



Code of Ethics



Adopted with resolution of the Board of Directors of 23 October 2017

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 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 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

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

HEALTH AND SAFETY

social responsibility

customers

TRAINING

ecology and environment

WELFARE

SUPPLIERS

confidentiality

privacy

AWARENESS

1. PURPOSES AND EXTENSION OF THE CODE OF ETHICS

2. PRINCIPLES OF CONDUCT WITH RESPECT TO STAKEHOLDERS:

- 2.1 PERSONNEL
 - A) PERSONNEL POLICIES
 - B) PRIVACY POLICY
 - C) HEALTH AND 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 DECISION-MAKING PROCESS
- 3.2 CORPORATE DISCLOSURES
- 3.3 ACCOUNTING TRANSPARENCY
- 3.4 PROTECTION OF CONFIDENTIALITY OF INFORMATION
- 3.5 CONFLICT OF INTEREST
- 3.6 USE OF CORPORATE ASSETS

4. INFRINGEMENTS OF THE CODE OF ETHICS

1. Purpose and extension of the Code of Ethics

The Elettronica Code of Ethics 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

2. Principles of conduct with respect to stakeholders

2.1. PERSONNEL

a) Personnel Policies

Elettronica 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 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 political, trade union, religious, racial, language, gender and sexual orientation discrimination and do not admit any form of prejudice or intimidation.

b) Privacy Policy

Elettronica 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 and 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, 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.

2.2. COLLECTIVITY

a) Social Responsibility

Elettronica 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 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.

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, 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 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 and is therefore constantly monitored through structured customer satisfaction procedures.

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 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 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.

2.6 MASS MEDIA

Elettronica 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 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 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.

3. Internal principles of conduct

3.1. 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 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.

3.2 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.

3.3 ACCOUNTING TRANSPARENCY

Elettronica 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.

3.4 PROTECTION OF CONFIDENTIALITY 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 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. Instead, external documents retain the degree of confidentiality attributed to them by the third party they come from.

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.

3.5 CONFLICT OF INTEREST

All Recipients are required to carry out their work activities in pursuit of the general interest of Elettronica 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 interest.

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.

3.6 USE OF CORPORATE ASSETS

Elettronica 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 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.

4. *Infringements of the Code of Ethics*

Non-compliance with or violation of the principles contained in the Elettronica Code of Ethics compromises, at all levels, the trust relationship with the Company and 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 must be addressed to the Human Resources Function and to the Legal Function, which are jointly responsible for receiving them and carrying out a preliminary analysis of the matter. These reports must be made by anyone who is aware of the fact.

The ascertainment of these infringements, the management of disciplinary proceedings and the application of sanctions remain the responsibility of the Human Resources Function, which is responsible and delegated, 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.



