



CODE of ETHICAL CONDUCT



**PATROLLINE GROUP
SOCIETA' COOPERATIVA**



CODE OF ETHICS PATROLLINE

PATROLLINE has ruled in accordance with its corporate policies to adopt a "**Model of Organization, Management and Control**" that meets the purposes and requirements of Legislative Decree 231/2001 "Regulation of the administrative responsibilities of legal persons and companies". This Code of Ethics is an integral part of PATROLLINE's internal control system and outlines the values, principles, rules of good behavior required of those operating within or cooperating with the firm. **PATROLLINE believes** in social responsibility and ethical conduct and is responsible for its employees all over the world. Our key values, Responsibility, Innovation, and Integrity steer our actions and everyday decisions at work. Moreover, PATROLLINE and its employees have a duty to comply with high standards of integrity and fairness towards all.

These are the bases and reasons for which PATROLLINE has created the Code of Ethics.

Who does the Code of Ethics apply to?

The Code of Ethics applies to directors, working members, all employees, trading partners supplying PATROLLINE products or services, suppliers (and sub-suppliers if used in dealings with PATROLLINE), consultants, distributors, agents and other partners.

Legal Conformity

PATROLLINE respects the laws and regulations of the countries in which it operates. The Code of Ethics does not replace existing legislation, in the event of conflict, the existing legislation has priority. The Code of Ethics is applied where it sets higher standards than existing legislation. The Code of Ethics is valid in its Italian version. In the case of conflicting versions in other languages, these must be considered only as translations.

Reporting

In the case of doubts, complaints or flagging of non-compliance or violations, the employees must report to their immediate supervisor or to a local representative manager or to the Office of Compliance. Reports must be made in written non-anonymous form. Information about employees will be treated confidentially, no employee will be discriminated against for reporting any violations of the Code of Ethics in good faith. Manifestly unfounded reports will not be taken into account (or: will be subject to penalties).

Dissemination, Implementation, and Monitoring

PATROLLINE promotes the dissemination, knowledge and observance of the Code of Ethics among all recipients required to comply with it and verifies its implementation regularly. The Code of Ethics is delivered to the employees and made available to outsiders, customers, suppliers, partners and institutions through the firm's website.

At the beginning of a new employment, consultancy, collaboration or supply contract, information about the contents of the Code of Ethics will be provided.

Any violations of the principles and rules of the Code of Ethics will be managed immediately, in the event of non-compliance, appropriate disciplinary or contractual sanctions will be considered.

Responsibility of Management. PATROLLINE is committed to constantly implementing, monitoring and improving its internal management systems, in particular those relating to the protection and dignity of persons, the proper management of relations with public institutions, customers and suppliers, the commitment to safety at work and the proper use and protection of environmental resources.

1. Generalities

PATROLLINE respects the laws and regulations of countries where it operates and also requires its employees the compliance with them. Moral integrity is the constant responsibility of all those who work for the firm and characterizes the conduct of the whole organization.

The directors and employees of the firm, as well as those who operate with it in various capacities are thus required to know and respect the laws and regulations in force within the scope of their respective responsibilities.

1.2 Public Inspection

PATROLLINE cooperates with all public investigation units.

Relations between the Authorities and those who work for the firm must be based on the utmost correctness, transparency and collaboration, in full compliance with the laws, regulations and their institutional functions.

1.3 Unfair Competition and Antitrust Law

PATROLLINE does not tolerate unfair competition or anti-competitive agreements. Antitrust and competition legislation may vary from one country to another but the general principles are the same. Employees must avoid any kind of anti-competitive agreement or concerted practice, mutual or other understanding with any current or potential competitor of PATROLLINE. Moreover, the exchange of sensitive information between potential competitors is illegal in most jurisdictions.

Special attention must be paid during the meetings of representative associations. Employees must not agree on resale prices with trading partners or impose minimum mark-up prices on PATROLLINE products.

1.4 Selection of Suppliers

Processes for the selection of suppliers must comply with the rules and internal procedures provided for by PATROLLINE. The choice of the supplier and the purchase of goods and services of any kind must be made in accordance with the principles of competition and parity of conditions of the candidates whose offers will be objectively evaluated on the basis of their competitiveness, quality, usefulness and cost of the supply. When choosing suppliers for financed activities, the rules required by the public purchaser are applied. During selection, PATROLLINE considers the requisites of competence and professionalism of the supplier/provider, applying the constraints defined by the current regulations regarding accreditation and certification. When choosing the supplier, the firm considers the ability to ensure the implementation of adequate quality systems, the availability of means and organizational structures and the ability to meet confidentiality obligations. Furthermore, the firm's management system includes keeping a register of qualified suppliers with assessment criteria, according to internal procedures that do not represent entry barriers.

1.5 Fairness and Diligence in Carrying Out Contracts

Relations with suppliers, including financial and advisory contracts, are governed by the rules of this Code and are subject to constant careful monitoring by PATROLLINE, also in terms of the adequacy of performance or goods supplied for the agreed price.

The selection and purchasing procedure is recorded so that every operation is traceable and verifiable.

PATROLLINE deals with the supplier in order to establish trust and cooperation. On its part, the firm is committed to informing the supplier properly and quickly about the characteristics of the activity, payment terms and conditions, restrictions to the conditions and procedures of the client, in accordance with current rules; on the other hand, the fulfillment of the contractual services by the supplier should comply with the principles of fairness, equity, diligence and good faith, according to current rules.

1.6 Protection of Personal Data

PATROLLINE processes personal data in a safe responsible and compliant manner. To facilitate compliance, PATROLLINE has adopted a Compliance Program to protect the personal data of natural persons (GDPR), based on the principles of protection of personal data, applied in Europe and recognized globally. PATROLLINE employees must comply with the GDPR rules and any local laws applicable on the processing of personal data. GDPR policies and procedures are published on PATROLLINE site and are available for reference to PATROLLINE suppliers.

Principles of Personal Data Protection

The principles of personal data protection defined in the GDPR must be adopted by PATROLLINE for the processing of personal data. All processing must be justified, the personal data of employees and other natural persons must only be used for specific, explicit and legitimate business purposes. The personal data must be adequate, accurate, updated, limited to the purposes, kept for a period not exceeding the achievement of the purposes for which they were processed. Adequate protection, safety and confidentiality must be guaranteed.

Justification of Processing

PATROLLINE must first identify and document the legitimacy of the personal data processing, which could be: a legal requirement, the execution of a contract with the interested party, a legitimate business interest or a formal consent.

Transparency and Rights

To ensure correct transparent processing, PATROLLINE must inform the persons concerned about the processing of their personal data using simple, clear and easy-to-understand language. They must be informed about: the purposes of the processing, the retention time, the data controllership, their rights and the contact details to use to send requests for the application of their rights.

Agreements for Personal Data Processing

PATROLLINE must sign agreements defining the obligations of both parties concerning personal data processing, regardless of whether the firm is the direct buyer of services or is acting as a provider of the processing on behalf of another firm.

Safety of Personal Data

According to the risk level in processing personal data, PATROLLINE must take technical and organizational measures to ensure an adequate level of safety. This includes the protection of archives with passwords and other systems to ensure confidentiality.

Handling of Data Breach

Personal data breach or suspected breach must be reported immediately in compliance with the procedures for incident management, assessment and notification of data breach.

Personal Data Transfer

Personal Data Transfer to countries other than that in which they were collected may be limited or forbidden by local laws. Before transferring personal data to other countries, PATROLLINE must have a documented legal basis.

1.7 Anti-corruption

PATROLLINE does not tolerate corruption. This means that PATROLLINE forbids its employees to give or endorse offers, promises, payments or gifts of personal value to decisively influence the decisions of third parties, whether they be private citizens or civil servants. Likewise, PATROLLINE forbids its employees to receive valuables that might influence their decisions in a determinant way. Moreover, PATROLLINE's anti-corruption policy contains the following key messages, among others:

Gifts and Presents

Gifts and presents, both given and received, must be of limited value for marketing purposes, clearly documented and reasonable. Sales and purchases must be managed with the utmost integrity. Gifts, presents and low-value expenses may be accepted, provided that they are carefully assessed and do not influence the conclusion of business transactions in a determinant way. Any activity that could be assessed as unsuitable must be avoided. Namely, expenditures involving institutions, public officers or civil servants, politicians or other subjects or public bodies must be strictly controlled. It is illegal in many countries to offer gifts, presents or expenditures to public officers or employees.

Representatives

PATROLLINE may be considered responsible for the unfair behaviour of business partners acting in the name and on behalf of PATROLLINE. Hence, these agents must be carefully evaluated and employed exclusively for lawful commercial purposes under reasonable market conditions. Parties authorized to act in the name or on behalf of PATROLLINE are obliged to respect all parts of the Code of Ethics.

Discounts, Rebates, Commissions, and Bonuses

Price concessions and compensations that are excessively high could be forms of corruption. The terms of these agreements must be written and commercially reasonable.

Concessions

PATROLLINE does not accept to pay concessions or "bribes" to any officer or public employee.

Political Contributions

PATROLLINE does not offer political contributions. Individual involvement in politics, including donations, should not use the funds, time, equipment, utilities, facilities, brand or name belonging to PATROLLINE.

Charity Donations and Sponsorship

PATROLLINE supports charities for legitimate purposes. Donations must be devolved to charities to demonstrate the firm's social responsibility. Moreover, PATROLLINE does not use charitable donations or sponsorship as an expedient for corruption.

1.8 Registers and Reports

The integrity of server data recording systems is of prime importance. Employees must pay special attention so that such information is always protected and safeguarded regardless of whether it is for internal or for external use.

1.9 Conflict of interest

Any conflict of interest between employees and the firm must be avoided. If this is not possible or if suspected, the employee must inform the firm via written communication and inform his/her direct superior. Typical situations of conflict of interest include external commercial activities, personal financial interests, internal information and employing relatives and kindred or buying and selling with them.

1.10 Confidential Information

Any information that, if disclosed, could result in a condition of competitive disadvantage for PATROLLINE must be kept confidential and disclosed exclusively to persons in charge of carrying out the work.

1.11 Patents, Registered Trademarks, and Copyright

PATROLLINE attributes great value to its brands and registered trademarks. Any new inventions, processes, intellectual works, technological developments or solutions unique to business problems, developed or drawn up for work purposes and during the period of employment by PATROLLINE, are the property of the firm.

1.12 Computer Software

PATROLLINE respects the copyrights of computer software, the applicable laws and regulations for its use, hence expects that its employees comply with applicable laws and rules that do not, for example, use copied programs unless expressly authorized by the license.

1.13 Rules on Export Control

Compliance with rules on export control is crucial for PATROLLINE as such rules are often intended to limit activities opposed by PATROLLINE, such as terrorism. For more information, see the Legal Compliance section on PATROLLINE's intranet.

2. Communication

2.1 Generalities

All communications on behalf of PATROLLINE must be consistent with PATROLLINE's trade values and policies, regardless of the communication channel. PATROLLINE's employees must be professional, honest, precise and always maintain confidentiality in all communications. Sensitive or confidential business information should not be discussed or published.

2.2 Electronic Messaging and Internet Use

Communication through electronic messaging should be handled in the same way as any other written business communication in terms of content, formal language and document handling. The firm's internet and messaging services must be used exclusively for business purposes, being all traffic owned by the firm.

2.3 Telephone Conversations

PATROLLINE does not monitor telephone conversations, except for specific purposes, such as training. Any monitoring must be agreed upon in advance between the firm and its employees. Any third parties must also be informed in advance.

2.4 Confidentiality and Information Handling

All those who work for any reason on behalf of PATROLLINE shall be required to maintain the utmost confidentiality regarding information acquired in the performance of their duties, in compliance with laws, rules and circumstances. They shall not disclose or request unduly information about documents, know-how, social and training projects, business operations, sensitive information of service users or, in general, all information learned due to their work function.

In particular, information of any nature (technical, commercial, organizational, administrative, etc.), which is learned in the course of/ or in connection with work activities shall constitute confidential or secret information, the distribution and use of which may cause danger or damage to the firm and/or undue gain to the employee.

Information or reports on employees (e.g. salaries, personal situations) are also considered confidential; the confidentiality obligation also applies to all general information, the disclosure of which may cause disturbances within the firm.

The breach of confidentiality obligations by employees or collaborators seriously undermines the trust relationship with the firm and may lead to the application of disciplinary or contractual penalties. The confidentiality obligation continues even after the termination of employment as long as the use or disclosure of information or news may damage the business interests. The employee must strive to ensure that the obligations provided for by the privacy regulations in force are respected and that the documents entrusted to him/her are carefully guarded.

2.5 Media Relations

Relations with the press, media and, more generally, external interlocutors, must only be held by subjects expressly delegated for the purpose, in accordance with the procedures adopted by PATROLLINE. Any request for news from the press or media received by the staff of the firm must be communicated to Management before making any commitment to reply to the request.

External communication should follow the guiding principles of truth, fairness, transparency and prudence, fostering knowledge of the firm's policies, programs and projects. Relations with mass media should be based on respect of the law, the Code of Ethics of relevant protocols and the principles already outlined, with reference to relations with public institutions with the purpose of protecting the firm's image.

3. Human Rights and Working Conditions

3.1 Employment of Minors

PATROLLINE does not accept child labor and recognizes every child's right to be protected against economic exploitation. That is, they must not be obliged to carry out work that is potentially a threat to their physical and psychological integrity or to their moral and social development, or which could interfere with their education. In this context, "minor" means a person under the age of 18.

PATROLLINE undertakes not to employ or support the exploitation of child labor for minors under the age of 15. The employment of children aged 15-18 may occur only in compliance with regulations in force regarding the employment of minors. The commitment not to use child labor is requested from all suppliers.

3.2 Apprenticeship as a Tool for the Integrating Young People into the Workplace

PATROLLINE is available to host children aged 15-18 for curricular internship periods through conventions with educational institutions and training senders. The internship is not an employment relationship and is carried out based on a Training Plan agreed between the firm and the educational institution sender. The trainee must be constantly accompanied by a business tutor for the whole duration of the internship. The trainee must be informed and trained about the workplace risks, he/she must perform tasks and duties consistent with his/her training, and must not be exposed to situations that are dangerous, hazardous or harmful to his/her health.

3.3 Forced or Hard Labor

PATROLLINE does not implement or accept any form of forced or hard labor, carried out by detainees or illegal workers. All workers must have the right to freely leave their workplace and, where provided, their lodging outside working hours.

3.4 Freedom of Association and Collective Negotiation

PATROLLINE grants its employees the maximum freedom to join/establish an association and to organize individual or collective negotiation, in compliance with national laws and national regulations. Its employees can exercise these rights without fearing any repercussion or discrimination.

3.5 Labor Contracts, Working Hours, and Salaries

PATROLLINE complies with local laws and regulations regarding labor contracts, working hours, overtime, and relative salaries. Salaries must be paid regularly in accordance with local laws and the local market situation. Employees are entitled to, at least, one day of rest per week, as well as to enjoy national and local holidays. Employees must also be granted the annual leave, sick leave, and maternity/paternity leave provided for without any negative repercussions. PATROLLINE does not accept any irregular work labor with no contract, neither internally nor by its suppliers; non-compliance with this principle will be considered cause for withdrawal from contracts in force.

3.6 Staff Commitments: Use of Business Assets, Use of IT Systems

PATROLLINE's staff undertake to comply with the obligations of the Code and to abide by the law in the performance of their duties, basing their conduct on principles of integrity, fairness, loyalty, and good faith.

The employee is obliged to use and care for the assets made available to him/her for his/her role. Each employee and each collaborator is directly and personally responsible for the protection and

legitimate use of the assets and resources entrusted to him for the fulfillment of his/her tasks. Other uses of the assets and resources belonging to the firm are not allowed.

Each employee is responsible for the safety of the IT systems used and is subject to both the regulations in force and the terms of the license agreement.

Without prejudice to the provisions of civil and criminal law, misuse of the business assets and resources included using them for purposes other than those related to the employment relationship or to send offensive messages or messages that could harm the firm's image.

3.7 Discrimination, Harassment, and Diversity

PATROLLINE favors and promotes diversity as well as equal opportunities. PATROLLINE ensures a working environment in which everyone must be treated with dignity and respect and can count on equity and equal opportunities for professional growth. Hence, PATROLLINE respects individual dignity, does not tolerate and aims to prevent any form of discrimination or harassment at work on the grounds of ethnicity or nationality, sex, sexual orientation, religion, age, disability, political views or other potentially discriminating factors. PATROLLINE recognizes employees' rights to follow principles and practices related to culture, religion, sexual preferences, union or political membership, which do not go against the basic principles laid down in the Italian Constitution.

PATROLLINE pursues gender equality and does not allow conduct that is sexually coercive, offensive or aimed at the exploitation of others.

3.8 Records and Medical Records

Employees' medical records are confidential and managed exclusively by the Occupational Doctor. They may not be accessed by third parties without the written authorization of the employee in question unless provided for by law. Employees' medical records are stored separately from all other employee records, in locked cabinets or equivalent.

3.9 Abuse of Alcohol and/or Illegal Substances

PATROLLINE works proactively to remove all dangers from the workplace. It is forbidden to arrive on the business premises or in the workplace under the effect of alcohol which could impair the employee's ability to diligently carry out his/her job. PATROLLINE tolerates no drugs and forbids its employees from arriving on the business premises or in the workplace under the effect of such substances.

3.10 Consumer Interests

PATROLLINE guarantees compliance with the health and safety requirements relating to its products and services; the necessary relevant information about its products and services are published on the appropriate channels.

3.11 Responsibility Towards the Community

PATROLLINE aims to operate in full respect of local communities and, wherever possible, suitably supports local, regional and global communities.

Hence, it plans to implement a system of social responsibility towards all stakeholders, both internal and external, therefore including communities in the areas where it operates and society as a whole.

4. Environment

4.1 Environmental Policy

PATROLLINE respects environmental legal requirements and is committed to continuous improvement in the use of natural resources and in preventing pollution. Therefore, it systematically evaluates the impact on the environment of the work carried out, both on its own production site and by customers using its products. PATROLLINE constantly reassesses its production processes, in order to minimize the environmental impact generated. Each process/product change or innovation is evaluated in order to implement, where necessary, adequate measures for prevention, control and reduction of the environmental impact. PATROLLINE aims to instill in its employees an ever-growing focus on environment protection, the proper use and waste disposal of products used, through informative meetings, training, and periodic audits. In its commitment to a healthy environment, PATROLLINE also aims to involve its suppliers, both of general resources, of products and equipment.

4.2 Environment and Sustainability

PATROLLINE ensures that all its productive units have the permissions and environmental permits necessary to operate. All its employees must support and are responsible for PATROLLINE's environmental performance. PATROLLINE encourages the development and dissemination of eco-friendly technologies and is committed to implementing certified environmental management systems in all units that have a significant environmental impact. PATROLLINE is constantly developing strategies that help to reduce resource consumption, including energy, waste, water, to prevent pollution, ensure acceptable noise levels and reduce the environmental impact of its activities and products throughout the value chain. Chemical substances and dangerous materials must be properly labeled, stored safely, recycled, reused, and disposed of correctly.

5 . Health and Safety

5.1 Workplace

PATROLLINE systematically operates to increase health and safety at work and is committed to ensuring a safe workplace, reducing the risks that could cause accidents and injuries or compromise the health and wellbeing of employees. Therefore, health hazards and safety at work should be identified, assessed, and managed using a priority ranking procedure to implement a safety management system at work. The system requirements are:

- The acceptance of specific responsibility by the Executive Board;
- The appointment of technical experts specialized in workplace safety (Head of Prevention and Protection Services, Competent Doctor, Emergency Staff);
- By carrying out risk assessments;
- Basic and specialist training of workers about health risks and the measures taken to reduce them, about the use of general and personal protective equipment,
- By carrying out periodic inspections and checks on the facilities, plants and equipment used;
- The preparation of improvement plans based on the inspections carried out.

Hence, health and safety hazards at work must be identified, evaluated and managed through a priority ranking procedure, with the direct commitment of Management and the involvement of all workers. PATROLLINE operates to ensure fair working conditions that may motivate all employees to work better.

5.2 Health Protection Measures

A safe workplace ensures, for example, that the work areas are clean and free of pollutants, that the machines in production are safe and do not endanger employees' health, checks if the rules on the use of personal protective equipment and work equipment are respected. Moreover, the workplace must be adequately lit and have acceptable temperature and noise levels. Employees must wear personal protective equipment, such as hearing protectors. All units must provide employees with clean suitable changing rooms and separate toilets for men and women. Visitors to PATROLLINE premises must be informed about the health and safety principles and the evacuation measures in the event of danger.

5.3 Suppliers' Responsibility

PATROLLINE's suppliers are responsible for their safety. Nevertheless, PATROLLINE requests that they take part in PATROLLINE's safety process and plan different risk scenarios. Suppliers are invited to submit reports if they detect health and safety practices non-compliant with PATROLLINE's principles for a safe workplace.

5.4 Building Safety and Firefighting Equipment

Dangerous materials and equipment must be stored in compliance with applicable measures and policies. Emergency exits must be clearly shown, unobstructed, and well lit. All employees must be informed about safety measures, such as emergency exits, fire hoses, first aid equipment, etc.; an evacuation plan must be displayed on each floor of the buildings. The firefighting equipment and evacuation measures must be tested in periodic drills.

5.5 First Aid and Medical Assistance

Rescue equipment must be available in suitable places, at least one worker for each factory must attend a first aid course. In the event of an accident or injury, the emergency service (112) should be contacted if needed.

6. Internal Control System and Application of the Management and Control Organization Model

6.1 Internal Control System

The internal control system is defined as the set of processes aimed at monitoring the efficiency of PATROLLINE's operations, the reliability of the financial statements, compliance with laws, regulations and protection of the business assets.

PATROLLINE's Board of Directors is responsible for the internal control system, for which it establishes guidelines and regularly monitors their adequacy and effectiveness, ensuring that the main risks (business and financial) will be detected and managed adequately. The prevention of risks and identification of their origins are part of a constant systematic process.

In addition to the ordinary monitoring activities that the managing procedures have assigned to the technical management bodies and roles provided by the Company Regulations, the Board of Directors is responsible for verifying the implementation of the internal control system and its adequacy in terms of cost/benefit analysis.

In order to prevent the risk of committing crimes under Legislative Decree no. 231/01, the firm has adopted an organizational model that is adequately effective as a deterrent.

The Board periodically verifies the adequacy and effectiveness of the internal control system, carries out measures considered necessary or suitable to ensure excellent operation, drawing on the feedback provided by the Supervisory Committee, in keeping with the provisions of Legislative Decree 231/01.

6.1 Organizational Model and Supervisory Committee

PATROLLINE is firmly convinced that the implementation of The Organizational, Management, and Control Model, in compliance with the provisions of Legislative Decree 231/01, is a valuable means to raise awareness in all the persons acting in its name and on its behalf, so that they will adopt proper linear behavior while carrying out their duties, to prevent the crimes covered by the Decree. Legislative Decree 231/01 entrusts a special body (the Supervisory Body) with the task of monitoring the operation and compliance with The Organizational and Management Model.

The Supervisory Committee is an independent body in the firm with full autonomy of action and control, the activities of which must be marked by professionalism and operational efficiency.

The composition, tasks and powers of the Supervisory Committee are laid down in more detail in the Model. Regarding the Code of Ethics, the Supervisory Committee gives binding opinions on ethical issues related to business decisions and contributes to its periodic review.

6.2 Penalty System

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of PATROLLINE's employees, contractors and suppliers, pursuant to the Civil Code.

Serious and persistent breach of the Code regulations damages the relationship of trust established with the firm and constitutes the failure to fulfill the obligations of the employment relationship or existing cooperation or supply contract.

Board of Directors

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