

Code of Ethics - Seven Elettronica

Seven Elettronica's Code of Ethics is the document that defines the ethical principles and core values that guide the company's actions and conduct. This Code represents Seven Elettronica's ("Company") commitment to integrity, accountability and compliance with national and international regulations. Its purpose is to ensure that all parties involved (hereinafter also referred to as, "Recipients"), both internally (in relations between employees) and externally (in relations with institutions, suppliers, customers, business *partners*, political and trade union organisations as well as the media in the company's activities) operate in compliance with the laws and ethical principles that the company promotes.

1. General Principles

The general principles on which Seven Elettronica's activities are based are: integrity, respect for the law, transparency, respect for people and social and environmental responsibility. These values underpin every decision and action taken by the company. Respect for these principles is essential to maintain a respectful, ethical and transparent working environment.

It is the Company's belief that ethics, in the conduct of its business, is an indispensable condition for its success, a tool for promoting its image and represents an essential asset of the Company.

Seven Elettronica has decided to adopt its own Code of Ethics in full compliance with the provisions of the law in force, constituting a fundamental fulfilment of the implementation process of an Organisation, Management and Control Model, in accordance with the provisions of Legislative Decree 231/2001.

2. Regulatory References

The Code of Ethics is inspired by and complies with various national and international regulations, including:

2.1 D. Legislative Decree 231/2001

Italian legislation introducing the administrative liability of legal persons for offences committed by employees or managers for the benefit of the company.

2.2 MOG

The Organisation, Management and Control Model (MOG), required by Legislative Decree 231/2001, is a fundamental tool for the prevention of offences within companies. Seven Elettronica adopts the MOG as a measure to ensure that all company activities are carried out in compliance with applicable regulations and with the utmost transparency and legality.

2.3 Italian Civil Code

The Italian Civil Code sets out the main rules governing contractual and labour relations within companies, and Seven Elettronica is committed to strict compliance with them.

2.4 International human rights standards

Seven Elettronica is committed to respecting and promoting **fundamental human rights**, in line with **international standards** as defined by the main United Nations (UN) and International Labour Organisation (ILO) conventions. These standards establish the basic principles to ensure the dignity and protection of workers' rights, regardless of their origin or social status.

3. Respect for People and Equal Opportunity

Seven Elettronica is committed to ensuring equal opportunities for all its employees and collaborators, without discrimination.

3.1 Inclusiveness and Valuing

The company promotes an inclusive environment and values diversity as an asset for innovation and success. Every employee is encouraged to respect cultural and personal differences and to contribute to the creation of a harmonious working environment.

3.2 Dignity and Behaviour

The company adopts policies and practices that value individual dignity and advancement and combat discriminatory behaviour of any kind, such as gender, status, age, ethnicity, geographical origin, culture, religious, political or sexual orientation or that abuses hierarchical position.

4. Integrity and Honesty

Integrity and honesty are core values for Seven Elettronica. Every employee and collaborator is expected to carry out their activities in a transparent and honest manner, avoiding conduct that could compromise the reputation of the company or its customers.

4.1 Legality

Seven Elettronica srl operates in absolute compliance with the law and with this Code. All Addressees are therefore required to comply with all applicable regulations and to keep themselves constantly updated on legislative developments.

4.2 Transparency

The Company considers transparency in financial statements and accounting a fundamental principle for the performance of its business and for the protection of its reputation. Any kind of corruption, fraud or conflict of interest is prohibited. All company operations must be documented accurately and transparently.

4.3 Fairness

Fairness and moral integrity are an unfailing duty for all Addressees. Addressees are bound not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages. The intrinsic conviction of acting in the interest of the Company does not exonerate the Addressees from the obligation to punctually observe the rules and principles of this Code.

5. Environmental sustainability

Seven Elettronica recognises the importance of protecting the environment and is committed to minimising the environmental impact of its operations. The company promotes sustainable practices, such as efficient use of resources and waste management, and is committed to complying with all applicable environmental regulations. Sustainability is integrated into all company processes, from the assembly of electronic boards to the use of advanced soldering technologies.

5.1 *Recycling and waste reduction*

Seven Elettronica implements waste management policies that prioritise the recycling and reuse of materials, reducing the amount of waste sent to landfill. The company works to reduce solid waste produced, especially hazardous waste, through proper disposal and separation of recyclable materials.

5.2 *Energy*

The company promotes a focus on energy efficiency in the plants. This includes lighting, energy use for heating and optimising production processes to reduce energy consumption.

6. Social responsibility

The company is committed to respecting human rights and labour laws. This includes the rejection of any form of forced or child labour and the promotion of safe and decent working conditions.

6.1 *Respect for human rights*

Seven Elettronica adheres to the main international human rights standards, ensuring that all business operations are conducted with respect for human dignity. Seven Elettronica **rejects all forms of forced or child labour** and is committed to ensuring that no employee, supplier or business partner uses forced, slave or child labour. This commitment follows the international conventions of **the International Labour Organisation (ILO)**, such as Convention No. 29 and No. 138, which aim to eliminate forced

labour and ensure a minimum age for employment.

6.2 Compliance with labour laws

Seven Elettronica is committed to complying with all national and international labour regulations, with particular attention to:

- **Regular and transparent employment contracts:** The company ensures that all employees are employed under contracts that comply with the law and applicable national collective agreements, ensuring transparency and fairness in labour relations.
- **Training and professional development:** Seven Elettronica invests in the continuous training of its employees, offering opportunities for professional development to improve technical skills and foster personal and professional growth. The company promotes a culture of continuous learning, ensuring that employees are always prepared to meet the challenges of the future.

7. Occupational Health and Safety

Occupational health and safety is a priority for Seven Elettronica. The company takes all necessary measures to ensure a safe working environment that complies with applicable regulations and minimises the risks associated with production processes. The correct use of welding and coating technologies, together with the application of safety standards, is essential to protect employees and ensure product quality.

7.1 Working conditions

Seven Elettronica takes measures to ensure safe, healthy working conditions that respect individual rights, in compliance with local and international workplace safety regulations, such as **Legislative Decree 81/2008** in Italy. The company is committed to providing adequate equipment, constantly monitoring the work environment and training staff on safety protocols, and is also committed to providing its employees with working environments that respect their dignity.

8. Reporting and Whistleblowing

Seven Elettronica encourages its employees to report any unlawful behaviour or behaviour contrary to the principles of the Code of Ethics. The company has implemented a whistleblowing system that allows employees to report, in confidence, any violations. Reports are handled with the utmost discretion and without any form of retaliation against the whistleblower. Any breach of the Code of Ethics will be investigated and may result in disciplinary action, including termination of employment.

9. Disciplinary System

In the event of violations of the Code of Ethics, Seven Elettronica adopts a disciplinary system that provides for sanctions proportionate to the seriousness of the offending conduct. Sanctions may range from simple warnings to contract termination, depending on the nature of the violation. The company applies the principle of transparency and ensures that any disciplinary proceedings are handled fairly and in accordance with applicable regulations.

10. Monitoring and Review of the Code of Ethics

Seven Elettronica is committed to regularly monitoring the implementation of the Code of Ethics and evaluating its effectiveness. The Code is subject to periodic review, including on the basis of regulatory developments and business needs. Any updates will be promptly communicated to employees and collaborators, who must comply with the new provisions.

THE MANAGEMENT

COMPANY STAMP

SEVEN ELETTRONICA S.r.l.
Via Robert Fulton n. 14
40017 S. GIOVANNI IN PERSICETO (BO)
C.F. 01789981204