

Anticorruption and Decree No.23-2001

Personnel policies

Human resources

We promote collaborative communities based on the principles of contributing to the common good and the company. We value meritocracy, quality of work, and personal dignity, guaranteeing freedom of association and collective bargaining..

Employee responsibilities

All employees must be familiar with the Code and relevant regulations and refrain from any conduct that contravenes them. Employees are required to seek clarification from their superiors and report any violations or unlawful requests, while ensuring the confidentiality of the whistleblower. Managers and supervisors must prevent retaliation.

Duties of managers

Managers comply with the regulations and the Code and monitor their application by employees through appropriate and periodic checks. They cooperate fully with internal audits and with administrative or judicial authorities when requested.

Duties of department heads

Department heads—as identified in the organizational chart, job descriptions, and delegation system—are responsible for ensuring compliance with the Code, promoting awareness among employees that its provisions are an integral part of their work, and promptly reporting any critical issues, requests, or reports received to the Board of Directors/CEO. Failure to comply may result in disciplinary action.

Selection and recruitment

We recognize that our staff plays a central role. Recruitment and collaboration are carried out in accordance with equal opportunities and objective criteria, merit, and competence, involving department managers. We avoid favoritism, nepotism, and cronyism: those involved in the selection process declare any family ties and abstain from the process itself. Irregular work and all forms of exploitation are strictly prohibited.

Training

We invest in professional development with refresher courses and training aimed at improving skills and results, ensuring equal opportunities for growth and assessments consistent with objectives.

Protection of individuals

We place the utmost importance on safeguarding the dignity and moral integrity of each individual. Harassment, offensive behavior, and language, as well as any form of discrimination, are expressly prohibited. We guarantee protection to whistleblowers who report serious offenses pursuant to Legislative Decree 231/2001, in full compliance with the whistleblowing procedure.

Information management

Compliance with information security policies is everyone's responsibility. To ensure data integrity, confidentiality and availability, documents must be drafted in a clear, complete and verifiable manner.

Privacy protection complies with current legislation: the dissemination of data without consent is prohibited, except in cases provided by law. It is mandatory to maintain the utmost confidentiality regarding company information.

Protection of information

Company and third-party information are processed only by authorized people and for work purposes. Contracts include ethical clauses and NDAs where necessary. Any information incidents must be reported immediately; violation of these obligations will result in disciplinary or contractual measures.

Conflict of interest

Any situation involving a conflict of interest must be prevented and employees must refrain from taking advantage of opportunities known to them due to their role. Examples include: personal or family financial interests with suppliers, customers or competitors; acceptance of money, gifts or favours. Any conflicts, even if only potential, must be reported promptly to the employee's manager.

Use of company assets

Company assets, both tangible and intangible (strategies, customer lists, personnel data, marketing plans, organizational charts, pricing policies, financial and accounting data) must be protected and used diligently, in accordance with procedures. Private or

improper use is prohibited. In the IT field, it is mandatory to use systems for business purposes, comply with security policies, avoid offensive messages and not access inappropriate websites or social networks without authorization.

Confidential information

Information relating to the Company constitutes assets that must be protected. Recipients must refrain from disclosing, either within or outside the Selematic Group, any confidential information learned in the course of their duties, in compliance with laws and internal procedures.

Health and safety

We guarantee healthy and safe environments, promoting a culture of prevention with structured risk management systems. Everyone must comply with rules and procedures and report any critical issues.

We adopt the general measures provided for by Legislative Decree 81/2008 and subsequent amendments and additions, defining operating procedures, risk assessment documents, training and regulatory monitoring. The use of alcohol, drugs or substances with similar effects is prohibited.

Privacy protection

We treat the personal data of employees and collaborators with the utmost confidentiality, in accordance with Regulation (EU) 679/2016 and national legislation, collecting and storing data diligently and with prior consent when required. Investigations into ideas and private life are prohibited. The same precautions apply to the electronic management of data.

Institutional relations

Public Administration

Public Administration (PA) refers to any public body or entity, as well as anyone responsible for public services, at national or international level. Relations with the PA are based on fairness, transparency and honesty: it is forbidden to unduly influence decisions or engage in unlawful conduct (offers of money or other benefits). Corrupt practices, gifts of more than modest value or promises of advantages are not permitted.

In public tenders, we operate in full compliance with the law and best practices. It is prohibited to be represented by consultants with conflicts of interest or to establish working/consultancy relationships with former civil servants outside of standard procedures. Public contributions and funding must be used exclusively for the purposes for which they were granted; false or misleading documents or statements are prohibited. All contact with the public administration is handled by authorized departments, with segregation of duties, minutes/evidence and storage in accordance with document policies.

All communication with the public administration must be authorized and traceable; any violations or attempts must be reported promptly to the Supervisory Body and the relevant departments.

Financial institutions

Our relationships with financial intermediaries are based on fairness, transparency and responsibility. When selecting partners, we favour those with a solid reputation, operational reliability and a clear alignment with our values.

We require clarity in economic conditions, traceability of transactions, compliance with industry regulations (including anti-money laundering) and standards of integrity and ESG consistent with our commitments.

Integrity in B2B relationships (anti-corruption between private individuals)

It is forbidden to offer, promise, give, solicit or accept money, gifts, hospitality, discounts or other benefits in order to obtain or maintain business. Gifts and hospitality are only permitted if they are modest, proportionate and in accordance with internal policies and thresholds; initiatives exceeding the threshold require prior authorization.

Donations, sponsorships and gifts

Gifts and sponsorships are only permitted if they are consistent with corporate values and do not have any distorting effects. Contributions to individuals connected to public officials or counterparties involved in ongoing negotiations/tenders, to entities that lack transparency regarding their UBO (ultimate beneficial owner) or have serious reputational issues, as well as cash payments, payments through unauthorized intermediaries or payments to individuals other than the beneficiary are prohibited.

All initiatives require due diligence assessments, prior authorization and traceability of transactions. The Company applies specific anti-corruption and anti-money laundering policies and provides internal reporting channels.

Accounting and financial reporting

Transparency in accounting

Transparency in accounting requires true, accurate and complete information. Every management event must be represented correctly and promptly. For each transaction, adequate documentation must be kept for recording, identifying responsibilities and reconstructing the process.

Records must accurately reflect the supporting documents. Omissions, falsifications or negligence must be reported to the superior or the Supervisory Body. We apply principles of segregation of duties for the correct allocation of responsibilities in financial areas.

Controls and checks

We guarantee the audit and control bodies access to information and documents, with the full cooperation of directors and employees. Documents and records are kept in accordance with the law and internal policies; internal control carries out periodic checks; the Supervisory Board receives information flows and may request evidence at any time.