowed, such as to undermine the trust that the market places in the Company regarding transparency and rigour in the application of the law and company procedures.

In the event that the supplier engages in conduct that is not in line with the general principles of this Code, the supplier may also be precluded from further opportunities for future collaboration.

Conflict of interest

Employees and/or collaborators must refrain from carrying out activities that are out of the Company's interest, with particular reference to personal and/or family interests that could influence the independence of their judgement and conflict with their responsibilities, and avoid any situation that could be a conflict of interest or incompatibility of functions, assignments and positions outside as well as inside the Company.

Each employee is obliged to report to his or her hierarchical superior any situation that may fall within this context.

Conduct in IT matters

With regard to the use of company computer systems, resources working on behalf of the Company are obliged to:

- use the information and equipment available exclusively for work purposes;
- use company accounts to manage company, customer or supplier data and/or information, avoiding sending emails that may cause offence to the person and/or damage the Company image;
- avoid leaving unattended, or in any case accessible to persons outside the Company, the computer equipment and apparatus provided;
- comply with established procedures and standards.

They undertake in any case to use the IT tools made available to them in an appropriate, reasonable and respectful manner.

Application and recipients of the Code

In order to make its Code of Ethics effective and to make its observance an established practice within the company, EUROSYSYSTEM2000 SRL undertakes to facilitate and promote the awareness of the Code of Ethics by its addressees and to carefully observe its implementation. The Company's Code of Ethics and Conduct can be found on the Company website www.es2000.it.

The rules of this Code apply, without exception, to all members of the company, from the legal representative to collaborators, consultants and the entire company staff. Any third party who may act on behalf of the company becomes subject to compliance with the Code.

Compliance with the rules is an essential part of the contractual obligations of all addressees.

Clarifications and reporting of violations

For EUROSISTEM2000 SRL, unethical or unlawful behaviour by a person working on behalf of the Company would represent a breach of trust for the Company, resulting in serious damage to the organisation's reputation and credibility.

The Company guarantees the processing of personal and sensitive data of those involved in its daily work activities, in accordance with the provisions of the privacy regulations in force, protecting the confidentiality and privacy of the information it comes to know.

EUROSISTEM2000 SRL, to protect its image and safeguard its resources, will not entertain relations of any kind with persons who do not intend to operate in compliance with the regulations in force and/or who refuse to behave in accordance with the principles of this Code of Ethics and Professional Conduct.

For clarifications or reports of possible violations, the contact person is the immediate superior.

However, the immediate superior is not the only possible contact person. A further channel for reports is the email address codice.etico@es2000.it. The Company offers reporting persons the highest level of protection and confidentiality.

EUROSISTEM2000 SRL commits itself to taking all necessary measures towards those who violate the principles of this Code, which may be verbal or written reprimands, suspension or immediate termination of employment, or any other disciplinary measure deemed appropriate under the circumstances.

Decision orientation

If you are in doubt as to whether your behaviour or actions are consistent with the principles of the Code of Ethics, ask yourself the following questions:

- Is the behaviour I intend to engage in legal and lawful?
- By adopting this behaviour, am I sure I am operating within the bounds of internal regulations and legal standards?
- Would the company have made the same decision in similar situations?
- Would I accept my decision if I were the person concerned?
- Would I adopt such behaviour if I knew it would be released by the media and/or made public?
- Would I feel at ease giving explanations for my behaviour to my family and top management?

If all answers are positive, the actions and behaviour you are about to adopt are consistent and in conformity with this Code. If there are any doubts, you can always contact the appropriate person, as indicated in the relevant section.

The Company Management


