

BUSINESS ETHICS

ATIS SRL EXPECTS ALL PERSONNEL TO CARRY OUT THEIR WORK AND THEIR WORK ACTIVITY IN ACCORDANCE WITH THE HIGHEST ETHICAL STANDARDS AND DO NOT CONDUCT THEIR WORK OR ACTIVITIES IN SUCH A WAY AS TO DAMAGE THE REPUTATION OF ATIS SRL OR CAUSE THE VIOLATION OF ANY LAW. OR REGULATION.

CONFLICT OF INTEREST

All decisions and business choices made on behalf of ATIS srl must correspond to the best interest of the same and ATIS srl undertakes to take all necessary measures to prevent and avoid conflicts of interest, or those situations in which the recipients pursue interests in contrast with that of ATIS srl and its objectives, or carry out activities that are incompatible with office duties. Any situations that may even appear to be in conflict of interest, or those in which a person can pursue a personal interest using his or her corporate or professional role, must be avoided or at least reported to the Head of the Code of Ethics. By way of example and not limited to, the following situations may cause a conflict of interest:

- perform a top management function or the head of an organizational unit and have personal economic interests in common with suppliers;
- accept money or favors from people or companies that have or intend to enter into business relationships with ATIS srl;
- have personal or family affective interests that may influence the independence of judgment in deciding which is the best interest of ATIS srl and the most appropriate way to pursue it;
- take advantage personally, through family members, colleagues or third parties, of business opportunities related to the performance of their functions or in relation to the activity carried out on behalf of ATIS srl.

Employees must not have, directly or indirectly, significant financial interests in any company or entity that has or seeks to do business or is in competition with ATIS srl, unless they have previously obtained written approval from the board of directors of the ATIS srl.

INTELLECTUAL PROPERTY

ATIS srl ensures the confidentiality of the information in its possession and ensures that the acquisition, processing and storage of the information and personal data of the Recipients and of all the subjects with whom ATIS srl operates or whose data and information it processes take place in compliance with current laws. All information that is not in the public domain relating to ATIS srl, or relating to its activity or business, of which the Recipients are aware due to their functions or in any case of the employment and professional relationship, must be considered confidential, as strictly owned by these entities, and be used only for the performance of their work. Confidential information means, by way of example only: technical information relating to products and work procedures; design and production processes, management systems; purchasing programs; cost, pricing, marketing or service strategies; information relating to sales, mergers and acquisitions; information relating to company processes (of any type, not only production) and / or to the organization and company know-how in a broad sense. Recipients must take every care to avoid the undue disclosure of such confidential information and must not use or allow the use of information that is not in the public domain, relating to ATIS srl, its activity or business, or relating to subjects who have relations with it, to promote or favor their own interests or those of third parties. If an Employee or Collaborator believes that it is appropriate or legally necessary to disclose or use the confidential information outside ATIS srl, before proceeding they must contact and request appropriate authorization from their Code of Ethics Manager and wait the necessary time to allow them to be adopted. suitable protective measures. In the event that ATIS srl has signed a confidentiality agreement regarding confidential information disclosed by third parties, a)ATIS srl itself, the Recipients who receive such information must comply with



the terms of the aforementioned agreement. The confidentiality obligations remain in force even once the employment or collaboration relationship has ended. With specific reference to the data and information processed in relation to its business, ATIS srl undertakes to the aforementioned processing, on paper or electronic support in line with the provisions of the law in force, including those issued by the Community. The obligation for each employee to carry out their work in order to guarantee the protection of data and information from undue intrusions or communications and disclosures irrelevant to the assigned duties remains unaffected.

COMPETITION

ATIS srl undertakes to create and supply quality products and to compete on the market according to principles of loyalty, fair and free competition and transparency, maintaining correct relationships with public, governmental, administrative institutions, with third parties and with customers, including any competing subjects. In particular, in relations with third parties, ATIS srl bases its business on compliance with the rules of fair competition, avoiding unfair and / or unfair commercial practices, misleading information and behaviors that can, in any way, procure an undue advantage from others' positions. economic weakness and / or information deficit. ATIS srl, recognizing the importance of a competitive market, undertakes to comply with the rules of competition law and condemns any conduct aimed at disturbing the game of competition and, in general, the regular exercise of industry and commerce. Agreements between companies and in any case all situations that may have a distorting effect on competition, in particular agreements that contain exclusivity clauses, restrictions on pricing, territorial restrictions are subject to antitrust legislation. Therefore, in any case of potential conflict with antitrust regulations, the verification of legal experts is requested in advance. ATIS srl rejects and sanctions any corruptive behavior in relations between private individuals. In particular, the behavior of anyone who gives or promises money or other benefits to any person belonging to other economic subjects (e.g. directors, managers, employees, etc.) is censored so that the latter violate the obligations inherent in their office or their loyalty obligations towards of the entity to which they belong. More generally, acts of unfair competition and, in general, unfair actions in commercial competition are prohibited. By way of example, the following conducts are prohibited: corruption or use of bribes to favor an activity or induce contractual violations by third parties; acquiring a competitor's trade secrets through bribery or theft; false, misleading or disparaging claims or comparisons in relation to competitors or their respective products; unreasonable claims made about third party or competing companies' products; dissemination of commercial information of the company to competing companies; cancellation of employees or agents of the company in favor of competing companies; dissemination of information on the company's customers to third parties.

CORRUPTION AND EXTORTION AND CONCUSSION

ATIS srl has a zero tolerance policy for corruption or the use of bribes and prohibits its employees who carry out activities on its behalf from carrying out activities that are not in accordance with its policy. ATIS srl makes every reasonable effort to promote adherence to this Code of Conduct among its employees and exercise due diligence to prevent and detect corruption in all corporate agreements. Atis SRL REQUIRES INTERNAL STAFF TO ADOPT honest conduct based on integrity in relations with third parties.

Illicit payments and donations of benefits are considered acts of corruption. In particular, the staff and any external person who represents ATIS srl in various capacities are required to refrain from promising, offering, soliciting or accepting advantages of any kind for illegal purposes during the course of third parties, whether private or belonging to the public administration. of activity for ATIS srl in no case is the use of corporate economic resources in favor of public or private officials accepted for illegal purposes.

Gadgets and gifts of modest value and of an appropriate nature are excluded from this prohibition when this is not aimed at obtaining improper advantages.

In particular, all personnel must not:



- offer, promise, give, pay, authorize anyone to give or pay, directly or indirectly, material benefits, economic benefits or any other utility to a public or private official (Active Corruption);
- accept, or authorize someone to directly or indirectly accept economic benefits or other benefits or claims or solicit economic or other benefits from a public or private official (Passive Bribery);
- engaging in any type of anti-competitive activity, including cartel agreements, abuse of dominant position and abuse of economic dependence.

ATIS srl keeps complete and updated records of all expenses and payments in its accounting books, records and accounts, in compliance with the law and anti-corruption regulations. We expect that our staff in offering or receiving any corporate gift or courtesy will not make or receive corporate gifts other than of nominal value and permitted by law, regulations, rules and standards of the recipient's organization, and in any case never in cash or equivalent. We provide meals and entertainment to customers and others only as permitted by applicable laws and regulations and, to the extent permitted by law, in a reasonable and customary manner, never luxurious or inappropriate.

ACCOUNTING AND SOCIAL TRANSPARENCY

ATIS srl undertakes to ensure that the financial statements and corporate communications required by law are drawn up clearly and capable of representing the equity and financial situation of ATIS srl correctly and truthfully. In the same way ATIS srl undertakes to communicate correctly and punctually the information relating to its staff, to respect the rules on health and safety at work as well as to respect the environment with the utmost transparency, as well as to correctly maintain all data on personnel, to manage the single labor book as required by law. In general, the company's activities in any area must be carried out in line with the applicable laws and accounting principles.

ATIS srl acts honestly, with integrity and in compliance with all laws and regulations applicable to the business in any country. ATIS srl complies with all the terms, conditions and other provisions set out in the purchase orders.

The choices of ATIS srl in the fiscal field must always be based on principles of transparency, where necessary, also by resorting to the support of external consultants for the correct interpretation and application of the law, all the more so in the face of interpretative uncertainties. ATIS srl rejects and prohibits any behavior aimed at the illegitimate reduction of the tax burden, the omission of payments due, the omission of declaratory obligations, the acquisition of undue benefits or concessions. The behavior towards the PA must always be correct and transparent, such as not to lead to error or to hinder the due verification activity, as well as always collaborative, in order to provide all the information requested or useful for the regular performance of the control activities. .

ENVIRONMENTAL PROTECTION

ATIS srl undertakes to contribute to the development and well-being of the environment in which it operates and constantly pursues the protection of the health of its Employees, other Collaborators and the communities affected by the Company's activities. The operational management of industrial activities must refer, in compliance with current legislation on environmental prevention and protection, to the most appropriate environmental protection and energy efficiency criteria, in order to reduce their impact on the environment. In particular, in carrying out its business ATIS srl aims to:

- continually improve the policies, programs, and environmental behavior of the company, taking into account technological progress, scientific knowledge, consumer needs and the expectations of the community;
- disseminate the environmental policy through information, training, consultation and involvement of the Recipients for a responsible management of their activities in respect of the environment;
- assess the direct and indirect environmental aspects / impacts during the production and design of new activities and before the decommissioning of a plant or the abandonment of a site;



- minimize the environmental consequences in the context of waste production and their elimination, made safe and responsible through the design, development and management of plants and considering an efficient and safe use of energy, materials, substances and dangerous preparations and a sustainable use of renewable resources;
- instruct customers, distributors and the public in order to promote safety in the use, transport, storage and disposal of the products supplied;
- reduce the environmental impact of its products and services, with reference to raw materials, products, processes, emissions and waste associated with the business of the company;

HUMAN RIGHTS AND SECURITY

We expect our employees to treat people with respect and dignity, encourage diversity and different opinions, promote equal opportunities for all and help create an inclusive and ethical culture. We make sure our staff are aware of the importance of ethical behavior. ATIS srl ensures that it does not resort to forced labor, subordinate work, involuntary prison work or human trafficking. This includes the transportation, hosting, recruitment, transfer or reception of vulnerable persons by threat, force, coercion, kidnapping or fraud for the purpose of exploitation. We make sure that child labor is not used in the performance of the job. The term "juvenile" refers to any person below the minimum legal age for the employment in which the work is carried out. We provide equal employment opportunities to employees and job applicants regardless of race, ethnicity, religion, color, gender, nationality, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information or mental disability or physics.

We protect the health, safety and well-being of those who may be affected by their activities by complying with all applicable laws, regulations and provisions relating to environmental health and safety. We make sure our staff are aware of their contribution to product safety, as well as their contribution to product or service compliance. We promote a safe, respectful and productive workplace by establishing and maintaining fair working practices, including compliance with laws that prohibit harassment.

PRIVACY

ATIS srl undertakes to manage any information in all areas with the utmost respect for current privacy regulations.

All our staff safeguard all sensitive information, including the safeguarding of proprietary and confidential information disclosed by ATIS srl, physical property or personal data of ATIS srl and its employees who are in their care or possession, and uses such information only for the commercial purpose for which it was provided. No one should be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attack his honor and his reputation. Everyone has the right to the protection of the law against such interference or attacks. Everyone must respect intellectual property rights and protect confidential information by safeguarding it from misuse, theft, fraud or improper disclosure.

COUNTERFEIT

We supply items that are not and do not contain suspicious / counterfeit parts. We develop, implement and maintain appropriate methods and processes for our products and services to minimize the risk of introducing counterfeit parts and materials. We make sure our staff are aware of their contribution to product or service compliance.

EXPORT CONTROLS

ATIS srl scrupulously manages export procedures to ensure compliance with applicable export controls and the laws and regulations on economic sanctions of all the countries concerned.

VIOLATIONS AND CONDEMNATION OF RETORSION ACTS

ATIS srl requires the Recipients to strictly observe the provisions of this Code. If any Recipient becomes aware of situations, even if only potentially illegal or contrary to the principles expressed by this Code of Ethics, he must take action to immediately inform the subjects appointed to receive it and with the appropriate methods, as described below: failure to comply with the duty information may be subject to disciplinary sanctions (reporting). It is immediately specified that retaliation or discriminatory acts, direct or indirect, against whistleblowers for reasons connected, directly or indirectly, to the information are prohibited: ATIS srl, therefore, immediately guarantees that no retaliation will be implemented by ATIS srl to following the report.