


	Code of Ethics	ASA-CE-01	
		rev. B	28/02/2022

Code of Ethics

Principles, values and application specifications of Legislative Decree 231/01 ("Administrative liability of legal persons")

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REVISIONS

Revision	Date	Description of the change
A	01/07/2018	First issue
B	28/02/2022	<p>Page 8, modification of the title of the “Confidentiality and processing of information and personal data” section.</p> <p>Introduction of the “General code of conduct on the use of data” following the reform of the discipline pursuant to EU Reg. 679/16 “GDPR”.</p> <p>Page 13, added reference to the “General code of conduct on the use of data”.</p> <p>Page 16, removed the reference to the Supervisory Board with respect to supervisory activities on transactions of significant amounts.</p> <p>Page 20, details of the advisory functions of the Supervisory Board in relation to amending or updating the Code of Ethics.</p> <p>Page 20, addition of e-mail address for reporting violations of the Model.</p> <p>Page 21, added possibility of reporting infringements anonymously (“Whistleblowing” rules under Law 179/2017).</p>

Note: revisions made are highlighted with a sidebar to the left.

This manual is available and can be consulted in the company portal at the following link: **company/documents/regulations/model 231/01**, archived at the following link **/Aerosekur/Quality/Sgq/Aero Sekur NewCO - from 22 May 2017/1 Liv Manuals/ASA-CE-01 Code of Ethics** and has been disseminated by internal e-mail by the Quality Department.

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1 INTRODUCTION

This document (“Code of Ethics”) defines and describes the fundamental values and principles of conduct adopted by Aero Sekur in the development of its activities.

It also contains the set of Aero Sekur’s rights, duties, and responsibilities towards internal and external stakeholders (employees, Suppliers, customers, Public Administration, shareholders, financial market, etc.), to complete and support what is already expressed in the “Integrated Management System Policy”.

It derives from the Company’s commitment to operate in full compliance with the applicable laws and regulations and its willingness to expressly adhere to the provisions of Legislative Decree 231/01 “Administrative liability of legal persons” and subsequent amendments.

Therefore, the Code of Ethics confirms and extends Aero Sekur’s commitment to always pursue responsible, proactive conduct that can foster, on a long-term basis, value and competitive advantages for all stakeholders.

It is formulated in accordance with the fundamental principles expressed by the Confindustria Guidelines and is detailed and implemented in the procedures (or “protocols”) adopted by the Company and/or in the specific corporate Policies.

This document has been formally adopted by the Company.

1.1 AERO SEKUR’S VALUES AND ETHICAL VISION

Aero Sekur’s philosophy is to operate at the highest technological level and, at the same time, to ensure sustainable business development in economic, social and environmental terms.

For this purpose, the Company:

- operates in full compliance with applicable laws and regulations, as a fundamental condition for the company’s actions and the preservation of its reputation;
- seeks the full satisfaction and well-being of its employees and collaborators, promoting conduct based on the dignity, protection and respect for the rights of each individual and encouraging the full expression of their potential and professional growth;
- promotes continuous research and understanding of customers’ present and future needs and compliance with their requirements in order to aim to exceed their expectations;
- ensures the creation of stable value over time for shareholders and the financial community, while guaranteeing the Company’s economic and financial stability;
- promotes a fair distribution of benefits with business partners and encourages the development of issues relating to the quality of products and services provided to customers, respect for people and protection of the environment;
- promotes the establishment of stable and long-term cooperation relationships with suppliers, acting with transparency, integrity, impartiality and contractual fairness,

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- encouraging suppliers to adopt socially responsible conduct and working conditions aimed at ensuring health and safety and respect for the environment;
- promotes a participatory dialogue with the local communities in which the Company operates and develops projects of common interest or information campaigns on issues aimed at improving the quality of life and safeguarding the surrounding natural heritage;
- promotes innovative projects to engage stakeholders in a clear focus on sustainability, protection and preservation of the environment.

For the effective and consistent implementation of its values, the Company expressly requires its Suppliers, collaborators and Partners to behave in line with those defined in this Code.

1.2 RECIPIENTS

The Code of Ethics is binding, without exception, on all company representatives (directors, auditors and employees) as well as on all external collaborators.

Suppliers, business partners and all those who, directly or indirectly, have business relations with Aero Sekur, are also required to adhere to the principles defined in this Code.

Compliance with the Code of Ethics is an essential part of the contractual obligations of the Company's Collaborators, pursuant to and for the purposes of Article 2104 of the Civil Code and of the National Collective Labour Agreement in force.

Violation of the principles contained in the Code of Ethics may also lead to the application of the sanctions contained in the corporate disciplinary system adopted pursuant to Legislative Decree 231/01.

Compliance with the Code of Ethics is a prerequisite for the continuation of the professional or collaborative relationship with the Company for Recipients who are not Collaborators.

Violations by third parties will be sanctioned in accordance with the criteria set out in any specific contractual clauses.

1.3 RELATIONSHIP WITH OTHER SYSTEMS

This document ("Code of Ethics") is structured to summarise and integrate provisions and principles defined by the Company and/or found in other management systems developed and applied within Aero Sekur.

Detailed procedures and instructions ("protocols"; see Article 6 of Legislative Decree 231) are developed in the form of procedures of the Integrated System, with appropriate ratification.

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2 PRINCIPLES, CRITERIA AND CONDUCT IN MANAGING THE BUSINESS

2.1 HONESTY, MORAL INTEGRITY, FAIRNESS, TRANSPARENCY AND OBJECTIVITY

In the performance of their activities and in their relationships of any kind, all those who work with and for Aero Sekur must scrupulously respect the laws and regulations in force, this Code of Ethics, the internal regulations and the system procedures adopted.

They must behave in accordance with the fundamental principles of honesty, moral integrity, correctness, transparency, objectivity and respect for the individual in the pursuit of the company's objectives in all relations with persons and bodies inside and outside the Company.

Under no circumstances may the pursuit of the Company's interest justify any action that does not comply with a proper line of conduct and conforms to the laws in force.

Therefore, Aero Sekur will not enter into or continue any relations with anyone who engages in conduct contrary to the provisions of this specific point of the Code of Ethics.

2.2 NON-DISCRIMINATION

The Company expressly prohibits and rejects any form of discrimination and in particular any discrimination based on race, nationality, sex, age, disability, state of health, sexual orientation, political or trade union opinions, philosophical views or religious beliefs towards any person inside or outside the Company.

2.3 THE VALUE OF HUMAN RESOURCES

Aero Sekur protects and promotes the value and development of human resources, as a fundamental factor of the Company's success, and prohibits any act that may be considered harmful to the employee's dignity and autonomy.

To ensure full respect for the individual, the Company requires all its resources to comply with legal obligations in terms of labour protection, health and safety conditions, trade union rights or, in any case, rights of association and representation required by the legislation of the country in which they operate.

2.4 CORRECTNESS AND TRANSPARENCY OF CORPORATE INFORMATION

The Company ensures that all business operations and activities take place in conditions of maximum fairness and transparency.

All operations and transactions must be properly executed, recorded, authorised, ascertainable, legitimate, consistent and appropriate. This means that each action and operation must be properly recorded in the accounting system, according to the criteria indicated by law and the applicable accounting principles. In order for the accounts to meet the requirements of truthfulness, completeness and transparency of the data recorded, each transaction must be supported by appropriate documentation, so that checks can be carried out at any time to certify the nature and reasons and identify who authorised, performed, recorded and checked the transaction.

2.5 INTERNAL CONTROL SYSTEM

The Company recognises the importance of an efficient and effective internal control system as a prerequisite and essential condition for carrying out its business activities in a way that is compliant and consistent with the principles of this Code of Ethics.

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To this end, Aero Sekur ensures the creation of effective organisational structures (such as, for example, management systems), so that the awareness of the importance of internal controls and compliance with corporate policies and procedures, as well as their impact on the Company's overall results, is promoted and disseminated at all corporate levels.

An adequate and complete determination and assignment of tasks and responsibilities to those acting on behalf of the Company, with the consequent adoption of a consistent allocation of operating powers, is a prerequisite for the creation of an effective internal control system.

2.6 EXTERNAL COMMUNICATION

Aero Sekur's communications, including those related to its products, must be based on respect for the right to information; under no circumstances may false or biased information or comments be disseminated.

All communication activities must comply with the laws, rules and practices of professional conduct and be carried out in a clear, transparent and timely manner.

2.7 TRANSPARENCY AND COMPLETENESS OF INFORMATION

The recipients of this Code and all Aero Sekur collaborators are required to prepare and provide complete, transparent, truthful and comprehensible information at all times, in order to allow the stakeholders (Customer, Supplier) to make independent and informed decisions.

In particular, when formulating any form of agreement, Aero Sekur will specify to the contracting party, in a clear and comprehensible manner, the conduct to be observed in the performance of the relationship established.

2.8 CONFIDENTIALITY AND PROCESSING OF INFORMATION AND PERSONAL DATA

Aero Sekur assures the utmost confidentiality of the information in its possession and guarantees that personal data will be processed in full compliance with the provisions in force regarding privacy, as established by the **European Regulation 679/2016 (better known as "GDPR"**, repealing Directive 95/46/EC, which regulated data processing at EU level - legislation transposed into our law by Legislative Decree No. 101 of 10 August 2018, amending the previous Privacy Code set out in Legislative Decree No. 196 of 30 June 2003).

Aero Sekur employees are required not to use confidential information constituting company assets for purposes that are not related to the exercise of their activities, and not to process the same information in a manner that does not comply with the authorisations received and the established company procedures.

~~With regard to the protection of personal data, the company adopts a specific set of rules, known as the "General code of conduct on the use of data" (ASA-GDPR-01), for all employees, collaborators, partners or suppliers, with the aim of guaranteeing the best possible protection of the personal data in its possession, both in its capacity as Data Controller and Data Processor.~~

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2.9 QUALITY AND SAFETY OF THE PRODUCTS

Aero Sekur ensures that high-quality, guaranteed products that fully meet the technical, performance and safety requirements of its markets are put into circulation.

For this purpose, the Company ensures:

- full compliance with current legislation on products/services;
- the adoption of the highest standards of product quality and safety;
- the adoption of Management Systems such as those for Quality, Safety and Environment subject to certification by a Third Party;
- compliance with the requirements defined by the standards UNI EN ISO 9001, EN 9100, Regulation (EC) N° 748/2012 Part 21 Sec A Sub G, Regulation (EC) N° 1321/2014 Part 145, FAA FAR 145, ECSS-Q-ST-20C; UNI EN ISO 14001/04, OHSAS 18001/07, FAA 49 CFR, TCCA CAR 573;
- involvement, empowerment, integration and retention of Suppliers and Business Partners to contribute and participate in the common success.

2.10 FAIR COMPETITION

Aero Sekur complies with the competition regulations in force and safeguards the value of fair competition, refraining from collusion and/or any other form of unfair competition.

In particular, the Company requires the Code of Ethics recipients to refrain from practices (e.g. creation of cartels, market sharing, restriction of production or sales, conditional agreements, etc.) liable to violate the provisions on competition, and from being involved, either personally or through third parties, in initiatives or contacts between competitors.

2.11 PREVENTION OF CONFLICT OF INTEREST

In the conduct of any activity, employees, members of the corporate bodies and, in general, all those who operate in the name and on behalf of Aero Sekur, must avoid situations in which the persons involved in operations and transactions are, or may even only appear to be, in conflict of interest. Any situation in which a conflict of interest may arise that could influence the impartiality and integrity of the conduct of the above persons shall be avoided. Persons who find themselves in a situation of conflict of interest, even if only potential, must immediately inform their Department Manager and the Supervisory Board, and refrain from carrying out any activity relating to the conflict of interest detected.

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2.12 GIFTS, GRATUITIES AND BENEFITS

Aero Sekur strongly condemns all corrupt practices, unlawful favours, collusion, direct and/or indirect solicitation of personal advantages.

No form of offer, donation, promise of money or goods or future benefits (e.g. money, objects, services, favours) of any nature whatsoever to/from third parties (with particular reference to Italian and foreign public officials, their relatives and kindred) which may be, even only indirectly, interpreted as exceeding the normal manifestations of courtesy allowed by business practice and/or Company Policies is allowed.

The only forms of courtesy allowed must be of “modest value” and must be aimed at boosting Aero Sekur’s image; however, they must be authorised by management and supported by appropriate documentation.

3 PRINCIPLES OF CONDUCT IN RELATIONS WITH STAFF

3.1 SELECTION OF PERSONNEL

Applications shall be assessed based on the conformity of the candidates’ profiles with the needs and requirements established by the Integrated Management System, respecting equal opportunities for all stakeholders.

The information requested from candidates must be strictly related to the verification of the professional and psychological-aptitude profile of the individual, as well as to the verification of compliance with national and international legal requirements and suitability in relation to the prevention of offences pursuant to Legislative Decree 231/01, always in accordance with the principles of non-discrimination and protection of personal data, as defined in this Code of Ethics and provided for by law.

3.2 ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP

The staff is always employed under a regular employment contract and no irregular work or undeclared work is tolerated.

At the establishment of the employment relationship, each employee must receive accurate information on:

- the nature of the function to which they belong, the responsibilities of their role and the tasks to be performed, company and second-level organisational regulations and provisions for any specific duties for the best performance of work;
- regulatory and salary elements, as regulated by the national collective labour agreement and any second-level agreements;
- rules and procedures to be adopted in order to avoid conduct contrary to laws, company policies and internal regulations;
- information about this Code of Ethics and the specific supporting procedures

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(“protocols”).

This information shall be presented and provided to the employee so that any acceptance of the assignment is based on effective knowledge and understanding of it.

3.3 RELATIONS WITH COLLABORATORS AND EMPLOYEES

Each manager is required to make the most of employees’ working time and potential and their professional development by requiring performance consistent with their duties and work organisation plans.

Requesting services, personal favours or any action in violation of this Code of Ethics is considered an abuse of authority.

Involvement of employees in the performance of their work is ensured, including participation in discussions and decisions aimed at achieving the company’s objectives.

The employee must be involved in these activities cooperatively and with independent judgement.

Employees must be managed in accordance with the Policies and by using the instruments provided by the Human Resources Department.

3.4 DEVELOPMENT AND TRAINING OF RESOURCES

Each company manager must use and fully exploit all the professional skills present in his or her structure by activating all the instruments available to foster the development and growth of his or her employees, encouraging their skills and participation.

Aero Sekur ensures institutional training, provided at specific times in the employee’s corporate life (for example, for new recruits, training related to occupational safety, Legislative Decree 231/01 and related risk prevention, introduction to the company and its business) and recurrent training for operational staff and always in accordance with the values of this Code of Ethics.

3.5 STAFF APPRAISAL

Aero Sekur avoids any form of discrimination against its employees. In the processes of personnel management and organisation, decisions are based on whether the expected profiles match the profiles possessed by the employees.

Employee reviews are carried out through a periodic performance appraisal system involving the Human Resources Department, the relevant managers and the person concerned.

During the assessment process, the Human Resources Department ensures compliance with the criterion of non-discrimination and, within the limits of available information, takes appropriate measures to avoid favouritism, nepotism or forms of patronage.

3.6 THE EMPLOYEE’S RIGHTS: OCCUPATIONAL HEALTH AND SAFETY

Aero Sekur undertakes to create and maintain safe and healthy working environments in compliance with the accident prevention regulations in force and to disseminate and consolidate a culture of occupational health and safety by developing risk awareness and encouraging responsible conduct by all employees.

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Moreover, the company requires compliance with the provisions of Legislative Decree 81/01, Legislative Decree 231/01 and this Code of Ethics as a prerequisite for the qualification of suppliers and the signing of contractual agreements.

3.7 THE EMPLOYEE’S RIGHTS: PROTECTION OF PRIVACY

The employee’s privacy is protected in accordance with the provisions of the regulations in force, better specified in paragraph 2.8 above, by adopting procedures defining the type of information to be requested from the employee and the relevant processing and storage methods.

Any investigation into the ideas, preferences, personal tastes and, in general, information of collaborators not related to the purposes of personnel selection and management of the employment relationship, according to the principles indicated in this Code of Ethics, is excluded. Except in cases provided for by law, these procedures also prohibit the communication or dissemination of personal data without the prior consent of the data subject.

Apart from the cases provided for by law, the Company prohibits any form of interception by any means whatsoever.

3.8 THE EMPLOYEE'S RIGHTS: PERSONAL PROTECTION

Aero Sekur is committed to protecting the moral integrity of its employees, guaranteeing the right to working conditions that respect the dignity of the individual.

For this reason, physical or psychological violence, sexual harassment, any attitude or conduct that is discriminatory or harmful to the individual, his or her beliefs and preferences will not be tolerated.

Any employee who believes he or she has been subjected to harassment or discrimination on the grounds of age, gender, race, state of health, nationality, political opinions and religious beliefs, etc., may report the incident to the Supervisory Board, which will assess the reported conduct and any violation of the Code of Ethics.

3.9 THE EMPLOYEE’S DUTIES: GENERAL PRINCIPLES OF CONDUCT

The employee must act loyally, in compliance with the obligations subscribed to in the employment contract, with the provisions of the Code of Ethics and with company regulations, ensuring the agreed performance to the standards set.

He or she must avoid any conduct that could damage corporate assets, corporate management, relations with stakeholders and Aero Sekur’s image.

Decisions made by each individual must be based on principles of sound and prudent management, assessing potential risks wisely, in the knowledge that personal choices contribute to the achievement of positive company results.

All operations and transactions must be inspired by the utmost fairness from a management point of view, by the completeness and transparency of information, by legitimacy in form and substance and by clarity and truthfulness in accounting, in accordance with the regulations in force and company procedures and must be subject to verification.

It is forbidden to solicit or accept, for oneself or for others, recommendations, favourable treatment, gifts or other benefits from persons with whom one has relations, avoiding receiving benefits of any

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kind that may be or appear to influence one's independence of judgement or operational impartiality.

3.10 THE EMPLOYEE'S DUTIES: CONFLICT OF INTERESTS

All Aero Sekur employees are required to avoid situations that may lead to conflicts of interest (e.g. with suppliers or customers) and to refrain from taking personal advantage of business opportunities of which they become aware in the course of their duties. Should even only the appearance or potential of a conflict of interest arise, employees shall promptly inform their direct superior and the Supervisory Board to assess its actual existence.

3.11 THE EMPLOYEE'S DUTIES: PROTECTION OF CORPORATE ASSETS

Each employee is required to work diligently to protect the company assets assigned to him/her and to prevent their fraudulent or improper use, through responsible behaviour in line with the objectives and operating rules established to regulate their use.

Company instruments, including computer systems, used by the company's employees and/or consultants (for the latter, within the contractual limits) must be functional and exclusively for the performance of work activities or purposes authorised by the relevant internal functions, in full compliance with the "General code of conduct on the use of data" adopted by the company.

Aero Sekur has the right to prevent improper and/or illegal use of its assets and infrastructures through the use of appropriate control systems.

The Company expressly prohibits any form of conduct or behaviour that may lead to computer crime (including, by way of example, damage to systems, information, software, theft and dissemination of access credentials) or unlawful processing of data pursuant to the GDPR referred to in the sections above.

3.12 THE EMPLOYEE'S DUTIES: INFORMATION MANAGEMENT

Employees must be familiar with and implement the company's IT security policies and rules to ensure the integrity, confidentiality and availability of information.

The information acquired in the performance of the assigned activities must remain strictly confidential and appropriately protected and may not be used, communicated or disclosed, either within or outside the Company, unless in compliance with current legislation and corporate procedures.

Each employee is required to process his or her documents using clear, objective and comprehensive language, allowing for any verifications by colleagues, managers or authorised external parties.

In documenting the activities carried out (including tracking and control activities), the Company requires the preparation of clear, complete and available recording documents in the form required by contract.

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3.13 THE EMPLOYEE'S DUTIES: REPORTING OBLIGATIONS

Employees are required to report to the manager of the organisational unit to which they belong any anomalous situations or instructions received conflicting with the law, the Integrated Management System, the content of employment contracts, internal rules or this Code of Ethics. If the order deemed unlawful is given by the manager in question, the report shall be addressed to the Supervisory Board.

Any retaliation against a person who has reported in good faith possible violations of the Code or requests for clarification on how the Code is applied is a violation.

Conduct by a person who accuses other employees of violations while knowing that such violations do not exist is also a violation.

4 PRINCIPLES OF CONDUCT IN RELATIONS WITH CUSTOMERS AND SUPPLIERS

4.1 ESTABLISHING AND MAINTAINING COMMERCIAL RELATIONS

In establishing commercial relations with new Customers and/or Suppliers and in managing existing ones, Aero Sekur expressly prohibits the establishment and maintenance of relationships:

- with persons involved in unlawful activities, in particular related to the offences provided for in Legislative Decree 231/2001 and, in any case, with persons lacking the necessary requirements of seriousness and commercial reliability;
- with persons who, even indirectly, hinder human development and contribute to disrespecting human dignity and individual personality and/or violate fundamental human rights (e.g. by exploiting child labour, promoting trafficking in migrants or sex tourism, etc.);
- with persons who do not formally commit to the Company (e.g. within the scope of a contract) to comply with the laws in force on labour (with particular attention to child labour) and occupational health and safety, and generally with all the principles laid down in this Code of Ethics.

The Company still expressly prohibits:

- perform services for Partners that are not adequately justified by the relationship established with them;
- pay fees to external collaborators that are not adequately justified by the nature of the task to be performed or that are not justified within normal market values.

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4.2 RELATIONS WITH CUSTOMERS

Professionalism, competence, helpfulness, respect and fairness are the guiding principles and conduct to be followed in dealing with customers.

To safeguard the company's image and reputation, it is essential that relations with customers, including general advertising messages, are guided by the following principles:

- full transparency and fairness;
- compliance with the law;
- free from all forms of influence, whether internal or external.

4.3 CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

The Company ensures that contracts and communications to Customers are:

- clear, comprehensive, detailed and complete in relation to both the technical and commercial aspects of the agreement, which shall be formulated in a language as close as possible to that of the other party;
- comply with applicable regulations, without resorting to evasive or otherwise unfair practices;
- in accordance with the company's commercial policies and the parameters defined therein;
- complete and such that no element relevant to the client's decision is overlooked.

Communication purposes and recipients must determine, on a case-by-case basis, the choice of the most suitable contact channels for the transmission of content, undertaking not to use misleading or untruthful advertising tools.

4.4 RELATIONS WITH SUPPLIERS

Any purchase made in favour of the Company shall be made with loyalty, integrity, confidentiality, diligence, professionalism and objectivity of judgement, by qualified personnel who take responsibility for their assessments and judgements, ensuring compliance with all relevant regulatory provisions when purchasing.

Commitments and management of relations with current and potential Suppliers must be undertaken in compliance with the contents of this Code of Ethics concerning the prevention of conflicts of interest and, specifically, the persons responsible for and involved in the purchasing process:

- are required to comply with the principles of impartiality and independence in the

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exercise of the tasks and functions entrusted to them, by operating according to the adoption of objective, documentable criteria and in accordance with the provisions of the system procedures;

- must refrain from personal obligations towards Suppliers; any personal relationships of employees and/or consultants with Suppliers must be reported to the relevant management prior to any negotiations;
- must maintain relations and conduct negotiations with Suppliers in a way that creates a solid basis for mutually beneficial relationships of adequate duration, in the interests of the Company;
- are under an absolute obligation to immediately report to the Supervisory Board any attempt or case of alteration of normal business relations;
- must not offer goods or services of any kind, in particular in the form of gifts, to personnel of other companies or entities for the purpose of obtaining confidential information or direct or indirect significant benefits for themselves or for the company, without prejudice to the general provisions of this Code of Ethics;
- must not accept goods or services from external or internal parties in return for the release of confidential information or the undertaking of actions or conduct aimed at favouring such parties, even if there are no direct repercussions for the Company.

4.5 TRANSPARENCY AND FAIRNESS IN PURCHASING PROCESSES

To guarantee maximum transparency and efficiency of the procurement process, the following must be provided for in the company's procedures:

- the separation of roles between the organisational unit requesting the supply and the unit concluding the contract;
- proper tracking and recording of the choices made;
- retention of information and all documents relevant to the management of the relationship, including instruments to ensure control over supplies.

The Company also ensures that contracts of significant amounts are monitored by the internal managers in charge, also taking into account the contribution provided by the Supervisory Board as part of its control activities.

4.6 CONTRACTUAL CLAUSES ON ETHICAL CONDUCT IN SUPPLIES

To ensure the effective application of the provisions contained in this Code, the Company guarantees that violations of established principles result in disciplinary measures.

For this purpose, individual contracts must contain specific clauses and/or penalties aimed at ensuring compliance with the Code of Ethics for supplies.

5 PRINCIPLES OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION

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5.1 FIELD OF REFERENCE

The Company ensures that relations with the Public Administration are conducted in conditions of maximum transparency and fairness.

For the purposes of this Code of Ethics, Public Administration refers not only to any public body, including companies in which public bodies have a partial stake, but also to any independent administrative agency, natural or legal person acting as a public official or public service appointee or as a member of a body of the European Communities or as an official of the European Communities or as an official of a foreign state.

Also according to this Code of Ethics, the definition of “public body” includes those private entities which, for political and economic reasons, perform a public function aimed at protecting general interests, such as the management of regulated markets.

5.2 RULES OF CONDUCT ON CORRUPTION AND BRIBERY RISKS

In relations with the Public Administration as defined (see par. 5.1 above), it is prohibited, either directly or indirectly, or through a third party, to offer or promise money, gifts or compensation in any form whatsoever, or to exert pressure, or promise any object, service or favour to managers, officials or employees of the Public Administration or persons in charge of a public service or their relatives or co-habiting persons for the purpose of inducing them to perform an official act or an act contrary to their official duties, including the purpose of favouring or damaging a party in a civil, criminal or administrative trial in order to directly or indirectly benefit the Company.

Furthermore, anyone who receives explicit or implicit requests for benefits of any kind from persons in the Public Administration, as defined above, must immediately:

- suspend all relations with them;
- inform the Supervisory Board and their company manager in writing.

The provisions mentioned in the preceding points must not be circumvented by resorting to different forms of aid and contributions which, in the form of appointments, consultancy, advertising, etc., have similar aims to those prohibited in the same points.

5.3 FAIRNESS IN BUSINESS DEALINGS WITH THE PA

If the product is supplied to the PA, the company ensures that it is supplied under conditions of maximum control.

In particular, the following actions shall not be taken, directly or indirectly:

- engage in conduct that could constitute or be construed as attempts at bribery;
- examine or propose employment and/or business opportunities that may benefit employees and/or their direct superior in a personal capacity;
- offer or, in any way, provide gifts that are not of modest value, while ensuring their traceability through appropriate documentation;
- request or obtain confidential information that may compromise the integrity or reputation of either party.

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5.4 CONDUCT RELATING TO DECLARATIONS AND STATEMENTS MADE TO THE PUBLIC ADMINISTRATION

False declarations or documents, or those certifying things that are not true, or omitting information in order to obtain, to the advantage or in the interest of the Company, contributions, financing or other disbursements, however defined, granted by the State, a Public Body or the European Union, are not permitted.

Misleading anyone, by means of trickery or deception, to obtain an unfair profit for the Company to the detriment of others is prohibited.

The breach of this rule is even more serious if the State or a public body is misled.

“unfair profit” may be direct or indirect and includes not only contributions, financing and other disbursements granted by the State, a public body and the European Union, but also concessions, authorisations, licences or other administrative measures.

5.5 USE OF GRANTS AND LOANS RECEIVED

Grants, loans or other disbursements, however named, granted to the Company by the State, a public body or the European Union, may not be used for purposes other than those for which they were granted.

5.6 DATA AND IT SYSTEMS RELEVANT TO THE PUBLIC ADMINISTRATION

Altering the operation of a computer or telecommunications system in any way or illegally intervening in any way on the data, information and software contained therein or pertaining thereto, so as to obtain an unfair profit to the detriment of others, is prohibited.

The violation is punished more severely if the State or a public body is harmed.

6 PRINCIPLES OF CONDUCT IN RELATIONS WITH THE COMMUNITY AND INSTITUTIONS

6.1 SOCIAL POLICY

Aero Sekur pursues objectives that are consistent with those of community development and the environmental surroundings in which it operates.

This is based on the awareness that community satisfaction is one of Aero Sekur’s goals as well as a competitive advantage.

6.2 RELATIONS WITH PARTIES, TRADE UNIONS AND ASSOCIATIONS

Aero Sekur does not finance political parties, either in Italy or abroad, or their representatives or candidates, nor does it sponsor congresses or parties that have an exclusive political propaganda purpose. It refrains from any direct or indirect pressure on political representatives (e.g. acceptance of recommendations for recruitment, consultancy contracts).

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6.3 INSTITUTIONAL RELATIONS

All relations with local, national and international public institutions that are part of normal government activities are based on principles of transparency and fairness, avoiding any collusion.

To ensure the utmost clarity in relations, contacts with institutional stakeholders must be made exclusively through contacts who have received an explicit mandate from Aero Sekur's legal representatives.

7 PRINCIPLES OF CONDUCT RELATING TO ACCOUNTING, ADMINISTRATIVE OR FINANCIAL ACTIVITIES

All persons (employees and/or consultants) who, for any reason whatsoever, including as mere data suppliers, are involved in the preparation of the financial statements and similar documents, or in any case of documents representing the Company's economic, equity or financial situation, as well as, in particular, directors, auditors and those holding top management positions:

- must provide the utmost cooperation in specific aspects; ensure that the information provided is complete and clear and that the data and calculations are accurate;
- are forbidden to present untrue facts, even if subject to assessment, or to omit information or conceal data in direct or indirect violation of regulatory principles and internal procedural rules, so as to mislead the recipients of the above-mentioned documents.

Any unlawful conduct will be considered as committed to the detriment of the Company.

It is forbidden to prevent or in any case hinder the performance of the control or audit activities legally attributed to the shareholders, the Board of Statutory Auditors, the statutory auditor, the Supervisory Board or the audit company.

8 PRINCIPLES OF CONDUCT REGARDING THE PREVENTION OF MONEY LAUNDERING

The persons to whom this Code of Ethics applies, within the framework of the various relations established with the Company, shall in no way and under no circumstances be implicated in events connected with the laundering of money from criminal activities or the receiving of goods or other benefits of unlawful origin.

They are also required to check in advance the information available on their commercial counterparts, Suppliers, Partners, collaborators and consultants, in order to ascertain their reputability before establishing business relations with them.

The Company undertakes to comply with all national and international rules and regulations on anti-money laundering.

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9 ENVIRONMENTAL PROTECTION

The Company promotes production policies that combine economic development and value creation requirements, typical of the business activity and related to it, with the need to respect and protect the environment.

To this end, Aero Sekur complies with all applicable environmental laws and regulations, including the design, adoption and certification of an Environmental Management System in accordance with the EMS standard.

10 IMPLEMENTATION AND MONITORING OF THE CODE OF ETHICS

10.1 IMPLEMENTATION

This Code of Ethics, formally adopted by the Company, is detailed and completed within the Company's Integrated Management System (which, therefore, contains the specified requirements for the Model pursuant to Article 6 of Legislative Decree 231/01) and in the Company's policies.

Any amendments and/or updates that may be necessary shall be prepared exclusively by the competent internal bodies with the cooperation of the Supervisory Board, a body which retains merely advisory functions with regard to interventions in the internal procedures adopted by the company.

10.2 KNOWLEDGE AND UNDERSTANDING OF THE CODE OF ETHICS

The Code of Ethics is brought to the attention of interested parties inside and outside the Company by means of appropriate communication and dissemination activities.

The Code of Ethics is distributed to all employees at the time of recruitment and to all third parties that enter into business relations with Aero Sekur.

The Company ensures that all personnel have adequate knowledge and understanding of the Code of Ethics through information/training programmes defined according to the rules established by the Integrated Management System.

10.3 WHISTLEBLOWING

Any reports of breaches of the provisions of this Code of Ethics and/or of others associated with the Model pursuant to Legislative Decree 231/01 may be forwarded in writing:

- by ordinary mail to the address: *Aero Sekur Supervisory Board at Via delle Valli, 46, Postal Code 04011 Aprilia (LT)*;
- By ordinary e-mail to: segnalazioniodv@sekur.aero;
- by Certified E-mail at the following addresses: *valerioapostolico@pec.it* or *antonellopompilio@ordineavvocatiroma.org*

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As established by Law No. 179/2017 (in application of the EU Whistleblowing Directive, better known as the “Whistleblowing Directive”), which resulted in the addition of 3 new paragraphs to Article 6 of Decree 231 on the criminal liability of entities, the company also accepts reports made anonymously.

To this end, the company provides an additional channel, in addition to the ordinary channels described above, for the benefit of employees and all the other parties that have relations with Aero Sekur, through which they can submit anonymously detailed reports of unlawful conduct relevant to Decree 231 in a completely anonymous manner, in order to protect the company’s integrity.

All channels ensure the confidentiality of the whistleblower’s identity in the handling of the report.

The company expressly prohibits any act of retaliation or discrimination against the whistleblower, for reasons directly or indirectly related to the reporting, and therefore adopts effective sanctions both against those who violate this requirement and against those who make unfounded reports with malice or gross negligence.

The company ensures that the data relating to whistleblowers is processed under conditions of the utmost confidentiality and in accordance with the requirements set out in the GDPR.