

kineton
High-Tech Humanity



Code of Ethics

Kineton LLC - Benefit Company

1. Introduction

Kineton Srl – Benefit Company (hereinafter "Kineton") is a modern company founded in the electronic engineering sector in 2017. Today, Kineton operates in the following Sectors: Media, Automotive, Space and Defense, IT, & Telco.

Kineton's Mission is to pursue, in strict compliance with this Code of Ethics, the creation of value not only for customers (through the offering of solutions increasingly innovative and futuristic, while at the same time being able to guarantee very high-quality standards and competitive prices), but also for employees, collaborators and company operators (hereinafter the staff) (constantly acting on the growth of their professional, social and economic profile), For The Stakeholders (pursuing profit realization) and for the community where we operate (reaffirming what is already present in the company statute and - to the occurrence of possibilities - offering our skills, time and resources to support different causes and encouraging and supporting Kineton members engaged in social activities outside the working environment).

To pursue these purposes, Kineton commits to:

- respect and enforce internally the laws in force and ethical principles according to standards of transparency, correctness and loyalty;
- adopt the tools and precautions necessary to prevent the violation of laws, operating according to the principles of transparency, correctness and loyalty to our employees and collaborators; monitoring the real observance of the principles themselves;
- ensure to the market, the Stakeholders and the community in general transparency on our activities; ensure confidentiality on corporate information, know-how and intellectual property, aimed at ensuring the integrity of our business and protecting that of our customers and suppliers;
- to practice a fair competition;
- disapprove and condemn the use of incorrect behaviour aimed at achieving economic objectives and of any other nature;
- ensure that whoever violates The Code of Ethics or Kineton procedures is subject to disciplinary action, up to and including dismissal or termination of employment, under the current laws.





1.1. Purpose and recipients of the present Code of Ethics

This Code of Ethics aims to promptly define the principles, rules, and values that Kineton draws inspiration from to achieve its objectives. Their compliance is essential for the reliability, reputation, and image and for the correct functioning of the company itself. It, therefore, requires all managers, auditors, consultants, employees, stakeholders, as well as all those who have any title whatsoever, relations and relationships with the company and in its interest, to observe and enforce, within one's functions and responsibility, the corporate rules and the precepts set out in this Code of Ethics.

In particular, the members of the Company's Board of Directors, all Company Managers, and Managers of Company Sectors and Functions are required to be inspired by the principles of the Code of Ethics in setting the objectives of the company, in proposing investments and implementing projects, as well as in any decision or action relating to the management of the company itself. In no way the conviction of acting to the advantage of the company will justify the adoption of behaviour in contrast with the principles reported in the present document.

Compliance with the Code of Ethics must be considered an essential part of the contract obligations of all the company's people pursuant to and for the applicable law. Kineton, also through its delegates, will constantly monitor the application of the Code of Ethics by the interested parties, even by means of an evaluation of any reporting; to report to the CEO, and where appropriate, to the Board of Directors, the ascertained violations of the Code of Ethics; to provide, where necessary, for periodic revision of the Code of Ethics; to propose and apply suitable sanctioning measures in the event an ascertained violation.





2. General Principles

All recipients of this Code of Ethics must observe the contents and the inspiring principles within their specific functions, attributions and activities in any situation and context. The Administrators, the Senior executives, and the Managers of the Company Sectors and Functions must comply with proposed and implemented projects, actions and investments useful for increasing the long-term economic value of the company and the well-being of its employees. All Personnel of the Company must be committed to respecting the laws and current regulations. In the presence of doubts and perplexities about how to proceed, one must ask their superiors for the necessary directives and operational information. Each recipient of this Code of Ethics is expressly required to know its content, actively contribute to its implementation and report potential deficiencies and violations.

2.1. Dissemination and awareness of the Code of Ethics

Kineton is committed to facilitating and promoting knowledge of the Code of Ethics by its recipients and to scrupulously monitor its observance, preparing adequate information, prevention and control tools to ensure, in any case, the transparency of the operations and the behaviors put in place, intervening, if necessary, with corrective actions. All staff are required to report promptly and inform the company management of any news they may have concerning the violation of the norms of the Code of Ethics so that the company can promptly prepare all the necessary protective initiatives and interventions that are any way useful to lead the operation back to norms of ethics and restore compliance to the standards of law, where violated.

Retaliation against anyone who reports an alleged violation of the Code in good faith will not be tolerated. Anyone who retaliates against such individuals will be subject to disciplinary action up to and including dismissal or termination of the business relation in compliance with the laws in force.

2.2. Fundamental rights

The company acts in its business activity by respecting the fundamental rights of every individual, protecting their moral integrity and ensuring equal opportunities. Internally, the company wishes to maintain a peaceful working environment in which everyone can work in respect of the laws, principles and values shared; in particular, it does not tolerate any form of isolation, exploitation or harassment for any cause of discrimination. For personal or work reasons and so any discrimination based on racial diversity is expressly prohibited, language, color, faith and religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status,





disability and physical aspect, economic-social condition; concessions of any privilege related to the reasons listed above, without prejudice to the rules in force.

2.3. Value of human capital

All Personnel - employees, collaborators (therefore even non-employees) and corporate operators - are carriers of talents and unique perspectives for our organization and constitute an essential factor for the company's success. For this reason, Kineton protects and promotes the value of human capital to improve and increase the assets and competitiveness of everyone's skills. Kineton believes that healthy competition a commitment to improvement, is key to developing and progressing within working groups. Recognition of results achieved, the professional potential and the skills expressed make up central moments of the professional development of the Personnel of the Company. Therefore, the selection, training, management and professional development are carried out without discrimination, according to merit, competence and professionalism criteria. Pursuing these principles and rewarding, where possible, exclusively according to these criteria, Kineton ensures the protection of the principle of equal opportunities and manages career advancement and salary on this basis, in a continuous comparison and balance regarding the market, ensuring transparency, seriousness, correctness and clarity on the evaluation methods applied. The company also offers adequate staff, tools and opportunities for professional growth. It considers learning and training a model of lifelong acquisition, by which it is possible to reach knowledge, understanding and effective interpretation concerning the change, acquire new ideas, improve productivity, and develop individual and overall growth of the company. The company places innovation at the centre of its activities, considering that the latter requires high dynamism and attention at the organizational level for the people that are part of the company, Customers, and Suppliers.





3. Special rules: standards of conduct

3.1. Company commitments

The Corporate Bodies, aware of their responsibilities, are inspired by principles contained in this Code of Ethics and undertake to guide their activities based on values of honesty, integrity in pursuing corporate objectives, loyalty, correctness, respect of the people and rules and mutual collaboration. In particular, the Directors commit to conduct the company responsibly in pursuing objectives to create value in favour of third parties. More precisely, the company is committed to: 1. ensuring maximum diffusion of the Code of Ethics among all personnel; 2. supplying every possible explanation about the interpretation and implementation of the rules of the Code of Ethics and, in particular, regarding its application in company procedures; 3. carry out checks concerning any possible violation of the norms of the Code of Ethics and, in case of proven violation, to adopt appropriate sanctioning measures; 4. adopt all security measures required by technological evolution and others strive so that the physical integrity and moral personality of work providers is guaranteed. Kineton also guarantees protection and safety in the workplace for its personnel and third parties, committing themselves to comply with safety regulations at work and promoting the safety of all the places that make up the work environment itself, even further beyond express legal obligations.

The company protects the principle of equal opportunities, committing itself to ensuring transparency, seriousness, correctness and clarity in the evaluation methods applied. The company spreads and consolidates a firm culture and environmental consciousness, always operating in compliance with the laws in force and encouraging the application of technologies available focused on minor environmental impact.

3.2. Specific duties of sector heads and business functions

The behaviour of each Company Sector or Function Manager complies with the values of this Code of Ethics. It represents an example for its collaborators as well as all personnel. They establish relationships with all personnel, imprinted on reciprocal respect and profitable cooperation, favouring the development of the spirit of belonging.

Each Company Sector or Function Manager encourages the professional growth of the resources assigned, taking into consideration the attitudes of each in the assignment of tasks, to achieve real efficiency in the operational area and ensure the same opportunities to express one's professional potential. More specifically, each Company Sector or Function Manager has the obligation: 1. to represent with one's behaviour an example for the staff of the sector or company function and direct





these employees compliance with this Code of Ethics; 2. to work so that they understand that complying with the rules of this Code of Ethics constitutes an essential part of the quality of work performance; 3. report the news to the Company Management provided by employees or own findings about the possible cases, even doubtful ones, of violation from the rules of the Code of Ethics.

3.3. Duties of employees, collaborators and corporate operators

Without prejudice to the legal and contractual provisions regarding workers' duties, professionalism, honesty, dedication, loyalty and spirit of collaboration and mutual respect are required of all staff. The dynamics that characterize the context in which society moves require adopting transparent behaviours. The main factor is the professional and organizational contribution that each human resource ensures. More precisely, personnel must: 1. refrain from behaviour contrary to the rules dictated by this Code of Ethics; 2. promptly report to one's Sector or Function Manager or the CEO any news regarding possible violations; 3. maintain conduct that is inspired by maximum transparency, correctness and legitimacy, performing one's activity with commitment and professional rigour, contributing appropriately to the responsibilities assigned and acting in a way that preserves the prestige and good name of the company; 4. Always act in compliance with the current law; 5. Act in full respect of one's colleagues and comply with the principle of solidarity.

The employee who believes that his direct manager or other employees want to induce them to behaviours or acts that are not ethical or illicit must immediately warn the Company Board.

3.4. Use of Company means and equipment

Each Company resource is held responsible for guaranteeing the maximum respect for the company infrastructures, vehicles, tools and materials and promptly reporting any non-compliant use to one's manager. It is strictly forbidden for anyone to act with company means, whether IT, technical or any other type, to achieve private purposes or interests or compete with corporate activities. It is permitted to use company equipment or material outside of structures of the latter only in case of use for business reasons, such as activities at locations different from the usual, seconded workers' performance, and similar. In all other cases, authorization of one's superior is required.

3.5. Conflict of interest

In order to avoid conflicts of interest, every operation and activity must be undertaken solely and exclusively in the company's interests in a lawful, transparent and correct manner. All personnel (employees, collaborators, etc.) must avoid any situation or activity in which a conflict may arise with the interests of the company or



what may interfere with one's ability to assume decisions impartially, in the company's interest and full compliance with the rules of this Code of Ethics. All staff are required to avoid conflicts of interest among personal and family economic activities and tasks that are internally covered within the area one is involved in. Every situation that may constitute or determine a conflict of interest must be promptly communicated to the management.

3.6. Confidentiality

All staff (employees, collaborators, etc.) must maintain the strictest and most absolute confidentiality regarding all information relating to the company and/or its employees are aware of by virtue of their work activity. To avoid disclosing confidential and relevant news about the organization, production methods and any other information which disclosure may damage the company or anyone within the company. In particular, the Personnel Management will have to: 1. acquire and deal with only necessary data appropriate for the purposes directly attributable to the function performed; 2. acquire and process the data itself only within specific procedures; 3. keep the data itself so that those unauthorized are prevented from gaining knowledge of it; 4. to communicate the data themselves within the scope of the pre-established procedures or on explicit authorization from superiors; 5. ensure that there are no constraints on any possible disclosure of information regarding third parties linked to the company by a relationship of any nature and, where appropriate, obtain their consent; 6. protect and respect the confidentiality of colleagues about one's non-disclosure of personal data.

3.7. Professional business conduct and manner of operation

In every business relationship, the company inspires the principles of loyalty, correctness, transparency, efficiency and competition in the market. The personnel must follow correct behaviour in business and customer relationships, regardless of the importance of the negotiated deal. It is forbidden to offer money or gifts to the Customers' managers, officials, employees or relatives, except for useful gifts of modest value. The expense notes must be specifically authorized, carefully documented, identified in accounting, and properly treated for tax or other internal control purposes. Any personnel offered or receiving donations or gifts from third parties not attributable to normal acts of commercial courtesy must refuse it immediately and inform one's manager. Concerning Christmas or other gifts intended for individual employees, they must be brought to the management's attention, who will express their acceptance of the possible acceptance.

Company work must be carried out with professionalism, reliability, precision, consistency and courtesy. A total sharing of knowledge must be guaranteed, and a constructive environment aimed at mutual group cooperation within the group internally and remain open to welcome external new stimuli. Personnel's continuous training must be placed among its main objectives, act to increase one's knowledge





progressively in the workplace and fully share those already acquired. One's work must be carried out professionally and competently, with diligent precision, politeness and courtesy, always checking the work before handing over the work carried out and possibly with detailed written documentation. Should the employee, while carrying out the entrusted task, find difficulty in carrying out the same, they must promptly report it to the manager, who can support or replace it. One must operate honestly and transparently in full respect for this Code of Ethics, other people and the company itself, in the exclusive interest of the customer.

3.8. Compliance with the regulations on free competition

Kineton acts fairly in the marketplace, ensuring that its business is based on respecting the principles of integrity and transparency and refraining from the behaviour of competitive abuse. The company respects the rules in force concerning free competition, excluding any phenomenon of corruption and favouritism.

3.9. Supplier relations

The relationship with suppliers is based on respect and sharing of ethical principles reported in the present Code of Ethics. Within its Company's Purchase Policy, the company aims to procure goods and services at the most advantageous conditions. Such an objective, however, is combined with the need to establish relationships with suppliers who ensure compatible operating methods with due respect for the individual rights of the person, the health and safety of the workers, and environmental protection.

The selection of suppliers and the determination of the acquisition conditions are based on an objective assessment of quality, price and ability to deliver and guarantee services of adequate level. In particular, the person responsible for the purchasing process will not be able to receive any form of compensation from anyone for the execution of an act of one's office or, contrary to official duties, accept any form of conditioning from a third party unknown to the company and from the company itself, unauthorized on making decisions relating to the choice of supplier. Furthermore, by way of example and not limited, the company requires its suppliers to refrain from using irregular, child or juvenile labour; refrain from discrimination, abuse or coercion against workers; and respect the legislation related to safety and health in the workplace; and environmental protection; to read and accept this Code of Ethics. For whatever purchase order, a document must be drawn out, reasonably and adequately formalized concerning the reasons for the choice and considerations on the price applied, as established by the procedures of the company's corporate quality management system. Furthermore, the personnel who proposes a purchase request to the manager of the purchase process must not accept any gift or other benefit that may create an embarrassing condition of choice or raise doubts about the transparency and impartiality of their conduct.





3.10. Relationships with public institutions

Relationships relating to the company's activities are maintained with public officials or with public service representatives who operate on behalf of the Public Administration, legislative organs, community institutions, international public organizations, the judiciary, supervisory authorities and other independent authorities, as well as with private dealing partners of public service, must be undertaken and managed exclusively by the designated company functions and authorized in the absolute and strictest respect of the laws and regulations in force, of the principles exposed in the present Code of Ethics in a way as not to compromise the integrity and the reputation of both parties.

Attention and care must be placed in relationships with the subjects indicated above, in particular concerning operations related to competitive bidding processes, contracts, authorizations, licenses, concessions, requests or management of public financing, management of orders, entities social security, entities concerning taxes, judicial entities, etc.

Within the established limits, offering money or gifts to public administration managers, officials, employees or relatives is prohibited. It is prohibited to offer or accept any object, service, or provision of value to obtain more favourable treatment concerning any relationship with the public Administration.

In any business negotiation with the Public Administration, the Company Staff must not attempt to improperly influence decisions from the counterpart, including those of the officials that deal with and make decisions on behalf of the Public Administration.

In the specific case where the company participates in a tender, one must operate according to the law and use correct commercial practices. The same directives for Internal Personnel will apply should the company use third parties, giving them an assignment towards the Public Administration. In the case of commercial negotiations, administrative processes and relations with the Public Administration, the following actions must not be undertaken: examine or propose employment or commercial opportunities that may benefit public administration employees; offer gifts or gifts that may influence ongoing negotiations; solicit or obtain confidential information that may compromise the integrity or reputation of either party. Kineton attentively evaluates the application of appropriate prohibitions to hire former employees of the Public Administration (or their relatives) who have personally and actively participated in business negotiations or have endorsed the requests made by the company to the Public Administration. The personnel must not promise or offer to public officials or public employees in general of the Public Administration or other Public Institutions money, goods and other benefits of any kind to promote and favour one's interests or those of the company or also to compensate or repay for an act of their office, nor to achieve the execution of an act contrary to one's duty. Furthermore, the company is committed to giving full and scrupulous observance to the regulations of the public



authorities of supervision in compliance with current regulations, providing them with maximum collaboration and transparency, not delaying, denying or concealing any information or communication that the Public Authority of vigilance should request, including the requests as part of the public inspection activities of the same authorities; strive carefully to avoid being in a situation of conflict of interest with managers and employees of any Public Supervisory Authority and their family members. With the aim of not carrying out acts in contrast with the norms and in any way prejudicial to the image and integrity of the company, the operations above that foresee relationships with people from the Public Administration must be undertaken by the specifically authorized Company roles, in due respect of the laws and principles set out in this Code of Ethics; informing the Company Management promptly on possible and potential violations of the principles fixed in same to adopt adequate measures.

3.11. Customer relationships

The customer relationship is based on respect and sharing ethical principles in this Code of Ethics. To protect the interests of its customers, the company adopts a style of behaviour based on respect, availability, flexibility, proactivity and courtesy, in view of a collaborative relationship and of high professionalism, working hard to avoid the onset of conflicts of interest.

The company pursues the objective of satisfying its customers by providing them with quality compliant services to what is expected by legislation and laws in force, working to ensure that the provision of services guarantees a constant balance of interests without ever generating doubts about one's integrity and professionalism and without ever discriminating arbitrarily against our Clients.

3.12. Commercial partners

In the constitution and the development of ATI, RTI, and consortia, the company complies with the regulations and ethical principles contained in this document, which will be brought to the attention of the Commercial Partners so that they are aware of it. Should the company become aware of the fact that the Partners - when carrying out their business - have engaged in behaviour that is not in line with the general provision principles of this document, it is therefore entitled to take appropriate measures to preclude further opportunities of collaboration that may be foreseen that may also involve the resolution of the contract.

3.13. Professionals and autonomous worker relations

Kineton is committed to the Professionals or Self-Employed Workers whom they should make use of in paying fair compensation and not exploiting their position to obtain reductions or other benefits.





3.14. Accounting transparency

Every operation and transaction must be correctly registered, authorized, verifiable, legitimate, coherent and congruous. All the actions and operations must be adequately recorded, and it must be possible to verify the process decision, authorization and progress.

Accounting transparency is based on the accuracy, completeness and authorization of the basic information for the relevant accounting records. Each employee must collaborate to correctly and promptly represent management facts in the accounts. For each operation, adequate supportive documentation of the activity is preserved to enable an easy registration of the accounts. Identifying the different levels of responsibility and an accurate operation reconstruction also reduce the chance of interpretative errors. Each registration must accurately reflect what is found in the supporting documentation. All documentation must be promptly and systematically archived to reconstruct the data at any time. The documents (except for particular cases when paper storage is required) must be stored in electronic media to be tracked and displayed quickly. The staff must ensure that the documentation relating to company activities is easily traceable and consulted according to logical criteria. In any case, corporate payments to be processed must be exclusively proportioned to the performance and, as indicated in the contract, cannot be carried out to a different person other than the contractual counterparty. The use of company funds for illegal or improper purposes is strictly prohibited. No payments can be made to anyone and for no reason that is not based on properly authorized or granted business transactions through illegal forms of remuneration. Any neglect, omission or falsification that employees become aware of must be promptly reported to management.

The principles expressed in this paragraph are also applied to employees and consultants entrusted with tasks relating to bookkeeping and tasks related to the financial statement.





4. Special rules: implementation and control of the code of ethics

4.1. Violation of the Ethics Code - Disciplinary measures

Kineton has, to date, stood out for its compliance with current regulations for every specific sector of interest by gaining credibility and appreciation on behalf of its Customers. Unethical or illegal behaviour would lead to the company's failure, damaging relationships of trust with very serious damage to image, reputation and credibility. All personnel are required to comply with this Code of Ethics in all respects. Therefore, the observance of the present rules of the Code of Ethics constitutes an essential part of the contractual obligations of all Kineton Personnel, pursuant to and for the articles. 2104 and 2106 of CC. The violation of provisions of this Code of Ethics by any one of the personnel constitutes a failure to fulfil contractual obligations. Depending on the case, it may determine the application of sanctions and disciplinary measures provided for by the collective labour contracts applicable, even up to the termination of the employment or business relationship, in compliance with current laws and compensation for damages. Kineton will take the appropriate measures towards those whose actions violate this Code of Ethics. Some violations of this Code of Ethics can also be persecuted civilly or criminally by the Administrative Authority or other authorities.

4.2. Final principles

The present Code of Ethics does not constitute, nor does it imply in any form, a condition of employment or a guarantee of employment. The job or business relation may be resolved according to the terms thereof and the same regulations in relation to the applicable laws. The rules in this Code of Ethics do not represent an exhaustive list of the standards adopted by Kineton, nor an exhaustive list of behavioural typologies susceptible to disciplinary measures. The present Code of Ethics is applied to all staff who are hired from now on. In contrast, for those already hired, the communication will be forwarded by electronic communication, and the accompanying message will contain the notice for which, after ten days from its receipt, the Code of Ethics will be deemed accepted by the recipient.

