



# Code of Ethics

Revision Status	Date of issue	Document title:
	06/12/2018	CHARTER OF VALUES/CODE OF ETHICS
1	22/09/2021	CHARTER OF VALUES/CODE OF ETHICS



Adopted by resolution of the Board of Directors on 30th April 2021

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Structure of this Code of Ethics:

- The **Charter of Values**, the general ethical principles underlying the Company's actions, consistent with the Company Vision;
- The **Charter of Commitments**, a set of rules of conduct that guides the daily operations of the Company and all those who are part of it in achieving the Company Mission.

# The Charter of Values

- Our Values are found in who we are and what we realise in our products and in our relationships, at all levels. For us, this means **Coherence**.
- Sharing this value system is a motive for unity, strength and pride, which guide us – all together – towards a more conscious future.

## Innovation

Our experience with our clients makes us concrete innovators, able to anticipate tomorrow's challenges through continuous research into and development of technologically-advanced solutions. The enthusiasm with which we explore reality, the ability to integrate scientific and industrial collaboration, method and process, all characterise the relentless evolution of our work.

## Reliability

In our industry, excellence is an absolute must. Design, production and assistance are subject to stringent control procedures and continual improvement processes, aimed at ensuring that each client's specific requirements are met correctly and guarantee the maximum reliability of our products, in all operational scenarios.

## Belonging

People are our most important asset. We believe in sharing and integration, in diversity, in ongoing professional development, in growth based on merit achieved by valuing commitment and talent. We work towards ensuring that each one of us can realise our full potential and feel an integral part of the success of the company and our own lives.

## Honesty

We firmly believe that the best way to guarantee stable and lasting relations in the countries we operate in is by respecting the rules. Honesty, transparency and accountability form a fundamental premise behind the way we work, both internally and in our interactions with our partners and clients, given that mutual trust is a primary asset for us to cultivate and to protect.

## Dynamism

We combine respect for the rules and procedures with a spirit of initiative, enterprise and flexibility, balancing rapid decision-making processes with effective control mechanisms. The fluidity of the contexts of reference and our propensity for innovation lead us to always being lean in our work organisation systems and proactive in our relationships with partners and clients. Ours is a dynamic equilibrium, made up of coordination and movement.

# The Charter of Commitments

## 1. PURPOSE AND ADDRESSEES OF THE CODE OF ETHICS

## 2. PRINCIPLES OF CONDUCT TOWARDS STAKEHOLDERS:

### 2.1. THE PERSONNEL

- A) PERSONNEL POLICIES
- B) PROTECTION OF PRIVACY
- C) OCCUPATIONAL HEALTH AND SAFETY

### 2.2. THE COMMUNITY

- A) SOCIAL RESPONSIBILITY
- B) ECOLOGY, ENVIRONMENT AND ENERGY

### 2.3. PUBLIC INSTITUTIONS

### 2.4. THE CLIENTS

### 2.5. THE SUPPLIERS

### 2.6. MASS MEDIA

### 2.7. POLITICAL AND TRADE UNION ORGANISATIONS

## 3. INTERNAL PRINCIPLES OF CONDUCT:

### 3.1 DECISION-MAKING PROCESS

### 3.2 CORPORATE DISCLOSURE

### 3.3 ACCOUNTING TRANSPARENCY

### 3.4 PROTECTING THE CONFIDENTIALITY OF INFORMATION

### 3.5 CONFLICT OF INTEREST

### 3.6 USE OF COMPANY ASSETS

## 4. BREACHES OF THE CODE OF ETHICS

## 5. SUPERVISORY BOARD

# 1 Purpose and Addressees of the Code of Ethics

The Code of Ethics adopted by **CY4GATE** (hereinafter also referred to as the “Company”) is aimed at **directing the actions of its Addressees towards ethical behaviour**, marked by principles such as loyalty, integrity, professional rigour, confidentiality and transparency, through the introduction of rules of conduct that flank and complement the applicable legal obligations.

The principles and provisions contained in the Code of Ethics are binding on the following Addressees:

- Members of the Board of Directors, in all resolutions adopted, aimed at the pursuit of corporate action;
- Members of the Board of Statutory Auditors, in exercising control activities, in verifying the formal correctness and substantive legitimacy of the Company’s activities, and finally, in the functioning of the internal Control and Risk Management System;
- Employees and associates with whom the company has contractual relations, for any reason whatsoever, including occasional and/or temporary;
- People with relations of any kind, whether paid or unpaid, with the Company.

The members of the Board of Directors align the strategic corporate objectives with the values of the Code of Ethics.

The Directors are to adopt all appropriate means to ensure its implementation and updating.

As part of the internal Control and Risk Management System, the Code of Ethics constitutes a prerequisite and reference for both the preventive Organisation, Management and Control Model and the sanctions system.

Likewise, the commitment to fully implement the Code of Ethics falls on all employees and on those who, for whatever reason, come into contact with the Company.

The Addressees are thus obliged to know and respect its contents.

Verification of the implementation of the Code and its application is the responsibility of the Supervisory Board and the Board of Directors, in accordance with their respective spheres of competence.

Every Director and employee is responsible for reporting any non-compliance or non-application to the Supervisory Board, set up pursuant to Legislative Decree no. 231/01.

CY4GATE promotes the knowledge and observance of the Code of Ethics amongst all Addressees, providing for appropriate disciplinary or contractual sanctions in the event of non-compliance.

Addressees are required to be familiar with the contents of the Code of Ethics, also by requesting and receiving appropriate clarifications on the interpretations of the contents from the relevant corporate functions.



# 2 Principles of conduct towards stakeholders

## 2.1 THE PERSONAL

### a) Personnel Policies

Human resources are an indispensable element of a company's existence and a critical factor for successfully competing in the market.

The Personnel's honesty, loyalty, ability, professionalism, reliability, technical preparation and dedication are thus amongst the determining conditions for achieving business objectives, representing the characteristics required of the Company's directors, employees and associates in their various capacities.

CY4GATE adopts Personnel Policies aimed at fostering their professional satisfaction and well-being in the workplace, sure that these conditions are fundamental for the full realisation of all those who work in and for the Company, in their individual dimension and in that of components of the corporate community and, ultimately, for the growth of the Company and the improvement of its productivity.

With this in mind, the Company defines and implements personnel selection, recruitment and management policies based on the recognition of merit and respect for the principle of equal opportunities. In line with business development opportunities, it also promotes the professional growth and enhancement of its employees, taking into account the skills and competences of each one and offering everyone programmes and tools suitable to ensure the bettering of skills and adequate professional updating, with a view to continuous training.

In the assignment of work tasks, the Company promotes a policy of awareness aimed at ensuring that each individual fully understands the importance of carrying out their task in a responsible manner in view of the concrete impact on the company's activities.

With respect to well-being in the workplace, CY4GATE implements measures and actions aimed at ensuring continuous improvement, always being attentive to assessing staff happiness. As part of this welfare strategy, the company ensures a comfortable and welcoming physical environment, fosters personal relationships between colleagues by stimulating the company's sense of "community" and encouraging work-life balance, through flexible work management and a policy that is always attentive to the needs of people, both as employees and as members of their families.

CY4GATE is also committed to protecting the moral integrity of all employees and associates, guaranteeing their right to working conditions that respect personal dignity as well as the full exercise of trade union and political rights. The Company safeguards workers against acts of psychological violence or bullying and opposes any attitude or conduct that is discriminatory or harmful to the person, their beliefs and inclinations. It is absolutely forbidden to engage in conduct likely to jeopardise the smooth performance of the assigned duties or, in any case, to undermine the dignity of the worker or to resort to harassment of any kind in work relations.

All company policies are **based on a solid foundation of values** that condemn all forms of political, trade union, religious, racial, language, gender and sexual orientation discrimination and does not permit any form of prejudice or intimidation.

## **b) Protection of privacy**

CY4GATE considers as a priority the **protection of the personal data** of its employees and of any natural and/or legal person who, for any reason, comes into contact with the company.

In accordance with applicable laws, appropriate organisational measures and procedures are put in place and updated to ensure that the data of employees and that of third parties acquired in the course of the performance of work activities is effectively protected in terms of confidentiality and privacy.

So as to preserve each individual's informational self-determination (meaning the right to decide whether or not to hand over their data and under what conditions), the company adopts and promotes a clear and unambiguous communication style

that facilitates full understanding of any request for data and its purpose.

CY4GATE adopts appropriate measures to ensure that access to telematic and IT data is carried out in full compliance with the regulations and the privacy of the persons involved and in such a way as to guarantee the confidentiality of the information and is processed by persons expressly authorised to do so, preventing undue intrusions and violations.

The Company also ensures that the processing of personal data and the use of computer, information and telematic tools complies with the principles of fairness, protection of the secrecy of correspondence, privacy and investigative secrecy, all in such a way as to guarantee the integrity and authenticity of the computer, information and telematic systems as well as of the data processed, in order to protect the interests of the Company itself and of third parties.

Furthermore, CY4GATE adopts adequate measures and initiatives aimed at guaranteeing the security, integrity, correct use and operation of the Company's or third parties' computer or telematic systems, programs or data, also protecting the intellectual property rights pertaining to the use of computer and telematic programs and data and, more generally, of intellectual property.

### **c) Occupational health and safety**

The Company undertakes to conduct its activities whilst paying particular attention to the working environment and the safety of its personnel, favouring the protection of workers' health in work organisation and also setting the objective of improving the conditions and levels of safety and health in full compliance with the applicable legislation.

To this end, CY4GATE adopts an internal organisation with the appropriate technical skills, instrumental and economic resources and powers, so that the verification, assessment and management of risks are carried out to the highest standards.

In particular, the persons in charge of the individual activities supervise compliance with the preventive measures of the resources they coordinate and take on board employee notices on improving safety and health protection.

All employees undertake to scrupulously comply with the provisions issued and applicable and to bring any possible situation of risk to the attention of their direct supervisor so that appropriate action can be taken.

One particular element of the system is the prevention of occupational accidents and illnesses, implemented by means of an extensive network of risk control as well

as constant information and awareness-raising amongst employees, with the aim of developing a strong and deep-rooted culture of safety and promoting the value thereof.

## 2.2 THE COMMUNITY

### a) Social Responsibility

CY4GATE is attentive to the impact of its business activities within its area of influence and thus recognises and adopts socially-responsible behaviour to meet the economic, environmental and social expectations of all stakeholders. To this end, it **significantly affects the economic, employment and social fabric of the territory** by creating and maintaining stable relations with organisations and companies and acting as a point of reference for the enhancement of skills in the technological field.

### b) Ecology, Environment and Energy

Given that one of its objectives is the protection of the **environment as an asset of 'common interest'**, the company implements strategies to ensure the right balance between business needs and ecology. In view of this, it is committed to **industrial process efficiency** in order to market products with a low environmental impact and which optimise the use of natural resources.

In order to reduce costs to the environment, CY4GATE ensures – amongst other things – the careful procurement of energy resources and the constant monitoring of consumption and, with the same aim, invests in the periodic renewal of plant and machinery and the purchase of new technology.

## 2.3 PUBLIC INSTITUTIONS

The Company deals with Public Institutions with **integrity and fairness**, in the firm belief that the protection and respect of the principles of impartiality and independence of the Public Administration is also in its own interest.

All dealings with the Public Institutions, always inspired by **criteria of collaboration and transparency**, are entrusted exclusively to the company departments designated for such purposes, whose Personnel are made aware of all applicable regulations and correct conduct practices within the sector.

Furthermore, for such relations with institutions of particular sensitivity and regulation, like those concerning public procurement, governmental authorisations and licences, social security and taxation, the Company has set up structures supervised and managed by qualified and competent personnel who are called upon to direct the internal mechanisms towards **full compliance with all applicable sector regulations**.

The Company, also having a specific **Anti-Corruption Code**, condemns any practice of active or passive corruption and collusive conduct of any form or nature. In consideration of the above, it is forbidden for personnel to promise or offer to persons working for or on behalf of Public Administrations – Italian or foreign – or to accept from them any undue money, utilities, goods, services or benefits in order to influence decisions with a view to obtaining more favourable treatment or undue benefits and, in general, for any other purpose.

Gifts and courtesies of modest value that fall within the scope of business practice are permitted insofar as they are not prohibited by specific regulations – including local regulations – and only if they cannot be unambiguously interpreted as seeking favours or attempting to exert undue influence.

The Supervisory Board must be informed about any requests for or offers of money or favours which, due to their type and/or economic entity, do not fall within the scope of legitimate business practices or are contrary to regulations, including local regulations, if they are unduly formulated to or by those who operate, on behalf of CY4GATE, in the context of relations with the Public Administration, both Italian and foreign, or with private entities, Italian or foreign.

## 2.4 CLIENTS

In conducting business negotiations, the Company undertakes to act with loyalty and fairness, pursuing the full satisfaction of the client's needs as its end goal. With this in mind, the company refrains from carrying out initiatives that could lead the other party to have an incorrect perception of the products and services offered and guarantees the careful and scrupulous assessment of the feasibility of the services requested.

All contacts and communications with clients are guided by principles of the utmost transparency, clarity and professionalism to provide timely, qualified and competent answers without ever overlooking any factor necessary for the decision to contract to be made in full knowledge.

Execution of the contract is carried out with the objective of full compliance with the obligations undertaken with the aim of guaranteeing the client full correspondence between that which has been agreed upon and what has been produced, in any case ensuring technological solutions in line with the highest industry standards.

The Company's care and attention to the technical and design aspects of products placed on the market also extends to their safety profile.

Customer satisfaction, both in terms of product quality and service excellence, is a priority for CY4GATE and is thus constantly monitored through *customer satisfaction* procedures.

CY4GATE refrains from establishing any relationship whatsoever – even whereby indirect or through intermediaries – with parties (natural or legal persons) that are part of or carry out in Italy or abroad support activities in any form whatsoever in favour of criminal organisations or groups operating for the purposes of terrorism.

Endowed with a specific **Anti-Money Laundering Code** in the interest of preventing the risk of carrying out, even unintentionally, money laundering transactions involving currency, goods or other utilities and as stipulated in the aforementioned Code, CY4GATE does not receive bearer securities, cash payments or payments made through unauthorised intermediaries or through the intermediation of third parties, such as to make it impossible to identify the payer.

As mentioned in the previous paragraphs, the company has an anti-corruption code to regulate in detail, amongst other things, everything concerning the sale and supply of the company's products.

## 2.5 SUPPLIERS

Every decision by the Company regarding procurement, whether necessary for business operations or for the production of products and services, is taken on the basis of assessments of the **utility, quality, competitiveness** and **price** of the supply.

CY4GATE observes strict internal procedures for supplier selection, in compliance with the principles of **transparency** and **competition**, adopting objective evaluation criteria such as competence, availability of appropriate means and facilities, fairness and reliability, in full compliance with anti-corruption regulations.

Specifically, as early as during the pre-selection of the supplier, CY4GATE verifies as a minimum requirement the possession of the appropriate levels of ISO certification to guarantee the quality of the supply and requires the selected supplier to give evidence of the implementation of its own Code of Ethics or to commit to observing

the values and principles of this Code of Ethics, in addition to compliance with all applicable regulations.

CY4GATE refrains from having any relationship whatsoever, even indirectly or through intermediaries, with persons (natural or legal persons) who are known to be or have reason to suspect that they are part of or carry out, in Italy or abroad, activities supporting any form whatsoever in favour of criminal organisations of any nature, including mafia-type organisations, organisations dedicated to human trafficking or to the exploitation of child labour or arms trafficking, as well as persons or groups operating for the purposes of terrorism, such as conduct likely to cause serious damage to a country or an international organisation, carried out with the aim of intimidating the population or forcing public authorities or an international organisation to perform or abstain from performing any act or destabilising or destroying the fundamental political, constitutional, economic and social structures of a country or an international organisation.

The Company's Anti-Money Laundering Code also governs all relationships involving the receipt or transfer of sums of money or other benefits.

## 2.6 MASSMEDIA

CY4GATE manages its relations with the mass media by taking into account the necessary balance between commercial confidentiality and information needs whilst also ensuring that all communications to the mass media are always correct and truthful.

The transfer of any information concerning CY4GATE to the mass media is delegated to specially-appointed company personnel. Beyond this, all employees are required to obtain the necessary authorisations before making any communication to journalists or responding to any requests from them.

External communications must follow the principles of truthfulness, fairness, transparency and appropriateness.

It is also forbidden to communicate or disseminate in any form, and outside the normal exercise of the functions assigned, information sourced from privileged information, thus not in the public domain and if disseminated, being capable of influencing the price of financial instruments, learned in the course of the activity performed.

## 2.7 POLITICAL AND TRADE UNION

All CY4GATE relations with Political and Trade Union Organisations are marked by fairness, in a **logic of dialogue and direct discussion** between the parties, in compliance with the regulations in force, with a view to the pursuit of the objectives of the company and the country as well as in the interests of the workers.

CY4GATE does not directly or indirectly favour nor discriminate against any organisation of a political or trade union nature.

Without prejudice to the trade union prerogatives provided for by law, each Addressee is aware that any involvement in political activities takes place on a personal basis, at their own expense and in accordance with the law.



# 3 Principles of internal conduct

## 3.1 THE DECISION-MAKING PROCESS

The company assures stakeholders of the proper use of company resources and the pursuit of the corporate objective by introducing specific internal accountability and control mechanisms.

In particular, CY4GATE's accountability policy is implemented by means of internal rules aimed at ensuring that any initiative and/or resolution adopted by the Company is always the expression of a transversal and collegial assessment of the various corporate functions concerned with the subject matter.

In this way, all the corporate functions involved are called upon to share responsibility for the decision by offering a contribution of specific professionalism, attention and accuracy in the analysis and thus avoiding any form of arbitrariness and approximation.

Furthermore, the Company guarantees the complete and transparent traceability of the internal decision-making process and the possibility of carrying out swiftly and accurately any verification that may be necessary for the detection of facts that are not in line with the procedures in force, the persons who caused them, the reasons that determined the decision taken and any other relevant information.

## 3.2 COMPANY POLICY

In accordance with the statutory provisions, the Company ensures that the notices due to Shareholders and Corporate Bodies provide the most truthful and complete representation of the company's performance. To this end, the transfer of all relevant information – whether of an economic-financial or strategic-business nature – is based on the principles of maximum and absolute transparency and timeliness.

In compliance with regulations, CY4GATE promptly and completely provides the information, clarifications, data and documentation requested by shareholders, suppliers, public supervisory authorities, institutions, bodies and other stakeholders in the performance of their respective functions.

## 3.3 ACCOUNTING TRANSPARENCY

CY4GATE ensures that all economic-equity evaluations are carried out in compliance with the criteria of reasonableness and congruity, and that each accounting entry expresses with truthfulness and completeness what actually results from the real documentation accompanying each transaction carried out, guaranteeing, inter alia, the due preservation of the documentation itself in accordance with the law.

In the case of economic/asset items based on valuations, the relative entry must be made with the criteria of reasonableness and appropriateness, clearly illustrating in the relevant documentation the criteria that guided the determination of the value of the asset.

Anyone who becomes aware of possible omissions, falsifications or irregularities in bookkeeping and basic documentation, or in any case of violations of the principles set out in the Code of Ethics and in the specific protocols, is required to promptly report such to the Supervisory Board per Legislative Decree 231/01. Such violations breach the relationship of trust with the Company, being relevant from a disciplinary point of view and will be appropriately sanctioned.

In compliance with regulations, CY4GATE promptly and completely provides the information, clarifications, data and documentation requested by shareholders, potential clients, suppliers, supervisory authorities, institutions or bodies in the performance of their respective activities and functions. All relevant information must be communicated with the utmost timeliness both to the corporate bodies in charge of controlling the company's management and to the supervisory authorities.

## 3.4 PROTECTING THE CONFIDENTIALITY OF INFORMATION

The Company is fully aware that certain information (whether of a technical, commercial, economic or other such nature) constitutes a strategic and fundamental asset of its own, and that unauthorised disclosure of the same could result in inestimable damage. All employees are continuously urged to be aware of this and to give absolute priority in their daily work to the issue of reservedness of confidential information and the significant risks associated with its improper use or

dissemination. Similar attention and care is given to information coming from external parties, individuals and companies, as well as Public Administration structures and institutional bodies with which CY4GATE has business relations.

The confidentiality of information is satisfied through the provision and adoption of appropriate measures that ensure compliance with the authorised use, non-disclosure to third parties and proper retention of the information itself on the basis of its degree of desirability (so, the interest that the document might prompt in third parties) and the potential damage that disclosure may cause. External documents, rather, retain the degree of confidentiality attributed to them by the third party from which they originate.

Documents identified as confidential may be circulated within the Company exclusively “*on a strictly need-to-know basis*” for actual work requirements and, in any case, always marked with the degree of confidentiality attributed to them, so that all those who have to handle such documents are able to comply with the internal rules and procedures.

More generally, the Company requires employees to refrain from discussing with persons outside the Company, and beyond strictly professional reasons, matters concerning technologies under development, product characteristics that are not in the public domain, marketing strategies, profits, procurement plans, business volumes and financial data.

The obligation not to disclose and not to misuse the Company’s confidential information must be respected by employees even after termination of the employment relationship.

The Addressees’ breach of confidentiality duties severely invalidates the relationship of trust with the company and may lead to the application of disciplinary or contractual sanctions relating both to the breach of duties of confidentiality and to the breach of the Code of Ethics itself.

Due to the specificity and relevance of the areas of activity overseen by the company (ergo, defence, strategic communications, scientific research, protected technologies, and so on), all addressees are required to maintain the utmost confidentiality and thus not to unduly disclose or request information on documents, know-how, research projects, company operations and, in general, all information and data learned in the course of their work.

In particular, confidential or secret information constitutes information that is subject to specific laws or regulations insofar as it relates, for example, to national security, military sectors, inventions, scientific discoveries, protected technologies or new industrial applications, as well as contractually-secret information. Confidential

information also constitutes all particulars learned in the course of work activities, or in any case on the occasion thereof, the dissemination and use of which may cause danger or damage to the company and/or undue profit for the employee.

## 3.5 CONFLICT OF INTEREST

The Code of Ethics applies to all employees and members of CY4GATE's management and supervisory bodies.

All Addressees are required to carry out their work in compliance with current legislation and with this Code.

In consideration of the above, everyone is required to avoid any situation and refrain from any activity that, in the performance of their duties or outside the work context, implies – de facto or even merely potentially – an immediate or deferred conflict between one's own interests (or those of family members and acquaintances) and those of the Company or that may hinder – in any way and for any reason – the requirement that all decisions pertaining to the job performed be taken with regard to the Company's interest.

CY4GATE promotes the activities necessary for the prevention of situations of conflict of interest that concern or may concern, by way of example, the following:

- Relations between employees when, in the performance of their duties within the Company, the employee interacts with members of their family, relatives and/or relatives-in-law or with third parties with whom they have relations of a personal nature;
- Financial rapports, when an employee expects a financial return or has an influence on the supplier, subcontractor, client or competitor involved in CY4GATE's business;
- Other employment relationships in cases where an employee also acts as a partner, consultant, representative, agent, director or board member of another company that is a competitor, supplier, partner or subcontractor of CY4GATE.

In order to avoid situations of conflict, upon the assignment or activation of the work relationship, CY4GATE requires its directors, employees, consultants and associates in various capacities to sign a declaration by which they:

- Underline the absence of conditions of conflict between the individual and the company;
- Undertake to promptly and thoroughly inform the Supervisory Board pursuant to Legislative Decree 231/01 should they find themselves in actual or even only potential

situations of conflict, in the meantime refraining from engaging in any conduct attributable to the reported situation.

Any situation of real or potential conflict of interest must be communicated by the employee to their manager, who is required to immediately give notice thereof to the Supervisory Board through the dedicated channel (email to [odv231@cy4gate.com](mailto:odv231@cy4gate.com)).

## 3.6 USE OF COMPANY ASSETS

CY4GATE provides each employee with the resources necessary for the performance of their work activities (IT tools, telephones, credit cards, etcetera), the use of which is permitted exclusively within the limits of the assigned tasks and in the manner set by the applicable internal rules.

CY4GATE endeavours to ensure that the use of available resources is aimed at securing, increasing and strengthening the company's assets, in order to protect the company itself, along with its shareholders, creditors and the market.

Addressees are directly and personally responsible for the protection and legitimate use of assets (both material and intangible) and resources entrusted to them to perform their duties.

None of the assets owned by the Company may be used for purposes other than those indicated by the Company or for illegal purposes but must be used in compliance with the law and regulations and in accordance with operating procedures.

All information contained in the tools assigned to the users, if related to their work activities, are to be considered CY4GATE's property and, as such, all employees are obliged to ensure the security thereof through compliance with the precise rules of conduct governing its proper use.

Employees may use the email system and Internet services exclusively for work purposes in order not to expose the company to external risks (viruses, industrial espionage, sabotage, illegal dissemination of company data and so on) and not to compromise the security of computer networks.

# 4 Breach of the Code of Ethics

Any non-observance or violation of the principles contained in the CY4GATE Code of Ethics compromises, at any level, the fiduciary relationship with the Company and is sanctioned under the disciplinary profile within the circumstances and in the forms allowed by the applicable regulations and the national Collective Agreement, clearly without prejudice to any further civil and criminal consequences.

Reports of violations of the Code must be addressed to the person's superior and in any case to the Chief Executive Officer or President of the Company. Such reports must be made by anyone who becomes aware of the fact.

The establishment of the aforementioned breaches, the management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the Chief Executive Officer and the President of the Company, in compliance with the law and the Collective Agreement in force.

Finally, non-compliance or breach by associates or third parties connected by a non-employee contractual relationship may be considered a breach of contractual obligations, with all legal consequences, including with regard to the termination of the contract and/or assignment, and may lead to action being taken to claim for damages if such conduct causes harm to the Company.

# 5 Supervisory Board

The Board of Directors entrusts the task of supervising the operation of and compliance with the Code of Ethics to the Supervisory Board.

This body is endowed with autonomous powers of initiative and control and the appropriate instruments for ascertaining and supervising the adequacy and effective implementation and updating of the Code of Ethics, as defined in the organisational model adopted pursuant to Legislative Decree 231/2001.

In order to facilitate the flow of reports and information to the Supervisory Board, a dedicated information channel has been set up (with email address [odv231@cy4gate.com](mailto:odv231@cy4gate.com)), through which all those who become aware of any conduct contrary to the Code of Ethics may report freely, directly and confidentially to the Supervisory Board.

Relationships pertaining to the Company's activity entered into with public officials or public service representatives who operate on behalf of the central and peripheral Public Administration or legislative bodies, community institutions, international public organisations and any foreign state with the judiciary, with public supervisory authorities and other independent authorities, as well as with private partners concessionaires of a public service, must be undertaken and managed with a spirit of collaboration, in absolute compliance with the laws and regulations in force as well as with the principles established by the Code Ethical so as not to compromise the integrity and reputation of either party.

Care and attention must be paid in relations with the aforementioned parties, in particular in transactions relating to tenders, contracts, authorisations, licences, concessions, requests for and/or management and use of financing, however denominated, of public origin (national or EU), relations with supervisory authorities or other independent authorities, representatives of the Government or other Public Administrations, social security bodies, tax collection bodies, bodies involved in bankruptcy proceedings, civil, criminal or administrative proceedings, access to and use of computer or telematic systems or data, as well as electronic documents.

In the context of relations with Italian and foreign institutions, CY4GATE is committed to representing its interests and expressing its needs in a correct and transparent manner, in strict compliance with the principles of independence and impartiality of the Public Administration's decisions and in such a way as not to mislead or misdirect

its pronouncements. In order to ensure the utmost clarity in relations, contacts with international interlocutors are only made by persons authorised to do so and in such a way as to guarantee the correctness and traceability of such contact.

With regard to any requests of any nature coming from the Judicial Authority and, more generally, to any possible contact with said Authority, CY4GATE undertakes to provide the utmost cooperation and to refrain from any conduct that may cause hindrance or prejudice, in absolute compliance with the laws and regulations in force and in accordance with the principles of loyalty, fairness and transparency.





