

OPTIT
optimal solutions



**CODE OF
ETHICS**

Index of revisions

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INTRODUCTION

Optit Single member LLC (Optit), is a company, founded in 2007 as an accredited spin-off of the University of Bologna (Operations Research group), today a registered Innovative SME, which develops analytics and optimization solutions and services to support business processes.¹

The company provides Decision Support Solutions and Services, leveraging on Operational Research, Data Science, Machine Learning, Advanced Analytics and Artificial Intelligence, collaborating with large companies and organizations in various sectors, including: Logistics, Retail, Energy, Environment. Additionally, the company actively participates in the scientific community, serving as a Digital Innovation and Knowledge Transfer agent from the academic world to .

Optit's team of professionals (Data scientists, Business consultants, IT professionals, Operations Research experts) is highly specialized (all resources have a Master's degree or a PhD) to guarantee top-notch competencies and technical excellence while managing projects and providing solutions with high innovation content.

This document referred to as the Code of Ethics, regulates the set of rights and responsibilities that our organization assumes towards all the stakeholders with whom it interacts in carrying out its activities. In drafting this Code of Ethics we took inspiration from our history, from the ideals that have inspired us since our foundation, as well as from those principles of social responsibility that have always guided us and that are largely reported in this document.

¹ Optit single member limited liability company, is referred to in this document as both Optit and the Group. Both terms include subsidiaries and the parent company.

OUR VALUES

EXCELLENCE: we seek innovative and unconventional solutions to anticipate and satisfy the needs of our customers, leveraging on our skills and ability to transform the results of scientific research into applications to support decision-making processes.

ENTREPRENEURSHIP: we translate ideas into solutions with creativity, resourcefulness, proactivity, the ability to take risks and the courage to dare.

INTEGRITY: we believe in the transparency of relationships between customers, employees, collaborators and partners, guiding authentic, sincere, reliable and consistent behavior.

AGILITY: we quickly adapt our organization and our solutions to changing technology and customer needs, integrating new skills into our offer leveraging on internal resources and strategic partnerships.

SUSTAINABILITY: we believe in the possibility of technology to contribute to the construction of a more sustainable, equitable, efficient and just society and we strive, in our work, to pursue these objectives.

EQUITY: we reject any type of discrimination based on the age, sex, state of health, ethnicity, nationality, political opinions and religious beliefs of our counterpart and we enhance and reward professionalism and merit, guaranteeing everyone equal opportunities for personal and professional growth within the organization, favoring teamwork over hierarchical relationships.

INTRODUCTION TO THE CODE OF ETHICS OF OPTIT

This Code of Ethics has been prepared to guarantee a clear definition of Optit's fundamental ethical values, according to a principle of collaboration between people and respect for everyone's tasks and roles. Furthermore, the Code is aimed at ensuring that these values constitute the basic element of the corporate culture, as well as the standard of behavior that all Optit collaborators, both internal and external, must maintain in conducting business and, in general, in managing their activities.

Optit, in achieving its mission, aims to generate value in a stable way for the benefit of shareholders, human resources, customers and organizations that relate to the Group (e.g. suppliers, financial operators, unions) within the current legal and regulatory system; to this end, the Group believes that the conduct of its business must always and constantly comply with the principles of loyalty, legality and correctness.

Absolute respect and observance of the values and responsibilities assumed internally and externally by employees are key elements to guarantee the good functioning, reliability and reputation of Optit. It is every employee's responsibility to undertake, observe and enforce, without exception, the principles detailed in this document, within the scope of their responsibilities. In fact, the adoption of behaviors that are not in line with what is detailed in the Code is not justified, even where there is the conviction of acting to the advantage of the Group. Any behavior contrary to the Code of Ethics will be sanctioned in accordance with what is defined in section 10 of this document.

ETHICAL PRINCIPLES

Optit's ethical principles are detailed below and, as previously stated, are valid for all companies belonging to the Group.

Correctness and transparency

All actions of the Recipients must be based on the legitimacy, both formal and substantial, of the regulations in force to protect Optit correctly. Optit is committed to providing complete, timely, and truthful information, guaranteeing the transparency of decisions taken in a comprehensive and verifiable manner without possible ambiguity. Complete information must also be ensured for all those who sign, in any form, agreements or contracts with the Group, to communicate the expected behavior.

Legality and Honesty

Optit undertakes to conduct its business in full compliance with current regulations, the Code, and internal regulations, ensuring that the decisions taken are in no way attributable, even potentially, to personal interest or in conflict with the fiduciary duties which are at the basis of the corporate roles. This commitment must also apply to consultants, suppliers, customers, and anyone who has relationships with Optit.

Impartiality

Optit acts in full respect of personal characteristics, encouraging the spirit of belonging and enhancing professionalism, integrity, and sense of responsibility, in compliance with the principles of freedom, dignity of the human person, and respect for diversity, repudiating any discrimination based on age, sex, sexual orientation, state of health, ethnicity, nationality, languages, personal and social conditions, religious beliefs and political and trade union opinions.

Value of people

Optit recognizes the fundamental value of each employee and collaborator and their potential as people and active subjects for the achievement of common objectives. Optit promotes agility policies to ensure a work-life balance. Optit recognizes the fundamental value of human dignity and is committed to implementing internal policies aimed at respecting the fundamental principles of the person.

The social value of the company

Optit is committed to respecting the social value of the company and fostering free competition in the market, inspired by the principles of loyalty, correctness, and legality.

Commitment to the environment and sustainability

Optit, aware of the importance of minimizing the environmental impact deriving from carrying out its business activities, adopts behaviors and choices aimed at guaranteeing continuous improvement in environmental performance and overall sustainability. Optit is committed to complying with all relevant legislative and regulatory requirements, with particular attention to energy consumption and emissions, together with responsible management of the waste produced. It also undertakes, wherever possible, to ensure that the solutions and services developed and proposed to the market are aimed at promoting energy efficiency, lower consumption of resources, the principles of the circular economy, decarbonisation, equity, social justice, and the well-being of people.

External references

The Code of Ethics has been prepared in line with the main relevant international and national regulations and guidelines, which include:

- the United Nations Universal Declaration of Human Rights;
- the Charter of Fundamental Rights of the European Union;
- the Labor standards envisaged by the ILO (International Labor Organization) conventions;
- the OECD (Organisation for Economic Co-operation and Development) Guidelines for multinational companies;
- Bribery regulations (e.g.: OECD Anti-Bribery Convention, Italian Legislative Decree 231/2001, Foreign Corrupt Practices Act, Bribery Act, Loi Sapin 2, Ley Organica, etc.),
- the United Nations guidelines on Sustainable Development Goals.

RECIPIENTS AND SCOPE OF APPLICATION

This Code expresses the commitment and ethical responsibilities assumed towards stakeholders (shareholders, employees, collaborators, suppliers, customers, and business partners, hereinafter "Recipients") in the belief that ethics in conducting business is an essential prerequisite for Optit's success.

The Code of Ethics, therefore, is addressed to members of the corporate governance and control bodies, employees of Optit and all companies controlled by Optit, and any third party such as suppliers, business partners, and industrial collaborators working on behalf of or for the benefit of Optit, wherever they operate and in any way contribute to creating value for the company.

Moral integrity is a duty for all those who work with Optit and characterizes the behavior of its entire organization. The Code is based on an ideal of cooperation to the advantage of the parties involved and is therefore binding for all those who collaborate with Optit both directly and indirectly, permanently or temporarily. All recipients, with their behavior, in carrying out the tasks and tasks entrusted to them, represent Optit and the Group and must comply with the Code.

What we expect from recipients:

FROM OUR EMPLOYEES

All Optit employees must commit to observing and ensuring the observance, without exception, of the principles and behaviors detailed in the ethical code. Indeed, all employees are always required to act in a professional manner. Violation of applicable laws, as well as the principles of the ethical code and guidelines defined by the Group, is never justified, even when there is a belief that one is acting in the best interest of the Group.

FROM OUR MANAGERS

All Optit managers must commit to respecting and disseminating the standards and ethical principles defined in the Code, serving as a reference point for clarification requests or for reporting any detected violations. The role of managers is crucial in establishing a work environment that encourages employees to discuss uncertainties about the behaviors to be adopted in the performance of their activities.

FROM OUR PARTNERS AND THIRD PARTIES

Partners and third parties who collaborate or wish to collaborate with the Group, such as but not limited to consultants, agents, suppliers, and customers, are required to respect the ethical principles and behaviors defined in this Code. This commitment is formally specified through specific contractual clauses in all relationships with third parties and therefore the case of non-compliance by the third party involved constitutes a contractual breach. Optit reserves the right to evaluate the severity of any non-compliance and the possibility of terminating the contract.

HOW TO RAISE A DOUBT?

It is everyone's responsibility to promptly report to their hierarchical superior or the relevant functions (as indicated on page 25), through the tools made available by the Group, any violation of laws, regulations, association Codes of ethics and industry best practices, as well as the principles of the Code and company guidelines.

Each employee will be able to contact, in addition to their superiors, directly the specific internal functions responsible for maintaining compliance with the rules defined in the Code.

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OUR RESPONSIBILITY TO PROTECT PEOPLE

Optit is aware of how People are a fundamental element for achieving corporate objectives and for business growth, and for this reason, it develops policies aimed at the valorisation and continuous development of all its People.

Optit promotes equal opportunities to allow everyone to express themselves at their best. Diversity is a fundamental value for Optit and no discrimination based on ethnicity, nationality, gender, sexual orientation, disability, age, political or religious beliefs, or other personal characteristics is tolerated.

The creation of an inclusive and safe working environment is a priority for Optit, guaranteeing everyone the right to physical and psychological integrity every day, as well as the right to opinion and association.

5.1 We promote inclusion and value diversity

Diversity and inclusion are fundamental to Optit, and each employee is required to create and maintain a working environment of respect and consideration, where the differences and experiences of others are valued and celebrated, assigning the right value to initiatives and encouraging trust and acceptance in the working environment, including, but not limited to, the embracement of gender diversity, the protection of the parental role, the development of innovative welfare policies and the promotion of work-life balance.



We are all responsible for embracing diversity and fostering inclusion in every area of our business.



5.2 We protect and promote human rights

Optit recognizes respect and protection of human rights as a central theme for the Group and all its people. The set of values, principles and policies defined by Optit are aimed at promoting and respecting the criteria contained in the International Charter of Human Rights of the United Nations and the Fundamental Principles and Labor Standards of the International Labor Organization.

The topics regulated within the company policies are aimed at guaranteeing safe conditions in the working environment, prohibiting discrimination, child or forced labor, and human trafficking, guaranteeing fair compensation to its employees for the hours worked, and respecting the legislation related to national labor contracts.



We are all responsible for constantly monitoring our behavior to ensure respect for all fundamental human rights.



5.3 We do not tolerate any type of discrimination

Optit aims to guarantee its staff the opportunity to develop their skills and contribute to the growth of the Group. To achieve this objective, Optit believes it is essential not to allow discrimination during recruitment or ordinary management of the company's activities.

The choice of the best candidate for a position within the Group must be based mainly on the candidate's merits, qualifications, and work performance. Considerations on the individual's particularities not related to the work task are not permitted, such as color, ethnicity, country of origin, religion, sex or sexual identity, sexual orientation, age, disability, and any other status protected by law.



We are all responsible for honest behavior to give people the opportunity to increase their skills and improve within the Group.



5.4 We guarantee a safe working environment

Optit guarantees a work environment free of violence, harassment of any kind and any other harmful conduct.

The Group complies with all national and local laws prohibiting harassment and the Code rejects any behavior that may make people feel threatened, harmed and/or unsafe in their workplace. The concept of harassment can be encapsulated in the following points:

- sexual harassment
- language, comments or jokes;
- racial, ethnic, sexual or religious insults;
- intimidating, threatening or hostile behavior towards other people.

The Group also prohibits the possession of weapons in the workplace and within Optit-owned facilities, including parking lots.

The company policy of "zero tolerance" regarding violence in the workplace applies to all Optit staff, who are required to immediately report any situation of possible harassment to the competent bodies (as indicated on page 25).



We are all responsible for respecting and protecting others and immediately report any circumstances of possible discrimination or harassment.



5.5 We protect Health and Safety in the workplace

Optit is committed to spreading and consolidating the culture of health and safety in the workplace, safeguarding the health and safety of employees and all stakeholders. The company's health and safety policies and procedures are structured with the aim of ensuring a safe working environment at all the company's facilities.

Health and safety in the workplace are organizational and personal responsibilities that must be effectively applied in strategic, organisational, managerial and executive choices, to be pursued with a view to constant improvement. In no case can the adoption of prevention measures and their observance be subordinated to the interest in carrying out the work, respecting deadlines (effectiveness) and reducing costs (efficiency).

Therefore, Optit undertakes to comply with all regulatory provisions that allow the protection of workers' health in the workplace, through the continuous activity of company functions specifically responsible for this. Employees and collaborators must scrupulously comply with current company provisions and, in any case, with legal requirements regarding personal safety and health protection.

Optit invites all its employees and collaborators to report any situations where they are asked to perform a task that is too complex compared to their capabilities or unsafe and/or where a component of the equipment necessary to carry out the task does not function correctly and may create risks for the security.

All employees and collaborators are requested to contribute personally and promote and maintain a climate of mutual respect and safety in the work environment. Being found or being under the influence of alcoholic substances, narcotic substances or substances with similar effects during work performance and in the workplace will be considered a conscious assumption of risk of compromising these environmental characteristics.

We are all responsible for always putting safety first and persevering in our behavior so that every function is carried out in a safe and transparent way, no matter what activity it is.



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THE RESPONSIBILITY TO OPERATE WITH INTEGRITY

6.1 We prevent and manage conflicts of interest

Optit undertakes to respect the principles that guarantee the transparency and correctness of transactions that involve members of the Board of Directors, Auditors and related parties.

In conducting every activity, Optit strives to avoid situations where the subjects involved in the transactions are, or may even appear to be, in a conflict of interest.

Employees and collaborators are therefore required to avoid any situation and abstain from any activity that could put a personal and/or family interest against those of Optit or that could interfere and hinder the ability to make decisions in an impartial and objective manner, in the interests of the Group. Any situation of conflict of interest, even indirect or potential, must be promptly reported to the company management (or, if this may be an interested party, to the Ethics Committee) so that its existence and severity can be assessed and the risks can be excluded or consequent effects mitigated.

For example, the following situations determine a conflict of interest:

- Economic and financial interests of the employee and/or his family in the businesses of customers, suppliers, and competitors;
- Using your position in the group or information acquired in a way that creates a conflict between your personal interests and company interests;
- Carrying out any work activity for customers, suppliers, competitors;
- Acceptance of money, favors or other benefits from people who are or intend to enter into a relationship with Optit.



We are all responsible for avoiding situations and behaviors in which a personal interest could even potentially interfere with our ability to make an objective decision.



6.2 We fight corruption and money laundering practices

The Recipients of the Code must not find themselves involved in operations that do not respect the principles of anti-corruption and anti-money laundering (art. 648 bis of the Criminal Code, the substitution or transfer of money, goods or other benefits deriving from a non-negligent crime, or carrying out operations, so as to hinder the identification of their origin), obtaining benefits from illicit and criminal activities.

It is the duty of Optit and its staff to ascertain in advance through specific checks the behavior and information of customers and suppliers, with the aim of evaluating their respectability and legitimacy of their behavior before starting new business relationships.

The Group must at all times comply with the application of anti-money laundering laws in any competent jurisdiction.



We are all responsible for fighting all forms of corruption in favor of anyone, without any exceptions.



6.3 We guarantee the transparency of accounting activities

All employees have the obligation to contribute to ensuring that management events are promptly and correctly entered into the company accounts. The transparency of accounting activities is based on the truthfulness, completeness and accuracy of accounting records.

Each registration must faithfully report what appears in the document held by the Group. Employees have the duty to check that the documents are complete and truthful and to communicate any falsifications and/or omissions detected to their superior or to the Ethical Committee.

It is essential that the documentation for each registration is archived in order to guarantee the traceability of the authorization flows and allow the evaluation of the completeness and congruity criteria.



We are all responsible for maintaining the company accounts accurately, always communicating transparent and truthful information.



6.4 We protect personal data and protect privacy

Optit complies with the provisions regarding the protection of personal data, as regulated by current legislation regarding the protection of natural persons with regard to the processing of personal data and the free circulation of such data.

With reference to the processing of personal data of employees, collaborators, suppliers and customers, the Group will be required to inform recipients about the personal nature of the data being processed, the method and purpose of processing, adopting appropriate measures to guarantee the necessary integrity, security and confidentiality, and, where circumstances require it, obtain consent for data processing.

The processing of personal data must take place in a lawful and correct manner and, in any case, only data necessary for specific, explicit and legitimate purposes are collected and recorded. The data will be stored for a period of time no longer than is necessary for the collection. The Recipients must respect the confidentiality, integrity, and truthfulness, in form and content, of any data, information, documents, and systems, whether IT or otherwise, public or private, belonging to anyone. Therefore, access and use of data, information, documents, and systems must be carried out in strict compliance with the instructions given in any form, even tacit or implicit, by the owner of the relevant rights.

The duty of confidentiality also extends beyond the end of the employment service or collaboration relationship with Optit.



We are all responsible for protecting personal data to which we have access and to protect the right to privacy of all Stakeholders, complying with current regulations.



6.5 We operate on the market fairly

As part of its business activity, Optit is inspired by the principles of legality, correctness, loyalty, and respect for promises and agreements, and promotes acting with a sense of responsibility and in good faith in every activity or decision.

Optit recognizes free and fair competition in a market economy as a decisive factor in growth, development, and constant business improvement and believes that its message of product quality can be developed within this context.

Employees and collaborators in any capacity are, therefore, required to guarantee correct behavior towards competitors, refraining from discrediting the activities carried out by counterparties, communicating false information, and misleading their customers through conduct prohibited by law.



We are all responsible for complying with the regulations to protect fair competition.



6.6 We respect the image of the Company

Optit's reputation comes from the daily behaviors of its staff and corporate communications. Optit's People, when using company resources, the internet, and social networks, must respect the company principles identified in the Code.

Furthermore, it is of fundamental importance to interact with stakeholders consistently with the Company's mission, enhancing the Optit brand and making all stakeholders perceive the value and solidity of the Group.

The activities carried out by all staff on social networks are in the public domain and it is forbidden to carry out any action that could damage the company's reputation.



We are all responsible for protecting the company's reputation by acting in compliance with the principles of this Code.



7. RESPONSIBILITY IN DAILY ACTION

7.1 Relationships with customers

Optit recognizes the primary importance of its customers. In decisions relating to strategic choices and commercial policies, Optit follows the criterion of professional loyalty toward all customers. The Group undertakes to promote and encourage the purchase of its services by respecting all principles on the protection of consumer interests, guaranteeing not only its presence in the purchase phase but also in post-sales services. Optit People are required to interact with customers in compliance with internal company procedures, guaranteeing, within the limits of contractual provisions, high-quality services and transparent, impartial, complete, and clear information about the services offered.



We are all responsible for guaranteeing quality services and professional loyalty towards customers by committing to building a business relationship based on ethics and integrity



7.2 Relationships with suppliers, collaborators, and consultants

Optit is committed to maintaining maximum transparency in the relationships with suppliers, collaborators, and consultants. All those who collaborate in various capacities with Optit must carry out their activities in a fair manner, respecting the contractual obligations and clauses, following the obligations set out in this Code as well as carrying out actions that aim to respect Human Rights and the principles of sustainability that Optit promotes.

To this end, Optit staff respects the internal procedures to qualify, select, and monitor collaborators, reporting any violations of the Code by external collaborators to their superior or the Ethics Committee.



It is the responsibility of each of us to establish commercial relationships with suppliers based on the principles of transparency, ethics, and integrity, in full compliance with the law.



7.3 Relations with Public Institutions

Optit supports the relationship and active collaboration with international, national, and local public institutions, identifying in advance the functions authorized to maintain such relationships.

The staff undertakes not to communicate untruthful information that could mislead the Public Administration, and not to promise/make cash payments, gifts, employment opportunities, and benefits of any nature to obtain an advantage for the Group. Gifts can only be given for a minimum value which does not affect the integrity of the interested parties. The financing of political parties, movements, and political and trade union organizations is prohibited.

Optit condemns any behavior, carried out by anyone on its behalf, consisting in promising or offering, directly or indirectly, money or other benefits to representatives of the Public Administration or to their relatives or in-laws, which may result in an interest or advantage for Optit, even just potential.

Optit also condemns any behavior carried out by anyone on its behalf, consisting in promising or giving, directly or indirectly, money or other benefits to intermediaries, by way of undue compensation, to obtain a benefit for the Society whose achievement is granted by the actual, or presumed, knowledge of representatives of the Public Administration or their relatives or similar.



We are all responsible for establishing relationships with the authorities based on the principles of correctness, transparency, and traceability, promoting dialogue and cooperation.



7.4 Relations with local communities

Optit recognizes the importance of creating a long-term collaborative relationship with local communities, in particular the territory, regional authorities, local public entities, and university centers, focusing on local development that supports the vocation and ambition of Optit to acquire an important international role.

To achieve an ever greater level of interaction, Optit takes into consideration environmental aspects, workplace safety, and respect for Human Rights.



We are all responsible for contributing to the development and well-being of the communities in which we operate, establishing virtuous relationships in compliance with the principles of this Code.



7.5 Relations with Staff

Optit protects and promotes the value of human resources - as an indispensable element for the existence and development of the company - to increase the wealth of skills of each employee and promotes respect for the physical, moral, and cultural integrity of the company person.

The Company commits to adopt, from the personnel recruitment stage, meritocratic and professional competence criteria for any decision relating to a worker, and actively involves workers in the decision-making process, to allow the expression of personal skills and professional fulfillment. Optit protects the moral integrity of its staff, guaranteeing the right to working conditions that respect the dignity and potential of the person.

For this reason, Optit is committed to protecting workers from acts of psychological violence or mobbing and counteracts any attitude or behavior that is discriminatory or harmful to the person, their beliefs, and their inclinations. Optit prevents employees from suffering illicit conditioning and

inconvenience during their work activities, intervening to prevent abusive and defamatory attitudes.

Optit guarantees working conditions that respect individual dignity and safe working environments, in full compliance with current legislation and regulations. The staff is hired solely on the basis of regular employment contracts, as no form of irregular work is tolerated.

Optit complies with the regulatory provisions relating to working hours, holidays, permits, and remuneration. The candidate must be made aware of all the characteristics relating to the employment relationship in accordance with the provisions of the transparency decree (Legislative Decree 104/2022).

Upon establishment of the employment relationship, the staff receives clear and specific information on regulatory and remuneration aspects. Optit invests in the training of human resources through specific training programs.



It is the responsibility of each of us to contribute to the development of a work environment that fosters a spirit of collaboration and is capable of bringing out individual talents, promoting human and professional growth, and the well-being of everyone.



PROMOTION AND DIFFUSION OF THE CODE OF ETHICS

The Board of Directors of Optit is responsible for promoting, updating and disseminating the Code.

The main objective is disseminating knowledge of the values and principles expressed in the Code, as well as facilitating the application and use of the Code of Ethics to all interested parties.

To ensure full accessibility to all recipients and stakeholders, Optit publishes the Code of Ethics on its website.

Each Manager, as part of their activities, ensures the dissemination of the principles contained in the Code both internally, to their superior, and to commercial partners, as well as to other subjects with whom they collaborate, and takes action in proposing changes and/or updates.

Furthermore, the Code is disseminated and promoted through a variety of actions, including specific training activities, to ensure it is commonly known and fully understood.

REPORTING AND PRINCIPLE OF ZERO RETALIATION

Optit promotes a policy of maximum communication, encouraging its employees and staff to comply with the obligations in this Code.

In the event of suspected violations, Optit invites its employees and other stakeholders to ask for explanations or make reports to the company management and/or the HR function, or by sending a message via ordinary mail to the Ethics Committee (To: Comitato Etico di Optit, cc: Lucio Procaccianti, Via Beatrice II d'Este 51/A, 44121, Ferrara, Italy), made up of an external figure and/or the HR function, who are responsible for managing the issue adopting the appropriate measures while respecting the anonymity of the reporter.

Optit undertakes to analyze all reports received and to define a specific report, guaranteeing maximum respect for privacy and anonymity.

Optit does not tolerate any retaliation against anyone who reports a known or suspected violation of this Code and will take appropriate disciplinary remedies, which may include the dismissal of personnel involved in any act of retaliation.

Optit's objective is the creation of a collaborative working environment, in which there is mutual respect for everyone and in which everyone can feel at ease in reporting any violations of regulations, the Code, and company policies.

VIOLATION OF THE CODE OF ETHICS AND SANCTION SYSTEM

Compliance with the Code of Ethics is an integral part of the contractual obligations of employees, collaborators, and, more generally, of all recipients. Any violations trigger the application of measures by the Company, modulated about the seriousness of compliance with the laws in force.

About employees, any ascertained non-compliance with this Code entails the initiation of disciplinary proceedings against the employee according to the methods and terms set out in the art. 7 L. 300/1970 8 of the Workers' Statute, as expressly referred to in Optit's Company Regulations.

Optit also requires its employees to behave with correctness and good faith with regard to the communication of any violation of the law or company policies: retaliation against employees who have provided a report relating to one of the violations or may have participated in the investigation of an alleged violation will not be justified.

Failure to comply with this Code of Ethics by the Directors of Optit will result in the adoption of the most appropriate protection measures among those provided for by current legislation by the competent corporate bodies.

Suppliers, collaborators, and, in general, all recipients who have business relationships with Optit are required to comply with the provisions contained in this Code, Failure to comply constitutes failure to fulfill the contractual obligations and may trigger the application of the contractual remedies.

The signing or, in any case, adhesion to these provisions and to the principles envisaged by this Code by Optit's third parties with whom it has collaborative relationships, professional consultancy or commercial partnerships represent, in fact, a condition of the stipulation of contracts.

The specific provisions contained in the Code constitute an integral and

substantial part of the contracts stipulated by them with the Company.

Any violations by third parties of specific provisions of the Code legitimize the interruption by the Company of existing contractual relationships and may be identified as a cause for express termination of the contract under art. 1456 of the Italian Civil Code.

OPTIT

optimal solutions

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