

CODE OF ETHICS and CONDUCT

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PREMISE

Steliau Technology Italy S.p.A. is a company of over 60 people specialized in the design, production and distribution of electronic components, professional electronic systems, products and special materials intended for manufacturing industries operating in the public, private, defense and space industrial sectors, in the national and international area.

Through a constant commitment to the improvement of materials and technologies, **Steliau Technology Italy S.p.A.** aims to exceed market expectations and dynamically respond to its challenges. The company constantly implements its know-how and solid technical expertise in specific industrial areas, innovating and developing cutting-edge solutions, orienting itself towards the quality of materials on the market, specialization, the growth of professional expertise and the optimization of work cycles and financial management, in order to offer a product of the highest added value necessary to acquire, consolidate and support customers. The passion for innovation has allowed **Steliau Technology Italy S.p.A.** to plan today what the future will be, what will make production more efficient, transforming what seems impossible into reality, contributing to the well-being of the community. Being competitive for **Steliau Technology Italy S.p.A.** means investing in research and development to improve existing products and continuing to develop customized solutions to meet the demands of an expanding market, enthusiastically expressing creativity and technical ability, to create products with the utmost respect for the environment and the ESG principles. The commitment to sustainability is highlighted by adherence to E.S.G. (Environmental, Social, Governance) principles, which guide the company in minimizing environmental impact and supporting local communities.

So why a code of ethics? Because **Steliau Technology Italy S.p.A.** strongly believes that the success of the company and the satisfaction of customers, employees and partners can only be achieved through conduct guided by loyalty, correctness and diligence, in line with ethical principles and compliance with current regulations. This code represents the effective element of the strategy and organization of the company, guided by ethics, reputation and credibility, crucial intangible resources for building solid relationships with all interested parties.

Art. 1 - GENERAL PRINCIPLES

Steliau Technology Italy S.p.A. operates, in all its activities, in compliance with European directives and national standards regarding respect for the environment and the protection of the health and individual protection of workers. The products offered are supplied by leading manufacturers, both



European and overseas, carefully selected and with certifications according to various Directives / Standards (e.g. UNI EN 9100, ISO/TS 16949, AER-Q-2110, AQAP 2110, UNI EN ISO 14001, OHSAS 18001:2007).

Steliau Technology Italy S.p.A. presents third-party certifications recognized at national and international level regarding quality and supply relationships (ISO 9001:2015 – AS/EN 9120:2018) and anti-corruption (T-Compliance – Ethixbase 360 (formerly TRACE) <https://www.tcompliance.com/due-diligence-risk-assessment>), while for Health and Safety it applies a system validated by an Accredited External Company.

The company is committed to ensuring that company performance meets legal requirements and company objectives regarding the integrated policy, with a view to continuous improvement, designing and adapting processes and operating methods.

This Code determines the obligations of loyalty, correctness and diligence that all people who have working relationships of any kind with **Steliau Technology Italy S.p.A.** must comply with, and must inspire the conduct and behavior of all those who work and/or come into contact with the company, both inside and outside the corporate organisation. The Code, approved by the Management, is binding for all those who work for and with **Steliau Technology Italy S.p.A.**, both in Italy and abroad, and can only be modified by the Management, which undertakes to promptly communicate any changes. The responsibility for implementing and updating the Code of Ethics is the responsibility of the Management; the recipients have the task of reporting any non-compliance or failure in applying it, also through the dedicated anonymous reporting channel. The advice and suggestions of employees and third parties aimed to improve what is indicated in the Code will be fully evaluated.

Art. 2 - ETHICAL VALUES AND LEGALITY

Steliau Technology Italy S.p.A. guides its activities based on principles of correctness, transparency, legality and clarity. All company operations must be conducted with scrupulous honesty, loyalty and professional commitment, in compliance with the laws, company procedures and this Code of Ethics. In particular, management and function managers must exhibit exemplary behaviour, promote compliance with the rules of the Code and ensure that compliance with these rules is perceived as an integral part of the contractual relationship with the company.

Steliau Technology Italy S.p.A. adopts, in accordance with the provisions of Legislative Decree 24/2023, the internal reporting channel of offenses called "Parrot Whistleblowing WB", a communication channel that guarantees the confidentiality of the identity of the whistleblower in the reporting management activity and, in particular, the "Parrot" software provided by the privacy



consultancy company and accessible through the company website via a specific link (<https://steliau.parrotwb.app/>).

Art. 3 - ESG - ENVIRONMENTAL, SOCIAL, GOVERNANCE website <https://esg.steliau.it/en/>

Stelium Technology Italy S.p.A. recognizes the key role of companies in supporting global sustainable development. The objective is to pursue ESG objectives through its services, minimizing the negative impacts linked to its operations and enhancing the positive ones, contributing to the achievement of the *Sustainable Development Goals* (Agenda 2030). The society:

- ✓ prepares its customers for the future, intercepting trends relating to society, climate change, technology and the sustainable use of resources, inserting these elements into its projects.
- ✓ actively manages and implements the same ESG performances, disclosing the results obtained every year through globally recognized frameworks (Synesgy questionnaire and Sustainability Report), in order to ensure maximum transparency to stakeholders and the entire company. In 2022 it voluntarily drew up its first sustainability report.
- ✓ creates the ideal working environment for staff every day so that it can be a valid stimulus to express their full individual potential.

Art. 4 - EXCELLENCE AND QUALITY

Stelium Technology Italy S.p.A. aims to satisfy the needs of clients while maintaining high levels of quality, performance and reliability; innovation and excellence are rooted in the company culture to operate in a sustainable and resilient way.

For this reason the company is certified UNI EN ISO 9001:2015 and AS/EN 9120:2018.

Clients' needs must be identified and satisfied by making the most of company resources and synergies through continuous constructive dialogue.

If daily activities were not planned and carried out precisely to meet the client's requirements, there would be a risk of having to repeat them. This, in addition to not satisfying the clients, could cause delays in programming and negatively affect the profitability of the works carried out by **Stelium Technology Italy S.p.A.**

In order to avoid problems in terms of quality, all the people of **Stelium Technology Italy S.p.A.** must commit to operate with standards of excellence from the outset and ensure that the work performed meets or exceeds expectations. Likewise, **Stelium Technology Italy S.p.A.** continuously seeks to improve its processes and procedures, learn from mistakes and hold each other accountable for the quality of the work performed. This protects the reputation of **Stelium Technology Italy S.p.A.** and helps ensure the success of the company.



Art. 5 - HEALTH PROTECTION AND SAFETY OF WORKING PLACES AND CONDITIONS

Steliau Technology Italy S.p.A., in compliance with the provisions in force, including, in particular, Legislative Decree no. 81 of 2008 and subsequent amendments, and any other regulatory provision on the matter, undertakes to protect the health of workers, preparing all necessary and appropriate measures, in accordance with the best technical-scientific knowledge, with the view of guaranteeing the absolute conformity of workplaces to the highest standards regarding safety and hygiene. The company relies on an accredited partner to comply with the regulatory obligations established pursuant to Legislative Decree 81/2008, legislation on safety at work, and specifically:

- ✓ workplace safety consultancy service with RSPP appointment;
- ✓ occupational medicine service with appointment of Competent Doctor for the Milan office only;
- ✓ mandatory training service on safety for workers.

Furthermore, it spreads and consolidates a culture of safety, to protect the health of workers in the workplace, developing awareness of risks and promoting responsible behavior on the part of all employees and/or collaborators.

Steliau Technology Italy S.p.A. pursues the highest levels of health, safety, and hygiene for its workers and guarantees the prevention and protection measures necessary to avoid or minimize professional risks. For this reason, the company applies an internal policy (H&S Policy) and has an agreement with an Accredited External Company for the verification of health, safety, and hygiene conditions and health surveillance; all the People of **Steliau Technology Italy S.p.A.** are required to evaluate and manage risks in advance, and to intervene effectively in order to avoid unsafe situations and behaviors, contributing to maintaining their working environment healthy and safe, while ensuring the safety of colleagues and collaborators.

Steliau Technology Italy S.p.A. undertakes to make available the human, instrumental and economic resources necessary to pursue the objectives of improving the safety and health of workers, as an integral part of its activity and as a strategic commitment with respect to the more general objectives of the company. The company is committed to spreading a culture of safety within the workplace, involving its people in information and training activities and requesting them to suspend activities when necessary, and to report unsafe acts or behaviors. Furthermore, it undertakes to preventively evaluate all company factors that may have an impact on the health and safety of workers, and which can be avoided through continuous preventive monitoring implemented through careful planning of maintenance activities, thus reducing risks at the source.

Each supervisor, employee, or collaborator must operate in full compliance with current legislation on safety and health at work and environmental protection. The People of **Steliau Technology Italy**



S.p.A. must not under any circumstances work under the influence of alcohol, drugs, or medications that may interfere with the ability to carry out activities safely. It is strictly forbidden to bring weapons, real or fake, into the workplace.

Art. 6 - ENVIRONMENTAL PROTECTION

Steliau Technology Italy S.p.A. has a responsibility to use the planet's resources wisely and ensure the Earth sustains future generations. The company recognizes this responsibility by respecting all environmental laws, rules, and regulations and following best practices to mitigate the environmental impacts of the company's projects and activities.

For this reason, the company has signed a renewable and eco-sustainable energy contract "100% Renewable Energy" and only uses energy produced from renewable sources such as water, sun, wind, and heat from the Earth, certified by the manager's "guarantee of origin" system energy services, based on EC directive 2009/28/EC. The company also reports environmental issues in the annual questionnaire and is committed to safeguarding the environment during all its activities: to this end, it operates through processes, technologies, and materials capable of reducing the consumption of energy and natural resources, avoiding or thus limiting the impacts deriving from company activities (pollution, greenhouse gases, waste production and inconvenience for local communities), preventing pollution, reducing discharges, waste and the consumption of resources to respect a sustainable environment.

With climate change a global threat, working diligently to protect and improve the environment has never been more important. **Steliau Technology Italy S.p.A.** is proud to support the construction of a sustainable future for all and to contribute to the fight against climate change and all its People must evaluate and manage environmental aspects in advance, promoting a green and circular economy, intervening effectively to avoid situations of danger to the environment.

Steliau Technology Italy S.p.A. is committed to spreading a sustainable environmental culture within the workplace, involving all staff through information and training activities.

Art. 7 - CORPORATE SOCIAL RESPONSIBILITY AND REGULATORY COMPLIANCE

Regarding the area of corporate social responsibility and regulatory compliance in relation to the supply of minerals from conflict areas, **Steliau Technology Italy S.p.A.** is aware and transparent about the possible presence of "conflict minerals" in its supply chain, as required by *Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and California Senate Bill 861*; although it holds the role of authorized distributor and/or reseller, it is not able to declare the content



of the materials of products manufactured by another company or to certify such products according to the GeSi module of the *Electronic Industry Citizenship Coalition or Conflict Free Sourcing Conflict Mineral Reporting Template (CMRT)*. Likewise, the company is available to supply, on specific codes provided, the original declarations on Conflict Minerals, Directive (EU) No. 1907/2006 (REACH), Delegated Directive 2015/863/EU (RoHS) or other Regulations upon customer request, issued by the manufacturers.

Art. 8 - CONDUCT CRITERIA

The company has drawn up an internal company regulation which regulates the principles and values that all the people of **Stelium Technology Italy S.p.A.** must adopt in relation to internal relationships and all commercial transactions, at a local and international level. It also drawn up the "Regulations on the correct use of company tools" shared with all the people in the company.

Relations with external interlocutors – Employees who have business relationships with third parties must conduct the relationship in a fair and correct manner. These principles are valid for customers, suppliers, consultants, and individuals who carry out any activity directly or on behalf of the company.

Relationships with suppliers – Suppliers are selected according to principles of correctness and impartiality. The selection of suppliers and the formulation of the conditions of purchase of goods and services are carried out on the basis of criteria established on cost-effectiveness, quality, and transparency, technical-professional suitability, compliance with applicable rules on human rights and workplace, including equal opportunities, health, safety, as well as compliance with environmental criteria. In the event that the supplier, in carrying out its business, adopts behaviors that are not in line with the general principles of this code, the company is entitled to take adequate measures until the collaboration relationship ends. When choosing suppliers, pressures such as to favor one supplier over another are not permitted. It is not permitted to give or receive in any form, direct or indirect, of offers of money or gifts for the purpose of obtaining personal benefits of any nature.

Relationships with Customers – In line with the general conditions of sale published on the company website (<https://www.stelium.it/it/conditioni-di-vendita>) and with the related confidentiality agreements, the company pursues the objective to fully satisfy customer expectations and believes it is essential that its customers are always treated correctly and honestly. It undertakes to



guarantee its customers a service that meets the same quality standard and to periodically monitor the perceived quality.

Stelium Technology Italy S.p.A. believes that free competition contributes to the improvement of commercial capabilities and therefore excludes cartels or agreements aimed at preventing customers from optimizing costs.

All business relationships undertaken must be managed in a transparent and standardized manner in accordance with company procedures and maintain the conditions promised in the offer phase and/or in confirmed orders over time. Sales must not be made below cost or at a negligible margin which could compromise the financial solidity of the company, nor have attitudes or make proposals which could be assimilated to attempted corruption towards third parties. For this reason, the company has chosen to follow a path that has led *TCompliance ETHIXBASE 360 (formerly TRACE International)*, an American non-profit company, to certify that the company has met the audit standards for transparency in national and international commercial transactions (<https://www.tcompliance.com/due-diligence-risk-assessment>).

Relations with Institutions - In relations with local, national, international public institutions, with the Public Administration and with state, regional, provincial and municipal public bodies, each person in charge, employee or collaborator is required to comply with the regulations in force and undertakes to operate on the basis of maximum loyalty and correctness; Behaviors that lead to false or ambiguous interpretations are not tolerated.

Stelium Technology Italy S.p.A. undertakes to provide only truthful information about itself, its legal representatives or delegates, and anything else useful to better define its work. Furthermore, it undertakes not to request confidential information that could compromise the integrity, morality and reputation of its interlocutors.

External relations - The company recognizes the primary role of clear and effective communication in external relations. Employees responsible for disclosing company information externally, in the form of speeches, participation in conferences, publications or any other form of presentation, must comply with company provisions and receive prior authorization from company management or a delegated person.

Relations with mass media - External communication is based on respect for the right to information. Communications must be truthful, clear, transparent, unambiguous or instrumental, compliant with company policies and programs. Relations with the mass media are reserved exclusively for top management and/or the competent corporate function. Employees must refrain



from issuing formal or informal communications to the outside world in any capacity and take care to communicate any questions posed by the media to authorized persons and/or the competent function.

Gifts and donations – Employees cannot, directly or indirectly, offer or receive gifts, offerings, money, payments, or freebies of any kind. Any form of gift that goes beyond normal commercial practices or in any case aimed at acquiring preferential treatment in the conduct of any activity connected or connectable to the company, is not permitted. In particular, any form of gift to public officials, auditors, councilors, mayors, or their family members, which could influence their independent judgment, is prohibited.

Employee relations – **Steliau Technology Italy S.p.A.** undertakes to guarantee the utmost respect for the human person, giving all collaborators the right personal and professional consideration, the correct remuneration, within the established terms, the correct payment of tax burdens, as well as confidentiality in the event of reports of violations of the law or of situations in conflict with this code. The company undertakes not to use child labor under any circumstances.

Steliau Technology Italy S.p.A. is an employer attentive to equal opportunities and is committed to supporting an inclusive culture of collaboration where people can express their visions freely in the context of corporate values, to attract the best talent, and to incentivize and develop important people regardless of their characteristics, opinions, tastes or tendencies. It recognizes the benefits of a diverse workforce in understanding the needs of an equally diverse customer base and believes that supporting diversity opens doors to creativity and innovation. In light of an evolving European and national regulatory context, increasingly oriented towards transparent reporting of company operations, especially with reference to the impact of its activities also on the social dimension, **Steliau Technology Italy S.p.A.** felt the duty to take on a priority role in social action, signing the UN Global Compact Manifesto and committing to reducing social and gender inequalities, promoting positive practices of decent work and the protection of human rights. In particular, the company works against slavery and has drawn up an internal policy shared with the entire supply chain, in which a zero-tolerance approach is adopted towards modern slavery and maximum commitment to preventing episodes of human trafficking in its own operations and those of the supply chain. It is therefore committed to demonstrating compliance with EDI principles in a number of areas:

- ✓ **Equal opportunities** – **Steliau Technology Italy S.p.A.** is committed to being a fair, transparent and inclusive employer that bases its decisions regarding hiring and employment solely on merit and at the same time introduces reasonable adjustments in order to ensure that all individuals are able to carry out their duties and access to the same professional opportunities.



- ✓ **Inclusive workforce and supply chain** – Where possible, **Steliau Technology Italy S.p.A.** will encourage local employment and the use of local suppliers to ensure that your workforce and supply chain are a reflection of the community in which you operate. **Steliau Technology Italy S.p.A.** is committed to being a society where people, ideas, and beliefs from all backgrounds are treated, valued, and considered based on their individual merits and contributions. Furthermore, it recognizes and promotes the diversity of its People as an essential element for company growth. The scope of diversity and inclusion embraces not only ethnic and gender differences, but also the multiplicity of religious confessions and beliefs, political opinions, abilities, educational levels, socio-economic and cultural backgrounds, and much more. As an equal opportunity employer, **Steliau Technology Italy S.p.A.** does not tolerate discrimination based on these reasons or on any other aspect protected by the legislation in force.
- ✓ **Staff selection** – The company evaluates the staff to be hired on the basis of the correspondence between the characteristics of the candidates and the profiles necessary for the company's needs, in full compliance with equal opportunities. Adopt adequate measures to avoid favoritism, nepotism, or forms of cronyism.
- ✓ **Establishment of the employment relationship** – The company hires staff with a regular employment contract in the Commerce - Tertiary sector CCNL category. No form of irregular work is permitted. Upon establishing the employment relationship, each collaborator receives accurate information on: characteristics of the function and tasks to be performed, regulatory and remuneration elements based on current legislation, rules and procedures regarding safety in the workplace, processing of personal data, and tools in equipment.
- ✓ **Personnel management** – The company rejects any form of discrimination against its collaborators. Access to roles and assignments is established based on skills and aptitudes. Compatibly with the efficiency of the company, those forms of flexibility in the organization of work which facilitate the management of maternity and childcare, in general, are favoured.

Competition – **Steliau Technology Italy S.p.A.** accepts the principle that free competition contributes to the improvement of commercial capabilities. It also avoids establishing cartels or agreements aimed at preventing its customers from optimizing costs. As part of commercial loyalty, the company undertakes not to knowingly violate the intellectual property rights of third parties.



Accounting management - All managers, employees, or collaborators involved in accounting management operations must comply with the dispositions of current legislation, guaranteeing the truthfulness of the accounting records and operations and informing their superiors of any anomalies found.

The accounting archives must be adequately managed, ensuring the easy traceability of all phases and the relevant managers for each operational process.

All operations and transactions must be correctly recorded, authorized, verifiable, legitimate and appropriate.

Recycling - Each manager, employee, or collaborator of **Stelium Technology Italy S.p.A.** must not accept any form of implication that may constitute money laundering arising from any form of illicit activity.

Art. 9 - RESPONSIBILITY AND CONDUCT IN THE WORKPLACE

Stelium Technology Italy S.p.A. has as an essential principle compliance with the laws and regulations in force in Italy and in all the countries in which it operates. The recipients of the Code are required to comply with current legislation and in no case is it permitted to pursue or achieve the interests of **Stelium Technology Italy S.p.A.** in violation of the laws. **Stelium Technology Italy S.p.A.** undertakes to ensure that interested parties are provided with an adequate information and continuous training program on the Code of Conduct. Each person in charge is required to operate with loyalty, diligence, and correctness, assuming responsibility for their actions in accordance with what is indicated by current legislation.

The company takes action to ensure a healthy and safe working environment and promotes an internal climate in which employees interact with full mutual respect, abstaining from behavior that is not in line with what is declared by the Code and committing to reporting any violation as promptly as possible.

The managers of the various areas are given the task of making people understand the importance of respecting what is indicated in the Code and of verifying exact observance of the same, with a guarantee of no retaliation to the detriment of employees who report violations. The managers of the various areas must also propose to the Management any disciplinary measures commensurate with all violations of the code that may be found. Each person in the company is responsible for the material and equipment made available by **Stelium Technology Italy S.p.A.** for their correct use and maintenance of efficiency. Each employee is required to carry out their duties responsibly, honestly, diligently, and in accordance with company policies and procedures and is personally responsible



for behaviors that, in contrast with the Code, may give rise to any inconvenience that causes damage to the company or third parties, immediately generating all possible legal and employment contract actions aimed at compensation and protection of what has been generated.

Steliau Technology Italy S.p.A. does not accept any form of harassment or unwanted behavior, whether on a sexual basis, social, racial, political, or religious discrimination, or which in any case damages the dignity of the person, both inside and outside the workplace.

Each supervisor, employee, or collaborator must exempt himself from:

- ✓ Serving under the influence of alcohol or narcotic substances
- ✓ Swearing or expressing oneself in a scurrilous and/or vulgar manner
- ✓ Having behaviors that may have an intimidating effect on colleagues
- ✓ Having offensive attitudes towards colleagues
- ✓ Having attitudes aimed at discrediting the work or professionalism of colleagues
- ✓ Having behaviors that may cause damage to the health and safety of others

Steliau Technology Italy S.p.A. has formalised, in accordance with the provisions of Legislative Decree 24/2023, the Whistleblowing procedure, establishing a clear policy and providing its employees with adequate training on reporting methods and protecting the confidentiality of whistleblowers. Monitoring and updating the procedure are among the commitments of **Steliau Technology Italy S.p.A.**, in order to reassure its employees and encourage them to report unethical or illegal behavior without fear of repercussions.

In fact, **Steliau Technology Italy S.p.A.** adopts "**Parrot Whistleblowing WB**", a communication channel for reporting offenses that guarantees the confidentiality of the identity of the whistleblower in the reporting management activity (<https://steliau.parrotwb.app/>).

Art. 10 - CONFLICT OF INTEREST

The company bases relationships with its employees on mutual trust and loyalty. Employees must pursue, in carrying out their work, the company's objectives and interests, avoiding in any way placing themselves in situations that conflict with the company's interests.

Each person in charge, employee, or collaborator must refrain from activities that may cause damage to the image, financial solidity, or moral and legal integrity of **Steliau Technology Italy S.p.A.**.

Each supervisor, employee, or collaborator must avoid all those activities that are in conflict of interest with the company, with particular reference to personal or family interests that could



influence the independence in carrying out their activities with risks on the achievement of the best company interest. It is therefore mandatory for each manager, employee, or collaborator to report situations of conflict of interest.

Art. 11 - CONFIDENTIALITY

Stelium Technology Italy S.p.A. guarantees the maintenance of confidentiality of information regarding the company, directors, employees, and collaborators and is available to stipulate the Confidentiality Agreement (<https://www.steliau.it/it/download/131>) with customers and suppliers. In carrying out their activities, the recipients observe the utmost care and diligence in relation to personal data (1) and company information, with the aim of ensuring their confidentiality, avoiding any use that is not consistent with the relationship with the Company, as well as the dissemination, loss, destruction or unauthorized modification, and in any case the use with modalities by subjects and for objectives other than those for which they were acquired and are available to the Company. The following are considered, by way of example, confidential information: business plans, strategic economic/financial/accounting plans, commercial contracts and estimates, corporate agreements; investment projects and plans; data relating to staff, customers, suppliers, users, and, in general, all personal data. Recipients who, for official reasons, become aware of confidential information must not communicate it to third parties except for official or professional reasons and in any case only with the prior authorization of their manager. In communications with third parties, the confidential nature of the information transmitted and the obligation to confidentiality also on the part of the third party must be declared. The internal circulation or circulation of documents containing confidential information must be organized carefully and scrupulously to avoid prejudice towards **Stelium Technology Italy S.p.A.** The Confidentiality clauses remain valid even after the termination of the employment or collaboration relationship in order to avoid prejudice towards **Stelium Technology Italy S.p.A.**

(1) "Personal data": any information relating to an identified or identifiable natural person (art. 4, EU Regulation 2016/679 GDPR)

Art. 12 - SECRECY OF PERSONAL DATA AND INFORMATION

Stelium Technology Italy S.p.A. undertakes not to knowingly violate the rights and intellectual property of third parties. Therefore, each person in charge, employee, or collaborator is required to



maintain maximum secrecy regarding technical, technological, and contractual information, customer or supplier lists, procedures, or anything else that constitutes the intrinsic assets of **Stelium Technology Italy S.p.A.** and could, if disclosed, constitute financial and image damage to the same. For this reason, **Stelium Technology Italy S.p.A.** makes use of consultancy on Privacy and GDPR from an accredited external partner, who certifies the company's internal regulations. In compliance with Privacy Regulation 679/2018 (GDPR) and within the Confidentiality Agreements drawn up with customers, all information processed by recipients during the course of the employment and collaboration relationship is property of **Stelium Technology Italy S.p.A.** and cannot be disseminated except in cases where personnel are expressly authorized to do so in accordance with current legislation. The use of data for purposes other than those for which they were communicated is absolutely prohibited, except in the case of express authorization and in any case always in the most rigorous observance of current legislation on privacy and internal company rules. The protection of information and data contained or archived in IT media must be ensured by security measures suitable for the purpose. Each supervisor, employee or collaborator must process personal, sensitive data and confidential information, in compliance with all laws in terms of secrecy and privacy, avoiding any improper use. Employees who, in the normal performance of their company activities, become aware of confidential information relating to the Company cannot use it for personal, private, economic purposes. Such uses, in addition to constituting a moral and ethical issue, are legally prosecutable. The transfer of sensitive data and/or confidential information to third parties (e.g. customers, suppliers, public and private bodies, etc.) must always be authorized in advance by the administration or any of its representatives.

Art. 13 – IT MANAGEMENT AND COMPUTER SECURITY

IT software and services play a fundamental role in supporting the operations of **Stelium Technology Italy S.p.A.** which uses an accredited external partner for the correct management of IT security. The speed with which cybersecurity threats emerge requires fast and agile responses and **Stelium Technology Italy S.p.A.** has equipped itself with adequate prevention tools.

In fact, due to the growth of cyber-crime, company data and resources are increasingly at risk, therefore, it is essential that every Person of **Stelium Technology Italy S.p.A.** follow the appropriate IT security procedures, paying attention to phishing attacks and other scams that allow you to gain illicit access to IT systems or steal company or personal data. For these reasons **Stelium Technology Italy S.p.A.** has decided to protect its infrastructure from security risks through the adoption of IT



Cyber Security Operation Services focused on the *Security Monitoring* of the IT infrastructure, to internally incorporate the most recent best practices in corporate cybersecurity procedures.

Furthermore, the company has drawn up an internal regulation on the correct use of company "tools" taking into account the applicable legislation on the protection of personal data (GDPR) and the security protection needs, to ensure that the use of technology does not subject confidential information and personal data at undue risk of unauthorized disclosure. IT services cover fundamental functions for different operations, such as activity planning, design, document management, bookkeeping, and employee administration and organization. It is very important to follow the guidelines regarding the use of these tools and their correct use and, in the event of security incidents, the company will adopt the Data Breach procedure as per EU Regulation 2016/679 (GDPR).

Art. 14 - VIOLATIONS

In the event of confirmed violations of the provisions of the Code of Ethics, adequate sanctioning measures will be adopted in line as expected by the national collective labor agreements. Each employee must report any information relating to violations of the Code to their direct superior. If for a justified reason or opportunity, a direct reference to one's hierarchical superior is deemed inadvisable, it will be the employee's responsibility to communicate directly with the Administrator. All requests will be responded to promptly without there being any risk for the employee of suffering any form, even indirect, of retaliation. Anyone who reports alleged violations of the Code of Ethics not in good faith will be sanctioned pursuant to the same.

Compliance with this code of ethics must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of art. 2104 of the Civil Code. Violation of the code may constitute a failure to fulfill the primary obligations of the employment relationship or a disciplinary offense, in compliance with the CCNL, with all legal consequences (including with regard to the preservation of the employment relationship), and may result in compensation for damages suffered by the company.

Compliance with this code must be considered an integral part of the contractual obligations assumed by collaborators and/or persons having business relations with the company. Violation of the code may constitute a failure to fulfill contractual obligations, with all legal consequences (including with regard to the immediate termination of the contract and/or assignment), and may result in compensation for damages suffered by the company.



Art. 15 - ENTRY INTO FORCE

This Code of Ethics comes into force upon its approval by the Management and any subsequent changes or additions must be approved by the same.

The current Code is available in PDF format on the company website <https://www.steliau.it/it/governance>

Milan, June 26, 2024

