

CODE OF ETHICS OF INFORDATA SISTEMI

Rev. 1 of 28.10.2024

1. INTRODUCTION This Code of Ethics represents the set of fundamental values and principles that guide Infordata Sistemi Srl's activities, providing guidelines for ethical and responsible behavior by all employees, collaborators, suppliers, and stakeholders involved in the company's operations.

2. MISSION AND VALUES Infordata Sistemi Srl operates in the fields of software development, systems integration, research and development, wholesale distribution of electronic equipment, access control systems, attendance tracking, and traceability solutions. Our mission is to provide advanced technological solutions that foster innovation and the digitalization of business processes, while maintaining ethical and sustainable practices.

The core values that guide our company are:

- **Respect:** towards people, the environment, and the community.
- **Fairness:** in compliance with regulations and in relationships with all stakeholders.
- **Transparency:** in internal and external communication.
- **Equity:** ensuring equal opportunities for all employees.
- **Responsibility:** social, environmental, and economic.
- **Innovation:** offering cutting-edge technological solutions.
- **Security:** protecting information, data, and company infrastructures.

3. ETHICAL PRINCIPLES

3.1 Compliance with Laws Infordata Sistemi Srl is committed to complying with all applicable local, national, and international regulations, ensuring adherence to Italian **Legal Rating**, National Cybersecurity Agency qualified services, ISO9001 and ISO27001 certifications.

3.2 Conflict of Interest Employees must avoid situations where personal interests could compromise the impartiality and transparency of corporate decisions.

3.3 Confidentiality and Data Protection Infordata Sistemi Srl protects sensitive information of customers, employees, and partners in compliance with data protection laws and cybersecurity management standards (SGSI).

3.4 Gender Equality and Inclusion The company promotes equal opportunities regardless of gender, ethnicity, religion, sexual orientation, or disability, and is implementing corporate welfare measures to support employee well-being.

3.5 Sustainability and Social Responsibility Infodata Sistemi Srl has initiated the adoption of ESG policies and is working towards becoming a benefit corporation, with the aim of increasing transparency and commitment to environmental and social sustainability.

4. WORKPLACE BEHAVIOR

4.1 Work Environment The company promotes a safe, inclusive, and collaborative environment where every employee can reach their full potential.

4.2 Harassment and Discrimination Any form of discrimination or harassment is not tolerated, and disciplinary measures will be taken against behaviors that do not comply with these principles.

4.3 Health and Safety Employees must comply with safety regulations and report any hazardous situations.

5. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS, AND STAKEHOLDERS

5.1 Honesty and Transparency Relationships with customers and suppliers must be based on maximum transparency, fairness, and respect for contractual commitments.

5.2 Quality and Reliability Infodata Sistemi Srl ensures the excellence of its products and services through a certified quality management system.

5.3 Stakeholder Engagement The company interacts with customers, suppliers, and the community through surveys, ticketing systems, and the contact center.

6. GOVERNANCE AND MONITORING

6.1 Organizational Structure The company is managed by the General Directorate and the Board of Directors. Ethical compliance is supervised by the Quality Manager, the SGSI Manager, and the Cybersecurity Committee, with support from an external controller for financial management.

6.2 Reporting Violations A whistleblowing system for anonymous reporting of unethical behavior is being implemented.

6.3 Sanctions Violations of this Code of Ethics will be assessed and sanctioned based on their severity, ensuring impartiality and compliance with applicable regulations.

7. IMPLEMENTATION AND DISSEMINATION

- The Code of Ethics is communicated to all employees and made available on the company's website.
- Periodic training sessions are planned to ensure understanding and adherence to ethical principles.

This Code of Ethics represents Infordata Sistemi Srl's concrete commitment to a transparent, responsible, and sustainable company.

For the General direction,

Marko Petelin

Legal representative

