

CODE OF ETHICS OSAlcnc S.r.l.

Approved by the Board of Directors

on xx.xx.2024

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Introduction

This Ethical Code (hereinafter also referred to as the "Code") is adopted by OSAlcnc S.r.l. (hereinafter also "OSAlcnc" or the "Company"), with its registered office in Ivrea (TO), at Via Jervis 11, ZIP code 10015. OSAlcnc is a leading company in the development and production of customized solutions for numerically controlled automation.

Founded in 1957 as an integral part of the Olivetti Group, OSAlcnc has gradually consolidated its presence both in the national and international markets. The company's mission is to provide innovative and high-quality solutions that meet the specific needs of its customers, while always upholding the core values of economic and social sustainability.

The Company is ISO 9001:2015 certified, demonstrating its ongoing commitment to excellence and continuous improvement. It is part of the Ningbo Physis Technology Co. Ltd. group, which holds 100% of the share capital and benefits from global expertise and resources, thanks to its 3 foreign branches.

In an ever-evolving market, OSAlcnc has maintained its core business, strengthened its market position, and focused on quality and innovation. The corporate governance is deeply committed to promoting and ensuring the effectiveness of the principles outlined in this Ethical Code among employees and collaborators, ensuring that they operate in full compliance with legality and ethical correctness.

This Ethical Code represents a declaration of the principles and values that guide every action and decision of the Company and reflects its commitment to operate with integrity, transparency, and respect towards all stakeholders.

1. The Ethical Code

1.1 Applicability and Purpose of the Ethical Code and Code of Conduct

The Ethical Code and the Code of Conduct of OSAlcnc outline the ethical principles and responsibilities that guide all business activities and operations. These documents apply to all levels of the organization, including executives, employees, internal and external collaborators, and business partners. Every individual who operates under the direction or control of the company must adhere to the principles and standards set forth in the Code.

OSAlcnc is committed to ensuring that the Code is known and understood by all, promoting a shared corporate culture. It is the responsibility of each recipient to understand and respect the principles and values expressed, contributing to maintaining the integrity and reputation of the company.

The Code is based on reciprocity and constructive cooperation, aimed at ensuring mutual benefits for all parties involved, respecting the roles of each. OSAlcnc requires that all recipients and external stakeholders follow principles and standards that reflect this same ethical approach to conduct.

The principles and standards contained in the Ethical Code enrich decision-making processes and professional training, guiding the actions and choices of all recipients. These standards are binding in the conduct of business activities, and it is required that they be respected by external stakeholders as well.

OSAlcnc believes that ethical responsibility is fundamental for transparent and fair business operations. Therefore, the company is committed to ensuring that the Ethical Code is widely disseminated and strictly followed, so that all parties involved act with integrity and responsibility, contributing to the common good and the continuous improvement of the organization.

1.2 Dissemination and Training

OSAlcnc is committed to widely disseminating the Ethical Code, ensuring its availability to all recipients and providing adequate training programs. Ongoing training is essential to ensure that all members of the organization understand and adhere to the ethical principles outlined in the Code.

The Code is made available at all organizational levels through the Company's website, ensuring that the principles are clear and easily accessible.

The Code is subject to periodic revisions to ensure that it remains current and effective. Updates are communicated through dedicated meetings and via the Company's website.

1.3 Structure of the Code of Ethics

The OSAlcnc Code of Ethics is structured as follows:

- **General Principles:** Describes the ethical principles and values governing relationships between the Company and Recipients, among Recipients themselves, and in dealings with External Stakeholders, defining the reference values for all Business Activities.
- **Code of Conduct:** Provides specific guidelines and standards that the Company and Recipients must follow to uphold the general principles and prevent unethical behavior.
- **Implementation and Monitoring Procedures:** The necessary tools for implementing, monitoring, and promoting adherence to the Code of Ethics, ensuring the continuous improvement of compliance and business practices.

2. General Principles: OSAlcnc's Ethical Principles and Values

OSAlcnc is guided by ethical principles and core values that reflect our mission and vision. Our uniqueness lies in our origins within the Olivetti Group, where economic and social sustainability were fundamental values. With over 60 years of history and evolution, we have maintained our core business, strengthened our market position, focused on product quality, and consistently pursued innovation.

OSAlcnc combines decades of solidity and experience with the dynamism and innovation typical of a start-up. Our goal is to be recognized not only for the innovative solutions we bring to the market but also for our commitment to upholding timeless values. We deeply respect our customers and suppliers, aspiring to establish mutually successful collaborations. The company aims to provide employees with a safe, pleasant, and comfortable work environment, staying true to the values that have always defined the company.

The fundamental values promoted and upheld by OSAlcnc are the pillars on which this Code of Ethics is based. These principles guide all actions and decisions every day:

- **Integrity:** Commitment to operate transparently and honestly, adhering to laws and regulations. Every employee is required to act with fairness and loyalty, ensuring that all business activities are conducted ethically and responsibly.
- **Legality and Compliance:** Commitment to operate in full compliance with current laws and regulations, promoting a culture of legality and compliance within the organization. All business activities are carried out in line with legal requirements, ensuring that all operations are safe and regulated.
- **Quality:** Customer satisfaction is an absolute priority. Their requests are carefully listened to in order to continuously improve the quality of services provided. There is a commitment to maintaining high standards of excellence and promoting open and constructive communication with customers to continuously enhance the service provided. Contractual obligations are always respected with integrity and good faith.
- **Excellence and Innovation:** Striving for excellence in every aspect of work, from design to production. Each phase is marked by a constant commitment to achieving the highest quality standards. Dedication to innovation enables the provision of cutting-edge solutions. Innovation is central to the strategy, allowing OSAlcnc to remain competitive in an ever-evolving market.
- **Experience and Competence:** Valuing the experience and technical expertise accumulated in the sector, essential for developing innovative solutions, and promoting their enhancement through technical and soft skills training programs.
- **Transparency:** Transparency is essential to building trust with stakeholders. Communicating clearly and comprehensively, without omissions or falsifications, ensuring that all information is accurate and timely. This commitment enables the maintenance of trust and credibility with customers, suppliers, and all business partners.

- **Reciprocity:** Promoting ethical behavior based on fulfilling promises, transparency, and trust. Encouraging ethical conduct in dealings with customers and suppliers, creating relationships based on mutual trust. Every collaboration is seen as an opportunity to build strong, lasting relationships based on loyalty and reliability.
- **Respect for Dignity and Diversity:** Promoting an inclusive work environment where each individual is valued. Respecting everyone's dignity by ensuring equal opportunities and rejecting any form of discrimination or harassment. Valuing diversity and fostering an environment where everyone can express their potential and contribute to shared success.
- **Impartiality and Non-Discrimination:** Avoiding all discrimination based on age, gender, health status, race, nationality, political opinions, and religious beliefs in business decisions. Ensuring that all decisions are made impartially and objectively, respecting the dignity and rights of each individual.
- **Fairness:** Fairness underpins internal and external relationships. Treating all stakeholders with equity and respect; this approach allows OSAlcnc to build relationships of trust and mutual respect.
- **Ethics and Social Mission:** Recognizing the importance of operating with a strong ethical sense and contributing to social welfare. Striving to promote sustainable and responsible development, balancing business interests with those of the community. Supporting cultural initiatives and collaborating with non-profit organizations to foster growth and social integration.
- **Sustainability and Environmental Protection:** Sustainability is a central value for OSAlcnc. Committing to operate responsibly, minimizing the environmental impact of activities, and promoting sustainable practices throughout the entire value chain.
- **Confidentiality:** Ensuring the confidentiality of information held. Protecting the privacy of customers and collaborators with the utmost care and respect.
- **Anti-Money Laundering:** Strictly adhering to anti-money laundering regulations, grounding business relationships on principles of legality and integrity.

3. Code of Conduct

The Company is committed to creating and maintaining a work environment that respects the rights of all its employees and collaborators by promoting a healthy, safe, and respectful workplace free from discrimination.

This section of the Code of Ethics outlines the policies related to human resource management, relations with external private and public entities, and sustainable actions.

Section I - Principles of Conduct in Relations with Personnel

OSAlcnc recognizes the fundamental importance of human resources and is committed to respecting and promoting the rights of its employees. In return, each collaborator is required to perform their duties with diligence and professionalism, actively contributing to the success of the company. While carrying out their work activities, employees must dedicate their efforts to the care of the company's interests in full compliance with the law. Violating this principle may constitute a serious breach. Some obvious examples of such violations include: theft of company property, abuse of alcohol or drugs, sexual or racial harassment, and mistreatment of other employees.

OSAlcnc is committed to providing a respectful and safe work environment, promoting a corporate culture based on transparency, integrity, and mutual respect. In this context, every employee is called to contribute to the common well-being by adhering to the values and standards established by the company.

3.1 Health and Safety at Work

The health and safety of employees are top priorities for OSAlcnc. The Company is committed to ensuring a safe and healthy work environment by adopting all necessary measures to prevent accidents and occupational diseases.

Compliance with Legislative Decree 81/2008 on workplace safety is ensured through the designation of specific roles.

Policies:

- Implement safety standards that comply with and exceed local and international regulations.
- Distribute to employees a document ("Third-party Work Information") that provides guidelines on how to manage emergencies or anomalies that may arise when working off-site, for example, at a client or supplier location.
- Provide regular training on health and safety.
- Encourage employees to immediately report unsafe working conditions or health issues.

3.2 Employee Well-being

OSAlcnc recognizes the importance of employee well-being as an essential element for ensuring a productive and positive work environment. The Company is committed to creating and maintaining conditions that promote physical and mental health, emotional well-being, and professional satisfaction for its employees.

Policies:

- Establish and promote company policies that support work-life balance, including parental leave, flexible working hours, and support for employees' mental well-being.

3.3 Human Resource Management and Professional Development

OSAlcnc promotes the professional development of its employees through continuous training programs and growth opportunities. The Company recognizes that long-term success depends on the talent and skills of its staff.

All employees should have the opportunity to advance within the Company and improve their skills. Promotions are based solely on individual abilities and the demonstrated competence in carrying out specific duties.

Policies:

- Provide each employee with a clear description of their role and related expectations.
- Promote transparency in the communication of company policies and HR procedures.
- Offer regular training courses on technical skills, soft skills, and managerial development. This includes workshops, seminars, online courses, and mentoring sessions.
- Ensure that performance evaluations are fair, based on objective criteria, and regularly reviewed.
- Conduct regular feedback and professional development meetings.
- Implement a performance evaluation system that includes regular and constructive feedback. Annual evaluations and professional development meetings are key tools for identifying progress and areas for improvement.
- Recognize excellent performance and commitment to continuous improvement.
- Encourage creativity and the search for new ideas and solutions to improve company performance.
- Create an environment that fosters brainstorming and offers spaces for experimentation.
- Establish a reward and recognition system based on clear and transparent criteria.

3.4 Non-Discrimination and Equal Opportunities

OSAlcnc is firmly committed to ensuring equal opportunities for all employees, without discrimination of any kind. We promote an inclusive environment where every individual can freely express their abilities and aspirations. The company does not tolerate discrimination based on age, disability, sexual orientation, gender, religion, or origin. OSAlcnc pays particular attention in selecting its business partners, especially in regions of the world where child labor is prevalent under degrading conditions that disrespect human rights.

Adoptable Policies:

- PDR 125 Equal Opportunities Certification.
- Ensure that selection, hiring, compensation, and promotion processes are free from bias.
- Promote a corporate culture that celebrates diversity and inclusion. Monitor and review HR practices to ensure their fairness and compliance with non-discrimination policies.
- Not engage in or continue relationships with suppliers that do not ensure the respect of fundamental rights for workers, employees, and minors.

3.5 Integrity and Protection of the Individual

OSAlcnc is committed to protecting the moral integrity of its collaborators, ensuring the right to work conditions that respect human dignity. The company protects workers from psychological violence and combats any discriminatory or harmful attitudes or behaviors toward individuals, their beliefs, or preferences. Sexual harassment is not tolerated, and behaviors or speech that may disturb an individual's sensitivity should be avoided. These principles are in line with Law No. 4 of January 15, 2021, which adopts International Labour Organization (ILO) Convention No. 190.

In hierarchical interpersonal relationships, those in positions of authority are required to exercise their role with fairness and integrity, with the primary objective of respecting the dignity of individuals and avoiding any abuse of power.

Anyone who believes they have been subjected to harassment or discrimination based on age, gender, race, health status, nationality, political opinions, or religious beliefs can report the incident to their manager, who will refer it to the Compliance Officer for evaluation of the actual violation of the Code of Ethics. Treatment disparities not motivated by these reasons are not considered discrimination if justified or justifiable based on objective criteria.

Policies:

- Ensure a respectful and safe work environment for all employees.
- Implement clear procedures for reporting and managing harassment and discrimination.
- Train employees on appropriate behavior and the prevention of harassment and discrimination.
- Ensure that positions of authority are exercised with fairness and integrity, avoiding any abuse of power.
- Not engage in or continue relationships with suppliers that do not ensure the respect of fundamental rights for workers, employees, and minors.

3.6 Selection and Recruitment of Personnel

The selection and recruitment process at OSAlcnc is based on merit and competence criteria, ensuring transparency and impartiality. The company is committed to identifying and attracting the best talents to strengthen its organization.

All employees are hired with regular employment contracts, and no form of irregular labor is tolerated. Foreign workers are hired only if they possess a valid residence permit.

Policies:

Upon hiring, new employees are informed about:

- The specific duties they will perform.
- The legal and compensation elements, as provided by the applicable National Collective Labor Agreement (CCNL) and any supplementary agreements.
- The rules and procedures to be followed to ensure their health and safety.
- The importance of adhering to the principles of this Code of Ethics.

Objective assessment tools and structured interviews are used to ensure that the selection process is fair and based on the candidates' actual skills.

This approach ensures that all employees are fully aware of their responsibilities and the company's expectations, contributing to the creation of a fair and safe work environment.

3.7 Interventions on Work Reorganization

During work reorganization processes, OSAlcnc safeguards the value of human resources through training and professional retraining actions, following these general principles:

- The burdens resulting from the reorganization must be distributed equitably among all collaborators, respecting the effective and efficient management of business activities.
- In the presence of new or unforeseen events, which must be clearly communicated, employees may be reassigned to different tasks than those previously assigned, while preserving their professional skills.

3.8 Gifts, Presents, and Benefits

OSAlcnc regulates the receipt and offering of gifts, travel, meals, accommodations, and entertainment to avoid conflicts of interest and ensure that such practices do not inappropriately influence business decisions. In particular, any type of gift, present, or benefit to public officials, whether Italian or foreign, or their

family members, is prohibited if it could compromise their impartiality or induce them to grant advantages to the Company.

Gifts offered, with the exception of promotional items of modest value, must be properly documented to allow verification and must be authorized by the relevant department head.

Policies:

- The acceptance and offering of gifts and invitations must be transparent and of modest value (indicative reference value < €50.00).

3.9 Confidentiality and Privacy Protection

OSAlcnc protects the confidentiality and privacy of its employees and stakeholders. Personal and company information must be handled with the utmost care and in compliance with applicable laws. The company is also required to protect and not disclose personal, sensitive, and judicial data in accordance with data protection regulations.

Policies:

- Implement privacy management systems that include the adoption of advanced security measures to protect personal and company data from unauthorized access.
- Comply with national and international legal provisions regarding data protection (Personal Data Protection Code, Legislative Decree 196/2003 as amended, and the European Privacy Regulation No. 679/2016, General Data Protection Regulation).

3.10 Use of the Company Logo

The use of the OSAlcnc logo and trademark must be authorized and comply with company guidelines. Misuse of the logo that could damage the company's image and reputation is prohibited.

Policies:

- Provide detailed guidelines on the use of the company logo, specifying the correct methods and restrictions for its use in promotional materials and external communications ("OSAlcnc Brandbook").

3.11 Duties of Collaborators

In accordance with the general rules of this Code of Ethics, OSAlcnc collaborators must adhere to the following fundamental principles:

Respect for Intellectual Property: Collaborators must ensure the protection of the company's assets and maintain the confidentiality of all company information and know-how in the broadest sense, ensuring that they are not disclosed outside the Company in an uncontrolled or unauthorized manner, as approved by the Management.

Loyalty and Compliance: Collaborators are required to act with loyalty, respecting contractual obligations and the provisions of the Code of Ethics, ensuring the performance of the tasks assigned.

Knowledge and Implementation of Company Policies: It is essential that every collaborator is familiar with and implements the company's policies regarding security and information management, ensuring their integrity, confidentiality, and availability. Documents must be written clearly, objectively, and comprehensively, allowing for verification by colleagues, managers, or authorized persons.

Protection of Company Assets: Collaborators must work diligently to protect company assets, acting responsibly and following established procedures for their use. The use of company assets must be accurately documented, used prudently and sparingly, with particular attention to financial resource management. Improper use of company assets that could cause damage or reduce efficiency must be avoided.

Responsibility in Protecting Company Assets: Each collaborator is responsible for protecting the resources entrusted to them and has the duty to promptly report any risks or damages to the relevant departments.

Use of IT Applications: Collaborators must adopt the company's IT security policies to protect systems, enhance their technical knowledge, and avoid using company IT tools to access inappropriate websites or disseminate personal, confidential, or unauthorized company materials.

Conflicts of Interest: Recipients must pursue the general goals and interests of the Company, avoiding any activities or behaviors that may be incompatible with the obligations arising from their relationship with the Company. They are required not to make decisions, engage in activities, or accept other roles that conflict with their position in the company, their work hours, or the company's interests. If potential conflicts of interest arise, these must be promptly communicated, and the collaborator must refrain from decisions or actions in regard to those conflicts.

Policies:

- Declare any personal, financial, or other interest that could conflict with the interests of OSAlcnc at the time of hiring, updating it annually or whenever new potential conflicts arise.

- Declare any other role, activity, or employment that could overlap with the contractual commitment to OSAlcnc at the time of hiring, updating it annually or whenever new potential conflicts arise.

These principles ensure that every collaborator contributes to the success of the company, acting ethically and responsibly, respecting the company's interests, and maintaining a professional demeanor in all circumstances.

Section II - Principles of Conduct Towards Third Parties

3.12 Relations with Public Authorities

OSAlcnc maintains transparent and correct relationships with public authorities, complying with all applicable regulations and procedures. Every interaction must be conducted with integrity and professionalism.

Policies:

- Promote lawful and correct behavior, ensuring absolute transparency and traceability in accordance with the principles of legality.
- Reject any form of promise or offer of payments or goods to promote or favor any interest or advantage. Prohibit recipients from offering money or gifts to executives, officials, or employees of public authorities and institutions or their relatives, unless they are gifts of modest value.
- Prevent recipients from making, inducing, or favoring false statements to public authorities and public institutions.
- The company's financial resources must not be used for illegal purposes in favor of government officials or employees of public entities.

3.13 Relations with Third Parties

OSAlcnc requires internal staff to maintain honest and integrity-driven behavior in their relations with third parties. Illicit payments and the provision of benefits are considered acts of corruption. Employees and external representatives must refrain from promising, offering, soliciting, or accepting any kind of benefit for unlawful purposes, whether towards private individuals or public officials.

Payment, attempted payment, request, and acceptance of bribes are always contrary to OSAlcnc's policy. Inappropriate or non-transparent behavior towards foreign institutional entities is prohibited. This ban does not apply to modestly valued gifts or promotional items, provided they do not constitute a criminal offense and are not intended to obtain improper advantages. The Board of Directors defines what is meant by "modest value."

Anti-Corruption Policies:

- Promote transparency and traceability in all transactions with third parties.
- Implement a zero-tolerance policy towards illicit payments and the provision of benefits.
- Train employees and external representatives on appropriate and legally compliant behavior.
- Establish a reporting system for violations of the anti-corruption policy.

Clearly define what constitutes "modest value" for gifts and promotional items, as determined by the Board of Directors, and ensure they are properly authorized and recorded.

3.14 Relations with Customers

Impartiality and Fairness in Relations with Customers: OSAlcnc is committed to treating all customers without arbitrary discrimination. Negotiations with customers are conducted in accordance with the principle of good faith, ensuring the correct fulfillment of mutual obligations. The company guarantees prompt communication of any changes to the general terms of the contract, including economic and technical variations arising from various causes, avoiding evasive or unfair practices. The company ensures the confidentiality and protection of its customers' know-how, including confidential information, technology, and intellectual property in general.

Communications to Customers Policies: Communications addressed to customers, including advertising messages and the content of the company's website, must be:

- Clear and simple, using understandable language that resonates with the target audience.
- Compliant with current regulations, without resorting to evasive or misleading practices.
- Complete, ensuring that no relevant element for the customer's decision-making process is overlooked.
- Truthful and not misleading, both in content and in the communication medium used.

Marketing and Communication: OSAlcnc's marketing and communication activities must be precise, truthful, and transparent. It is essential that the information provided is clear, correct, and understandable, always respecting ethical principles and avoiding any form of deception. Policies:

- Ensure that marketing and communication activities adhere to ethical principles, ensuring that all information provided is transparent, accurate, and easily understandable.

Behavioral Style of Employees: Employee behavior toward customers should be characterized by availability, respect, and courtesy. The goal is to establish a collaborative and highly professional relationship.

Quality Control: OSAlcnc is committed to maintaining high-quality standards for the services provided, based on predefined levels and periodically monitoring the quality as perceived by customers.
Policies:

- Promote a commitment to excellence in all work activities and the delivery of high-quality products and services.
- Offer recognition programs for employees who contribute significantly to achieving excellence and quality goals.

3.15 Relations with Commercial Partners and Suppliers

Relations with commercial partners and suppliers must be based on the principles of transparency, fairness, and reciprocity. OSAlcnc is committed to establishing long-term, mutually beneficial collaborations.

Supplier Selection: OSAlcnc ensures that its supplier selection processes are impartial and based on objective criteria of quality, price, and reliability.

In accordance with the general rules established in this Code of Ethics, the purchasing processes follow these principles:

- **Competitive Advantage and Impartiality:** The search for the maximum competitive advantage for the company, ensuring equal opportunities for all suppliers, with loyalty and impartiality.
- **Transparency and Competition:** Employees responsible for purchasing processes must ensure that all qualified suppliers have the opportunity to compete for contracts, adopting objective and documentable criteria in selection and ensuring sufficient competition.
- **Selection Requirements:** Selection criteria include the documented availability of means, including financial resources, organizational structures, project capabilities, and know-how. Where required by the company's specifications, the existence and implementation of adequate company quality systems is also required.
- **Ethical Commitments:** The company may establish privileged relationships with suppliers who adopt ethical commitments and responsibilities aligned with those established in this Code of Ethics, without prejudice to other potential suppliers.

Integrity and Independence in Relations with Suppliers: OSAlcnc is committed to treating its suppliers without arbitrary discrimination. Negotiations with suppliers are based on the principles of good faith in contractual dealings and the correct execution of mutual obligations. The company guarantees prompt communication of any changes to the contractual conditions, including economic and technical variations, always avoiding evasive or unfair practices. The company constantly monitors relationships with suppliers through its designated bodies. Contracts must always be transparent and clear, avoiding forms of dependence where possible.

Policies:

- Violations of the principles of legality, transparency, fairness, confidentiality, and respect for human dignity are just cause for terminating relationships with suppliers.
- Employees and collaborators who receive offers of personal benefits from a supplier, aimed at favoring their business, are required to immediately suspend the relationship and report the violation to the Ethics Committee.
- Implement a supplier evaluation system that considers compliance with legal requirements, product and service quality, and adopted sustainability practices. This system is transparent and documented to ensure fairness and objectivity in decisions.
- Ensure transparency in the production chain, combating labor exploitation and promoting fair working conditions.
- Draft clear contracts that include anti-corruption clauses and adherence to OSAlcnc's Code of Ethics.
- Require the signing of a Supplier Code of Conduct.
- Regularly monitor the performance and adherence to ethical principles by suppliers and partners.
- Promptly resolve any discrepancies or behavior that does not comply with established ethical standards.

To ensure maximum transparency and efficiency in the purchasing processes, the following fundamental principles should be followed:

- **Separation of Roles:** A clear distinction between the unit that requests the supply and the unit that signs the contract, to avoid conflicts of interest and ensure impartiality.
- **Decision Traceability:** Ensure adequate documentation to allow the reconstruction of choices made during the selection process. Contractual information and documents must be kept for a period of ten years, unless legal provisions require a longer retention period.

Section III - General Principles of Conduct

3.16 Authorization and Registration of Financial Transactions

Every operation of the company must be authorized and recorded according to established procedures. The traceability system allows for subsequent checks on transactions and maintains an adequate level of transparency in the decision-making, management, and execution processes of the company's various activities.

3.17 Anti-Money Laundering

OSAlcnc is strongly committed to preventing money laundering and related illegal activities by adopting rigorous ethical principles and implementing specific policies and procedures to ensure maximum transparency and legality in its operations.

Policies:

- Check the origin of goods and funds that pass through the company accounts, ensuring they are of lawful origin.
- Reject the use of cash in business transactions to promote traceability and transparency in financial operations.
- Ensure that all financial transactions are accurately recorded and documented, maintaining transparency and facilitating any checks.
- Promptly report any suspicious activity or transaction to the competent authorities, in accordance with applicable regulations.

3.18 Information Management and Data Protection

OSAlcnc is committed to complying with data protection regulations. Personal information must be collected, processed, and stored in accordance with privacy laws, ensuring that data is used only for legitimate purposes and with the informed consent of the individuals concerned.

Policies:

- Adopt and maintain physical, administrative, and technical security measures to protect information from unauthorized access, destruction, use, modification, or disclosure.
- Sign confidentiality agreements with all employees and third parties who may come into contact with sensitive information.
- Implement advanced cybersecurity systems, such as encryption and firewalls.
- Provide regular training to employees on best practices for cybersecurity to prevent data breaches.
- Adopt data protection policies that include appointing a Data Protection Officer (DPO), implementing Data Protection Impact Assessments (DPIAs), and continuous training for employees on GDPR regulations.

3.19 Appropriate Use of Information Technology

The use of information technology must comply with company policies and applicable regulations. OSAlcnc is committed to ensuring that technologies are used securely and responsibly, avoiding improper uses that may compromise information security or the company's reputation.

Policies:

- Provide detailed guidelines on the use of company technologies, including mobile devices and email systems.
- Prohibit the use of unauthorized software on company devices and the inappropriate downloading of material from the internet.
- Monitor the use of information technology to prevent and detect illicit or non-compliant activities.
- Conduct training on best practices for the secure use of information technology.
- Require employees to immediately report any malfunction or suspected security breach.

3.20 Contributions and Sponsorships

OSAlcnc may respond to requests for contributions from non-profit organizations and associations with regular statutes and articles of incorporation, which have high cultural or charitable value and national relevance or involve a significant number of citizens. In selecting proposals to support, the company pays special attention to avoid any potential conflicts of interest, whether personal or business-related.

Section IV - Principles of Conduct in Sustainability

OSAlcnc places sustainability as a central point in its business strategy, with a particular focus on social sustainability. The company is committed to ensuring continuous progress toward compliance with ESG (Environmental, Social, and Governance) standards, adopting practices that reduce and improve the environmental and social impact of our products and operations.

Once again, the unique origins of OSAlcnc within the Olivetti Group are highlighted, where principles of economic and social sustainability were key values. These historical values continue to guide the company as it evolves and innovates technologically, responding to customer needs while maintaining responsible management of impacts, with a particular focus on people. The company is determined to make responsible impact management the cornerstone of its actions.

As OSAlcnc follows a business model involving production outsourcing, the progressive involvement of the supply chain is essential to share sustainability objectives to be pursued synergistically. The company considers the impacts across the entire value chain and product lifecycle, promoting sustainable practices among all its partners.

Policies:

- **Sustainability Reports:** Publish annual sustainability and social responsibility reports that detail our environmental, social, and governance performance, accessible to all stakeholders.
- **Sustainable Design:** Design products with the aim of containing and improving environmental impacts, reducing resource usage, and promoting energy efficiency.
- **Community Engagement:** Promote community engagement initiatives that improve people's quality of life and support social development.
- **Training and Awareness:** Implement awareness programs for employees on sustainable practices and environmental responsibility.
- **Supplier Management:** Collaborate with suppliers who share our sustainability values and who adopt responsible and transparent practices.
- **Environmental Targets:** Establish specific, measurable environmental goals, and encourage the adoption of energy-saving and recycling practices.
- **Energy Savings:** Promote the efficient use of energy resources and reduce waste.
- **Energy Efficiency:** Invest in technologies and processes that improve energy efficiency and reduce the environmental impact of our operations.
- **Sustainable Supply Chain:** Gradually involve our supply chain partners to share and achieve sustainability goals, considering the impacts across the entire value chain and product lifecycle.
- **Collaboration Between Companies:** Promote collaboration and partnerships with other companies to achieve common goals.

OSAlcnc is committed to maintaining these principles in its continuous evolution, ensuring that sustainability remains a fundamental element of its success and commitment to future generations.

Section V - Encouraged Behaviors

OSAlcnc promotes a corporate culture that aims to enhance the well-being of employees, organizational efficiency, and a positive impact on society. These desired behaviors are not conduct rules with sanctions but serve as guidelines to foster an environment where everyone feels motivated to act with integrity and responsibility. Here are the specific behaviors the company is committed to encouraging:

Impact on the Territory and Society

- **Corporate Volunteering and Community Development:** Promote corporate volunteering programs and community development initiatives, encouraging employees to actively participate.

- **Philanthropy and Donations:** Support social causes and charity through donations and volunteering activities, offering paid leave for these activities.
- **Social Innovation:** Encourage the development of innovative solutions that have a positive social impact, supporting projects and ideas aimed at solving social issues.

Respect for Time

- **Punctuality and Timeliness:** Respect others' time by being punctual for appointments, completing tasks in a timely manner, and avoiding unnecessary interruptions.
- **Efficient Time Management:** Manage personal time efficiently to optimize productivity and achieve set goals.

Effective Communication

- **Open and Honest Communication:** Encourage open, honest, and transparent communication between all employees.
- **Internal Communication Channels:** Implement effective internal communication channels and regular company meetings to ensure that information is shared in a timely and accurate manner.

Mindset

- Remain open-minded and promote a work environment that encourages innovation, creativity, and problem-solving skills, ensuring that each employee can actively contribute to collective success.

Leadership

- The company strives for leadership that establishes a strong spirit of collaboration, where leaders serve as a source of inspiration and motivation for all team members, making every individual feel valued and motivated to contribute to common success.

4. Implementation Methods

To ensure that the Company's Code of Ethics is not just a set of abstract principles, but a true operational standard, it is essential to have an effective monitoring structure in place to ensure that all activities are in compliance not only with legal standards but also with the ethical values that the Company promotes through the Code of Ethics.

4.1 Responsibility Structures and Roles

OSAlcnc has established specific roles for overseeing compliance with the Code of Ethics. It is the responsibility of each employee to report any violations or unethical behavior, using the communication channels set up by the company.

Policies:

- Establish an Ethics Committee within the company responsible for monitoring and enforcing the Code of Ethics. The Committee evaluates the reports received and takes the appropriate corrective actions.

4.2 Monitoring

The Company continuously monitors compliance with the Code of Ethics and takes necessary measures to prevent and correct any violations. This monitoring includes regular audits, internal reviews, and feedback from employees and stakeholders.

Policies:

- Plan audits at strategic moments, such as after the introduction of new policies or following reports of possible violations.

4.3 Employee Reporting (Whistleblowing)

OSAlcnc encourages employees, managers, and members of corporate bodies to report any suspicion of fraud, illegal or irregular conduct, as well as any serious danger or risk that may affect or harm employees, consultants, customers, suppliers, stakeholders, the public, or the reputation of the company. These reports should be based on information acquired during work and management activities. In particular, OSAlcnc specifies that:

- Each detailed report received within the company will be treated with the utmost consideration, ensuring the confidentiality of the whistleblower's identity as provided by Law No. 179/2017.
- Confidential reporting channels are in place to report violations of the code of conduct or other illegal or unethical behaviors.
- Whistleblowers acting in good faith will be protected from retaliation or discrimination.
- The company is committed to promptly and seriously investigating all reports received and to taking appropriate disciplinary measures in the case of confirmed violations.

The management of reports is done by following three steps:

1. Initiative phase

Transmission of the report through the prescribed channels (Solution Box located at OSAlcnc premises or e-mail box segnalazioni@osaicnc.com).

2. Investigation phase

Within 7 days of receipt (email or date indicated on the paper report if sent through the Solution Box), the Ethics Committee sends the reporter an email of receipt and takes charge of the report for an initial summary investigation to be carried out within 15 days, deciding whether to carry it out in person or to entrust it to the Management.

The Ethics Committee (possibly with Management) analyzes the report in order to determine its admissibility and admissibility and, if what was reported was not adequately substantiated, requests clarification from the reporter.

A. If it is found to be clearly and manifestly unfounded or inadmissible, the report is dismissed. Specifically, the following constitute possible grounds for dismissal:

- manifest lack of interest;
- manifest incompetence of the Ethics Committee on the matters reported;
- generic content of the report/communication or such that it does not allow any in-depth examination;
- reports concerning the same facts dealt with in proceedings that have already been settled.

B. In the event that none of the above-mentioned cases of archiving occur, the Ethics Committee shall verify the report received, also acquiring any useful element for the assessment of the case, taking care to adopt appropriate measures to ensure the confidentiality of the identity of the reporter where the investigations require the necessary involvement of third parties. This includes through:

- requesting news, information, documents from other people in the company;
- request for clarification, documentation and additional information from the reporter and/or any other third parties involved in the report.

Subsequently, the documentation and elements received are analyzed, verifying whether they are situations of which the person has become directly aware, or of which he or she has learned by virtue of the role held and work duties, or whether they are based on mere suspicions or rumors.

3. Decision Phase

If any of the above listed grounds for dismissal is found, no later than 30 days after sending the acknowledgement of receipt, the Ethics Committee shall dismiss the report with adequate justification by notifying the reporter

If, on the other hand, it is determined that the report is well-founded, the Ethics Committee shall prepare a report containing the findings of the investigation and how it intends to proceed, informing the reporter.

4.4 Review and Update

To ensure that the Code of Ethics and the Company Code of Conduct remain relevant, effective, and aligned with current laws, regulations, and best practices, OSAlcnc establishes a periodic review and updating process. This process ensures that the Code reflects regulatory changes, industry developments, and emerging business needs. The Code of Ethics and the Code of Conduct will be reviewed and updated every 5 years or in response to: significant changes in applicable laws and regulations, developments in the industry or best business practices, feedback from employees, customers, or other stakeholders, and any relevant incidents or reports indicating the need for modifications or clarifications to the Code. The responsibility for reviewing and updating the Code of Ethics and the Code of Conduct is assigned to the Compliance Officer, who ensures that the proposed revisions comply with applicable laws and regulations.

4.5 Communication and Training

To ensure that all employees understand and adhere to the principles of our Code of Ethics, it is essential to implement a clear and detailed communication plan.

Policies:

- Distribution of the Code of Ethics.
- Provide each new employee with a copy of the Code of Ethics during the onboarding process.
- Make physical copies of the Code available in all common areas of the company.
- Distribute the Code via email to all current employees and whenever it is updated.
- Publish on the Company Website.
- Publish in the section dedicated to transparency and governance on the company website, accessible to both employees and the public.
- Training is a crucial element to ensure that all employees not only know the Code but also understand how to apply it in their daily activities.

Policies:

- All new employees must participate in a mandatory training module on the Code of Ethics as part of the onboarding program.
- Periodic refresher sessions for all employees.

4.6 Sanctions for Violations of the Code of Ethics

OSAlcnc adopts a strict and fair approach to managing violations of the Code of Ethics. It is essential that all violations be taken seriously, and that consistent sanctions are applied to maintain the integrity and credibility of the organization.

The clear definition of sanctions helps prevent violations and ensures that all members of the organization understand the consequences of their actions.

Types of Violations

Violations of the Code of Ethics can vary in severity and may include behaviors such as fraud, corruption, discrimination, violation of data privacy, and misuse of company resources. Each violation is evaluated individually, considering the nature and severity of the act.

Disciplinary Sanctions

Sanctions for violations of the Code of Ethics are proportionate to the severity of the violation and may include:

- **Verbal or written warnings:** For minor violations or first-time offenders, where there is no significant damage to the organization or stakeholders.
- **Suspension from work:** In cases of more serious violations, temporary suspension without pay may be applied.
- **Termination of employment or contract:** For serious or repeated violations, termination of the employment relationship or contract may be considered. This applies in cases where behaviors have caused significant damage to the Company or have seriously jeopardized its reputation.
- **Legal action:** In cases where the violation also constitutes a crime, such as fraud or corruption, the Company may pursue legal action against the individual or individuals involved.

4.7 Documentation and Archiving

Maintain a record of all previous versions of the Code of Ethics, including details of the changes made and the rationale for those changes.

This process reflects the Company's commitment to transparency, integrity, and accountability—key elements in building and maintaining the trust of all its stakeholders.

5. Contact for Ethical Communications and Reporting

OSAlcnc encourages employees, executives, members of corporate bodies, and all third parties, such as consultants, suppliers, and stakeholders, to direct reports, complaints, requests for information, and any other communications related to ethical issues via email to segnalazioni@osaicnc.com.

