Business Ethics Policy

Top management of SOAG EUROPE SA' business is committed in the support, respect and protection of internationally proclaimed towards its own stakeholders through principles, values and standards for behaviors **to ensure a certain level of trust among every stakeholders**.
The issues that affect business relationships are constantly evolving for numerous reasons including regulatory and socio-economic variables. Contemporary issues common to business are managed by SOAG through **Global Ethic Code** and **PRO 32 GN on ESG | Sustainability Management** that includes provisions and risks including but not limited to the following subjects:

- Anti-corruption and bribery
- Fair competition and anti-trust
- Conflicts of interest
- Counterfeit parts
- Intellectual property
- Export controls and economic sanctions
- Money laundering
- Fiduciary duties
- Information security
  Whistleblowing and protection against retaliation

The Ethic Code of Group has been approved by the Board of Directors dated 01.16.2018 must be understood as an integral part of the Organization and Management of the Company and therefore applies to all stakeholder linked it. The SOAG commitment for **ethical conduct must become our main driver. It is our duty**, therefore, to consolidate and make known our excellent standards of conduct. It is essential that our employees - the new ones as well as the most experienced ones - know, apply and develop this modus operandi that has seen us growing and improving our technologies during these years.

The business ethical due diligence of SOAG Group is covered by optional Italian law 231/2001 that has been subscribed by SIGIT SpA and indirectly transposed by other Group's Companies through Ethic Code and annual Sustainability Report that try to unify single national laws with one corporate rulebook, i.e. Global Ethic Code, about principles that concern 17 SDGs of UNGC.

The provisions contained in this policy and in Group's Ethic Code are the principles of SOAG EUROPE SA that also required the compliance with national laws, other applicable laws and the principles described in the International Labor Organization Conventions, in the Universal Declaration of Human Rights and in the OECD Guidelines for Multinational Enterprises.

The Group operates in compliance with internationally recognized ethical standards, following EU Directives and the transposition of Member States. The key topics that protect the stakeholders and ecosystems involved are the following (ESG), each of which takes up sub-specific categories that can be evaluated through assessment and analysis of the results useful to pursue targets set for the improvement of the entire business management and in which the Group undertakes to train and raise awareness of its stakeholders:

Environment
The topic concerns a wide categories of which required to assess and analyze the results to plan strategical actions to reduce direct and indirect impact connected to the business value-chain. In particular this area require to evaluate and plan improvement through defined investments: *Carbon Footprint, energy consumption, water consumption, biodiversity, fugitive pollutants, materials, chemical substances and waste*.
These have almost all a quantitative nature because of it should be more easy fixed reduction target doing best practices as improvement in business activity.

Social
The topic concerns mainly the own workforce and the realization of how our business participate in contribution of wellness of our employees connected to their job. Group follows the social efforts to assure adequate respondence to its own employees in terms of: Health & Safety, training, working conditions, social dialogue, career management, child labor, forced labor and human trafficking, diversity, discrimination and harassment, wages and benefits, working hours, ethical recruiting, freedom of association and collective bargaining, women's rights and rights of minorities and indigenous people.

Governance
The Governance in terms of Sustainability concerns all how is preliminary declared in this policy about due diligence in legal and ethical management, in respect of stakeholders involved. The role of an enterprise in this sense is to offer training and assessment to its own supply-chain about all aspects about ESG. The aim of this mechanism is to contribute at a standardized level of ESG in practical for sector and entire ecosystem where Group operates.

Eventual violations of the Ethic Code must be reported to SOAG Helpline, managed by a **Supervisory Body** whom allows employees, suppliers, customers, and other stakeholders to ask for advice regarding the application of the Ethic Code and to make any reporting about alleged situations, events or actions that could be considered potential violations. The reports will be evaluated to ensure the **confidentiality of the identity**, in accordance with current standards, if they do not have the obligation of transparency and knowledge of the reporting Subject. The reports made in good faith will not lead to negative repercussions for the reporting Subject even if the result is unfounded. The reports cannot be anonymous and must be sent by email to: odv@sigit.it.