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FAE TECHNOLOGY CODE OF ETHICS

Process responsibility
General Management


Changes Table

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INTRODUCTION

The complex circumstances in which FAE TECHNOLOGY operates make it important to clearly define the set of values that FAE TECHNOLOGY recognizes, accepts and shares, and the set of responsibilities that FAE TECHNOLOGY assumes internally and externally.

This Code of Ethics has therefore been prepared, encompassing a set of principles and rules, addressees' observance of which is of fundamental importance for the smooth operation, reliability and reputation of FAE TECHNOLOGY.


All of FAE TECHNOLOGY's activities must be carried out in compliance with the law, within a framework of fair competition and demonstrating honesty, integrity, fairness, and good faith with respect for the legitimate interests of customers, employees, business and financial partners, and the communities in which FAE TECHNOLOGY operates.

All those who work in and for FAE TECHNOLOGY, without distinction or exception, are committed to observing and enforcing these principles within the scope of their functions and responsibilities.

In no way may the belief that one is acting for the benefit or in the interest of FAE TECHNOLOGY justify engaging in conduct that is contrary to these principles.

The Code of Ethics seeks to ensure that FAE TECHNOLOGY's operations, conduct and relationships, whether internal or external, are based on the following core values:

- **Legality, honesty and fairness:** FAE TECHNOLOGY operates in compliance with applicable laws, regulations, internal rules and procedures, and this Code. Under no circumstances may the pursuit of FAE TECHNOLOGY's interest justify conduct that is contrary to the principles of fairness and legality. FAE TECHNOLOGY strives within its corporate organization, for the dissemination and knowledge of legal regulations, and of the code and procedures established to prevent the violation of legal regulations.
- **Loyalty and good faith:** The relationships with the addressees and third parties in general must feature good faith and trustworthiness, thus maintaining the agreements and covenants to develop the company's assets and pursue good faith conduct in every decision.
- **Integrity:** In the relationships with the addressees and third parties in general, FAE TECHNOLOGY is committed to acting in a fair and transparent manner, avoiding misleading information and conduct such as to take undue advantage of third parties' position of disadvantage.
- **Transparency:** Information disseminated by FAE TECHNOLOGY must be complete, transparent, understandable, accurate, and comply with the principles of equal and contemporaneous public access to it.
- **Impartiality:** In its relations with stakeholders and third parties generally, FAE TECHNOLOGY avoids discrimination of any kind and in particular discrimination on the basis of age, sex, health status, nationality, political opinions and religious beliefs, and social or personal status.
- **Respect for people and equal opportunity:** FAE TECHNOLOGY respects the fundamental rights of the individual and ensures equal opportunities for all.
- **Community, society, and environment:** FAE TECHNOLOGY intends to contribute to the economic well-being and growth of the communities in which it operates by promoting respect for and protection of the environment, pledging to ensure full compliance with current environmental regulations by conducting all business activities in a sustainable manner.

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- **Professionalism and human resource development:** FAE TECHNOLOGY recognizes the centrality of human resources and protects and promotes their value in order to improve and increase the wealth and competitiveness of skills of each addressee, following a policy based on the recognition of merit and equal opportunities, and providing specific programs for staff skills development and the acquisition of greater expertise.
- **Confidentiality:** FAE TECHNOLOGY guarantees the confidentiality of the information it holds and refrains from collecting and using sensitive data except in the case of express and conscious authorization from the owner of the data and in any case in accordance with the legal regulations in force.
- **Safety, health protection and working conditions:** FAE Technology protects the safety, hygiene and health of workplaces and when carrying out its activities considers it fundamental and a priority to fully respect the health, physical integrity and rights of workers and to fully comply with current occupational health and safety, hygiene and safety legislation.

The management of FAE TECHNOLOGY, in line with the most advanced standards of corporate governance, adopts the Code in order to enshrine the aforementioned ethical principles.

FAE TECHNOLOGY carefully monitors compliance with the Code of Ethics, setting up appropriate information, prevention and control tools and ensuring the transparency of operations and behaviors implemented, intervening, where necessary, with corrective actions and appropriate sanctions.

FAE TECHNOLOGY ensures the widest dissemination of the Code of Ethics to all addressees and the general public, including through inclusion on the company's website at <https://fae.technology>.

1 GENERAL PRINCIPLES

1.1 Scope and addressees of the Code


The Code applies, in Italy and overseas, to all Addressees (as defined below).

“**Addressees**” are defined as all persons to whom the rules of this Code of Ethics apply, namely:

- The Directors and members of the corporate bodies of FAE TECHNOLOGY.
- Managers and any other persons in senior positions, i.e. any person holding representative, administrative or managerial positions or who exercises, including on a *de facto* basis, management and control over an individual area (the “**Company Representatives**”).
- All employees of FAE TECHNOLOGY, including temporary or part-time workers and workers treated as such (The “**Collaborators**”).
- All persons who, without being employees, cooperate in various capacities with FAE TECHNOLOGY, carry out activities at, on behalf of or in the interest of FAE TECHNOLOGY, maintain business relationships with the company, receive assignments or have long-term relationships with the company (consultants, suppliers, customers, agents, contractors, business partners, contractors, etc.).

All Addressees are required to be familiar with the Code of Ethics, to comply with its provisions both in their relations with each other (internal relations) and to actively contribute to its implementation, and to report any deficiencies to the relevant function.

All actions, operations and negotiations carried out, in general, the conduct of the Collaborators and more generally of the Addressees in the performance of the activity or services

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carried out for and/or with FAE TECHNOLOGY are therefore based on the utmost correctness and transparency of information, formal and substantial legitimacy, and clarity and truth in the accounting records in accordance with the regulations in force and internal procedures.

Company Representatives are specifically required to give concrete form to the values and principles contained in the Code, assuming responsibility both internally and externally and strengthening trust, cohesion and team spirit.

The members of the Boards of Directors, in setting business strategies and objectives, in proposing investments and in executing projects, and in any decision or action related to the management of FAE TECHNOLOGY, shall be guided by the principles contained in the Code.

In compliance with applicable laws and regulations, FAE TECHNOLOGY's collaborators adapt their actions and conduct to the principles, objectives and commitments set out in the Code.

To fully comply with the Code of Ethics, Collaborators who become aware of situations that may actually or partially constitute a violation of the Code of Ethics, must promptly report such to their direct function manager and/or service manager and/or to the Code Oversight Body, as defined in Section 1.6 below. All employees must provide professional contributions appropriate to the responsibilities assigned to them.


1.2 Commitments of FAE TECHNOLOGY S.P.A.

The Company ensures, including through the designation of specific internal functions:

- Full dissemination of the Code within FAE TECHNOLOGY and its effective application, including through the inclusion in the respective contracts of special clauses establishing the obligation to comply with its provisions.
- Updates to the Code in order to adapt it to the development of civil sensitivities, the business environment and regulations that affect the Code, conducting checks regarding any reports of violations of the Code's rules.
- Assessment of the facts and the consequent application of appropriate sanctions in the case of proven violations.
- That no one may be subjected to retaliation of any kind for reporting possible violations of the Code or relevant regulations.

1.3 Collaborator obligations and Whistleblowing Policy

- All Employees are required to be familiar with the rules contained in the Code and the related regulations governing the activities carried out within their function, adopting a policy whereby the detection of any possible wrongdoing, danger or risk that could harm customers, colleagues, shareholders, the public or the company's own reputation is reported.
FAE TECHNOLOGY Collaborators are required to:
 - Refrain from conduct contrary to these rules.
 - Contact supervisors - and only in case of the failure of the Code Oversight Body to respond - where clarification on how such rules are applied is required.
 - Promptly contact their supervisors - and only in case of the failure of the Code Oversight Body to respond - where clarification on how such rules are applied is required.

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- Promptly report to their superior, and only in the event of the failure of the Code Oversight Body to do so, any information, either directly acquired or reported by others, regarding possible violations and any request for violation that has been addressed to them.

1.4 Obligations of heads of business units and functions

Each Head of a Unit or corporate function (i.e. any person who exercises, including *de facto*, management and/or control of a business unit or division) is required to:

- Ensure their conduct is in line with the principles set forth in this Code and the relevant procedures, and to require compliance by Employees of Collaborators. For the purposes of this Code, each manager shall supervise the Employees and Collaborators subject to his or her direction, coordination or control and take the necessary measures to prevent violations of this Code.
- Work to ensure that Collaborators understand that compliance with the rules of the Code, and with safety procedures and regulations, is an essential part of the quality of work performance, and that its violation may constitute contractual default and/or a disciplinary offence, in accordance with the regulations in force.
- Carefully select, to the extent of their competence, internal and external collaborators to ensure that persons who do not demonstrate a complete commitment to comply with the Code's rules and procedures are not appointed.
- Take immediate corrective measures when required by the situation, and implement and promote the adoption of appropriate measures to prevent the recurrence of violations.
- Promptly report to the Code Oversight Body their own findings, in addition to any news reported to them by collaborators regarding potential or current violations of this Code by any Employee or Collaborator.

1.5 Applicability of the Code to third parties

All addressees, on the basis of their competencies, when dealing with external parties, must:

- Inform them adequately upon the commitments and obligations required by the Code.
- Demand compliance with the obligations which directly concern their activities.
- Adopt appropriate internal initiatives and, where within their scope, external initiatives in the case of non-fulfilment by third parties of their obligations to comply with the Code's rules.


1.6 Bodies responsible for Code application

The bodies responsible for Code application are:

- The **Code Oversight Body** is responsible for reviewing reports of possible violations and promoting appropriate investigations and verifications, making use of the relevant structures of FAE TECHNOLOGY. Accordingly, it will be in charge of evaluating any corrective measures to be taken.

1.7 Contractual value of the Code

The code is an integral part of the employment relationship.

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Compliance with the rules of the Code must be considered an essential part of the obligations of FAE TECHNOLOGY Employees, including pursuant to and for the purposes of the Article of the Civil Code.

Violation of the Code's rules may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, including as regards the preservation of the employment relationship, and may lead to actions for compensation for damages caused by the same violation.

For Addressees who are not employees, compliance with the Code is a prerequisite for the continuation of the existing professional or collaborative relationship with FAE TECHNOLOGY.

2 BUSINESS MANAGEMENT CONDUCT

2.1 General business management

The company's business relations are based on the principles of honesty, correctness, transparency, efficiency and openness to the market.

Addressees who act in the name or on behalf of FAE TECHNOLOGY are required in business dealings of interest to FAE TECHNOLOGY and in relations with the Public Sector to behave ethically and in compliance with the law, displaying the utmost transparency, clarity, fairness and efficiency.

In commercial or promotional relations and relationships, Addressees are also required to behave in a manner that aligns with FAE TECHNOLOGY's corporate policies and which may never result, even where in the pursuit of the corporate purpose, in acts contrary to the law, the regulations in force or the corporate procedures adopted with reference to the individual functions.

2.2 Gifts and other benefits


In dealings with customers, suppliers and third parties, offers/concessions of money, gifts and benefits of any kind designed to acquire favorable treatment are not permitted.

2.3 Conflicts of interest

The Addressees must avoid situations and/or activities that could lead to conflicts of interest with those of FAE TECHNOLOGY or that could interfere with their ability to make impartial decisions in safeguarding the latter's best interests.

By way of non-exhaustive example only, a conflict of interest exists in the case of:

- Co-interest (overt and covert, direct or indirect) of the Addressee in activities of suppliers, customers, competitors and, in any case, with external parties seeking to do business with FAE TECHNOLOGY.
- Use of one's functional position for the pursuit of interests in conflict with those of FAE TECHNOLOGY.

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- Use of information acquired in the performance of work activities, for one's own benefit or for the benefit of third parties and in any case contrary to that of FAE TECHNOLOGY.
- Undertaking of positions or performance of work activities of any kind and even indirectly, with customers, suppliers, competitors and third parties in general, contrary to the interests of FAE TECHNOLOGY.
- Assuming the duties of broker, business procurer or other intermediary on behalf of third parties in transactions concerning FAE TECHNOLOGY or its interests.

Where a situation of even potential conflict with the interests of FAE TECHNOLOGY arises for the Addressee, the latter should immediately notify their superior and, in cases of greater significance, the Code Oversight Body, and refrain from any activity related to the situation that is the source of the conflict.

In FAE TECHNOLOGY's dealings with third parties, Addressees must act in accordance with ethical and legal standards, with an explicit prohibition of illegitimate favoritism, collusive practices, bribery or solicitation of personal benefits for themselves or others.

Supervisors and, in cases of greater significance, the Code Oversight Body, must be promptly informed of any information that may suggest a situation of potential conflict of interest with FAE TECHNOLOGY.

This is without prejudice to the conflict of interest rules for members of the corporate bodies in accordance with law.

2.4 Selection of and contractual relationships with suppliers

The selection of Suppliers and the formulation of conditions for the purchase of goods and services for FAE TECHNOLOGY is based on respect for the values of competition, objectivity, fairness, impartiality, fairness in price and quality, carefully evaluating guarantees and the range of offers, preferring those Suppliers who promote values that are similar to those of FAE TECHNOLOGY, particularly in terms of social and environmental sustainability.


Purchasing processes must be geared toward seeking maximum competitive advantage for FAE TECHNOLOGY.

Entering into a contract with a Supplier must always be based on relations of extreme clarity, avoiding contractual ties that involve forms of dependence towards the contracting Supplier.

Should FAE TECHNOLOGY enter into relationships with companies in at-risk countries, its actions should be guided by criteria that guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, and protection against child labor.

2.5 Personal data protection

In order to ensure the protection of personal data, FAE TECHNOLOGY undertakes to process this in accordance with the GDPR (General Data Protection Regulation) on the protection of individuals with regard to the processing of personal data and the free movement of such data.

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“Personal data” is any information relating to a natural person who is identified or identifiable, even indirectly, by reference to any other information, including a personal identification number.

2.6 Use of company assets

2.6.1 Diligence

Each Addressee is responsible for the protection and proper use of FAE TECHNOLOGY's assets, material and non-material, including confidential information and computer and network resources, and must promptly inform the appropriate structures of any threats or events that could be harmful to FAE TECHNOLOGY.

Specifically, every Addressee must:

- Work diligently to protect company assets through responsible behavior and in line with the operating procedures set up to regulate their use.
- Avoid misuse of corporate assets for purposes contrary to the compulsory legal, public order or morality rules or that is carried out to commit or induce the commission of crimes and/or racial intolerance, the glorification of violence or the violation of human rights.
- Obtain the necessary permissions for the use of an asset outside the scope of company business.

2.6.2 Digital information


The constant dissemination of digital information requires ensuring the availability, security, integrity and maximum efficiency of FAE TECHNOLOGY data transmitted or available from remote platforms.

Every Addressee is therefore required to:

- Refrain from send threatening and insulting e-mail messages, resorting to obscene or otherwise low-level language, making inappropriate or undesirable comments that may cause offence to the person and/or damage to the corporate image, and otherwise constitute a violation of FAE TECHNOLOGY's values and policies such as sexual or racial harassment or other forms of discrimination.
- Avoid spam that may generate data/information/process traffic within the corporate telematics network such that network efficiency is significantly reduced with negative impacts on productivity.
- Not browse websites with content that is improper and offensive or, particularly, pornographic or otherwise unacceptable or contrary to applicable laws and common acceptability.
- Avoid loading unauthorized software onto corporate systems and never make unauthorized copies of licensed programs for personal, corporate or third-party use.

2.6.3 Traceability and integrity of documentation

Every Addressee must ensure, in compliance with company procedures, the adequate documentation of each transaction carried out, in order to be able to proceed at any time to verify

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the reasons and characteristics of the transaction in the stages of authorization, execution, registration and verification of the transaction itself.

All financial reports, accounting statements, research progress reports, sales reports, attendance records, and any other documents pertaining to the activities and organization of FAE TECHNOLOGY must accurately and clearly reflect the relevant facts and the true nature of each transaction.

Any document in any form and of any content that is incorrect, incomplete, or untrue is contrary to company policy and will therefore be considered unacceptable.

2.6.4 Travel and miscellaneous expenses

Travel and entertainment must be compatible with work requirements. FAE TECHNOLOGY intends to ensure that Employees and, more generally, Addressees, do not obtain unjustified or illegitimate advantages or suffer harm or economic loss as a result of business travel or entertainment. They are therefore required to use FAE TECHNOLOGY's money and handle it with the same care and caution as they would spend their own.

When an expense report is submitted, reasonable, actual and authorized expenses will be reimbursed according to the rules contained in the appropriate specific company procedures. Addressees should always be requested and personal expenses should be separated from business expenses under all circumstances.

3 EXTERNAL RELATIONS

3.1 Parties, trade unions and associations

Relations with political parties, trade unions and other interest-bearing associations are maintained by authorized Company Representatives or their sub-delegates, in compliance with the provisions of this Code and with the By-Laws and special laws, particularly in terms of impartiality and independence.

FAE TECHNOLOGY does not make direct or indirect contributions to political parties or their representatives or candidates, and refrains from any direct or indirect pressure on political figures (e.g., through acceptance of referrals for hiring, consulting contracts, etc.).


Every employee must recognize that any form of involvement in political activities is on a personal basis, on their own time, at their own expense, and in accordance with applicable laws.

FAE TECHNOLOGY also does not make contributions to organizations with which there may be a conflict of interest (such as labor unions, consumer protection associations).

Strictly institutional forms of cooperation are possible when:

- The purpose relates to FAE TECHNOLOGY's mission or to public interest projects.
- The allocation of resources is clear and documentable.
- There is express authorization from the relevant corporate functions.

3.2 Public sector

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In its dealings with the public sector, FAE TECHNOLOGY observes the following principles:

- It adapts its conduct to the utmost transparency, clarity, fairness and impartiality, such that it does not lead to biased, false, ambiguous or misleading interpretations on the part of any public institutional entity with which it maintains relations in any capacity.
- Relations with the public sector, Italian or overseas, for negotiations or other contacts of any kind that are instrumental to the company's business, are handled only by those who have been formally appointed to do so.
- It prohibits allocating grants, subsidies or funding obtained from the state or other public body or the European Union to purposes other than those for which they were intended, even for small values and/or amounts.

3.3 Other authorities and institutions

In institutional relations, FAE TECHNOLOGY is committed to:

- Establishing, without any kind of discrimination, stable channels of communication with all institutional interlocutors at the territorial, state, and community levels.
- Representing the interests and positions of FAE TECHNOLOGY in a transparent, rigorous, consistent and fair manner, avoiding attitudes of a collusive nature.
- Ensuring the strictest compliance with national and international regulatory requirements and company procedures.
- Interfacing with institutional interlocutors exclusively through persons expressly delegated to do so by FAE TECHNOLOGY's top management and who are not in a situation of conflict of interest.

In carrying out its activities, FAE TECHNOLOGY operates in a lawful and correct manner, cooperating with the Judicial Authority, law enforcement agencies and any Public Official and/or person in charge of a Public Service who has powers of inspection and to carry out investigations against it.


No Addressees may engage in economic activities, give professional appointments, give or promise gifts, money, or other benefits to those who carry out the assessments and inspections, or to bodies of the Judicial Authority.

Addressees who are subject, even in a personal capacity, for events related to the employment relationship, to investigations, or receive subpoenas, and/or those who will be notified of other judicial measures, must promptly inform the Supervisory Board of FAE TECHNOLOGY.

3.4 Supervisory authority

FAE TECHNOLOGY commits itself to full and scrupulous compliance with the rules set by the Supervisory Authorities, namely the Bank of Italy, Consob (National Commission for Companies and the Stock Exchange), ISVAP (Private Insurance Supervisory Authority), COVIP (supervisory commissions on pension funds), AGCM (the Antitrust Authority) and by the control bodies, and to base its relations with these bodies on the utmost cooperation in full compliance with their institutional role, undertaking to promptly implement their requirements as applicable to FAE TECHNOLOGY.

3.5 Mass media

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Communication to the media plays an important role in developing the image of FAE TECHNOLOGY. As such, relations between FAE TECHNOLOGY and the mass media are the responsibility only of the specially designated corporate functions, and must be carried out in line with the communication policy and tools defined by the corporate boards, and with professional conduct laws, rules and practices. External disclosure is based on criteria of truthfulness and transparency. It is absolutely forbidden to spread false news.

Social media plays a key role in today's corporate communication, which, in the case of FAE TECHNOLOGY, in addition to being managed and administered internally within the company, respects those core values on which its Code of Ethics is based.

3.6 Customers

FAE TECHNOLOGY's primary objective is to fully satisfy its customers through reliable, correct behavior designed to ensure high quality products and services.

FAE TECHNOLOGY establishes contracts and relationships with customers in a fair, complete and transparent manner, in compliance with the law, regulations, the Code and internal procedures.

Where unforeseen events or situations occur, FAE TECHNOLOGY respects the customer's expectations by executing contracts fairly, without exploiting any conditions of weakness or ignorance as unforeseen events arise.

Addressees are prohibited from maintaining business relationships with current or potential customers. In terms of those whose involvement in illegal activities is known or suspected, and in evaluating customers, their ability to meet their payment obligations must be considered.

In dealings with customers, Addressees must not offer or accept gifts or any other form of benefits that could be interpreted as a means of obtaining favorable treatment for any activity related to FAE TECHNOLOGY and which are not attributable to normal business or courtesy relations.

In addition, FAE TECHNOLOGY, to the extent that it knows the intended use of its products and services, also chooses the customer on the basis that it is not totally in conflict with the values described in this Code.


4 PERSONNEL POLICIES

4.1 Human resource management

Human resources are an indispensable element for the existence of an enterprise. The dedication and professionalism of employees are crucial values and conditions for its success.

FAE TECHNOLOGY is committed to developing the abilities and skills of every employee through a full sharing of the company's values, seeking to create synergy between the person and the company, so that energy and creativity find full expression in the achievement of the company's objectives.

FAE TECHNOLOGY offers all of its employees the same opportunities for professional growth, making sure that everyone enjoys fair treatment based on merit and fair pay, without discrimination

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of any kind, thanks to the company's commitment to such.

The competent functions must:

- Adopt criteria of merit, competence and evaluation of individual ability and potential, and in any case strictly professional criteria for any decision regarding an Employee.
- Provide for the selection, hiring, training, compensation, and management of Employees without discrimination of any kind.
- Oversee the working environment so that personal characteristics cannot give rise to discrimination.

Each Addressee must actively cooperate to maintain a climate of mutual respect for each other's dignity and reputation.

FAE TECHNOLOGY therefore opposes any behavior or attitude that is discriminatory or harmful to the individual and his or her beliefs and preferences.

Any violation of the provisions of this Article shall be immediately reported to the Personnel Department.


4.2 Workplace environment and safety

FAE TECHNOLOGY is committed to promoting and consolidating a culture of safety by developing risk awareness, promoting responsible behavior by all employees and by working to preserve, especially through preventive actions, the health and safety of workers.

FAE TECHNOLOGY's activities must be carried out in full compliance with current prevention and protection regulations. Operational management should strive to improve occupational health and safety conditions. FAE TECHNOLOGY is also committed to guaranteeing the protection of working conditions in the protection of the psycho-physical integrity of the worker, respecting their moral personality, ensuring that this is not subject to unlawful conditioning or undue hardship.

Specifically, the basic principles and criteria under which decisions of all kinds and at all levels are made regarding occupational health and safety. They can be identified as follows:

- Avoiding risks.
- Evaluating the risks which cannot be avoided.
- Combating the risks at source.
- Adapting the work to the individual, especially as regards the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous and repetitive work and to reducing its impact on workers' health.
- Adapting to technical progress.
- Substituting that which is dangerous with that which is not dangerous or less dangerous.
- Developing a coherent overall prevention policy which covers technology, organization of work, working conditions, social relationships and the influence of factors related to the working environment.
- Prioritizing collective protective measures (over individual protective measures).
- Giving appropriate instructions to workers.

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These principles are used by FAE TECHNOLOGY to take the necessary measures to protect the safety and health of workers, including occupational risk prevention activities, information and training, and the understanding of an organization and of the necessary means.

The entire company at both security and operational levels must comply with these principles, particularly when decisions are to be made or choices are to be made and, subsequently, when they are to be implemented.

4.3 Sexual harassment

FAE TECHNOLOGY does not tolerate sexual harassment and wishes to ensure a fair and professional working environment for all its collaborators. It condemns discrimination and harassment of all kinds, unprofessional behavior, inappropriate or derogatory remarks, insults, threats or taunts.

All workers therefore undertake to adopt behavior based on respect for interlocutors, including in terms of courtesy and professionalism, designed to at sharply reprimand any act of discrimination or harassment against any person, employee or collaborator.

Sexual harassment, in particular, is an act of discrimination under Article 26, Paragraphs 1 and 2 of Legislative Decree No. 198/2006, and consists of any behavior with sexual connotations expressed in physical, verbal or nonverbal form, which is unwanted, has the purpose or otherwise the effect of violating the dignity and freedom of the person subjected to it, and creates an intimidating, hostile, degrading, humiliating or offensive climate.

FAE TECHNOLOGY considers sexual harassment to be particularly serious when:

- it is implicitly or explicitly used to exert pressure in the case of employment or in the case of decisions affecting one's professional future.
- it has the purpose or effect of unreasonably interfering with job performance or creating an intimidating, hostile or offensive work environment. Sexual harassment also occurs where the perpetrator's behavior is not accompanied by blackmail or threats, but is unwanted by the sufferer. Even a single isolated, unrepeated act constitutes sexual harassment.


The following are forms of sexual harassment or discrimination:

- in verbal terms: sexual innuendo, sexual or racial remarks, insults or disparaging comments, vulgar jokes, threats, vulgar or insulting suggestions or sounds.
- in visual terms: disparaging or vulgar images, photographs and objects, obscene gestures.
- in physical terms: unwanted physical contact of any kind.

Harassment is also considered any initiative that represents making or threatening retaliation following a negative response to a verbal and/or physical approach.

4.4 Prohibition of discrimination

In conducting FAE TECHNOLOGY's business, employees must respect the dignity, rights and cultural differences of individuals. It is FAE TECHNOLOGY's policy not to exercise any discrimination on Collaborators and to observe the principle of equal employment opportunity without distinction of age, sex, race, religion, color, physical handicap, citizenship, marital status, or sexual orientation. No form of bullying will be tolerated.

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4.5 WHP Program

By joining the WHP program, FAE TECHNOLOGY is committed to providing its collaborators with opportunities to improve their health by reducing general risk factors and in particular those most implicated in the genesis of chronic diseases. It encourages physical activity, provides opportunities to quit smoking, and promotes healthy eating.

FAE TECHNOLOGY considers it unlawful conduct to work under the effects of alcohol, narcotics or similar substance abuse, or to consume or dispose of narcotics and/or alcohol in any capacity during the course of employment.

5 TRANSPARENCY OF ACCOUNTING DISCLOSURE AND INTERNAL CONTROLS

5.1 Accounting transparency

FAE TECHNOLOGY is aware of the importance of truth, transparency, accuracy, completeness and compliance with applicable regulations regarding accounting disclosure.

It has therefore put in place administrative and accounting systems capable of correctly representing management information and providing the tools to identify, prevent and manage, to the extent possible, financial and operational risks, in addition to fraud to the detriment of FAE TECHNOLOGY.

In this regard, FAE TECHNOLOGY pays special attention to the values of the Board of Statutory Auditors and to appointing both the Board of Statutory Auditors and the auditing bodies.


Specifically:

- All activities and actions performed and carried out by Addressees as part of their operations must be verifiable.
- Accounting transparency is based on the truth, accuracy, completeness and reliability of management information documentation and related accounting records.
- All Addressees are held to collaborate to ensure that operating events are correctly represented in a timely manner in the accounting records.
- Adequate supporting documentation regarding the activity carried out must be kept for each transaction, allowing for easy accounting records, identification of various levels of responsibility and accurate reconstruction of the transaction.
- All accounting records should perfectly reflect the supporting documentation.

Addressees who become aware of omissions, falsifications, alterations, incompleteness or neglect in disclosure or supporting documentation must inform their supervisor and the Code Oversight Body.

5.2 Internal control system

FAE TECHNOLOGY considers it essential to disseminate, at every organizational level, a culture based on an efficient internal control system. This process, carried out by Company Representatives, is designed to facilitate the achievement of corporate objectives while safeguarding resources, preventing corporate risks, ensuring compliance with applicable laws and regulations, and preparing reliable, truthful and correct financial statements and economic-financial data.

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Specifically, FAE TECHNOLOGY believes that the internal control system should be geared toward improving the effectiveness and efficiency of production and management processes.

All Addressees, within the scope of their functions, are responsible for the proper functioning of the control system.

6 ADOPTION, EFFICACY AND AMENDMENTS

This Code of Ethics is adopted by resolution of the management of FAE TECHNOLOGY S.P.A.

on 06/12/2021 and is effective immediately as of that date.

Any updates, amendments or revisions to this Code of Ethics must be approved by the management of FAE TECHNOLOGY S.P.A.

7 CONTACT DETAILS OF CODE OVERSIGHT BODY

Communications and reports required by this Code should be addressed to: Code Oversight

Body for the FAE TECHNOLOGY S.P.A. Code of Ethics.

Via Cesare Battisti 136, 24025 Gazzaniga (BG)

Email: g.codiceetico@fae.technology