



## CODE OF ETHICS

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## Summary

<b>PREMISE</b> .....	<b>3</b>
<b>1.RECIPIENTS</b> .....	<b>3</b>
<b>2.VALUES AND KEY PRINCIPLES OF OPTOI</b> .....	<b>4</b>
<b>3.SPECIFIC COMMITMENT TO CUSTOMERS</b> .....	<b>4</b>
<b>4.SPECIFIC COMMITMENT TO THE COMMUNITY</b> .....	<b>4</b>
<b>5.SPECIFIC COMMITMENT TO HUMAN RESOURCES</b> .....	<b>5</b>
<b>6.SPECIFIC COMMITMENT TO HEALTH, SAFETY, ENVIRONMENT</b> .....	<b>5</b>
<b>7.SPECIFIC COMMITMENT WITH PUBLIC ADMINISTRATION (PA)</b> .....	<b>5</b>
<b>8.SPECIFIC COMMITMENT IN ADMINISTRATIVE, ACCOUNTING AND TAX MATTERS</b> .....	<b>5</b>
<b>9.SPECIFIC COMMITMENT TO COPYRIGHT, TRADEMARK AND PATENT PROTECTION</b> .....	<b>6</b>
<b>10.SPECIFIC UNDERTAKING IN CUSTOMS MATTERS</b> .....	<b>6</b>
<b>11.IMPLEMENTATION AND CONTROL OF COMPLIANCE WITH THE CODE OF ETHICS</b> .....	<b>6</b>
11.1.FRAMEWORKS OF REFERENCE, IMPLEMENTATION AND CONTROL.....	6
11.2.REPORTING OF POSSIBLE VIOLATIONS OF THE CODE OF ETHICS.....	6
11.3.SERIOUS VIOLATIONS OF THE CODE OF ETHICS.....	6

## Premise

OPTOELETTRONICA ITALIA SRL (in abbreviated form and hereinafter: OPTOI) was founded in Trento (Italy) in 1995 as a consequence of a successful spin-off activity of the Institute of Scientific and Technological Research ITC-irst (now FBK). Both entities, located in Trento, historically cooperate each other profitably.

Since its incorporation, OPTOI focused its core business on microelectronic packaging and electronic assembly activities, for which it offers a qualified and appreciated expertise. Competence and know-how allowed OPTOI to grow rapidly gaining trust by multinational companies and small and medium-sized national and foreign companies active in the field of technological innovation and product miniaturization.

The company manufactures and markets silicon microelectronic sensors, hybrid modules and microsystems, smart electronic systems, microelectronic devices MEMS (Micro Electro Mechanical Systems) for standard and custom applications in the industrial, environmental, biomedical, telecommunications and aerospace sectors.

The company supports customers in identifying the technological solution suitable for strategic issues proposed, carrying out with professionalism all the activities of market analysis, design, engineering, production and assembly of the component.

OPTOI is active in various fields and application areas (Industrial, Green, Aerospace, Medical, etc.) and provides technological support, knowledge and assistance for the development of innovative microelectronic and electronic solutions in the field of measurements and process control, quality control, industrial automation and safety systems, as well in the domains of artificial vision, medical, biomedical, environmental and aerospace.

Currently OPTOI SRL represents the industrial holding of a group of companies focused on specific product families (sensors in measuring devices; sensors in the mechatronic field) oriented to specific geographical markets (Europe and South America).

This Code of Ethics, together with the company statute, establishes the "Constitutional Charter" of OPTOI SRL. Codes of ethics based on the same values and principles will be adopted by each Group company. Consequently, all activities conducted within the Group must be carried out in compliance with the principles set out below.

## 1. Recipients

The following parties are Recipients of the Code of Ethics and are required to comply with the principles and rules set forth therein:

- shareholders;
- the members of the Board of Directors;
- all Collaborators (internal employees and collaborators in any capacity);
- members of the controlling entities (auditors, supervisory board, etc.);
- all those who act, even in a non-continuous and non-exclusive way, in the name or on behalf and in the interest or advantage of OPTOI, regardless of the legal qualification of the relationship (agents, consultants, suppliers and third parties in general). The violation of this code, in carrying out activities in favor of OPTOI, constitutes a breach of contract and may lead, in the most serious cases, to the resolution of the contract;
- Group Companies directed by OPTOI, each one adopting their own Code of Ethics, in line with this document, as indicated in the introduction.

The violation of the Code of Ethics by the recipients is punished with the measures provided for by the sanctioning system of the "Organization and Management Model".

## 2.Values and key principles of OPTOI

The primary objective of OPTOI is the creation of value for Shareholders and more generally for Stakeholders (collaborators, customers, suppliers, territory, mankind).

OPTOI's economic and financial strategies and the consequent operational conduct are primarily geared towards this purpose.

In pursuing this objective, OPTOI, through the Recipients referred to in point 1, strictly adheres to the following key principles of conduct:

- aim and privileges **effectiveness**: the ability to eliminate obstacles to a direct and rapid management of problems and opportunities;

- cultivates **efficiency and sustainability**: the ability to identify, with the same objectives, the least expensive and most valuable combination of resources for the company, for the women and men involved, for the world community to which it belongs, in a medium-long term vision respecting Environment, Society and future generations;

- in conducting business, it is committed to respecting and enforcing the principles of **transparency, fairness, loyalty and honesty**;

- in internal and external communication, it is committed to privilege **clarity and synthesis**. As an active and responsible component of the community in which it operates, dedicates to respecting and enforcing, internally and in relations with the outside world, the principle of **legality (laws in force in the places where activity is implemented)**;

- **avoids and disapproves the use of unlawful or incorrect behavior** towards the community, public authorities, customers, workers, internal and external control functions, investors and competitors and in general the Stakeholders. This principle shall be applied in achieving company goals, to be pursued exclusively using the best level of performance in terms of quality, reliability, degree of innovation and progress, practicality and convenience of products and services, in full compliance with the laws in force;

- in its reference business it promotes **fair competition**, which it considers functional to its own interest as well as to that of all market operators, customers and stakeholders in general;

- protects and enhances the human resources it uses and, also through the adoption of appropriate ethical measures (flexibility in particular), considers **individuals and families** as fundamental nucleus at the heart of social, civil, technological, scientific and environmental progress;

- **protects privacy** in accordance with the provisions of current legislation, undertaking not to communicate or disseminate, without prejudice to legal obligations, the related data without the prior consent of the interested party.

## 3.Specific commitment to customers

OPTOI's products and services lies on customer care and willingness to satisfy demands coming from customers themselves. The objective pursued is to guarantee a **rapid, qualified and competent response**, acting with **simplicity, fairness, courtesy and spirit of cooperation**. All this is done in order to achieve the highest possible satisfaction for stakeholders.

## 4.Specific commitment to the Community

OPTOI intends to contribute to the economic well-being, progress and growth of the communities in which it works. This goal is achieved by **the provision of efficient and technologically advanced services**.

In line with these objectives and with the responsibilities assumed towards the various stakeholders, OPTOI identifies research and innovation as a priority condition for growth and success.

OPTOI maintains **relations** with local, national and international Public Authorities **inspired by full and effective collaboration** and transparency, respecting mutual autonomies, economic objectives and the values contained in this Code of Ethics.

#### 5. Specific commitment to human resources

OPTOI recognizes the centrality of human resources in the belief that the main success factor of any company is the professional contribution of all staff and collaborators, in a framework of **professionalism, loyalty and mutual trust**. The management of relationships among employees is oriented to ensure equal opportunities and to promote the **professional growth** of everyone. It is engaged in preventing any discriminatory behavior (by ethnicity, religion, sex, sexual orientation, gender identity, disability ...), which will not be tolerated, in any case with reference to all parties in touch with the company.

#### 6. Specific commitment to health, safety, environment

OPTOI believes in sustainable global growth in the common interest of the company and all staff. The company protects safety and health in the workplace. OPTOI aims to "**work safely**", i.e., to ensure compliance with prevention rules and the adoption of "safe" behaviors **protecting people and the environment**. Without prejudice to compliance with the specific applicable regulations, OPTOI takes environmental issues into account in defining its choices. All Recipients must comply with specific legislation on health and safety in the workplace and on environmental matters.

#### 7. Specific commitment with Public Administration (PA)

Regarding relations with the PA, OPTOI is aware of the importance of the constitutional principle of healthy performance and impartiality of the PA.

For this reason, in relations with public bodies, the company undertakes to comply with all the rules of conduct fixed by law with reference to **transparency, correctness and impartiality**. The company also undertakes to provide and transmit to the PA integral and truthful documentation.

All Recipients must maintain a conduct respectful of the role and of the public function, **refraining from any behavior that could undermine serenity and impartiality of judgment by public officials** (civil servants, i.e., in charge of public service).

**OPTOI totally avoids corrupt practices** or actions aimed to obtain undue advantages from public officials both in Italy and abroad.

#### 8. Specific commitment in administrative, accounting and tax matters

Each registration must be carried out in an orderly, accurate, complete, truthful and transparent manner, allowing any checks even by external operators. The drafting of management data, internally and externally, must comply with criteria of simplicity, clarity and homogeneity.

The Recipients in charge of accounting and tax obligations must provide, in particular:

- the regular keeping of social accounting in compliance with the provisions of art. 2219 C. C. All records must be kept according to the rules of an orderly and true accounting;
- the correct conservation of the records in the appropriate archives in a manner suitable to avoid deterioration, allowing easy recovery;
- the financial statements in compliance with the reference standards and the National Accounting Standards of Chartered Accountants and the International Accounting Standards (IAS / IFRS)

#### 9. Specific commitment to copyright, trademark and patent protection

OPTOI recognizes the importance of copyright, trademark and patent protection. It works against any form of fraud, abusive duplication or reproduction, counterfeiting, usurpation or alteration of assets object of an industrial or intellectual property title. It is engaged in recalling all those who work on behalf of the Company to comply with the law.

The Recipients are required to use only software for which a regular license has been purchased and have the absolute prohibition of duplicating illegally and violating the specific legislation on the protection of copyright, software and / or other digital goods covered by copyright.

#### 10. Specific commitment in customs matters

OPTOI recognizes the importance of compliance with customs rules. All Recipients employed in activities which, directly and indirectly, may affect the performance of customs procedures during import or export, must take care of the accuracy and truthfulness of the information transmitted to the Customs Agency.

### 11. IMPLEMENTATION AND CONTROL OF COMPLIANCE WITH THE CODE OF ETHICS

#### 11.1. Reference structures, implementation and control

The Board of Directors is responsible for the adoption and the modification of the Code of Ethics. Each Recipient is required to supervise the implementation of the Code of Ethics by the relative parties, whether they are collaborators or third parties operating in the name and on behalf of OPTOI.

The Supervisory Body, elected in the context of the Organization, Management and Control Model pursuant to former Legislative Decree 231/2001, has the possibility to express opinions and interpretations, as well as to report any need to update the Code of Ethics.

#### 11.2. Whistle blowing of any violations of the Code of Ethics

Any violation of the Code of Ethics must be reported to the top management (CEO) and / or to the Supervisory Body to the e-mail address [odv@optoi.it](mailto:odv@optoi.it) or through a special form for reports as explained to all employees. The report will be treated confidentially, guaranteeing adequate protection to the informer in good faith and to the involved party according to the provisions of Law 179/2017 (Provisions for the protection of authors of reports of crimes or irregularities).

#### 11.3. Serious violations of the Code of Ethics

The serious or persistent violation of the rules of the Code of Ethics by its Recipients compromises the relationship of trust established with OPTOI and may result in sanctions as provided for in the Company's sanctioning system and, where applied, in relation to the specific CCNL (National Collective Labor Agreement). The violation may lead, in the most serious cases, to the termination of the contract or the revocation of any assignments.