

Ethical Code

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Chapter 1 - The Ethical Code

1.1 Introduction

AVIOCONSULTING S.r.l. in order to ensure maximum fairness and transparency in the management of its activities and to protect its image and reputation, it has adopted this Ethical Code. This document clearly defines the set of shared values, rules and principles of conduct that guide the company's relations with staff and third parties, and which characterise the performance of the company's activities. The Ethical Code is a useful tool for preserving the value and integrity of the company over time.

As an essential element in the prevention of offences under Legislative Decree no. 231 of 8 June 2001, the Code provides guidelines with reference to standards of integrity and business conduct. However, it does not replace the responsibility and commitment of each individual to operate with good judgement.

The human resources of **AVIOCONSULTING S.r.l.**, at every hierarchical level or functional responsibility, as well as third-party collaborators, are required to scrupulously observe the rules and standard of conduct contained in this Code.

1.2 Code Recipients

The Ethical Code is addressed to those who, for various reasons, establish direct or dealings with the Company, directly or indirectly, on a stable or temporary basis, or who otherwise operate to pursue the company's objectives. Therefore, the recipients of the Ethical Code are considered to be employees, collaborators, consultants, and all those who, in some way, contribute to the activity of **AVIOCONSULTING S.r.l.**

Each recipient, through their conduct, contributes to building and consolidating the company's reputation. Consequently, the violation of the principles and rules contained in this Code undermines the relationship of trust established with the Company, compromising its credibility and image.

All recipients are required to know the Ethical Code, to actively contribute to its implementation, continuous improvement and dissemination within and outside the organization.

Chapter 2 - General Principles Of Conduct

2.1 Principles

In carrying out the function or assignment entrusted, all actions, operations, and behaviors of each of the Recipients must be inspired by fundamental principles such as legitimacy, both in formal and substantive terms, and the protection of the Company's interests. These principles must be pursued in full compliance with applicable laws and internal procedures, as well as with the utmost fairness.

In the realization of the "corporate mission", the behaviours of all the Recipients of this Code must be inspired by a strong ethic of responsibility, which implies awareness of the consequences of their actions and the willingness to always act in the best interest of the company and the community.

2.2 Environmental protection

AVIOCONSULTING S.r.l. attaches strategic importance to environmental protection, considering it a priority and essential commitment. The company actively promotes respect for the environment; To this end, it is committed to motivating and raising awareness among all employees, encouraging strict compliance with applicable environmental law and regulations. The primary objective is the prevention of pollution, through the adoption of innovative practices and technologies that minimize the environmental impact of business activities.

2.3 Health and Safety Protection

AVIOCONSULTING S.r.l., fully aware of the importance of ensuring the best health and safety conditions for all its employees in the workplace, is firmly committed to promoting and consolidating a culture of safety.

The company promotes and demands responsible behavior among its employees, in order to preserve the safety, health and well-being not only of personnel but of all those who, in various capacities, visit its premises. This commitment translates into continuous investments in training, prevention, and the adoption of state-of-the-art safety measures.

2.4 Protection of Company Assets

Each recipient of this Ethical Code is responsible for the protection and preservation of company assets, both tangible and intangible, that have been entrusted to them for the performance of their duties.

It is essential that these assets are used properly and in accordance with the company's purposes, avoiding any form of waste, abuse or improper use. The care and enhancement of the company's assets are essential elements to ensure the growth and prosperity of the company in the long term.

2.5 Accounting and Management Protection

AVIOCONSULTING S.r.l. recognizes the crucial importance of the truth, transparency, accuracy, completeness, and compliance with current regulations of accounting information. The correct management of accounting information is essential to ensure the transparency and reliability of the company towards all stakeholders.

To this end, **AVIOCONSULTING S.r.l.** it equips itself with administrative and accounting systems suitable for correctly representing management events and for providing the necessary tools to identify, prevent and manage, as fraud as possible, financial and operational risks, as well as fraud to the detriment of the Company.

2.6 Protection of the Share Capital

The share capital of **AVIOCONSULTING S.r.l.** represents a valuable asset that must be managed with the utmost care, fairness and honesty. The Administrator, employees, collaborators and all recipients of this Ethical Code are called upon to actively contribute to the protection of the integrity of the share capital.

No one should seek to influence the regular conduct of company meetings, misleading or deceiving others. Transparency and fairness in decision-making processes are fundamental elements to ensure the stability and solidity of the company.

2.7 Gifts and Forms of Benefits

The Recipients of the Ethical Code must refrain from accepting, even during holidays, gifts or other benefits related to their professional activities, if they are not of a modest value. Accepting gifts or benefits, even of modest value, may compromise the impartiality and objectivity of decisions, creating situations of conflict of interest.

If the Recipients of the Ethical Code receive gifts of modest value, they are required to promptly notify the company's top management, in order to ensure maximum transparency and prevent any misunderstandings.

2.8 Conflicts of Interest

Any activity carried out on behalf of **AVIOCONSULTING S.r.l.** it must be aimed exclusively at satisfying the interests of the same. Therefore, it is essential to avoid any situation of conflict between personal interest and that of the Company.

Should situations of conflict of interest arise, or potentially may arise, it is necessary to communicate them in advance to their superiors or to the company contact person, in order to identify the most appropriate solutions to protect the interests of the Company.

Chapter 3 - Standards of Conduct with Stakeholders

3.1 Relations with Employees

AVIOCONSULTING S.r.l. recognises the centrality of human resources and the importance of establishing and maintaining relationships with them based on mutual trust, respect and collaboration. The company promotes an internal climate of civil coexistence, where each employee interacts with honesty, dignity and mutual respect.

The evaluation of the personnel to be hired is carried out in compliance with equal opportunities, guaranteeing all candidates the same opportunities for success, regardless of gender, race, religion, political opinions or other personal characteristics.

3.2 Relations with Customers

Relationships with customers are based on the full satisfaction of their needs, with the aim of creating a solid relationship inspired by the principles of fairness, honesty, efficiency and professionalism.

AVIOCONSULTING S.r.l. is committed to providing its customers with high-quality services that fully meet their expectations.

The Company is committed to always responding to customer suggestions and complaints, considering them a valuable opportunity to improve its services and strengthen the relationship of trust.

3.3 Relations with Suppliers

It is the policy of **AVIOCONSULTING S.r.l.** negotiate in good faith and transparently with all potential suppliers. The company selects its suppliers based on objective criteria, such as the quality of the products or services offered, the price, reliability and compliance with ethical and environmental principles.

Suppliers are required to comply with the applicable laws, customs, the Ethical Code and the Organization, Management and Control Model of **AVIOCONSULTING S.r.l.**

The company is committed to promoting a culture of social responsibility among its suppliers as well, encouraging them to adopt sustainable practices that respect human rights.

3.4 Relations with Public Administration

Relations with the Public Administration must be inspired by the most rigorous observance of applicable laws and regulations and cannot in any way compromise the integrity and reputation of **AVIOCONSULTING S.r.l.**

The company is committed to operating in a transparent and correct manner, avoiding any form of corruption or illicit activity.

3.5 Relations with Judicial Authority

AVIOCONSULTING S.r.l. operates in a lawful and correct manner, actively collaborating with the Judicial Authority and the Bodies delegated by the same. The company is committed to providing the competent authorities with all the information and documentation necessary for the conduct of investigations and judicial proceedings.

To this end, the Recipients of the Ethical Code are required, if requested, to provide truthful, transparent and exhaustively representative testimonies of the facts, actively contributing to the ascertainment of the truth.

3.6 Relations with External Collaborators

The collaborators in any capacity and the consultants of **AVIOCONSULTING S.r.l.** are required, in the execution of the contractual relationship established or the assignment received from the same, to behave with correctness, good faith and loyalty. It is essential that external collaborators share the values and ethical principles of **AVIOCONSULTING S.r.l.** and commit to respect the rules of this Ethical Code.

Chapter 4 - Implementation and control of the Ethical Code

4.1 Implementation of the Code

Anyone who, acting in the name or on behalf of **AVIOCONSULTING S.r.l.**, who comes into contact with third parties has the obligation to inform these subjects of the commitments and obligations imposed by the Ethical Code. This information must be provided in a clear and understandable way, in order to ensure that third parties are aware of the expectations of **AVIOCONSULTING S.r.l.** in terms of ethical and responsible behavior.

4.2 Control of the Implementation of the Ethical Code

The Personnel Management (Sole Director), the Head of the Quality Management System (QMS) and the external personnel who perform the Internal Audits, within their respective areas of competence, are assigned the task of verifying the application and respect of the Ethical Code. These subjects are responsible for monitoring the implementation of the Ethical Code, collecting reports of any violations and taking the necessary corrective actions.

4.3 Violation of the Ethical Code and Sanctions

The serious and persistent violation of the rules of the Ethical Code by its recipients undermines the relationship of trust established with the company and entails the imposition of disciplinary sanctions, compensation for damages and, in cases of serious non-compliance, the termination of the employment relationship. The type and extent of disciplinary sanctions will be determined based on the severity of the violation and the specific circumstances of the case.

4.4 Final provisions

This Ethical Code, which represents the formalization of the modes of conduct in **AVIOCONSULTING S.r.l.**, is adopted by resolution of the Sole Director, competent to make changes and additions. Failure to comply with the Ethical Code may result in disciplinary action, up to and including dismissal from the Company and compensation for damages. The company reserves the right to modify and supplement this Ethical Code at any time, in order to adapt it to regulatory developments and business needs.

The Administrator