



CODE OF ETHICS			
VERSION	DESCRIPTION	APPROVED BY	Date
1.0	New Emission	Board of Directors	12/28/2023

Our goals and values

The company Tinvention S.r.l. (hereinafter "**Tinvention**" or the "**Company**"), is a technological partner for the creation of *Enterprise applications* and aims to acquire leadership in the target market. For this reason, people at Tinvention make up a *team* with technical *skills* and mastery of the most sought-after technologies in the ICT sector.

This goal requires us, first and foremost, to pursue ever higher quality levels, in order to gain visibility on the market and win the trust of customers, suppliers, business *partners*, financial institutions, shareholders and authorities.

In order to do this, it is necessary that our activity gets inspired by some ethical and social principles at all times, which are shared and adopted primarily by top management, namely:

- professionalism;
- independence;
- awareness and responsibility;
- transparency, honesty and fairness;
- quality and efficiency;
- compliance with applicable regulations;
- diligence and loyalty to the employer;
- politeness and respect in relationships between colleagues;
- enhancement of teamwork and training;
- protection of equal opportunities;
- protection of intellectual property rights;
- respect for the environment, health and safety.

Through the development of methodological and technological skills, Tinvention is able to operate in different *business* domains, and in particular, the domains in which we operate are: banking, insurance, finance, public administration, *e-commerce*, automotive, *sales automation*, *media & TV*, gas & power and *managed security*.

Purposes of the Code of Ethics

The Code of Ethics has the function of identifying some of the main conducts to be followed by the Company's employees, including managers, as well as listing the essential values to which the activities of all those who act in the interest of the Company, both internally and externally, should get inspiration. Therefore, also self-employed or parasubordinate collaborators, service providers, Suppliers and any contractors (hereinafter, the "**Recipient(s)**") should get inspired as well.

Quality as a priority

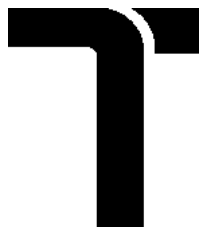
The Company's mission is to ensure ever higher quality *standards*, providing products and services that meet customers' demands and expectations in terms of quality, safety and flexibility.

We are convinced that the professionalism and quality of the services we offer depend primarily on enhancing people. For this reason, the Company's commitment to customers and business *partners* in terms of product and/or service quality and safety then becomes responsibility of each of us.

Our engineers received their training from Politecnico di Milano and then from the Consortium for Training and Research in Electronic Engineering ("CEFRIEL"). The founders are members of the Order of Engineers: a guarantee of professional ethics.

We are all required to strive for excellence in every activity we carry out, with the aim of achieving the maximum benefit for customers and for the Company, in compliance with the above-mentioned principles and values.

Knowing how to bring together shareholders, employees, suppliers and other resources in the best possible



way consents to us to guarantee the provision of an excellent service to our customers, fair profits in the competitive market, high levels of satisfaction for investors and, above all, a path of professional growth for our employees.

Correctness in the performance of activities

In carrying out one's duties, it is necessary to act at all times in an ethically correct manner and with full awareness of the social and environmental issues that are relevant from time to time.

This is actually the expectation of the customers and the authorities that control and regulate the activities carried out by the Company and the company's success depends largely on the level of satisfaction of such expectation.

Knowledge of and compliance with applicable legislation

The Company operates in full compliance with current and applicable legislation. Therefore, it requires its shareholders, directors, collaborators and employees in general and anyone who performs representative functions in any capacity, even de facto, to scrupulously observe, in every context, the regulations in force and applicable from time to time. Violation, even if only occasional, of these regulations could in fact cause serious damage to the Company's reputation and its ability to profitably carry out its business activities, as well as compromise the efforts made by others.

For this reason, we are required to be constantly informed and updated on applicable regulations, including those specific to the sector to which we belong which are constantly evolving.

In this regard, the Company's managers have the specific task of ensuring that their direct reports are aware of, understand and comply with the relevant regulations from time to time, including those of foreign jurisdictions, and promptly take the most appropriate action in the event of suspected violations of the same.

Whenever a doubt arises or there are difficulties in understanding a given regulatory context, it is necessary to contact the related managers promptly.

Conflict of interest

It is strictly forbidden to use the position held within the Company to obtain benefits or advantages of any kind, for oneself or one's family members.

In carrying out our duties, we are then required to act in accordance with the highest ethical standards, without personal interests influencing our ability to make impartial judgments and choices.

For this reason, it is necessary to avoid situations in which there may be even the slightest suspicion of a conflict of interest, since this mere appearance of conflict could damage the image of the company, damage the relationship between colleagues and compromise the trust that customers, investors and authorities have in the Company.

Therefore, everyone must pay great attention and sensitivity to the issue of conflicts of interest, promptly clarifying any doubts with the Company's Supervisory Body.

Should a Recipient find himself/herself in a situation of conflict of interest, even if only potential, and also in relation to activities carried out or positions held by relatives in the direct line and/or acquaintances, he or she is required to promptly inform the Company's Supervisory Body, which will take appropriate action in respect of everyone's roles in order to protect the Company as well as those directly involved.

Similarly, anyone who, in the course of their activities in the company, becomes aware of conduct and/or situations concerning third parties that may constitute, even potentially, a conflict of interest, is required to inform their manager.

Relations with third parties and external communications: computer systems, internet and social networks

Relations with third parties in general, including *business partners*, customers and suppliers, must always be based on principles of fairness, transparency and honesty, as well as comply with the regulations and practices applicable from time to time.

The selection and qualification of Suppliers and Business Partners, as well as the definition of the conditions for the purchase of goods and services, must be guided by criteria of competition, objectivity, fairness, impartiality, fairness in price and quality of the goods and/or services.

In particular, it is forbidden to offer or accept incentives, advantages or benefits, in cash or of any other nature, which are not provided for by law, as well as to engage in any practice or form of corruption, collusion,



blackmail or abuse.

External communications regarding the Company's activities, whether made through traditional *media* or *social networks*, must be authorized in advance by the Company itself. Communication to the outside world must follow the guiding principles of truth, fairness, transparency and prudence and must be aimed at promoting knowledge of the Company's policies, programmes and projects. In any case, offensive and/or defamatory and/or incorrect comments towards the Company, its managers and its representatives in general are prohibited.

Obligations towards institutions and authorities

The sector of activity in which the Company operates is strictly regulated and consequently there are numerous obligations to compile and store documents and information, which may be disclosed to competent institutions and authorities, both in Italy and abroad.

It is therefore necessary that the related requirements are carried out scrupulously and punctually. In some cases, a mere carelessness may in fact constitute a serious breach and generate doubts about the Company's competence and/or its good faith.

Persons in charge of preparing information, documents or reports for institutions and authorities, or who have relations with such subjects, must therefore carry out their task with the utmost diligence, fairness and transparency, providing truthful, timely and accurate communications.

For these reasons, the Company:

- it is inspired by maximum transparency in bookkeeping and tax returns;
- It promotes legality, fairness and transparency also in the choice of internal and external professionals who deal with tax *compliance*.

Fair competition

The Company operates on the market in a fair and loyal manner, in full compliance with the laws in force, and rejects any type of conduct that constitutes unfair competition or unfair practice.

Protection of confidential information and secrets

During the contractual relationship with the Company, you have access to data and information whose strictly confidential nature requires the constant and rigorous maintenance of a bond of confidentiality and secrecy.

These are, in particular, data and information concerning the Company's activities and products, including, by way of example but not limited to, studies, research, development or *marketing* plans, production and sales processes, commercial proposals and strategies, customer and supplier lists, new methods, formulas, concepts, ideas and applications (recordable, non-registrable, protected as other proprietary rights or in any case likely to give the Company a current or future competitive advantage), other intellectual property rights, as well as technical, accounting, commercial, economic, financial and human resources data (the "**Confidential Information**").

Confidential Information has a high current and future economic and commercial value and so represents a strategic and competitive advantage for the Company. Therefore, the Company aims to safeguard the confidentiality of such data and information, of which the knowledge and disclosure to third parties could cause irreparable economic and financial damage to the Company's business activity, protecting its interests also in relation to the activities and tasks that may be carried out by the Recipients in competition with the Company after the termination of their relation with the same.

Being aware of the legitimate interests of the Company, as expressed above, it is then necessary to assume confidentiality obligations even in addition to those that already derive from civil and criminal law, thus committing to maintain the strictest confidentiality on the above-mentioned Confidential Information and not to use it, directly or indirectly, except for the uses envisaged by the Company and/or for the fulfillment of the duties and obligations deriving from the relation in place with the Company itself, and this even after its termination (for any reason), until the Confidential Information has become generally available, in the public domain or otherwise freely usable.

Compliance with the above confidentiality obligations also includes simple precautions, including the removal of papers from desks or writings on blackboards in the rooms at the end of meetings, the non-forgetfulness outside the company premises or in inappropriate places of magnetic media or memory containing confidential



information.

It is also a good idea to never talk loudly about sensitive topics for the company's *business*, on the phone or in the presence of third parties, in crowded public places such as trains, planes, waiting rooms at stations and airports, hotels, restaurants and bars.

Specific rules of conduct can be found in the company *policy* dedicated to the rules of conduct for Tinvention employees.

Protection of intellectual property rights

The Company recognises the pre-eminent importance of the intellectual property and the wealth of *know-how* it owns, with particular reference to trademarks, products, *software* and production processes. For this reason, the Company strives with the utmost diligence to protect it in all the forms in which it takes place: in this regard, it should be noted that, in no way, the use of means protected by the rights of others is allowed without appropriate authorization or in violation of the terms provided for by the authorization itself.

Performing other activities by employees during the course of the employment relation

It is necessary to inform and obtain the approval of the Responsible Management before accepting an external assignment or participating, even occasionally, in political or social activities that may involve commitments during working hours, limiting the possibility of effectively fulfilling one's duties.

In the absence of prior approval from the Responsible Management, it is also forbidden to participate in events organized by third parties (e.g. as speakers at a conference) or to maintain relations with the press about topics or issues related to the Company's business or the function held within it.

If an employee holds external positions at the time of selection for recruitment, he or she is required to promptly inform the Company, in the person of the directly responsible and, if such an assignment should generate a conflict of interest, it must be resigned at the time of recruitment in the Company.

Value of training

The Company recognizes the importance of training as an indispensable factor in increasing the value of the company and the competence of employees. For this reason, we have a training course necessary not only to transfer technical content, but also to instill the philosophy and commitment of Tinvention. By creating a dynamic environment, we leave room for the ambitions of our employees and encourage the experimentation of their own ingenuity.

In addition, we offer undergraduates and recent graduates a training course lasting about three months and a period of *on-the-job training*.

Management of the Company's endowments and assets by employees

Company assets that we hold for service reasons must be used and safeguarded diligently and correctly. In the event of theft, loss or irreversible damage to the company asset entrusted to the company, as a result of negligent conduct, the Company reserves the right to take recourse against the employee concerned, including through a deduction of salary. Furthermore, if the negligent use of company assets or if it does not comply with the laws and/or company policies results in further direct or indirect damage to the Company, the latter reserves the right to take any action against the person concerned, without prejudice to any disciplinary action. The use of company resources or assets for illegal, unfair or non-transparent purposes is prohibited.

Specific provisions regarding the management of IT and digital tools owned by the Company are contained in the specific *policy* regarding the use of such tools.

Equal opportunities and non-discrimination

The Company aims to attract and retain the most qualified talents on the market and guarantee everyone careers opportunities, pursuing objectives of impartiality and meritocracy in the evaluation of the resources who are committed every day to growing its business. For this reason, the selection of persons must be motivated by criteria of merit, professionalism, competence, assessment of aptitudes and adherence to the values of the Company, which expressly rejects any form of discrimination or undue favouritism in the selection of its collaborators.

Each employee is valued for his or her skills and potential and must be treated with dignity and respect by his or her managers or directors, as well as by his or her subordinates or peers.

The Company also considers diversity as an element of value for its organization.



Harassing or discriminatory behaviour is not tolerated, including those that have repercussions on classification, remuneration, training and professional growth opportunities, as well as any discriminatory conduct for reasons of race, ethnicity or nationality, religion, sex, age, disability, sexual orientation, trade union, political or other. Any form of violence, threats or intimidation in the workplace is also prohibited and the Company will respond promptly and appropriately to any cases that may arise.

Safety in the workplace

The Company scrupulously observes the regulations on health and safety in the workplace, with regard to which it adopts periodic training courses and specific *policies* aimed at preventing and minimizing any risk related to work performance.

Respect for the environment

Environmental protection is a fundamental value for the Company, which has always been committed to operating in a safe and environmentally friendly manner.

We are therefore all required to take appropriate precautions in the execution of our tasks in order to minimize the environmental impact, paying particular attention to sustainability and energy saving.

Tinvention observes separate waste collection policies, which is why it is required to comply with local regulations regarding separation and disposal.

Protection of personal data

The Company processes and stores the personal data collected in the course of its business activities in compliance with the applicable legislation on the protection of *privacy* and requires the utmost attention from the Recipients in ensuring the best security *standards* in this regard. Compliance with the data protection regulations is also ensured, *inter alia*, by the adoption of appropriate technical and organisational measures. Specific provisions on the protection of personal data are contained in the specific *policy* adopted by the Company.

Publicity of the Code of Ethics

The Code of Ethics is published on the Company's website at the following link: <https://www.tinvention.net/>.