

Code of Ethics and Business Conduct

EOS Solutions Group



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digital systems | **human feelings**

Premise

What is the Code of Ethics and Business Conduct?

The Code of Ethics and Business Conduct consists of a collection of guidelines arranged on a voluntary common basis to define and recall what company values and principles employees must observe in their interpersonal relationships within the company.

To whom is the Code of Ethics and Business Conduct addressed?

The Code of Ethics and Business Conduct applies to all the members of the Board of Directors, managers, and every full-time and part-time employees of EOS Solutions Group. The Code of Ethics and Business Conduct applies also to other parties such as temporary employees, other people and/or companies operating in the name and on behalf of EOS Solutions Group.

The Code of Ethics and Business Conduct also involves all those who have professional relationships with EOS Solutions Group, such as suppliers, customers, consultants, and representatives, who are required to respect and share the principles and recommendations of this Code.

How is the Code of Ethics and Business Conduct applied?

The Code of Ethics and Business Conduct is accessible and available for consultation by all the interested parties.

The Code of Ethics and Business Conduct must be applied daily by the addressees in all behaviors related to the professional activities of EOS Solutions Group, considering the several aspects described in the following sections.

Why do we need the Code of Ethics and Business Conduct and what are our Accountability?

The activities of EOS Solutions Group are developed under many profiles, with various roles and points of view interplaying. This dynamism does not make it easy to identify what is, on the various occasions, the correct behavior to adopt. The Code of Ethics and Business Conduct is a guide to provide useful guidelines regarding the activities and contexts in which people of EOS Solutions Group operate daily.

What are our references for the implementation of the Code of Ethics and Business Conduct?

Each employee, co-worker, or other addressee as generally stated above is required to observe the Code of Ethics and Business Conduct available through EOS Solutions communication channels (website www.eos-solutions.it, e-mail, etc.). The Code of Ethics and Business Conduct is also enforced in practice with the constant supervision and targeted intervention of the specifically established Supervision Committee.



People's value

People are the driving force behind our organization.

Enhancing the potential, skills and uniqueness of our people makes everyone part of something great.

Group cohesion and collaboration is the way to a steady success.

Competence

EOS Solutions Group is a solid business in terms of efficiency and innovation, which are qualities intrinsic to the supply activities of products and services provided in favor of our customers, and the activities related to the solutions proposed by our suppliers. We pay particular attention to ensuring high levels of professionalism using *Best Practices* that are tailored to the specific needs of the case, providing focus and appropriateness regarding the choices made each time.

We also promote, with perseverance and dedication, special training paths through dedicated courses or events, fostering the development and constant updating of skills necessary to achieve common goals.

Empathy

EOS Solutions Group is committed daily to the empowerment of interpersonal relationships aimed at the successful performance of its internally performed and externally delivered business activities.

We also pay close attention to the attitudes and characteristics of our employees, fostering their professional growth and the development of their functional and soft skills.

Each of the employees working within EOS Solutions Group is required to interact with all their colleagues with a marked spirit of cooperation and good faith, politeness, and decency, as well as with full respect for each other's commitment and related competencies.

Equal commitment in terms of empathy, decency and professionalism is observed by all the employees of EOS Solutions Group in their external relations.

In the existing relationships with the employees and representatives of EOS Solutions Group, it is expressly requested that external parties, such as customers, partners, or suppliers, observe the same criteria described above and that are internally promoted.

Lastly, we encourage clear and helpful communication, both internally and with all our external stakeholders, so that the effective transmission of information that is functional to the proper conduct of EOS Solutions Group's activities is ensured.

Innovation

The constant research of cutting-edge processing Solutions represents the focus of supply activities by EOS Solutions Group.

Our proposal for *Digital Transformation and/or Digitalization* is the result of continuous updating and sharing of insights and experiences that have been practically realized during the carried-out activities and considering the goals and outcomes.

Territoriality

EOS Solutions Group guarantees an effective presence throughout the territory in which it operates, with appropriate assistance and support for the presented requirements, as well as a successful engagement of the people who are individually involved in the various ongoing activities. We believe in closeness to both our employees and our clients.

1. Ethics and social rules of EOS Solutions Group

Observance of Human Rights

Dignity and respect for human rights define any relationship of personal and professional kind, over which the activity of EOS Solutions Group is developed.

We are constantly committed to the recognition and execution of the guiding principles recognized by the international human rights conventions, the European Convention on Human Rights, and the International Labor Standards from the ILO (International Labor Organization).

EOS Solutions Group promotes the expression of the fundamental human rights, of which personal freedom, freedom of thought and association.

While performing its activities and pursuing its *Mission*, EOS Solutions Group rejects any form of inhuman or demeaning treatment such as forced labor or child labor.

Integrity and legality

EOS Solutions Group operates and works in full compliance with the relevant regulations for its activities, ensuring protection for its internal and other stakeholders, while also preserving its efficiency and reputation. The achievement of positive results is also based on our ability to comply with laws and regulations, as well as provisions that control internal processes.





We observe strict compliance with legality in the management of business and execution of software supply relationships and the related cooperation.

We therefore act in full compliance with the current laws, including those concerning anti-corruption, anti-money laundering, information security, and personal data protection.

Acts prosecutable by law such as theft, embezzlement, or fraudulent damage to property in the performance of activities and on workplaces are also expressly prohibited.

When developing interpersonal and interprofessional relationships, EOS Solutions Group rejects and condemns any form of offenses, abuse, or violence, whether physical or verbal, that can be punished according to the law, such as defamation, threats, injury or assault, sexual harassment, or violence, stalking or persecutory acts.

EOS Solutions Group also rejects and sanctions any form of violation, although minor and related to the already mentioned violations, of which by no means exhaustive bullying, prevarication, arrogance, or disrespect that can be condemned in any case, according to the common principle and contrary to the principles outlined in this Code or in the internal regulations.

Equity, inclusion, and non-discrimination

EOS Solutions Group works daily with the collective participation of all the stakeholders to ensure a fair and non-discriminatory working environment, without any form of intolerance or oppression based on age, origin and ethnicity, gender, sexual or political or religious orientation.

We pursue our active engagement in social training and awareness initiatives, having achieved accomplishments such as the Italian Trainers Association award for the "EOS4Women" project, or pursuing goals on a cultural and educational level, such as the participation in the "Diversity&Inclusion" program.

EOS Solutions Group works effectively for the removal of barriers related to psychophysical difficulties of people with disabilities that are part of its organization, fostering a genuine inclusion with shared paths and goals for growth.

Besides the business activities in a strict sense, we encourage with special emphasis the organization and participation in learning events and leisure areas, which are addressed and embraced by all the people that are part of EOS Solutions Group.

The pursuit and preservation of a healthy, fair, and inclusive work environment is a constant challenge for us, for which we do not fail to measure ourselves periodically, by consistently attending and participating in initiatives such as the "Great Place to Work," for which we have obtained and honored several awards.

Environmental and social impact

EOS Solutions Group enhances its presence in the diverse environment in which it operates with active commitment to social and environmental responsibility. We promote collectively recognized goals through the adoption of an internal structure with ESG profile, influencing the daily work and every activity of EOS Solutions Group.

We consciously take responsibility for decisions in terms of Governance in constant compliance with the ethical principles recalled in this Code.

We actively participate in the sharing of socially shared values, such as those of sports, materially supported through sponsorship activities, or inclusion and non-discrimination initiatives already promoted in the workplace in terms of culture.

We actively encourage any initiative to protect the environment, in accordance with the criteria and goals defined on a local and international level.

We are committed effectively and daily to the responsible use of environmental resources and to positively influencing the people and the communities in which we operate. As an example, we adhere with constant participation to the reforestation campaign with topic-based initiatives. In addition, we offer ESRS (European Sustainability Reporting Standards) consulting services to our clients and promote solutions in the Sustainability field with the specific purpose of enabling users to monitor CO₂ production by identifying "carbon hotspots" in the company and reducing them.





2. Industry Rules

Health and Safety

EOS Solutions Group pays special attention to the protection of health and safety in workplace and, in general, in any environment where our people are engaged in business and related activities. This concern is being realized concretely with explicit reference to the supply and partnership relations.

We provided our employees with tailor-made training courses to foster and support individual safety and promote wellness protection and a healthy lifestyle internally.

We require all our employees to strictly observe health and safety regulations. We also provide constant supervision, with appropriate support from responsible parties, to identify potential risks and contrast them promptly.

We are also committed to ensuring that the same provisions for workplace health and safety are observed in our business activities that are carried out in external environments. We ensure the same attention with reference to the quality of our professional relationships with external parties, in terms of regularity and safety, specifically assessing the appropriateness of the working environments provided and the treatment of external partners in relation with EOS Solutions Group.

Competition

EOS Solutions Group is consistently committed to compliance with the rules and criteria on competition, actively opposing any conduct in this regard that is harmful to the proper execution of its business and professional relations.

We adopt measures and good practices internally in preventing and opposing conflicts of interest, with effective implementation of such instructions and behaviors by our employees so that there is no undue exploitation of membership in EOS Solutions Group.

While carrying out business relations and executing supply activities, we reject any form of unfair competition against us, also giving special attention to the same observance from us towards our external stakeholders.



Intellectual and industrial property

The development and customization of our software solutions is a pillar of our activities as we pursue our *Mission*.

Know-how, patents, trademarks, designs, and software works represent valuable and protected resources for EOS Solutions Group.

We ensure appropriate protection of our intellectual and industrial property broadly, making all our employees aware of its respect and encouraging a professional and diligent approach to the subject.

At the same time, we guarantee respect for the intellectual and industrial property of third parties operating in our industry or present in the business relationships with EOS Solutions Group.

IT Security and Privacy

EOS Solutions Group carefully conveys its commitment and expertise in compliance with the rules of information security and personal data protection. We require compliance with the relevant technical regulations, with appropriate reference to EU regulations and acts, as well as with the legal provisions on criminal matters that can be implemented.

We work constantly to embrace the accomplishment and encourage the observance of appropriate standards and procedures for effective governance and management of corporate information systems and technologies (including audits, controls, and risk management).

All our employees are firmly committed to performing their tasks with fairness, diligence, and professional care, in accordance with the standards internally set to protect the security of the systems used and the information.

It is specifically expected that the tools and devices provided by EOS Solutions Group to its employees, or any interested parties will be used with diligence and in accordance with the law.

We preserve the confidentiality of information obtained while performing the EOS Solutions Group's business activities in accordance with specific confidentiality agreements (NDA) and in compliance with the Personal Data Protection provisions of the EU Regulation 2016/679 (GDPR). This information must not be used for personal purposes or given willfully to third parties.

We develop expertise in the related EOS Solutions Group's professional technical areas, accepting to undertake only those activities that we believe we can perform with the necessary skill, knowledge, and expertise.

Lastly, we are committed to informing stakeholders carefully of the work done with reference to the information received, also giving dutiful specific notice when relevant related facts occur.



3. Code of Ethics and Business Conduct's contact person, procedures, and sanctions

Supervision Committee

The circulation, pursuit and execution of the principles and criteria of the Code of Ethics and Business Conduct are ensured by the supervision and intervention of the appointed Supervision Committee.

The Supervision Committee is identified and based on requirements of competence, experience, and sensitivity to the issues addressed in this Code.

The Supervision Committee is expected to work consistently and constructively, taking action against any violations with criteria of professionalism, objectivity and common sense.

Reports and violation procedures

The Supervision Committee collects reports of non-observance of the Code of Ethics and Business Conduct following communication from interested parties through the designated reporting methods. Every report will be treated confidentially, to protect the confidentiality of the information and the data contained, the identity of the whistleblower and any other involved person necessary to identify the violations exposed.

If any verified violations (intended as severe and/or repeated violations) of this Code are established by the Supervision Committee, the following sanctions will be applied with the support of the appropriate departments.

For any type of whistleblowing covered in this Code it is expressly prohibited any arbitrary form of retaliation, threat, sanction, or discrimination against whistleblowers or anyone who has cooperated in the inquiry activities and subsequent actions and/or measures.

"Whistleblowing"

EOS Solutions Group has established a dedicated platform for Whistleblowing available at <https://wb.eos-solutions.it>. This tool has been implemented with the aim of enabling employees and co-workers to report potential violations of national and European Union regulations that could compromise corporate integrity. Reports may concern facts or behaviors that the whistleblower has learned about during their working activity.

It is important to point out that the platform is not intended to receive reports that concern personal complaints of the reporter or matters that concern only individual working relationships or interactions with hierarchical superiors. One of the key aspects of the platform is its ability to guarantee the confidentiality of the whistleblower as a measure expressly required by the related legislation for *Whistleblowing*.

Disciplinary sanctions

Any violation of the Code by employees and co-workers is a breach of the responsibilities and may entail disciplinary sanctions within the company, in accordance with the law and the regulations of reference.

Sanctions and contractual remedies

Any violation of the provisions provided in this Code by any interested party, including those who collaborate and work with EOS Solutions Group, implies a breach of the contractual obligations, leading to contractual sanctions including termination and, in any case, the use of the remedies provided by law.

The Code of Ethics and Business Conduct represents a **shared project and a common goal**, and anyone can ask the appropriate people for further information or support.

15th December, 2023

