



CODE OF ETHICS

January 2022



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Introduction

The company, founded in 1972, has its legal headquarter and operational facility in Volta Mantovana (Mantova), where antennas and telecommunications accessories are designed, engineered and completely manufactured.

The main focus is related to the production of antennas and accessories for VHF, UHF, TETRA, Cellular Systems (LTE, UMTS, GSM) and W-Lan/Wi-Fi up to 6 GHz.

The company is technically and mechanically equipped to create innovative products, customize existing products and develop new projects following customers based approach.

All the processes, from researching to manufacturing, assembling, antenna testing, packing and shipping are carried out entirely at the factory in Italy.

Since February 2004, Sirio Antenne's production and quality management systems have been certified according to the ISO 9001:2015 from DNV (Det Norske Veritas).

Sirio Antenne has about 50 employees, who work under the direction of the Administrator and Sole Shareholder Ms. Grazioli Stefania.

1. PRESENTATION

1.1. Code of Ethics

In the business environment, the absence of any ethical interest for one's own conduct could lead to "potentially opportunistic behaviours", dictated by the mistaken belief of doing the company best interest. Therefore, it is obvious the value of a Code of Ethics, according to which in no way can the belief of acting for the company best interest justify the adoption of behaviours opposite to shared principles and values.

The following document is not needed to increase the extent of compliance with the law or the reputation of the company, because legal responsibility, compliance with the law and fairness are an essential condition for the very existence of the company, and therefore cannot be considered objectives of a Code of Ethics. The primary objective of the Code of Ethics is to share at all levels the values in which the company recognizes itself, ensuring that, whenever anyone is in the position to make a decision, remembers clearly that not only one's own interests, rights and duties, are at stake, but also everyone's. In other words, the aim of the Code of Ethics is to raise awareness that everyone's well-being and respect must always be explicitly taken into account in the everyday work routine.

1.2. Scope of the Code of Ethics

All Company Representatives, without exception, and all those who, directly or indirectly, permanently or temporarily, establish relationships or relations with SIRIO and work to pursue its objectives, are recipients of the Code of Ethics. Particular regard, given the importance that participation in public tenders / procurement plays in the activity of SIRIO, to all those who, however linked to SIRIO, come into contact with the public Administration and / or with Public Officials / Public Service Officers, Italian or foreign, even only occasionally, both in Italy and abroad.

SIRIO requires all suppliers, contractors and subcontractors to behave according to the general principles of this Code, of course with respect regarding their own cultural and social diversity. The Company Representatives of SIRIO have the obligation to know the rules, refrain to act contrary to them, contact their superior, the Administrative Body or the Supervisory Body in charge of queries or complaints, collaborate with the structures

responsible for verifying violations and not hide the existence of a Code from the counterparties.

In business relationships, the counterparties must be informed of the existence of rules of conduct and must comply with them. Compliance with the rules of the Code of Ethics is an essential part of the contractual obligations of all employees pursuant Art. 2104 of the Italian Civil Code. This Code of Ethics is valid both in Italy and abroad, while finding reasonable application to the different cultural, political, social, economic and commercial realities of the various countries in which SIRIO may find itself operating.

2. RELATIONSHIPS WITH STAKEHOLDERS

SIRIO aspires to maintain and develop a relationship of trust with its stakeholders, that is with those categories of individuals, groups, legal entities and institutions whose contribution is required to achieve the company's objectives and consolidate its performance.

Stakeholders are those who make different types of investments connected to SIRIO's activity and, therefore, collaborators, employees, suppliers, business partners, banks.

2.1 Relationship with Customers

The main objectives of corporate interest are: - the full and continuous satisfaction of the Customer receiving our goods and services; - the creation of a solid relationship with the Customer based on principles of correctness, transparency, efficiency and courtesy; - the maintenance of a professional, competent and collaborative behavior towards Customers. Customers must always be provided with complete, truthful, exhaustive and accurate information. In the relationship with the Customer, maximum confidentiality must be

constantly guaranteed and all the rules on privacy must be respected. In starting business relationships with new customers, or in managing existing relationships, even indirect ones, contacts with parties known or suspected of belonging to criminal organizations, including mafia or terrorist organizations, or in any case involved in illegal activities, must be avoided.

Furthermore, any contact with subjects lacking the necessary requisites of professional seriousness and reliability should be avoided as well as those carrying out activities that, even indirectly, hinder human development and contribute to violating the fundamental Human Rights. In relation to any problems that may arise in customers relationships, the search for a friendly solutions is always preferred, following a customer based approach.

In dealing with customers, whoever acts on behalf of SIRIO must not accept or offer compensation of any kind and entity, gifts other than those with modest value or preferential treatment, in order to illegally favor the interests of the company. SIRIO carefully evaluates the adequacy and feasibility of the requested services, with particular regard to the regulatory conditions, technical and economic ones, in order to promptly detect anomalies and in no case assuming contractual commitments that can put the company in the position of having to resort to unacceptable cuts on quality service, personnel costs or job safety.

In relations with Customers, SIRIO ensures fairness and clarity in business negotiations and in the assumption of contractual obligations, as well as professional fulfillment of these same obligations.

2.3 Relationship with Suppliers

In public tenders, procurement and, in general, for the supply of goods and / or services, SIRIO values the important contribution of its suppliers; their collaboration is essential for the daily realization of the business activity.

All the purchasing processes undertaken by SIRIO aim to conciliate, at the same time, the search for the maximum competitive advantage for the company itself and to provide the same opportunities to each supplier, in a context of mutual loyalty, correctness and impartiality.

SIRIO requires from its suppliers to comply to strict standards, and at the same time offers them its best to constantly improve the customer / supplier relationship in a perspective of a real and complete partnership.

That being said, SIRIO generally requires its suppliers to adapt to the ethical principles and values that distinguish its philosophy, namely:

- to comply with all the regulations of the country in which they are based, as well as to comply with all Community and Italian regulations. SIRIO makes itself available to actively dialogue with the supplier in order to inform them of any particular regulations effective in Italy that may not be known by them, creating the best conditions for the strictest application of all legal regulations;
- to also maintain the most rigid standards regarding:
 - health and safety in the workplace, adopting all the precautions provided for by law, and also those that are not compulsory but suggested by common sense with regard to the best protection of worker safety;
 - sustainability and respect for the environment (including a correct waste disposal cycle, with particular attention to dangerous / toxic wastes);
 - non-discrimination in the workplace (racial, gender, sexual, etc);

- protection of workers' trade union rights, with particular regard to the discouragement of any form of "piecework";
- transparency and accounting and administrative correctness;
- not to promote programs for the exploitation of child labor, also carrying out the most appropriate and careful controls on this matter also on all their suppliers;
- not to promote or tolerate corrupt practices of any kind, including cash incentives or equivalent goods aimed at obtaining unfair profit, or aimed at influencing public, political and institutional authorities, or people in charge of public service;
- to implement the most appropriate precautions for the defense of industrial secrecy, to protect the integrity of production processes;
- to maintain the highest standard of transparency towards the supervisory authorities, for any information of public interest, and also not to misleadingly advertise their services / products to the public;
- to apply the directives regarding the processing of all sensitive data, to protect the privacy of customers but also of employees and collaborators;
- not to engage in unfair commercial practices towards commercial partners or final customers.

For suppliers of raw materials and / or finished or semi-finished products to be destined for trade, or all those materials functional to the production and trade of SIRIO products, the following obligations also apply:

- commitment to maintain strict supervision over the entire production cycle, ensuring the highest quality standards in the manufacturing processes;

- commitment to carefully verify the existence of all the requirements listed in this Ethical Charter also for raw materials purchased from third parties;
- commitment to provide quality certificates or any other documentation suitable for each batch of products / materials to guarantee correct and complete traceability of the product itself.

SIRIO is aware of the importance of the role of its supplier companies in their socio-economic system, especially as essential income generators for the families of employees, as well as of the importance that these companies in turn have for their suppliers of raw materials.

In case of violation of this Code of Ethics or in any case of non-compliance - in whole or in part - with the criteria set out, SIRIO intends to follow the following procedure:

- immediate implementation of every precaution necessary to mitigate the effects of the violation found, including the temporary suspension of all or part of the supplies, without this in itself being a contractual violation by SIRIO;
- contextual written information to the supplier, illustrating the reasons that reasonably suggested the advisability of temporarily suspending supplies.

Only in the event of the supplier's obvious unwillingness to remove the cause of the violation, the commercial relationship with the disputed supplier will be definitively terminated.

SIRIO undertakes to publicize this Code of Ethics for its suppliers internally, department by department, sharing its principles with all employees and external collaborators, making sure that the principles set out in it become part of the corporate culture and inserting the study of this Code in all periodic training courses.

SIRIO is also ready to receive and carefully examine any useful suggestion from commercial partners in order to improve this Code of Ethics year after year.

2.4 Relationships with Collaborators - Employees

SIRIO recognizes the centrality of human resources in the belief that the main success factor of every company is the professional contribution of the people who work there, in a perspective of loyalty and mutual trust. SIRIO protects safety and health in the workplace and considers essential, in carrying out its economic activity, the respect of workers' rights. The management of employment relationships is aimed at guaranteeing equal opportunities and promoting the professional growth of everyone.

2.5 Relationships with associations, political organizations, trade union organizations

Any funding by SIRIO to non-profit organizations, associations, foundations, committees, political parties and candidates must be in compliance with the law and regulations in force. The payment of said fundings must in any case be expressly authorized by the internal functions responsible for managing such relationships. SIRIO can join associations and / or economic and trade union, work and service organizations.

3. VALUES

3.1 Honesty and Transparency

Honesty represents the fundamental principle for all the activities of the SIRIO company, its initiatives, its products, its reports and its communications and constitutes an essential element of corporate management. Relations with stakeholders, at any levels, must be based on criteria and behaviors of correctness, consistency, loyalty and mutual respect. SIRIO communicates in a clear, transparent, accurate and timely manner with its stakeholders.

3.2 Centrality of the person

In line with its underlying ethical vision, SIRIO promotes the value of the person through respect for physical, cultural and moral integrity and respect for the dimension of relationships with others. SIRIO supports and respects human rights in every area of its actions and sphere of influence.

3.3 Labor protection

SIRIO undertakes not to use, even indirectly, both forced and compulsory labor and child labor. Rejects any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs; rejects all forms of discrimination in hiring policies and in the management of human resources. SIRIO undertakes to prevent any form of mobbing and exploitation of work, both direct and indirect, and to recognize in merit, work performance and professional potential the determining criteria for wage and career developments.

3.4. Compliance with the rules

As part of their professional activity, SIRIO employees and collaborators in various capacities are required to diligently comply with the laws in force, this Code of Ethics, the procedures, internal regulations and, where applicable, the rules of professional ethics. In no case can the pursuit of SIRIO's interest justify conduct in violation of these rules.

4. RULES AND STANDARDS OF BEHAVIOR

4.1. Conflicts of Interest

In conducting any activity of interest to SIRIO, situations where the subjects involved are in conflict of interest must always be minimized. A conflict of interest is considered to exist both in the event that an employee, a collaborator or a manager pursues an objective other than that pursued by SIRIO or voluntarily obtains a personal advantage when carrying out activities carried out in the interest of the company, or in the event that the representatives of customers, contractors, subcontractors, suppliers or public or private institutions, act in conflict with the fiduciary duties linked to their position.

4.2. Gifts, giveaways and benefits

It is forbidden, in relations with public officials and people in charge of a public service, to give or promise money or other benefits in any form, whether the conduct is carried out in the exclusive interest of the agent, or whether it is carried out for the benefit of or in the interest of SIRIO. It is also forbidden to make any form of gift, homage, or granting benefits to people who have commercial and / or entrepreneurial relationships with SIRIO, except in cases in which - also taking into account the countries in which SIRIO operates - such forms of gift, homage or benefit are of modest value and fall within the ordinary practices and customs.

In any case, each employee or collaborator of SIRIO, before proceeding to make any form of gift, homage or benefit that exceeds the modest value as considered in Italy (approximately € 50.00) must request express authorization from the office manager and / or the organizational unit with which they collaborate, so that the conduct to be followed can be decided.

The head of the office and / or organizational unit must ask for the authorization of their superior for the initiatives they deem to take directly. In any case, anyone who works in the name and on behalf of SIRIO must refrain from practices not permitted by law, commercial usage or ethical codes - if known - of public and / or private parties with whom they have relations both in Italy and abroad. Employees and collaborators of SIRIO who, due to the activity carried out for the company, receive gifts, gratuities or benefits in any form are required to notify the manager of the office and / or organizational unit under which they work, if employees, or with whom they collaborate, if collaborators, or, if always employees, to the direct superior, who will inform the administrative body, if the amount of the gifts, homages or benefits exceeds the modest value assessed according to uses and customs in force in the place and for the sector of activity in which the employee or collaborator operates.

4.3. Transparency of accounting, documentation and reporting

SIRIO operates with maximum accounting transparency in line with best business practices. This transparency is based on the truth, accuracy and completeness of the basic information for the related accounting records. For each operation, adequate supporting documentation of the activity carried out is kept on file, in order to allow easy accounting registration, identification of the different levels of responsibility and reconstruction of the operation.

Each accounting entry, in turn, must reflect exactly what results from the supporting documentation.

4.4. Internal Control

SIRIO recognizes the importance of internal control understood as a process, carried out by Company Representatives, aimed at facilitating the achievement of company objectives, safeguarding resources, ensuring compliance with applicable laws and regulations, preparing financial statements and economic data. reliable, truthful and correct financial statements. For this purpose, SIRIO has created and developed over time a set of tools, procedures and mechanisms suitable for managing the operation and monitoring of the organization. Well aware that the internal control system represents an element that characterizes good company management, SIRIO is committed to working so that the sensitivity of staff to the need for control can be increased at all organizational levels. At the same time, all Company Representatives must feel responsible for updating and managing an effective internal control system. For this reason, the management must not limit itself to participating in the control system within the scope of its own competences, but must undertake to share its values and tools with each collaborator or colleague. Everyone must feel responsible for safeguarding the Company's assets (whether tangible or intangible) and for their proper use. It is forbidden to misuse or damage the Company's assets and resources and to allow others to do so

4.5. Corruption and bribery

SIRIO undertakes to implement all the necessary measures to prevent and avoid corruption and extortion. It is not allowed that sums of money are paid, other forms of corruption

exercised in order to procure direct or indirect benefits to the Company itself. It is forbidden to accept gifts or favours from third parties that go beyond the normal rules of hospitality and courtesy. This applies both in the event that a Company Representative pursues an interest other than the corporate mission or personally takes advantage of business opportunities.

4.6. Diligence and fairness in the management of contracts

Contracts and work assignments must be carried out as knowingly established by the parties. For the correct management of contractual relations, SIRIO undertakes to guarantee a broad and exhaustive information to all employees and collaborators involved in the activities envisaged by the stipulated contracts.

5. HUMAN RESOURCES AREA

SIRIO guarantees an adequate degree of professionalism in the execution of the tasks assigned to its collaborators. To this end, it is committed to enhancing and increasing the skills of its human resources, providing them with suitable training, professional updating and development tools. Employees, whose physical and moral integrity is considered a primary value of the Company, are guaranteed working conditions that respect individual dignity, in safe and healthy work environments.

5.1. Personnel selection

The evaluation of the personnel to be hired by SIRIO is carried out on the basis of the correspondence of the candidates' profiles with those expected and with the company needs, in compliance with equal opportunities for all interested parties. The information requested is

strictly connected to the verification of the aspects foreseen by the professional and psychophysical aptitude profile, in respect of the private sphere and the opinions of the candidate. The Human Resources Department, within the limits of the information available, adopts appropriate measures to avoid favoritism, nepotism, or forms of clientelism in the selection and recruitment phases.

5.2. Establishment of the employment relationship

SIRIO personnel are hired with a regular employment contract; no form of irregular work or "illegal work" is tolerated. At the establishment of the employment relationship, each employee receives accurate information relating to:

- characteristics of the function and duties to be performed;
- regulatory and remuneration elements, as regulated by the national collective bargaining agreement;
- rules and procedures to be adopted in order to avoid possible health risks associated with the work activity.

This information is presented to the collaborator so that acceptance of the assignment is based on effective understanding.

5.3. Personnel Management

SIRIO avoids any form of discrimination against its collaborators. In the context of personnel management and development processes, as well as in the selection phase, the decisions made are based on the correspondence between expected profiles and profiles possessed by collaborators (for example in the case of promotion) and / or on merit considerations (for

example assignment of incentives based on the results achieved). Access to roles and positions is also established in consideration of skills and abilities.

5.4. Equity of authority

In establishing hierarchical relationships, SIRIO undertakes to ensure that authority is exercised with equity and correctness, avoiding any abuse. In particular, SIRIO guarantees that authority does not turn into an exercise of power that damages the dignity and autonomy of the collaborator, and that work organization choices safeguard the value of collaborators. It is an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favours or any behaviour that constitutes a violation of the Code of Ethics.

5.5. Work organization interventions

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and / or professional retraining.

5.6. Safety & Health

SIRIO undertakes to spread and consolidate a culture of safety by developing awareness of risks, promoting responsible behavior on the part of all collaborators; Furthermore, SIRIO works to preserve, especially with preventive actions, the health and safety of workers, as well as the interest of other stakeholders. To this end, it is evaluating to implement interventions of a technical and organizational nature, through:

- the introduction of an integrated risk and safety management system;
- a continuous analysis of the risk and the criticality of the processes;
- the adoption of the best technologies;

- the control and updating of working methods;
- the contribution of training and communication interventions.

5.7. Privacy protection

The collaborator's privacy is protected by adopting standards that specify the information that the company requests from the collaborator and the related processing and storage methods. These standards also provide for the prohibition, except for the cases provided for by law, to communicate / disseminate personal data without the prior consent of the interested party and establish the rules for the control, by each collaborator, of the rules for the protection of privacy. Any investigation into the ideas, preferences, personal tastes and, in general, the private life of collaborators is excluded.

5.8 Protection of the integrity of the person

SIRIO undertakes to protect the moral integrity of its collaborators by guaranteeing the right to working conditions that respect the dignity of the person. For this reason it safeguards workers from acts of psychological violence, and counteracts any discriminatory or harmful attitude or behavior of the person, his beliefs and preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitations) . Sexual harassment is not allowed and behavior or speeches that may upset the sensitivity of the person must be avoided (for example, the display of images with explicit sexual references, insistent and continuous allusions). Employees who believe they have been harassed or discriminated against for reasons related to age, sex, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc., must report the incident to the company which will assess the actual violation of the Code of Ethics. However, disparities are not considered discrimination if justified or justifiable on the basis of objective criteria.

5.9. Protection of company assets

Each employee is required to work diligently to protect company assets, through responsible behavior and in line with the operating procedures set up to regulate their use, accurately documenting their use. In particular, each collaborator must: use the assets entrusted to him scrupulously and sparingly;

- avoid improper use of company assets that may cause damage or reduction in efficiency, or in any case in conflict with the interests of the company;
- implement the provisions of company policies on information security to ensure its integrity. The company reserves the right to prevent the distorted use of its assets and infrastructures through the use of accounting systems, financial control reporting and risk analysis and prevention, without prejudice to compliance with the provisions of the law. in force (Privacy Law, Workers' Statute, etc.).

With regard to IT applications, each employee is required to:

- scrupulously adopt the provisions of corporate security policies, in order not to compromise the functionality and protection of the IT systems;
- do not send threatening and insulting e-mails, do not use low-level language, do not make inappropriate comments that may offend the person and / or damage the corporate image;
- not to browse websites with indecent and offensive content.

6. CUSTOMER RELATIONS AREA

6.1. Acquisition of orders

SIRIO's activity aimed at acquiring orders must be carried out in compliance with correct economic principles, in a regular market context and in fair competition with competitors, in compliance with the applicable laws and regulations.

6.2. Contracts and customer communications

The contracts and communications to SIRIO customers are:

- compliant with current regulations, without resorting to elusive or otherwise incorrect practices;
- complete, so as not to overlook any element relevant to the customer's decision;
- promptly communicated and adequately supported by suitable documentation.

6.3. Style of behaviour of collaborators towards customers

SIRIO's style of behavior towards customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship.

6.4. Quality and Customer satisfaction contro

SIRIO undertakes to guarantee adequate quality standards of the services / products offered on the basis of predefined levels and to systematically monitor the correct functioning of its quality system and that of its sub-suppliers.

7. SUPPLIER RELATIONS AREA

Relations with suppliers, including financial and consultancy contracts, are governed by the rules of this Code of Ethics and are subject to constant and careful monitoring by the company.

SIRIO makes use of suppliers, contractors or subcontractors who operate in compliance with current legislation and the rules set out in this Code of Ethics, and in particular those specified in the previous point 2.3.

8. COMMUNICATIONS AND COMPANY INFORMATION AREA

8.1. Information processing

The information of the stakeholders is handled by SIRIO in full compliance with the rules on confidentiality and privacy. To this end, specific policies and procedures for the protection of information are applied and constantly updated.

8.2. External communication

SIRIO's communication to its stakeholders is based on respect for the right to information; under no circumstances is it permitted to disclose false or biased news or comments. Each communication activity respects the laws, rules, practices of professional conduct, and is carried out with clarity, transparency and timeliness, safeguarding, among other things, “sensitive” information and industrial secrets.

9. VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS

Compliance with the Code of Ethics

Compliance with the rules of the Code of Ethics must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of art. 2104 of the Civil Code. It must also be considered an essential part of the contractual obligations also undertaken by non-subordinate collaborators and / or subjects having business relations with SIRIO. In compliance with civil, criminal and administrative regulations, the ascertained violation of this code may constitute grounds for determining disciplinary sanctions by the competent bodies.

10. PREVENTION OF CORRUPTION - WHISTLEBLOWING

The employee who reports the illegal or abusive conduct of which he or she has become aware of his employment relationship, cannot be - for reasons related to the report - subject to sanctions, demoted, fired, transferred or subjected to other organizational measures that have a negative effect on working conditions.

The employee must be reinstated in the workplace in the event of dismissal and all discriminatory or retaliatory acts must be considered null and void. The burden of proving that the discriminatory or retaliatory measures taken against the whistleblower are motivated by reasons unrelated to the report will be borne by the administration.

The identity of the employee who reports discriminatory acts may not be revealed for any reason and, in the context of criminal proceedings, the report will be covered in the ways and terms set out in Article 329 of the Criminal Procedure Code. The report is removed from the access provided for by articles 22 and following of the law of 7 August 1990, n. 241, and subsequent amendments.