

Relatech group

CODICE ETICO

Relatech S.p.A. e società del gruppo

Etica, innovazione, responsabilità e fiducia
per creare valore sostenibile nel tempo.

18/06/2026

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01

Introduction

This Code of Ethics sets forth the values, principles, and standards of conduct that guide the Relatech Group in carrying out its business activities and in its relationships with employees, collaborators, customers, business partners, suppliers, consultants, institutions, communities, public authorities, and all stakeholders.

In a context where technology has an increasingly significant impact on business processes, individuals, data, security, and companies' competitiveness, Relatech recognizes ethics, responsibility, transparency, legality, sustainability, security, and respect for individuals as fundamental elements for creating long-term value.

The Code of Ethics serves as a reference framework for guiding conduct, decision-making, and relationships, in compliance with applicable laws and regulations, internal procedures, and the objectives underlying Italian Legislative Decree No. 231/2001.

02

Overview of the Group and scope of application

Relatech is an Italian group specializing in innovation and digital transformation. Founded in 2001, it is now a strategic partner to companies and organizations seeking to evolve their business models through technology, data, and specialized expertise.

The Company operates across the principal domains of Digital Transformation, Industrial Automation, Cybersecurity, Cloud Computing, Artificial Intelligence, Data Governance, and digital solutions for businesses, supporting both small and medium-sized enterprises (SMEs) and large organizations in Italy and internationally. Relatech supports its customers throughout their entire transformation journey, from strategic consulting to the design, implementation, and management of innovative, scalable, and value-driven technology solutions.

Through an integrated approach that combines technological expertise, process knowledge, and a strong commitment to sustainability, Relatech contributes to transforming digital innovation into a tangible competitive advantage, helping organizations build a future that is more efficient, secure, connected, and data-driven.

Over the years, Relatech S.p.A. has pursued a growth strategy that has also included corporate acquisitions aimed at expanding the Group's service portfolio, expertise, market presence, and technological capabilities.

This Code of Ethics applies to Relatech S.p.A. and all companies within the Group, whether directly and/or indirectly controlled. All Group companies are required to accept, comply with, and promote the principles and provisions set forth in this Code.

Individual Group companies may adopt their own Codes of Ethics, provided that such codes are consistent with and aligned to the principles set forth in this document and, in any event, do not conflict with them.

The corporate structure of the Relatech Group is illustrated below:



Company	Registered Office	Share Capital	Ownership Interest	Consolidation Method
RELATECH S.p.A.	Italy	Euro 215,080	Parent Company	-
EFA AUTOMAZIONE SPA	Italy	Euro 120,000	100%	Full Consolidation
RELATECH CLOUDSECURITY SRL	Italy	Euro 46,800	100%	Full Consolidation
BTO SPA	Italy	Euro 2,465,313	100%	Full Consolidation
OKT SRL	Italy	Euro 96,000	51%	Full Consolidation
DTOK LAB SRL	Italy	Euro 11,136	51%	Full Consolidation
BTO FORSCHUNG GmbH	Germany	Euro 25,000	100%	Full Consolidation
BTO FORSCHUNG GmbH	Austria	Euro 35,000	100%	Full Consolidation
BTO RECHERCHE Sarl	Luxembourg	Euro 12,500	100%	Full Consolidation
2010OUS INC	USA	USD 2,000	100%	Full Consolidation
7Cento HK Ltd	Hong Kong	HKD 10,000	100%	Full Consolidation

03

Covered persons

The following persons are subject to this Code of Ethics:

- members of the Board of Directors;
- members of the supervisory and control bodies;
- management personnel;
- employees;
- collaborators;
- consultants;
- business and technology partners;
- suppliers and subcontractors;
- persons acting in the name of or on behalf of Relatech S.p.A. and the Group companies;
- all individuals who, directly or indirectly, contribute to the Company's activities.

Relatech also expects customers, suppliers, consultants, partners, and external stakeholders to conduct themselves in a manner consistent with the principles set forth in this Code of Ethics.

Knowledge of and compliance with this Code constitute an integral part of the professional, contractual, and behavioral obligations of each Covered Person.

04**General principles**

Relatech S.p.A. and the Group companies conduct their business activities and manage their internal and external relationships in accordance with the following principles:

- legality;
- transparency;
- good faith;
- loyalty;
- fairness;
- honesty;
- respect;
- confidentiality;
- integrity;
- health and safety in the workplace;
- environmental protection;
- social responsibility;
- data protection;
- service quality and reliability;
- responsible innovation;
- sustainability.

Under no circumstances may the pursuit of the interests of Relatech or any Group company justify conduct that is contrary to applicable laws and regulations, internal procedures, or the principles set forth in this Code.

Each Covered Person is required to be familiar with and comply with the laws, regulations, and rules applicable to their role, responsibilities, and activities.

05**Legality, transparency and integrity**

Relatech conducts its business activities in full compliance with applicable laws, regulations, national and international legal requirements, as well as with the internal procedures adopted by the Group.

Relatech promotes fair, loyal, and responsible conduct, opposing any form of fraud, corruption, abuse, favoritism, deceptive practices, or conduct that is inconsistent with the Company's ethical principles.

The Company is committed to ensuring communications that are clear, accurate, complete, and verifiable with customers, partners, employees, institutions, the market, and stakeholders.

06**Business operations and financial resource management**

Relatech S.p.A. and the Group companies manage their financial resources in accordance with the principles of transparency, verifiability, consistency, appropriateness, and traceability.

Financial resource management shall be carried out in compliance with internal procedures and in a manner consistent with the organizational and managerial responsibilities assigned to each function.

Relatech establishes specific procedures and control measures designed to prevent the risk of criminal offenses, including with reference to the objectives underlying Italian Legislative Decree No. 231/2001.

Every transaction must be duly authorized, documented, recorded, and verifiable, in order to ensure the reconstruction of the related decision-making, authorization, and execution process.

07**Conflicts of interest**

All covered persons must avoid situations in which personal, family, financial, or professional interests may interfere, even potentially, with the interests of Relatech or any Group company.

A conflict of interest arises when a covered person:

- pursues personal, family, or third-party interests other than those of the Company;
- engages in activities that may influence their ability to make decisions exclusively in the best interests of the organization;
- derives personal benefit from business opportunities related to the Company's activities;
- uses Company information or resources for personal purposes or for the benefit of third parties.

Any actual or potential conflict of interest must be promptly disclosed in accordance with the applicable Company procedures and, where required, to the Supervisory Body (Organismo di Vigilanza).

The covered person concerned is required to refrain from carrying out any actions related to the conflict-of-interest situation.

08

Confidentiality and protection of know-how

Relatech safeguards the confidentiality of information, data, business information, and know-how relating to its activities, customers, partners, and stakeholders.

Covered Persons are required not to disclose any non-public information acquired in the course of performing their duties, including information obtained inadvertently.

Such information may be used exclusively for purposes connected with the performance of their duties and in compliance with the authorizations granted.

The obligation of confidentiality shall continue to apply outside working hours and after the termination of the relationship with the Company, to the extent permitted by applicable laws and regulations and contractual agreements.

09

Data Protection, cybersecurity and information systems

As a technology group, Relatech places paramount importance on the protection of data, information, digital systems, and IT assets belonging to the Company, its customers, and its partners.

All covered persons are required to:

- process personal and business data solely for lawful, authorized, and relevant purposes;
- comply with applicable privacy and data protection laws and regulations;
- safeguard credentials, devices, access rights, and Company tools with due care;
- refrain from disclosing confidential or proprietary information;
- protect technical, commercial, financial, administrative, and organizational know-how;
- promptly report security incidents, anomalies, unauthorized access, or data breaches;
- use information systems, digital platforms, and Company tools in a proper, secure, and policy-compliant manner.

It is expressly prohibited to:

- gain unauthorized access to protected computer or telecommunications systems;
- obtain, reproduce, distribute, communicate, or provide codes, passwords, credentials, or other means capable of enabling unauthorized access;
- damage or destroy computer or telecommunications systems;
- damage, alter, or destroy information, data, or software programs;
- disrupt or interfere with the operation of systems, networks, or applications;
- intercept electronic or telecommunications communications;
- use Company systems for purposes other than those related to the activities of the organization.

Relatech's information and digital assets constitute a strategic asset of the Group and must be protected against any form of misuse, damage, or unauthorized disclosure.

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Innovation, artificial intelligence and responsible use of technology

Relatech promotes digital innovation as a driver of growth, competitiveness, and positive transformation for businesses and society.

In the development, adoption, and integration of digital technologies, including solutions based on artificial intelligence, automation, cloud computing, analytics, the Internet of Things (IoT), cybersecurity, and data platforms, Relatech is committed to promoting the principles of:

- security;
- reliability;
- transparency;
- data protection;
- information quality;
- human oversight, where necessary;
- prevention of improper, discriminatory, or harmful uses;
- alignment between technology, business objectives, and stakeholder impacts.

Relatech recognizes that the value of innovation lies not only in technology itself, but also in the ability to use it responsibly, sustainably, and in a manner focused on delivering tangible benefits to individuals, organizations, and the ecosystems in which it operates.

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Data governance and information quality

Relatech recognizes data as a strategic asset for the digital transformation of businesses.

To this end, it promotes a data management approach based on the principles of:

- quality;
- integrity;
- traceability;
- security;
- governance;
- accountability;
- regulatory compliance;
- informed use of information.

Covered persons are required to manage data, documents, reports, commercial, technical, financial, and project-related information with accuracy, confidentiality, and responsibility.

Any alteration, manipulation, concealment, or improper use of Company or third-party data and information is strictly prohibited.

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Health and safety in the workplace

Relatech promotes working conditions that safeguard the physical and mental well-being of individuals by providing workplaces that comply with applicable health and safety laws and regulations.

The Company adopts all necessary measures to protect the health and safety of its workers, including activities aimed at the prevention of occupational risks, as well as information, training, and the organization of the resources required for such purposes.

Relatech promotes communication and awareness initiatives designed to encourage responsible and proactive behaviors among all those with whom it works and collaborates.

Each covered person is required to contribute to risk prevention and to comply with all applicable health and safety laws, procedures, and instructions.

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Environment and sustainability

Relatech conducts its business activities in compliance with applicable environmental laws and regulations and is committed to avoiding any harm to the environment in the course of its operations.

The Company directs its decisions toward behaviors, projects, and initiatives that are consistent with environmental protection, sustainability, and the responsible use of resources.

Relatech also promotes communication and awareness initiatives addressed to employees, collaborators, customers, suppliers, and partners, with the aim of encouraging responsible and sustainable behaviors.

As further evidence of its commitment to sustainability and environmental responsibility, Relatech voluntarily prepares an annual Sustainability Report, which is duly published in a dedicated section of the Company's website. In addition, the Company publishes an annual Carbon Footprint Report aimed at measuring, monitoring, and reporting its environmental impact and the emissions generated by its business activities, thereby contributing to the definition of improvement initiatives and pathways for the progressive reduction of its carbon footprint.

The Company is committed to:

- promoting responsible behaviors in the use of resources;
- reducing, where possible, the environmental impacts of its activities;
- valuing and developing human capital;
- fostering training, learning, and skills development initiatives;
- promoting inclusion, well-being, and equal opportunities;
- progressively integrating sustainability into its business activities and stakeholder relationships.

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Board of Directors and corporate bodies

The Board of Directors of Relatech S.p.A. and of the Group companies performs its duties with diligence, fairness, responsibility, and transparency.

The Board ensures that its members receive adequate information regarding matters included on the agenda and, where applicable, adopts resolutions concerning the Organizational, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001.

The Board ensures that the Supervisory Body (Organismo di Vigilanza) is provided with independence, autonomy, professionalism, and continuity of action, and proposes any updates or amendments deemed useful or necessary.

Directors are required to:

- maintain the confidentiality of information and documents acquired in the performance of their duties;
- exercise their role with independent judgment;
- devote adequate time and commitment to the office held;
- be fully aware of the duties, responsibilities, and obligations associated with their position.

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Relations with human resources

Relatech considers its people to be an essential element of its existence, growth, and capacity for innovation.

The Company is committed to safeguarding the physical and moral integrity of its employees and collaborators by ensuring working conditions that respect individual dignity, individual and collective employment agreements, the Italian Workers' Statute, and applicable laws and regulations.

Relatech promotes:

- equal opportunities;
- inclusion and the enhancement of diversity;
- the absence of discrimination;
- mutual respect;
- collaboration among teams;
- professional growth;
- appropriate training;
- knowledge sharing;
- workplace health and safety;
- the protection of personal data confidentiality;
- a balance between business objectives and individual well-being.

Relatech opposes all forms of discrimination based on, by way of example, origin, nationality, religion, disability, age, gender, personal orientation, trade union membership, political opinions, or any other personal or social condition.

Intimidating, hostile, offensive, harassing, violent, or otherwise dignity-damaging conduct will not be tolerated.

The Company also ensures:

- the prohibition of child labor;
- the prohibition of forced labor;

- compliance with legally prescribed working hours;
- the payment of fair and dignified compensation;
- freedom of association and trade union membership;
- respect for collective bargaining rights;
- the economic and employment conditions provided for under applicable collective agreements and applicable laws and regulations.

Each individual is expected to actively contribute to a positive, safe, collaborative, and results-oriented working environment.

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Relations with customers and clients

Relatech considers customer trust to be a fundamental asset.

The Company is committed to fully satisfying the needs of those to whom it provides products and services, fostering relationships based on fairness, transparency, efficiency, and professionalism.

In its relationships with customers and clients, Relatech is committed to:

- understanding their strategic, operational, and technological needs;
- proposing solutions that are appropriate, sustainable, and proportionate to their business objectives;
- ensuring transparency in proposals, contracts, and communications;
- governing relationships through clear and understandable agreements;
- honoring its commitments, agreed timelines, and applicable service levels;
- managing any issues or critical situations promptly, responsibly, and in a spirit of cooperation;
- safeguarding customers' data, confidential information, intellectual property, and digital assets;
- avoiding misleading statements, unrealistic promises, or inaccurate representations of its capabilities, products, or solutions.

Relatech operates with the objective of building strong and long-lasting relationships founded on expertise, trust, value, and responsibility.

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Relations with suppliers

The selection of suppliers and the management of supplier relationships are carried out on the basis of criteria including objectivity, quality, economic sustainability, technical capability, reliability, expertise, professionalism, financial soundness, availability of project resources, know-how, and the adoption of quality management systems.

Negotiations and contractual relationships with suppliers must be conducted with the utmost fairness, professionalism, transparency, and compliance with applicable laws and regulations.

Suppliers are required to comply with this Code of Ethics, the applicable Company procedures and, where required, the documents forming part of Relatech's 231 Compliance System.

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Relations with consultants

Relatech selects its consultants on the basis of criteria of impartiality, merit, expertise, professionalism, and compliance with applicable laws and regulations.

Relationships with consultants must be governed by specific agreements that are clear, understandable, and consistent with the activities to be performed.

Consultants are required to comply with this Code of Ethics and with the documents forming part of Relatech's 231 Compliance System.

Under no circumstances may consultants engage in conduct intended to improperly influence supervisory, inspection, auditing, or control activities carried out by competent authorities, entities, or bodies.

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Relations with business partners and strategic alliances

Relatech recognizes the value of its ecosystem of business partners, strategic alliances, and technology partners.

Relationships with partners and strategic alliances are managed in accordance with the principles of:

- expertise;
- quality;
- reliability;
- fairness;
- transparency;
- sustainability;
- security;
- regulatory compliance;
- alignment with the Company's values.

Relatech requires its partners to conduct themselves in a manner consistent with this Code of Ethics, with particular regard to fair business practices, data protection, cybersecurity, the protection of individuals, compliance with applicable laws and regulations, and the prevention of conflicts of interest or unethical practices.

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Relations with Public Administration Authorities

Relatech S.p.A., the Group companies, and every internal or external individual acting on behalf of the organization shall conduct their relations with Italian and foreign Public Administration Authorities in accordance with the principles of legality, loyalty, fairness, transparency, and full compliance with applicable laws and regulations.

It is prohibited to promise, offer, or provide, whether directly or indirectly, money, benefits, or anything of value to officers, employees, or representatives of Public Administration Authorities for the purpose of improperly promoting or favoring the interests of the Company.

Only gifts of a symbolic nature or of modest value that are related to promotional activities or customary business courtesies are permitted, provided that they are consistent with Company procedures and applicable laws and regulations.

In particular, it is prohibited to:

- promise or grant money, benefits, or anything of value in order to obtain authorizations, licenses, endorsements, sponsorships, permits, or other administrative measures;
- improperly obtain contribution, social security, or welfare-related benefits or incentives;
- submit false or misleading statements;
- engage in schemes or deceptive practices aimed at improperly obtaining grants, contributions, disbursements, or financing;
- hinder or obstruct inspection, supervisory, or auditing activities carried out by Public Administration Authorities;
- engage in fraudulent, deceptive, or unfair conduct in public procurement procedures or other public competitive processes.

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Relations with Public Supervisory Authorities and institutional bodies

Relatech maintains relationships with Public Supervisory Authorities and institutional bodies based on transparency, professionalism, full cooperation, integrity, and fairness.

It is prohibited to influence the decisions of such authorities or bodies, or to seek preferential treatment through the promise, offer, or granting of compensation, benefits, or undue advantages.

Relatech fully cooperates with the competent Authorities by promptly providing any information, clarifications, data, and documentation required in the course of investigative, supervisory, inspection, or control activities.

Any personal or family relationships with officials of the Authorities must be managed in such a way as to avoid any form of undue advantage or conflict of interest.

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Relations with political parties, Trade Unions and associations

Relatech does not make contributions, either directly or indirectly, to political parties, committees, political movements, their representatives, or candidates, nor does it exert influence or pressure aimed at obtaining favors or preferential treatment.

The Company does not provide contributions to trade union organizations or associations for improper purposes, such as influencing their conduct in the context of proceedings or preventing disputes relating to its business activities.

Contributions to political parties, organizations, or associations are permitted solely in the cases and in the manner provided by law and only within the scope of clearly identified, duly authorized, and properly documented projects or initiatives.

23

Contributions, sponsorships and patronages

Relatech may promote or support sponsorship and patronage activities in compliance with applicable laws and regulations, internal procedures, and the principles of transparency, fairness, and traceability.

Sponsorships and patronages may relate, by way of example, to:

- sporting events;
- cultural events;
- social initiatives;
- humanitarian initiatives;
- environmental initiatives;
- innovation projects;
- initiatives consistent with the Group's values and market positioning.

Participation, in the name of or on behalf of Relatech, in committees, associations, events, or external initiatives must be expressly authorized.

In entering into sponsorship or patronage agreements, Relatech conducts itself in a fair and transparent manner and avoids any form of improper pressure on the parties concerned.

24

External communications, press, mass media and social media

External communications by Relatech must be clear, accurate, consistent, verifiable, and duly authorized.

Any request for news, statements, information, or comments from the press or other media outlets must be referred to the Company functions responsible for external communications.

Relations with the press, media, and other communication channels are managed by the competent Company functions.

Relatech ensures that information disclosed to the public is:

- truthful;
- transparent;
- consistent with Company policies;
- compliant with applicable legal and regulatory requirements;
- respectful of confidentiality obligations and the protection of sensitive information.

Covered persons may not make public statements, disclose Company information, publish content, use the Relatech brand, or represent the Company externally without appropriate authorization.

When using social media and digital communication tools, each covered person is required to maintain conduct that is respectful, professional, and consistent with the Company's values.

25**Use of company assets, equipment and resources**

Employees and collaborators of Relatech are required to use the assets, equipment, and resources made available by the Company in accordance with their intended purpose and in a manner that protects their preservation, functionality, and integrity.

Each covered person is responsible for the assets and resources entrusted to them and is required to promptly inform their manager of any improper use, damage, loss, or risk affecting the Company's assets.

It is prohibited to use assets, equipment, resources, IT tools, or other Company assets for unauthorized personal purposes, unlawful purposes, or any purposes otherwise inconsistent with the interests or policies of the Company.

26**Quality, project accountability and service delivery**

Relatech operates with the objective of ensuring quality, reliability, and value in its consulting, design, development, implementation, and management of technology solutions.

In the execution of project activities, covered persons are expected to:

- comply with applicable professional and methodological standards;
- ensure the accuracy, traceability, and quality of the activities performed;
- promptly communicate risks, issues, dependencies, and obstacles;
- collaborate constructively with internal teams, customers, and partners;
- promote the continuous improvement of processes and solutions;
- avoid operational shortcuts that could compromise security, quality, or compliance.

27**Internal control system and Supervisory Body**

Relatech has adopted specific tools, procedures, and organizational controls for the purpose of implementing this Code of Ethics and ensuring compliance with its provisions.

A Supervisory Body (Organismo di Vigilanza) has been established within Relatech S.p.A., as identified in the Organizational, Management and Control Model adopted pursuant to Italian Legislative Decree No. 231/2001.

The Supervisory Body performs the functions assigned to it in relation both to the Organizational Model and to this Code of Ethics.

The Supervisory Body operates with autonomy, independence, professionalism, and continuity of action. It is not vested with managerial duties or decision-making powers that would prevent or interfere with the performance of business activities by covered persons.

Any situation that may potentially give rise to a conflict of interest or impair a covered person's ability to make decisions in the best interests of the organization must be promptly disclosed in accordance with the applicable procedures.

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Reporting and whistleblowing

Relatech encourages the reporting of conduct that is contrary to the law, the 231 Model, Company procedures, or this Code of Ethics.

Any person who becomes aware of unlawful conduct, violations, or non-compliant behavior is required to report such matters through the channels established under the Company's whistleblowing procedures.

Reports are handled in a manner that ensures the utmost confidentiality of the persons involved and in compliance with applicable laws and regulations.

Any form of retaliation, discrimination, penalization, or unfavorable treatment against any person who makes a report in good faith is strictly prohibited.

Confirmed violations may be reported to the competent bodies for the purpose of adopting such disciplinary, contractual, or organizational measures as may be deemed appropriate.

29

Communication, training and updates

Relatech is committed to ensuring the broadest possible dissemination of this Code of Ethics both within and outside the Group.

The Supervisory Body (Organismo di Vigilanza), also on the basis of input provided by the competent Company functions, supports the organization in the development of training and awareness programs tailored to role, seniority, responsibilities, and the activities performed.

A copy of the Code of Ethics is made available within the Company and is accessible to all covered persons.

Relatech also promotes the dissemination of the Code to clients, suppliers, consultants, partners, and institutional stakeholders in order to ensure that stakeholders are fully informed of the values, principles, and corporate policies on which the Group is founded.

This Code of Ethics is subject to periodic review and updating in order to reflect legal, regulatory, and organizational developments.

30

Disciplinary and sanctioning system

Failure to comply with the provisions of this Code of Ethics, as well as with the measures set forth in the Organizational, Management and Control Model, shall result in the application of the relevant disciplinary and sanctioning measures.

The application of sanctions is independent of any criminal proceedings that may be initiated in relation to the conduct in question.

In order to ensure compliance with the standards of conduct established by this Code of Ethics, Relatech has adopted a disciplinary system that is proportionate to:

- the severity of the violation;
- the role and responsibilities of the individual involved;

- the intentional nature of the conduct;
- the damage caused, or the risk created, for the Company, its customers, partners, or stakeholders;
- any repeated occurrence of the conduct.

Sanctions shall be imposed in compliance with applicable laws and regulations, collective bargaining agreements, individual agreements, Company procedures and, where applicable, the disciplinary system established under the 231 Model.

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Commitment of covered persons

Each Covered Person is expected to be familiar with, comply with, and promote the principles set forth in this Code of Ethics, thereby contributing to the development of a corporate culture founded on legality, ethics, innovation, responsibility, security, sustainability, and trust.

Compliance with this Code of Ethics constitutes an essential element in safeguarding the reputation of the Relatech Group, maintaining the quality of relationships with stakeholders, and creating sustainable value over time.

RELATECH

Code of Ethics

Ethics, innovation, responsibility, and trust to create sustainable value over time.