




– CODE OF ETHICS –

# CODE OF ETHICS OF INNOVA S.P.A



Verified and Approved by	<b>BoD</b>
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## VISION

*«We want a future where the levers of technological innovation and scientific research place man at the centre, as the objective and means to achieve the tools that increasingly contribute to maintaining the freedom, democracy and safety of people and nations.»*

## MISSION

*«We use ingenuity to develop products and services dedicated to the investigations carried out by the police force. Excellence, reliability, simplicity and effectiveness combined with attention to the needs of our customers are the key values that inspire the design and development of the products and services that we produce. Profit is necessary for us to maintain the freedom to develop our ideas.»*

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## 1. INNOVA'S CODE OF ETHICS: PURPOSES AND RECIPIENTS

This Code of Ethics (hereinafter the "**Code**") sets forth the commitments and general ethical values pursued by Innova S.p.A. (hereinafter "**Innova**" or the "**Company**") in carrying out its business and daily activities.

The Code aims at providing ethical principles and binding all those who, at Innova, hold representation, administration or top management offices, or who manage and control the Company, its personnel with no exception, collaborators and anyone else entertaining business relationships with the Company, either directly or indirectly, on a permanent or temporary basis, i.e. collaborators under whatever title, to pursue the company mission (hereinafter the "**Recipients of the Code of Ethics**" or more simply the "**Recipient**" or "**Recipients**").

Complying with the ethical values set out in the Code is fundamental for the development of the business organization and relationships with all third parties that collaborate with the Company: compliance with this Code of Ethics is, therefore, extremely important for the proper operation, reliability and reputation of the Company.

Thus, compliance with the principles and commitments undertaken by applying this Code of Ethics represents an important tool for the creation of relationships based on trust, with both the customers and any other interlocutor of the Company.

Furthermore, Innova is aware of the fact that adopting a code of ethics is fundamental also with a view to preventing the offences provided in Law Decree no. 231 of 8 June 2001 ("Liability of physical persons"), being convinced that the proper adoption of ethical rules can strengthen the organizational model recently adopted by the Company in accordance with the aforesaid Decree, safeguarding its image and reputation.

## 2. ETHICAL PRINCIPLES

### 2.1 Lawfulness


Innova is convinced and aware of the essential need to:

- guarantee and promote, both inside and outside the Company, the highest degrees of protection of lawfulness aimed at safeguarding the centrality and dignity of the individual under any circumstance;
- carry out strict controls and undertake any possible initiative to make sure that legal regulations are strictly complied with in assigning works, supplies and services.

Under no circumstances is it allowed to pursue or achieve the Company's interest in violation of the law.

### 2.2 Impartiality

In managing company activities and taking the related decisions (including, merely by way of an example, relationships with shareholders, selection and management of personnel or work organization, selection and management of suppliers, etc.), Innova is committed to operate with impartiality, taking decisions with professional integrity, independence of judgement, transparency and according to objective, impartial and neutral valuation criteria, avoiding situations involving conflict of interests.

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### 2.3 Conflict of interests

In managing the various company activities and taking the related decisions, the Recipients of the Code of Ethics must operate in Innova's interest impartially, taking decisions with professional integrity, independence of judgement, transparency and according to objective, impartial and neutral valuation criteria, avoiding situations involving conflict of interests.

### 2.4 Value and protection of human resources

Innova considers its human resources as a key value for its development and growth in the sector in which it operates. Therefore, the Company safeguards the value of individuals prohibiting discriminatory behaviour, forms of exploitation and harassment and/or personal offense.

Innova manages its personnel by solely adopting merit and recognition criteria as well as criteria aiming at enhancing the skills, abilities and potential of each individual, guaranteeing everyone equal opportunities.

Innova selects its personnel based on the working skills and attitude to the position to be filled.

Innova undertakes to offer equal working opportunities to all its personnel based on the professional qualifications and performance abilities, without any discrimination.

### 2.5 Transparency and completeness of communications and protection of company's wealth

The actions, operations and, more generally, the behaviour of the Recipients of the Code of Ethics are inspired by the utmost transparency, accuracy and reliability. As a result, communications with the external environment must be truthful, accurate, clear, transparent, unambiguous or non-instrumental.


Every action, operation or transaction must be accurately recorded in the Company's accounting system according to the criteria laid down by legal regulations, applicable accounting standards, but must also be duly authorised and verifiable, lawful, coherent and reasonable.

The Company endeavours to guarantee responsible management so that the use of available resources - made in accordance with currently applicable legal regulations and the by-laws, and in line with the values of the Code of Ethics – aims at guaranteeing, increasing and strengthening the Company's wealth, the Company itself, its creditors and the market in general.

Innova is aware of the importance of being a strong and financially sound company, so that its ability to guarantee not only the quality but also the continuity of the service offered to Legal Practitioners is not even theoretically exposed to any risk.

### 2.6 Confidentiality

The Company considers confidentiality as an essential company rule and, therefore, it ensures the confidentiality of any information it holds, abstaining from using confidential data, unless expressly and clearly authorised to do so and, in any case, always strictly complying with the data protection regulations in force as per Law Decree 196/2003, as well as other applicable provisions issued by the Privacy Authority and/or other Supervisory Bodies. It is absolutely forbidden for the Recipients of the Code of Ethics to use confidential information that they become aware of because of their work activity, for personal purposes and, in any case, not related to the exercise of their functions or of the tasks carried out in Innova's interest.

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No employee can take any advantage whatsoever, in any way, whether direct or indirect, personal or wealth-related, from the use of confidential information, nor can he/she communicate such information to others or else recommend or lead others to use it.

Confidentiality is also guaranteed by adopting adequate data protection measures.

The use or dissemination of confidential and/or sensitive information that violates this Code shall cause the application of adequate disciplinary sanctions.

## 2.7 Environment

Innova operates being aware of the fact that the environment is a common good to be safeguarded, and is committed to train its collaborators so that they are aware of the environmental aspects and impacts associated with their activities.

Therefore, Innova has adopted an Environment Management System that complies with the UNI EN ISO 14001 standard, convinced that it is a fundamentally important tool, which enables it to avail of an effective environment management system to achieve sustainability and constantly improve environmental performance.


## 3. RELATIONSHIPS WITH THIRD PARTIES AND PREVENTION RULES

### 3.1 Relationships with the Public Administration and the Supervisory Authorities

Innova, also in the light of its mission, is aware of the importance of complying with strict transparency rules and correctness of relationships and interactions with institutional bodies and Public Administration offices.

The relationships that Innova entertains with (i) the Institutions and Public Administrations (mainly the Judicial Authority, Police Force, Public Prosecutor's Office, Judicial Police, and Legal Practitioners in general, as well as local Territorial Authorities, also economic entities, special-purpose or otherwise public, local, national or international companies, concessionaires of public services and/or officers in charge of public functions, etc.), (ii) the Supervisory Authorities (Privacy Guarantor, Telecommunications Authority, Anti-corruption Authority, Bank of Italy, etc.), (iii) public officials (those who - by performing a public function - contribute to the formation and manifestation of the will of the Administration by exercising authoritative or certifying powers) or (iv) those in charge of public service (those who under whatever title, render a public service, in the absence however of the typical powers entrusted with public officials) and, in any case, any relationship that has an institutional and public nature, are therefore inspired by the strictest compliance with applicable legal regulations, and are in line with the principles of transparency and honesty and respect for the institutions to guarantee the image, integrity and reputation of the Company .

As regards the relationships with the Public Administration, any activity aimed at improperly influencing the decisions of the representatives who deal or decide on its behalf is prohibited, as it is absolutely forbidden to use any corrupt practice to achieve advantages and benefits for oneself or Innova.

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By way of an example, it is strictly prohibited for anyone to:

- offer, promise, give, request, accept or receive, also through third parties, sums of money or other advantages for corrupt purposes;
- offer, promise, pay, give, request, accept or receive gifts that are not of low value or that do not integrate acts of mere commercial courtesy or that, in any case, can affect the independence of judgment of the recipient in favour of the Company;
- force or lead third parties that entertain business relationships with Innova, to give or promise, money or other advantages for oneself or for others.

Innova – also in consideration of the public role it may have to play in conducting its business – undertakes to comply with the obligations and carry out the duties laid down in applicable laws regulating the conduct of Public Officials, and therefore commits itself to maintaining the highest levels of attention and sensitivity, also guaranteed by continuous improvement and training activities.

### 3.2 Relationships with customers

Innova's objective is to fully satisfy its customers by continuously pursuing improvement of innovation, efficiency and effectiveness of its products and services, also – where possible – by anticipating customer needs, according to the principles of fairness and transparency, also by clearly defining contractual and economic terms and conditions.

In performing its business activity, given the peculiarity of the market in which it operates, Innova pays constant attention to customer expectations and, in general, of all interlocutors, with the objective of creating and maintaining with the same sound relationships based on trust, fairness, loyalty, efficiency and professionalism, inextricably based on the principles of the Code of Ethics and in the general compliance with the law.

Our conduct is always oriented towards compliance with the confidentiality of the information obtained in the performance of our activity, as well as applicable privacy regulations.

### 3.3 Relationships with suppliers and partners


Innova bases its conduct in its relationships with suppliers and partners on the principles of transparency, trust, impartiality and fairness, continuously seeking the best procurement conditions.

Innova selects and evaluates suppliers and partners with particular attention, in accordance with the aforesaid principles, verifying the actual technical and professional competence as well as any means/instruments deemed adequate to manage contracted work.

Innova undertakes to ensure that commercial relationships with parties operating at international level are carried out in compliance with laws and regulations; in particular, Innova adopts - in carrying out its activities - all necessary measures aimed at preventing the danger of involvement in acts of terrorism.

### 3.4 Relationships with personnel

The pursuit of behaviour aimed at strengthening the respect, protection, growth and value-enhancement of personnel represents fundamental and crucial values to achieve Innova's objectives.

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The management efficiency pursued by Innova is achieved through the professional and organizational contribution that each of its human resources involved ensures by complying with the criteria and principles of professionalism, transparency, fairness and honesty.

Each Recipient of this Code of Ethics is required to employ professionalism, commitment, diligence and accuracy in the performance of his/her duties, obligations and tasks, as well as loyalty and spirit of cooperation.

#### **3.4.1. Selection and Recruitment**

Innova, through the competent functions in charge of HR, selects, recruits, remunerates and manages its employees based on merit and competence criteria, without any political, trade union, religious, racial, language and sexual discrimination, in compliance with all legal regulations, employment contracts, regulations and directives in force.

#### **3.4.2. Employment relationship**

Innova undertakes to create a healthy & safe working environment for its employees.


Innova adopts suitable procedures aimed at protecting the privacy of its collaborators and the processing and storage of any data obtained.

The officers in charge of structures undertake to create a working environment that is free from prejudice and any form of intimidation that allows colleagues to be treated in compliance with the Company's values, blaming unfair pressure or undue discomfort.

Employees must also comply with the following rules:

- any situation or activity that may lead to conflict of interest with the company or that may interfere with the ability to make impartial decisions, in the best interest of the Company must be avoided;
- any information obtained in the performance of the activities assigned must remain strictly confidential and adequately protected and cannot be used, communicated or disseminated, both inside and outside the Company, unless it is done in accordance with applicable legal regulations and company procedures;
- each employee must respect and protect the Company's assets and prevent any fraudulent or improper use thereof; The use of the Company's assets by employees must be instrumental and solely aimed at performing business activities or for authorised purposes;
- personnel must not solicit or accept, for themselves or for others, recommendations, favourable treatments, gifts or other benefits from subjects with whom they relate, avoiding receiving benefits of any kind that may be or appear such to affect their independence of judgment and impartiality;
- the decisions made by each must be based on principles of sound and prudent management through the careful assessment of potential risks and being aware of the fact that any personal choices contribute to the achievement of positive corporate results.



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### 3.4.3. Health & Safety in the workplace

Innova promotes the dissemination of a culture of safety and awareness of risks in the context of work to guarantee the integrity of its personnel, being committed to ensuring working conditions that are safe and respect individual dignity.

From this point of view, Innova undertakes, also ensuring the suitable training of its employees, to comply with accident prevention regulations in force and the procedures drawn up to protect the safety of workers, always requiring careful, responsible and respectful behaviour in order to contribute to maintaining their own safety and that of others.

As part of their functions, all Recipients are required to participate in the process of risk prevention, environment protection and safeguard of their own health & safety as well as that of colleagues and third parties, always adopting responsible behaviour.

### 3.5 Cybercrime

Innova's objective is to use IT and/or digital services in a correct way, in accordance with applicable legal regulations and so as to guarantee the integrity and authenticity of processed data, protecting the interests of the Company and of third parties, especially as regards Authorities and Public Institutions. To this end, Innova undertakes to adopt all measures - also though specific corporate policies - deemed fit to guarantee that access to IT and electronic data occurs by fully complying with applicable legal regulations and the privacy of the subjects involved as well as to ensure that the information remains confidential and that the related processing takes place by expressly authorised subjects to avoid undue intrusions.


In particular, the Company prohibits to:

- illegally access IT systems protected by security measures; destroy, deteriorate, delete or alter information, data or computer software of third parties, of the State or any other public entity;
- produce apocryphal IT documents, whether public or private, that can be used as evidence;
- install, except where valid authorizations have been issued by the Judicial Authority, equipment aimed at detecting, preventing or interrupting communications relating to an IT or digital system or taking place between several systems; illegally subtract, reproduce, disseminate or deliver codes, passwords or other means to enable access to an IT or electronic system protected by security measures; access, without the authorization of the previous authority or after expiry thereof, to information and any data (on any device) associated with investigations performed by Legal Practitioners.

### 3.6 Protection of copyright

The Company acknowledges the great importance of intellectual and/or industrial property, in all its forms, whether it be copyrights, trademarks, patents or other intangibles, and complies with the related legal regulations.

It is strictly prohibited for Recipients to reproduce intellectual works protected by copyright and use or alter, in any form and/or manner and for any purpose, goods or objects protected by industrial property right, without the authorization of the right holders and/or those who enjoy lawful and complete access thereto.

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### 3.7 Anti-money laundering

The Company undertakes to avoid any implication or involvement in transactions that may result in the laundering of criminal or unlawful profits. The Company pursues the objective of maximum transparency in commercial transactions and arranges all the appropriate tools to fight the phenomena of money laundering and receipt of stolen goods.

Furthermore, the Company guarantees compliance with the principles of fairness, transparency and good faith in relation to all contractual counterparties.

### 3.8 Fair competition

The Company considers competition as a stimulus for constantly improving the quality of the products and services offered to its customers, basing its commercial behaviour on the principles of loyalty and fairness.

Innova acknowledges and safeguards the value of fair competition by abstaining from collusive and predatory behaviour.

The Company strictly prohibits the acquisition of information through improper means.

The Company considers any conduct integrating corruption between private individuals as detrimental to loyalty.

## 4. IMPLEMENTATION AND COMPLIANCE WITH THE CODE OF ETHICS

This Code of Ethics is approved by the Board of Directors of Innova.

Any amendments will take place according to the same procedure.


### 4.1 Communication and drawing up of the Code of Ethics

In order to pursue compliance with the principles of this Code of Ethics, the Company ensures:

- the utmost dissemination and awareness of this Code
- the interpretation and uniform implementation of this Code
- the performance of verifications in response to reports of violations of this Code and the application of sanctions in case of violations of the same, in accordance with applicable legal regulations
- the prevention and repression of any kind of retaliation against those who contribute to the implementation of this Code
- the regular update of this Code, based on the needs that emerge from time to time also in the light of the activities mentioned above.

### 4.2 Disciplinary system and sanctions

Compliance with the provisions of the Italian Civil Code must be considered and a key aspect of the contractual obligations of employees pursuant to and to the effect of art. 2104 of the Italian Civil Code. Violations of the rules of the Code of Ethics may amount to a breach of the primary obligations of the employment relationship or to a disciplinary offence, in compliance with the procedures laid down in art.

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7 of the Workers' Statute of Rights, with all legal consequences, also with regard to the preservation of the employment relationship, and may result in compensation for damages deriving therefrom.

Compliance with the Code must be considered as an essential part of the contractual obligations undertaken by external collaborators and/or subjects that have business relationships with the Company. Violations of the rules of the Code may amount to breach of contractual obligations, with all legal consequences, also as regards the interruption of activities and/or termination of the contract and/or of the engagement and/or application of fines and may also entail compensation for any damages deriving therefrom.

### 4.3 Supervisory Body

The Supervisory Body of Innova is responsible for supervising the implementation and compliance with this Code of Ethics, the Organization, Management and Control Model pursuant to Law Decree no. 231/2001 and their effectiveness, adequacy and ability to maintain the functionality and solidity requirements required by applicable legal regulations over time.

In particular, the Supervisory Body:

- is responsible for expressing opinions on ethical issues that may arise while making business decisions and on any alleged violations of the Code of Ethics;
- must regularly revise the Code of Ethics and its implementation mechanisms also by recommending updates to the Board of Directors.