

Organisation, Management and Control Model

(adopted pursuant to Legislative Decree No. 231/2001)

CODE OF ETHICS

Approved by the Board of Directors of Software Design ltd.

On December 14th 2023

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General Provisions

The Code identifies the fundamental cornerstones capable of defining the ethical standards of Software Design Srl (hereinafter also the 'Company') and of fixing the behavioural coordinates for all its components.

This Code constitutes an official document of the Company approved by the Board of Directors and an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter referred to as the 'Model' or 'MOG').

The Company, in order to protect its image and safeguard its resources, will not entertain relations of any kind with persons who do not intend to operate in strict compliance with the regulations in force and/or who refuse to comply with the ethical principles and rules of conduct set out in this Code.

This Code contains the ethical values that the Company's top management, the subjects subject to their direction and supervision, employees, consultants, collaborators, suppliers, business partners and all those who operate in the name of and/or on behalf of Software Design Srl (hereinafter 'Addressees') are required to respect.

The principles and provisions of the Code are binding for all Addressees and constitute exemplifying specifications of the general obligations of diligence, correctness and loyalty that must inspire them in the performance of their activities.

The employees and collaborators of Software Design Srl are obliged to know the rules and principles contained in this Code, to refrain from conduct contrary to them, and to refer to the Supervisory Body for clarification or complaints.

In this regard, with specific reference to the principles set out in this code of ethics, it should be noted that the belief that one is acting in some way to the advantage of the company does not justify, for Software Design, the adoption of conduct in conflict with the principles set out in this document; therefore, in such a case, the violation thereof will entail the adoption of the sanctions provided for in the Model's sanctions system.

Software Design Srl operates in compliance not only with this Code, but also with the specific provisions on the subject issued by its sole shareholder **Sita B.V.** Therefore, the following reference documents are hereby referred to:

- Code of Conduct
- Disclosures Policy
- ABAC Policy
- Sanctions Policy
- Intermediaries Policy

SECTION ONE - FUNDAMENTAL PRINCIPLES

All Software Design's activities are carried out in compliance with the ethical and behavioural principles set out below, by which the Company is inspired and which it requires all Addressees to respect.

Art. 1. - Compliance with laws and regulations

The company has as a fundamental principle the observance of the laws and regulations in force in Italy and in all countries in which it operates, and respect for the democratic order established there.

The addressees of the Code are obliged to comply with the laws in force; under no circumstances is it permitted to pursue or realise the interests of the company in violation of the law.

Each Addressee therefore undertakes to diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of his or her functions, as in force at the time.

Article 2. - Responsibility, Fairness and Professionalism

Honesty and moral integrity, as well as fairness and good faith, are the fundamental principles for all the Company's activities and constitute essential values of organisational management.

In the implementation of the corporate *mission*, the conduct of all Addressees of this Code must be inspired by the ethics of responsibility. Each Addressee shall perform his or her activity with the *diligence* required by the nature of the tasks and functions performed, making the utmost professional commitment in achieving the objectives assigned to him or her, making the best use of the tools and time at his or her disposal, and assuming the responsibilities that pertain to his or her duties. Each Addressee, moreover, performs with commitment the necessary in-depth and up-to-date activities.

The principle of fairness implies the respect by all, in the performance of their duties, of the rights of every subject involved in their work and professional activities. All Software Design activities must be performed with commitment and professional rigour and in a spirit of mutual respect and collaboration.

Each corporate representative and collaborator must provide professional contributions appropriate to the responsibilities assigned, must act in such a way as to protect the prestige and reputation of the Company and may not exploit the position he or she holds in corporate life to obtain economic advantages or benefits of any kind that are not his or her due.

Art. 3. - Accuracy of Accounting Records

Those entrusted with the task of keeping accounting records are obliged to make all entries accurately, completely, truthfully and transparently, and to allow for any verifications by persons, including external persons, entrusted with this task.

Accounting records must be based on accurate and verifiable information and must fully comply with internal accounting procedures. All actions concerning the company's activities must be evidenced by adequate records that allow for checks and controls on the decision-making, authorisation and execution process.

No false or artificial accounting entries may be made in the Company's books for any reason whatsoever, and no employee may engage in any activity that would lead to such an offence, even at the request of a superior.

Article 4. - Protection of Privacy and Confidential Information

The Company undertakes to treat as confidential any information obtained in the performance of its activities within the organisation, guaranteeing full and punctual compliance with the security and protection measures for data entered into its information systems and archives.

The Company requires compliance with data protection regulations; information obtained by recipients in connection with their employment and collaboration with Software Design must be considered the Company's property.

It is absolutely forbidden to use confidential data for purposes other than those for which they were communicated, except in the event of express authorisation and in any case always in strict compliance with current privacy legislation and internal company rules. Specifically, personal data must be processed lawfully, respecting the fundamental rights and freedoms as well as the dignity of the persons concerned and in accordance with fairness and, in any case, the collection and recording of the necessary data is carried out only for specific, explicit and legitimate purposes. Data is stored for a period of time not exceeding that necessary for the purposes of collection. Employees, consultants and other collaborators of the Company are obliged not to use information acquired in the performance of their duties for purposes not connected

with the strict performance of those duties. The obligations of loyalty and confidentiality bind these subjects even after the termination of their relationship with the company.

Art. 5.- Respect for Diversity

Software Design avoids in its relations with interlocutors any discrimination related to age, sex, sexual orientation, health status, race, nationality, political and religious beliefs.

Article 6. - Communication with the outside world

In addition to the provisions on confidentiality, the communication and disclosure to the outside world (including through the mass media) of news, information and data relating to the Company is characterised by respect for the right to information and is reserved exclusively for the corporate functions in charge thereof; under no circumstances may false or biased news or comments be divulged. All communication activities respect the laws, rules and practices of professional conduct, and are carried out with clarity, transparency, timeliness and accuracy.

In order to ensure completeness and consistency of information, employees and Managers are expressly forbidden to make statements to the media concerning their work and/or that of the company as a whole in their capacity as representatives of the company unless expressly and specifically authorised to do so.

Art. 7. - Workers' health and safety

Within the scope of its activity, Software Design pursues the objective of protecting the safety and health of the Addressees, adopting the measures provided for by law to achieve this purpose.

Each Addressee must take the utmost care in carrying out his or her activities, strictly observing all established safety and prevention measures, in order to avoid any possible risk for himself or herself, for his or her collaborators and colleagues, and for the community.

In particular, all the provisions dictated with reference to the Consolidated Safety Act (Legislative Decree no. 81 of 9 April 2008, as amended and supplemented) and any other law applicable to the Company must be observed. Furthermore, each Addressee must comply with the instructions and directives provided by the persons to whom the fulfilment of safety obligations has been delegated.

Article 8. - Environmental Protection

The Company is inspired by the principle of respect for and protection of the environment. Therefore, it carries out its activities with attention to environmental requirements in compliance with the regulations in force.

Article 9. - Anti-Money Laundering

Directors and employees are required to strictly observe laws, policies and corporate procedures in any economic transaction, including intra-group transactions involving them, ensuring full traceability of incoming and outgoing financial flows and full compliance with anti-money laundering laws.

It is prohibited to engage in conduct consisting in the use, transformation or concealment of capital of unlawful origin. With reference to such conduct, the replacement or transfer of money, goods or other utilities deriving from a non-culpable offence, or the performance, in relation to such assets, of other transactions, in such a way as to hinder the identification of their criminal origin, constitutes an offence.

The Company requires its personnel to verify, in advance, available information (including financial information) on the Company's counterparties and business partners in order to ascertain their reliability and the legality of their activities.

Article 10. - Protection of Industrial and Intellectual Property

The protection of trademarks, licences and intellectual works is considered of primary importance and therefore any conduct aimed at their alteration and counterfeiting as well as their undue reproduction, dissemination, sale or use is prohibited. All Addressees shall respect the legitimate industrial and intellectual property rights of third parties and refrain from unauthorised use of the aforementioned rights, in the knowledge that violation thereof may have negative consequences for the Company.

In particular, the Addressees, in the exercise of their activities, shall refrain from any conduct that may constitute usurpation of industrial property rights, alteration or counterfeiting of trademarks and/or distinctive signs of industrial products, or of patents, designs or industrial models.

Moreover, all Addressees shall refrain from using in any form, in an unlawful and/or improper manner, in their own interest, in the interest of the company or of third parties, intellectual works (or parts thereof) protected under copyright law and in particular under the Copyright Law (Law no. 633/1941).

Article 11. - Gifts

Gifts offered by the Company are properly documented and authorised by the competent manager in compliance with the relevant company procedures. In any case, Software Design abstains from practices that are not permitted by law, by business practice or by the codes of ethics, if known, of the companies or entities with which it has relations.

No form of gift, even in the sense of the offer and acceptance of hospitality or reimbursement of expenses incurred, exceeding normal business practice or courtesy, for the purpose of acquiring favourable treatment or otherwise influencing independent judgement is permitted.

The Addressees may not give gifts or other benefits, the amount and/or the beneficiary of which does not correspond to what has been formally defined and authorised on the basis of the system of powers and proxies in force in the Company and on the basis of the indications contained in the corporate procedures.

Article 12. - Donations and sponsorship

Donations may be granted for socially worthy initiatives (e.g. in favour of cultural, scientific, moral or charitable purposes), provided they come from non-profit organisations and associations. However, the Company pays particular attention, in adhering to these initiatives, to possible situations of conflict of interest, whether personal or corporate.

Sponsorships must be aimed at promoting the Company's image. Such initiatives may be carried out subject to specific agreements and verification of the honourability of the beneficiary and the event/initiative promoted.

Article 13.- Conflict of Interests

The Addressees of this Code shall pursue, in the performance of their activities, the general objectives and interests of the Company and shall therefore refrain from activities, behaviours and acts that are incompatible with the obligations connected to their relationship with the Company. All business decisions must be made avoiding any situation of conflict of interest between personal or family activities and duties held in the Company that may compromise impartial judgement.

Any employee in respect of whom a situation of conflict of interest, even potential, arises is obliged to report this circumstance promptly to his or her direct superior, who, after examining the circumstances, assesses whether the situation gives rise to a conflict of interest likely to impair the impartiality of the process in question and takes the most effective remedies.

Any situation potentially liable to generate a conflict of interest, or in any case to prejudice the Addressee's ability to take decisions in the best interests of the Company, must be immediately notified to the Supervisory Board and the Group Compliance team in accordance with current procedures, with the specific rules set forth in the Civil Code remaining valid.

Article 14.- Protection of company assets and use of work equipment

Company assets are used for work purposes, in accordance with current legislation. Under no circumstances may company assets be used for personal purposes or for purposes that are against the law, public order or morality. Every addressee of this Code is required to safeguard and take care of the Company's assets (immovable and movable property, technological resources, computer supports, equipment, information); he/she is also responsible for the protection of the resources entrusted to him/her and has the duty to promptly inform his/her direct supervisors of events potentially damaging to the Company.

SECTION TWO - RULES OF CONDUCT

Article 15.- Relations with employees

The Company provides for the dissemination of the Code of Ethics among employees. Employees are required to know and observe, to the extent of their competence, the provisions of the Code of Ethics and, compatibly, to promote its knowledge among new employees and third parties affected by its application, with whom they come into contact in the performance of their duties.

Employees represent a fundamental factor in the company's development. Therefore, the Company protects and promotes their professional growth in order to increase the wealth of skills they possess.

The Company promotes and offers equal opportunities for professional growth, excluding arbitrary discrimination, inspiring all relations to principles of fairness, correctness and loyalty, based on meritocratic criteria.

Software Design expects and expects every employee within the scope of their duties and competences:

- enhance their professionalism by all means;
- contribute to their own and their co-workers' professional growth;
- makes decisions and takes risks in accordance with sound and prudent management;
- considers the company's result as its own responsibility, a source of satisfaction and the result of teamwork.

All personnel are also required, through the dedicated channels, to give timely notice in the event that:

- is aware of a breach of laws or regulations and of the corporate MOG;
- is aware of any omissions, committed or attempted that are criminally relevant, committed in breach of the code of ethics, of these rules of conduct, or of corporate provisions, which could be prejudicial to the company.

No retaliation of any kind will be practised against the employee who has reported the above, and everyone will be guaranteed all the protections provided for by the legislation in force.

The selection and recruitment of personnel must be inspired by criteria of transparency in the assessment of the requirements of competence and professionalism, and of individual capacity and potential. Personnel are hired on the basis of regular employment contracts, since no form of employment relationship that does not comply with or in any case circumvents current regulations is allowed. Moreover, the Company does not employ workers without a regular residence permit.

At the establishment of the employment relationship, each employee receives accurate information on:

- characteristics of the function and tasks to be performed;
- normative and salary elements, as regulated by the national collective labour agreement.

Art. 16. - Relations with supervisory bodies

The Addressees must behave correctly and transparently in relation to any request made by the Sole Shareholder and the Auditing Firm, in the exercise of their respective institutional functions. An attitude of utmost helpfulness and cooperation must be guaranteed towards these subjects, with clear assumption of responsibility for the truthfulness, completeness and accuracy of the information provided, avoiding any form of potential pressure aimed at influencing their judgement.

Article 17.- Relations with Customers

The Company, in managing relations with customers, complies with the law and the principles of this Code of Ethics, and requires its employees and collaborators to avoid any situation of conflict of interest, even potential. Within the scope of its relations with customers, the Company undertakes to develop and maintain favourable and lasting relations with them marked by fairness and loyalty.

Article 18. - Relations with Suppliers

When dealing with companies supplying goods and/or services, Software Design scrupulously observes sector regulations, the principles contained in the Model and in the Code of Ethics and specific internal procedures.

In particular, Software Design Srl undertakes that

- the selection is made exclusively on the basis of objective criteria, such as, for example, price, quality of the services or goods offered, timing;

- not precluding any supplier meeting the requirements from submitting its proposal by also assessing the reliability of the proposer and its ability to properly fulfil its obligations;
- the persons selected have an impeccable reputation and therefore, prior to the conclusion of the contract, it must be verified that they meet all the requirements, both general and special, laid down by the regulations in force;
- in the case of negotiation with a single party, the offer must in any case be advantageous for Software Design and may in no case exceed market prices;
- the information given to suppliers is always complete, truthful and easy to understand;
- contracts with suppliers are drawn up in the form prescribed by law, company regulations and procedures;
- the remuneration to be paid is exclusively commensurate with the quantity and quality of the supply provided;
- contracts include the express obligation to comply with the principles of Model 231, indicating as a sanction for violations also the possible termination of the contract and/or actions for damages.

Article 19.- Relations with consultants

Recourse to the activity of the external professional/consultant must be justified by the proposing Manager, with an indication of the reasons underlying the request, in compliance with the provisions of the law, company regulations and procedures. The professional/external consultant shall be chosen on the basis of requirements of seriousness and reliability, taking care to consider only technical skills and personal characteristics.

Agreements with external collaborators must be drawn up in the form prescribed by applicable provisions, company procedures, and in any case in writing.

In any case, the remuneration to be paid shall be exclusively commensurate with the service indicated in the contract and, in any case, with the professional skills and the actual service performed.

Software Design employees in relation to their duties are required to:

- comply with internal principles and procedures for selecting and managing the relationship with the external professional/consultant;
- include in external collaboration contracts the express obligation to comply with the principles of Model 231, indicating as a sanction for violations also the possible termination of the contract and/or actions for damages.

Article 20. - Relations with competing undertakings

Competition with competing undertakings must be fair and focused on efficiency and quality of service. Anti-competitive practices which have as their object or effect the prevention, restriction or distortion of competition within the common market are to be avoided. Competitive acts carried out by bribery, violence or threats or in any way in violation of the law, internal rules and procedures are not tolerated.

Article 21. - Relations with the Public Administration

Relations with the Public Administration, certifying bodies, Public Supervisory Authorities, political and trade union organisations, national, European Union and international public institutions, as well as with public officials or persons in charge of a public service, must be conducted in compliance with the laws in force and with the principles defined in this Code of Ethics, on the basis of the general criteria of fairness, loyalty and collaboration.

It is prohibited to promise or pay sums of money or other benefits to public representatives and/or employees (or to persons close to them) with the aim of promoting or favouring the interests of the Company.

The management of negotiations and the entering into of commitments with public bodies are reserved exclusively to the company departments appointed and/or authorised to do so. Such operations must be appropriately documented and archived.

SECTION THREE - IMPLEMENTATION OF THE CODE

Article 22.- Dissemination of the Code

The Company undertakes to promote and guarantee adequate knowledge of the Code of Ethics by disseminating it to the Addressees through effective and adequate information and communication activities. In particular, the Code of Ethics is published on the company website.

Article 23.- Approval and Updating

The Code is a supplementary tool, dynamic and subject to updates and evolution of the Model, adopted by Software Design. Any amendment or integration must be approved by the Administrative Body and notice thereof shall be given in the manner set out in the paragraph on disclosure.

Article 24. - Reporting to the Supervisory Board

The Supervisory Board is called upon to supervise the operation of and compliance with this Code, as well as to promote its dissemination and knowledge.

Recipients are required to report any breaches of the Code to the Supervisory Board. In detail, reports may be sent in writing as follows:

- e-mail: odvsegnalazioni@sita.aero
- letter to the address: SOFTWARE DESIGN SRL
Supervisory Board 231
Capodichino Airport
Viale F. Ruffo di Calabria snc - 80144 Naples
- reporting through the Radar platform of the parent company Sita BV.

The Supervisory Board assesses the reports received and any measures to be taken, at its reasonable discretion and responsibility, possibly hearing the author of the report and/or the person responsible for the alleged breach and giving reasons in writing for any refusal to proceed with an internal investigation.

Violations of the Code produce disciplinary effects, in accordance with the Model's system of sanctions and in line with the provisions of the relevant regulations and contracts in force.