

INDEX

Premise	2
1. MISSION AND COMPANY VALUES	2
2. GENERAL PRINCIPLES.....	2
2.1 Purpose of the Code of Ethics	2
2.2 Recipients of the Code of Ethics	3
2.3 Compliance with the Code of Ethics	3
2.4 General principles of conduct	3
2.5 Public funding and disbursements	4
2.6 Sponsorships and Contributions	4
2.7 Judicial and supervisory authorities	4
2.8 Airworthiness Entities	4
3. ACCOUNTING RECORDS AND CORPORATE GOVERNANCE.....	5
3.1 Accounting transparency and corporate disclosure.....	5
3.2 Management of financial flows	5
3.3 The system of powers.....	5
3.4 Conflict of Interest	6
3.5 Protection of company assets	6
3.6 Relations with the mass media.....	6
4. GIFTS AND BENEFITS	7
4.1 General principles	7
5. WORKER SAFETY AND PROTECTION OF THE NATURAL ENVIRONMENT	7
6. RESPECT FOR THE INDIVIDUAL PERSONALITY	7
7. INDUSTRIAL AND INTELLECTUAL PROPERTY.....	8
8. COMPETITION AND LOYALTY IN RELATIONS WITH PARTNERS, CUSTOMERS AND SUPPLIERS	9
8.1 Respect for competition	9
8.2 Relationship with Partners.....	9
8.3 Relationship with Customers.....	9
8.4 Relations with Suppliers	10
9. IT SECURITY.....	10
10. CONTRAST TO ORGANIZED CRIME	11
11. PREVENTION OF TERRORISM.....	11
12. VIOLATIONS OF THE CODE OF ETHICS	12
12.1 Reports of violations of the Code	12
12.2 The system of sanctions	12
13. DISSEMINATION OF THE CODE OF ETHICS	12

Premise

ITAI SPA has chosen to formalize this Code of Ethics (hereinafter the "Code") to share the values, principles, rules of conduct with all its interlocutors, in order to build a transparent reality oriented towards compliance with ethical standards, typical of a mature civil context.

The recipients of this document must comply with the regulations in force in all the countries in which the Company operates, orienting their actions and behaviors to the principles, objectives and commitments referred to in the Code. Where the regulations prove insufficient to unambiguously outline the conduct to be followed, the principles cited in this Code will constitute the guidelines for its recipients.

In no case can the pursuit of the Company's interest justify conduct contrary to the laws in force and the rules of this Code, which is configured, in fact, as an instrument of guarantee and reliability, to protect its assets and reputation

The Collaborators of ITAI S.P.A must therefore comply with the principles and standards indicated therein, inspiring the daily corporate conduct.

1. MISSION AND COMPANY VALUES

ITAI S.P.A operates in the general industrial sector and in particular in the aeronautics, space and defense sectors. In pursuing its mission, ITAI S.P.A adopts the following values:

- **Integrity:** acts with integrity and fairness, demonstrating respect in making and implementing decisions. It bases its activities on honesty, fairness and transparency. Respect the rules established by the laws of the countries in which it operates, observing the Code and internal company rules. In relationships, both internal and external, it does not allow behaviors that originate from political and trade union discrimination, of religion, race, nationality, age, sex, sexual orientation, state of health and, in general, relating to any characteristic of the human person.
- **Responsibility:** keeps its word and acts in compliance with the commitments made with a sense of responsibility, constantly monitoring its performance and guaranteeing the promised results.
- **Transparency:** communicates transparently, providing complete, uniform and timely information to meet the legitimate expectations of the various stakeholders. It guarantees a business climate of openness and trust that facilitates the exchange and sharing of knowledge and ideas.
- **Customer orientation:** listens to the needs of its customers and punctually supplies them with innovative products and services of quality and at the right value, making all the resources available to achieve the best results.
- **Innovation:** demonstrates a passion for technological research and innovation. Face change with the contribution of ideas and solutions, flexibility and openness to the new. All the staff collaborate to achieve continuous business improvement.

2. GENERAL PRINCIPLES

2.1 Purpose of the Code of Ethics

The Code of Ethics is an official document which sets out the ethical principles that ITAI S.P.A respects, in which it reflects itself and by which all the subjects with whom it comes into contact must consistently be inspired; expresses the commitments and ethical responsibilities assumed by its collaborators in the conduct of company activities.

The Code of Ethics is aimed at making clear, unambiguous and understandable to all those who work within ITAI S.P.A or who are in any case linked to ITAI S.P.A to comply with the aforementioned ethical principles.

2.2 Recipients of the Code of Ethics

The recipients of the Code of Ethics are divided into obliged recipients and non-obliged recipients.

The obliged recipients are so called as they are obliged to comply with the Code and therefore can be punished in the event of violations. The obliged recipients, hereinafter the Collaborators, are all those who, for various reasons, act in the name or on behalf and in the interest or advantage of the Company, regardless of the formal legal qualification of the relationship, whether they have a working relationship that provides obligations of subordination to the authority of the Company whether they represent the Company to third parties

In particular, collaborators in general as well as any person exercising the management and control of ITAI S.P.A. Also obliged recipients of the Code of Ethics are all subjects who have an employment relationship for any reason, even occasional, with ITAI SPA such as temporary and para-subordinate workers, agents, consultants, partners and anyone who carries out activities in the name and on behalf of ITAI SPA or under its control.

Non-obliged recipients are so called as they are not subjected to sanctions for violating the provisions of the Code of Ethics. These are Suppliers, Consultants and Partners when they do not carry out activities in the name or on behalf of ITAI S.P.A as well as the beneficiaries of ITAI S.P.A's initiatives and all stakeholders in the same.

With regard to non-obliged recipients, compliance with and sharing of the Code of Ethics can constitute a criterion for choosing the subjects with whom to establish or maintain relations. It will be the responsibility of the competent function to obtain from these subjects the commitment to comply with the Code of Ethics.

ITAI S.P.A prefers interlocutors who conform in their behavior to shared ethical principles and in line with those expressed in this document.

2.3 Compliance with the Code of Ethics

ITAI S.P.A requires all its Collaborators to behave correctly and transparently in the performance of their function, contributing to the affirmation and improvement of reputation, to protect the value of the Company. Reputation, in fact, is considered an intangible asset of great importance, as it allows you to create and cultivate relationships based on trust with all interlocutors. Therefore, ITAI S.P.A expects all those who act on its behalf or in its interest to best represent its style, avoiding conduct of dubious moral foundation.

ITAI S.P.A also endeavors to ensure that the principles of the Code of Ethics are shared by Consultants, Suppliers, Partners and any other person who has business relationships with the Company.

Compliance with the principles of the Code of Ethics must be considered an essential part of the obligations towards the Company, pursuant to and for the purposes of the provisions in force. The violation of the principles of this Code damages the relationship of trust established by the Company and can lead to disciplinary actions. In the most serious cases, the violation may lead to the termination of the contractual relationship.

Responsible for supervising the application of the Code of Ethics is the Sole Director of ITAI S.P.A who encourages his employees and collaborators to contact in case of doubt about what is the most appropriate behavior to adopt in specific circumstances. All requests for clarifications will be promptly answered.

2.4 General principles of conduct

ITAI S.P.A conducts its activities with integrity, fairness and professionalism, in order to pursue the realization of its mission. Avoid any conduct that could facilitate or give rise to the suspicion of the commission of any type of offense, undermining the trust, transparency or tranquility of the work

environment and the economic context in which it operates.

All ITAI S.P.A collaborators must demonstrate moral integrity in the actions taken on behalf of the same, must observe the principles of the Code of Ethics and work to ensure that these rules are properly applied both within the Company and, in general, by all its interlocutors.

The rules contained in this Code integrate the behavior that Employees are required to observe also in compliance with the rules of ordinary diligence which employees are required to, as governed by the relevant legislation.

2.5 Public funding and disbursements

ITAI SPA condemns any behavior aimed at obtaining, by the State, the European Union or other national and foreign public body, any type of contribution, loan, soft loan or other disbursement of the same type, by means of declarations and / or altered or falsified documents or through omitted information or, more generally, through tricks or deceptions aimed at misleading the supplying body.

Contributions, grants or loans obtained by the State, the Regions, another public body or the European Union, even if of modest value and / or amount, cannot be used for purposes other than those for which they were granted.

The subjects assigned to the management of financial activities, investments and / or loans received from the national and foreign Public Administration, must base their work on principles of correctness and transparency, also observing the required information obligations.

2.6 Sponsorships and Contributions

ITAI S.P.A

- does not make contributions, direct or indirect, to political parties, movements, committees and political and trade union organizations, or to their officials, agents or representatives, both in Italy and abroad.
- does not finance or sponsor congresses or events that have political propaganda as their exclusive purpose and refrains from any direct or indirect pressure on politicians.
- can support initiatives proposed by declared non-profit organizations and associations with regular statutes and articles of association, evaluating the reliability, stature and their consistency with the values expressed in this Code.

There are also possible forms of collaboration, of a strictly institutional nature, aimed at contributing to the realization of events such as the implementation of studies, research, conferences, seminars or similar activities. Any contributions paid to the aforementioned entities must be compliant and consistent with the laws in force, as well as be accurately documented.

2.7 Judicial and supervisory authorities

ITAI S.P.A in carrying out its business, operates in a lawful and correct manner by collaborating with the Judicial Authority, the Police and any Public Official who has inspection powers and carries out investigations against him.

To this end, it requires all its employees and collaborators to give maximum availability to anyone who comes to carry out inspections and checks on behalf of INPS, the Ministry of Labor and any other Public Administration.

Anyone in a personal capacity or for facts dependent on the employment relationship, receives subpoenas, notification of judicial orders, must immediately contact the Company's lawyers.

2.8 Airworthiness Entities

With reference to national, EU and foreign airworthiness entities, ITAI S.P.A undertakes to ensure maximum collaboration and availability towards them.

The declarations of conformity issued by the Company, in compliance with the provisions in force, are the result of adequate preliminary checks on the processes, activities and operations carried out. ITAI S.P.A also ensures the transparency of communication to these Bodies to protect the safety of the aircraft on which supplied products are installed.

3. ACCOUNTING RECORDS AND CORPORATE GOVERNANCE

3.1 Accounting transparency and corporate disclosure

ITAI S.P.A draws up its own accounting records in compliance with the principles, criteria and rules established by the Civil Code and by the accounting principles. In compliance with the law, the accounting documents must meet the criteria of truthfulness, accuracy, completeness and clarity also in order to guarantee shareholders and third parties a clear image of the economic, equity and financial situation of the Company.

Collaborators are obliged to guarantee the truthfulness, authenticity and originality of the documentation and information provided in carrying out the activities within their competence. ITAI S.P.A condemns any behavior aimed at altering the correctness and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law. All the subjects called to form the aforementioned documents are required to verify the correctness of the data and information provided, with due diligence.

All employees and collaborators of ITAI S.P.A are obliged to carry out any complaint, communication and filing in the register of companies, within the time limits prescribed by law, any omission, inaccuracy or falsification of accounting records or supporting documents of which they have become aware.

3.2 Management of financial flows

Payments relating to any transaction in which ITAI S.P.A is a party cannot take place through cash or bank or postal bearer passbooks or bearer securities, when the value to be transferred exceeds the limits allowed by current legislation.

To avoid giving or receiving undue payments, the following principles must be respected:

- all payments and other currency transfers made by / to the Company, including from / abroad, must be accurately and fully recorded in the accounting books and mandatory records;
- all payments must be made exclusively to legitimate recipients and for contractually formalized activities;
- false, incomplete or misleading registrations must not be created, and secret or unregistered funds must not be established, nor can funds be deposited in personal or non-corporate accounts;
- no unauthorized use of company funds must be made.

3.3 The system of powers

No one must have powers of representation, direction and management outside of specific delegations and the system of authorizations and approvals for the taking of operational, financial and investment management decisions existing within ITAI S.P.A

All activities carried out by ITAI S.P.A or by third parties in the name and on behalf of the same must be in a confidentiality regime.

The proxies can also be attributed to subjects external to the Company, for example in the context of consultancy relationships. In this case, together with the acceptance of the delegated functions or tasks, these subjects must accept the principles set out in this Code.

3.4 Conflict of Interest

All Collaborators must ensure that every decision is made in the interest of ITAI SPA. They must, therefore, avoid any situation of conflict of interest, between personal or family economic activities and duties covered within the Company, which could jeopardize their independence of judgment and choice. For this purpose ITAI S.P.A. establishes the prohibition for those who have a competing interest, even only partially, with that of the Company, to carry out or collaborate in operations, through which the assets belonging to or managed by the same are available.

3.5 Protection of company assets

ITAI SPA endeavors to ensure that the use of available resources, carried out in compliance with current legislation and the contents of the Articles of Association, and in line with the principles of this Code of Ethics, is aimed at guaranteeing, increasing and strengthening the corporate assets, in order to protect Company itself, shareholders, creditors and the market.

Employees and collaborators are directly and personally responsible for the protection and legitimate use of assets (tangible and intangible) and of the resources entrusted to them to carry out their functions.

None of the assets owned by the Company can be used for purposes other than those indicated by the same or for illegal purposes.

Every asset owned by the Company must be recorded in the accounting records, unless the law allows otherwise.

Each Collaborator must work diligently to protect the Company's assets through conscious behavior, in compliance with internal guidelines. To this end, each Collaborator is responsible for guarding and preserving the assets and resources of the Company entrusted to him in the context of his activity and must make use of them in accordance with the corporate interest, preventing any improper use that may cause damage or of reduction of effectiveness and efficiency or in any case in contrast with the image of ITAI SPA.

3.6 Relations with the mass media

Relations with the press, the means of communication and information and, more generally, external communication, are inspired by principles of truth, fairness, transparency, prudence, and must only be held by individuals with specific powers.

All Collaborators are required to maintain the utmost confidentiality, and therefore not to disclose or unduly request information on documents, know-how, projects, company operations and, in general, on what they have learned in the course of their work.

It is not permitted to disclose to subjects external to the Company the contents, effects, terms or areas of application of measures or determinations having external efficacy, before they have been formalized and formally communicated to the interested parties. It is not permitted to make statements, affirmations or communications to the public that may in any way harm or put the position and the work of the Company in a bad light.

Third party access to internal documents of the Company is not allowed, both formalized and in the drafting phase, except in the cases and in the ways provided for by the law, as well as by the internal regulations in force. ITAI SPA, to safeguard its image and the correctness of the information released, and in line with the principles set out above, establishes that no employee and / or collaborator - if not authorized - may issue interviews or any type of declaration, on behalf of or concerning the Company to unqualified external parties or journalists. Anyone who is urged to make statements regarding the Company, to unqualified external parties or accredited journalists, must refer these to the Sole Director of the Company.

4. GIFTS AND BENEFITS

4.1 General principles

ITAI SPA prohibits its Collaborators from promising or offering, even as a result of unlawful pressure, gifts and / or benefits (for example, money, objects, services, favors or other benefits) to third parties (for example Partners, Customers, Suppliers), for the purpose of taking undue advantage for himself or for the Company.

Likewise, ITAI S.P.A prohibits its Collaborators from receiving gifts and / or benefits from third parties, even as a result of unlawful pressure, in order to influence potential or actual relationships with the Company.

Acts of courtesy and hospitality towards third parties are permitted when they are such, in terms of size and value, that they do not compromise the integrity and reputation of both parties and that they cannot be interpreted, by an impartial observer, as aimed at acquiring advantages in improper way.

5. WORKER SAFETY AND PROTECTION OF THE NATURAL ENVIRONMENT

As part of its activities, ITAI S.P.A guarantees the safety and health of its employees and collaborators. ITAI S.P.A guarantees a work environment compliant with current safety and health regulations, by monitoring, managing and preventing the risks associated with the performance of the professional activity.

Collaborators of ITAI S.P.A are expressly obliged to:

- behave correctly and transparently, in compliance with the law and internal company procedures;
- strictly observe all the safety regulations set by law and applied by the Company.
- As part of the aforementioned behaviors, it is mandatory in particular to:
 - assess all health and safety risks;
 - plan prevention;
 - eliminate the risks and / or in any case work to reduce them to a minimum;
 - carry out health checks on workers;
 - remove workers from exposure to risk;
 - adequately inform and train workers;
 - use warning and safety signs.

ITAI S.P.A carefully evaluates all those situations that can generate environmental impacts such as atmospheric emissions, waste and noise pollution.

The protection of the environment and the safeguarding of natural resources are among the main company objectives. Through the commitment of its collaborators, ITAI S.P.A strives to conduct its activities in order to protect the environment and continuously improve its environmental performance. The environmental management system implemented by the Company guarantees compliance with the law and defines high standards of compliance in this regard.

Each Collaborator must contribute to the pursuit of these objectives through their behavior.

Anyone who becomes aware of any inefficiencies of the protection devices or of the safety devices adopted by ITAI S.P.A is required to report them.

6. RESPECT FOR THE INDIVIDUAL PERSONALITY

Collaborators are expressly prohibited from engaging in conduct that could potentially harm the personal integrity of any individual who carries out their business in the name or on behalf of the Company.

ITAI SPA prohibits anyone by violence, threat, deception, abuse of a situation of physical or mental inferiority or a situation of necessity or by promising or giving sums of money or other advantages, to exercise on a person, powers corresponding to those of the right of ownership or to reduce or keep a person in a state of continuous subjection. In particular, ITAI S.P.A

- does not disseminate, distribute disclose or advertise juvenile pornographic material in any way, by any means, including electronically, or disclose news or information aimed at soliciting or sexual

exploitation of minors;

- does not use low-cost labor through the work of immigrants, including minors, from disadvantaged countries or in conditions of not being able to refuse such employment.

ITAI S.P.A recognizes the centrality of human resources in the belief that the main success factor of every company is the human and professional contribution of the people who work there, in a framework of loyalty and mutual trust. Therefore, in the phase of selection, hiring and career advancement of the Collaborators, evaluations are carried out exclusively on the basis of the correspondence between expected profiles and objective, transparent and verifiable considerations of merit, avoiding any form of discrimination and patronage. Practices of corruption, illegitimate favors, collusive behavior are unacceptable and, therefore, prohibited. The solicitation, even through third parties, of personal and career advantages for oneself and for others is equally prohibited. ITAI S.P.A does not establish any employment relationship with subjects without a residence permit or whose residence permit is irregular.

7. INDUSTRIAL AND INTELLECTUAL PROPERTY

All information held by ITAI S.P.A relating to critical knowledge for business activity is considered industrial and intellectual property. By way of example, these are: trademarks, designs, models, copyrights, patents, results of research, innovation, and creativity, know-how, software.

All information covered by state secrets or subject to secrecy restrictions by military provisions in use by the Company due to the nature of the activities carried out is also assimilated to industrial and intellectual property.

The aforementioned information, both exclusively owned and by third parties (for example, Partners, Customers, Suppliers), play a strategic role in ITAI SPA Unauthorized disclosure, tampering, theft or improper use of such data, even involuntarily, is capable of causing damage to the tangible and intangible assets of the Company, consisting, by way of example but not limited to, in the loss of competitive advantage, turnover, image, know-how, implying additional workloads for their restoration, with probable deterioration of internal relations and with the stakeholders involved.

Collaborators are required to maintain the utmost confidentiality on strategic, confidential or information relating to the industrial or intellectual property of the Company and its Partners, Customers and Suppliers, from whom the same behavior is expected.

The disclosure of data and information is prohibited, even after the termination of the relationship that binds the Collaborator to ITAI S.P.A, unless expressly authorized by the competent company functions or if not made public.

ITAI SPA takes all appropriate measures to identify the counterparty and to ensure that the latter uses the data and information transferred only for the agreed purposes and that it undertakes not to disclose such contents to third parties without specific approval by ITAI SPA. itself.

In the case of authorized disclosure, particular attention must be paid to the recipients of certain data and information, always ensuring that the interlocutors, directly or indirectly, do not act in the name, on behalf and in the interest of organizations with illegal purposes.

ITAI S.P.A in full compliance with its own and others' industrial and intellectual property, prohibits its Collaborators from counterfeiting and altering trademarks, distinctive signs, patents, models and designs. It also prohibits the use of altered or counterfeit trademarks, distinctive signs, patents, models and designs and the import and trade of products with false signs.

8. COMPETITION AND LOYALTY IN RELATIONS WITH PARTNERS, CUSTOMERS AND SUPPLIERS

8.1 Respect for competition

ITAI S.P.A recognizes the fundamental importance of a competitive market based on fair competition. Therefore, its Collaborators are committed to observing the laws on the subject, of any jurisdiction, and to collaborating with the market regulatory authorities.

It is forbidden to obtain information on competition, including industrial and intellectual property rights, by illegal or unethical means (for example, theft, corruption, false declarations, espionage).

8.2 Relationship with Partners

The complexity of economic activity increasingly requires participation in initiatives jointly with other subjects. This is implemented both through the establishment of joint ventures together with one or more Partners, and through the acquisition of shareholdings in companies where other shareholders are present.

ITAI S.P.A develops partnership relations with counterparties with a consolidated reputation and experience, setting up these relations in compliance with current regulations and the principles of this Code.

In developing these initiatives, ITAI S.P.A must:

- establish relationships with Partners or associates who are engaged only in lawful activities and which are inspired by ethical principles compatible with those of the Company;
- ensure that no Partner or associate is guaranteed disproportionately favorable treatment with respect to its contribution or contribution and not exploit situations of dependence or weakness of the counterparty;
- set up frank, open and collaborative relationships with Partners or associates, which enhance synergies;
- avoid signing confidential pacts or agreements that are contrary to the law or detrimental to the rights of other Partners or associates.

8.3 Relationship with Customers

The success of ITAI S.P.A is based above all on its ability to meet the expectations of its customers, while maintaining high levels of quality, performance and reliability. To this end, it is a priority to identify the needs of Customers, trying to make the best use of the Company's resources and synergies, in a correct and honest, professional and transparent way.

ITAI S.P.A provides accurate and exhaustive information about the products and services offered, so that customers can make informed decisions. In addition, it ensures appropriate methods of dialogue and listening, committing itself to always giving feedback to suggestions and complaints, in order to consolidate the relationship in the long term.

ITAI S.P.A negotiates and models contracts with its Customers according to principles of correctness, completeness and transparency, trying to predict the circumstances that could significantly affect the relationship established. In the event of unexpected events or situations, ITAI S.P.A takes care of the expectations of the Customers, executing the contracts with fairness, without exploiting any conditions of weakness or ignorance of the counterparty.

ITAI S.P.A actively cooperates with its Customers so that the verifications, inspections and any other type of intervention carried out by them at the Company's structures, preliminary or in implementation of contracts, allow them to finalize the objectives for which they are implemented. In particular, the moments of qualification, to which ITAI S.P.A is subjected, are facilitated by a collaborative and honest attitude towards Customers. To this end, all the measures to preserve this recognition over time are

implemented, through continuous monitoring of the critical aspects, and any significant changes in the qualification requirements are also promptly reported to the Customers. Likewise, the activities carried out by ITAI SPA Collaborators at the Customer sites are oriented towards compliance with this Code, the instructions and procedures received, avoiding that their respective behaviors lead to the emergence of responsibility for the Customers and ITAI. SPA itself.

The provisions contained in the Customer's Code of Ethics, for which the counterparty requests its adhesion, will be observed if not in conflict with those of ITAI S.P.A. In the event that the Customer's Code of Ethics, in the sections concerning the relationships in question, appears less rigorous than that of ITAI S.P.A, the behavior of the Collaborators will be inspired by the principles dictated by the latter.

8.4 Relations with Suppliers

Suppliers have a fundamental role in improving the overall competitiveness of ITAI S.P.A. The collaboration of Suppliers allows us to constantly ensure the satisfaction of customers' needs, in terms of quality, innovation, costs and services, to an extent at least equal to the expectations of the latter. Therefore, ITAI S.P.A directs relations with its Suppliers to comply with current regulations and to promote honest, diligent, transparent and cooperative behavior. At the same time, ITAI S.P.A encourages its Suppliers to use the same criteria, with the intention of mutually benefiting from the positive effects that only a stable relationship, shaped on trust, is able to produce.

The communication regarding the products and services requested is accurate and exhaustive, so that the Suppliers are able to prepare informed and aware offers. Complaints and reports of inconsistencies in supplies must be truthful and not instrumental to unduly benefit the Company. Suppliers are selected and qualified according to adequate and objective methods, based on their ability to offer and according to the principles of impartiality, fairness and quality. In any case, ITAI S.P.A balances the need to obtain convenient economic conditions with the need not to derogate from the quality parameters in the supply of goods and services. These selection requirements are declared and verifiable, so that the negotiations are characterized by a frank and open dialogue. Furthermore, any significant changes in the qualification requirements are promptly reported to the Suppliers, so that they are allowed to take action in the interest of the continuity of relations with the Company.

The checks, inspections and any other type of intervention, carried out by ITAI SPA Collaborators at the Suppliers' facilities, are oriented towards compliance with this Code, the instructions and procedures received, avoiding that the respective behaviors lead to the onset of liability by the Suppliers and by ITAI SPA itself.

The Company negotiates and sets up the contracts with its Suppliers, in a correct, complete and transparent way, trying to foresee the circumstances that could significantly affect the relationship established. In the event of unexpected events or situations, ITAI S.P.A undertakes not to exploit any conditions of weakness or ignorance of the counterparty.

The results of the control activities on the goods and services received and on the overall performance of the Suppliers are shared with them, with the aim of facilitating their progressive improvement in the common interest.

The remuneration to be paid to the Suppliers must be exclusively commensurate with the services and conditions indicated in the contract and payments cannot be made in favor of a person or in a country other than those of the contractual parties.

9. IT SECURITY

ITAI S.P.A prohibits any criminal conduct carried out through IT and telematic tools or in any case aimed at damaging them. It adopts adequate IT security policies aimed at protecting the electronic systems and the information contained from potential attacks and guaranteeing the continuity of the service.

In order to guarantee the protection of personal data, ITAI S.P.A undertakes to process the same in compliance with the reference regulations and in particular according to the principles of transparency,

lawfulness, quality guarantee and data correctness.

Any information relating to a natural or legal person, entity or association, identified or identifiable, even indirectly, by reference to any other information, including a personal identification number, is considered "personal data".

The personal data in question relate both to those who work in and for ITAI S.P.A and to all categories of interlocutors who interface with it (for example, Partners, Customers, Suppliers).

ITAI S.P.A guarantees the relevance of data processing with the declared and pursued purposes, in the sense that personal data will not be used for secondary purposes without the consent of the interested party.

Under the aforementioned rules, it is forbidden for anyone to:

- a) alter IT documents, public or private, having evidential value;
- b) illegally access the IT or telematic system of public or private subjects;
- c) illegally access their computer or telematic system in order to alter and / or delete data and / or information;
- d) illegally hold and use codes, keywords or other means suitable for accessing a computer or telematic system of competing subjects, public or private, in order to acquire confidential information;
- e) illegally hold and use codes, keywords or other means suitable for accessing their computer or telematic system in order to acquire confidential information;
- f) carry out procurement and / or production and / or dissemination of equipment and / or software in order to damage an IT or telematic system, of subjects, public or private, the information, data or programs contained therein, or of favor the total or partial interruption or alteration of its functioning;
- g) carry out fraudulent activities of interception, impediment or interruption of communications relating to an IT or telematic system of subjects, public or private, in order to acquire confidential information;
- h) install equipment for the interception, impediment or interruption of communications from public or private entities;
- i) carry out activities of modification and / or cancellation of data, information or programs of private or public subjects or in any case of public utility;
- j) carry out activities of damage to information, data and computer or telematic programs of others;
- k) destroy, damage, make computer or telecommunication systems of public utility unusable.

10. CONTRAST TO ORGANIZED CRIME

ITAI S.P.A strongly condemns any form of organized crime, even when it occurs at a transnational level. Particular care must be used by ITAI S.P.A Collaborators if they find themselves operating in geographic areas, both in Italy and abroad, historically affected by organized crime phenomena, in order to prevent the risk of criminal infiltration.

Every commercial and financial transaction with potentially risky counterparties must be carried out after suitable verifications, evaluations, controls and investigations on the counterparties.

In carrying out its activities, it strictly adheres to the legislation on the production and sale of armaments or parts thereof.

11. PREVENTION OF TERRORISM

ITAI S.P.A Collaborators are expressly prohibited:

- implement, promote, collaborate in the implementation of behaviors that integrate, directly or indirectly, the offenses of terrorism or subversion of the democratic order;
- use the Company or one of its organizational units for the purpose of allowing or facilitating the commission of the crime of terrorism or subversion of the democratic order;
- promote, set up, organize or direct associations that aim to commit acts of violence with the aim of terrorism or subversion of the democratic order;
- provide, directly or indirectly, funds and resources in favor of subjects linked to terrorist or subversive associations;
- take on or assign orders or carry out any commercial and / or financial transaction, including through a third party, with subjects included in the black lists disseminated by the Italian Exchange Office and the Ministry of the Interior;
- carry out transactions, take on or assign orders that may be of an anomalous nature by type or object

and establish or maintain relationships that present anomalous profiles from the point of view of the reliability and reputation of the subjects and the transactions to be concluded.

Every commercial and financial transaction with potentially risky counterparties must be carried out after suitable verifications, evaluations, controls and investigations on the counterparties. In particular, ITAI S.P.A Collaborators must verify that suppliers, partners, customers and employees do not belong to the international reference lists for the fight against terrorism.

12. VIOLATIONS OF THE CODE OF ETHICS

12.1 Reports of violations of the Code

Anyone who becomes aware of violations of the Code of Ethics and, in general, of internal procedures and regulations, has the obligation to promptly inform the Sole Director by email at info@itaispa.com anonymous reports will not be taken into consideration. . Anonymity and maximum confidentiality in the processing of information received is guaranteed to anyone in compliance with the privacy legislation.

12.2 The system of sanctions

Violation of the principles set out in this Code compromises the relationship of trust between ITAI S.P.A and its Collaborators.

It follows that any transgressor of the individual rules of conduct prescribed by this Code of Ethics will be punishable by disciplinary sanctions which may also lead to the termination of the employment relationship or the collaboration contract. ITAI S.P.A will pursue violations of this Code through adequate and proportionate disciplinary measures, commensurate with the seriousness of the infringement and its possible repetition. The application of disciplinary sanctions for violation of the rules of conduct and non-compliance with company provisions is independent of the establishment of legal actions and their outcome, and therefore regardless of the criminal offense that the conduct may constitute.

The disciplinary system adopted by ITAI S.P.A in line with the provisions of the Civil Code, the Statute of Workers and the applicable CCNL, is posted at the registered office.

13. DISSEMINATION OF THE CODE OF ETHICS

Knowledge and compliance with the Code by all its recipients are primary conditions for the transparency and image of the Company. ITAI S.P.A undertakes to promote and guarantee adequate knowledge of the Code of Ethics and to disseminate it, with all the means deemed most appropriate to the interested parties through specific and adequate communication activities.

To this end, a copy of this Code is available on the company intranet portal. Other copies will be available at the registered office.