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## GLOSSARY

Capitalized words in this document have the following meanings, whether used in singular or plural form:

**Antares Vision** means Antares Vision S.p.A., with its registered office in Via del Ferro 16, Travagliato (BS), registered at no. 02890871201 on the register of enterprises of Brescia;

**Antares Vision Group or Group** means Antares Vision and its Group Companies, as defined below;

**Anti-corruption Policy** means the Anti-corruption Policy of Antares Vision Group approved by Antares Vision and extended to the companies of Antares Vision Group in order to countering corruption phenomena, to prevent potential corruptive practices, and to promote integrity, traceability, accountability, transparency, and good faith in the management of business;

**Code of Ethics** means this Code of Ethics and Conducts;

**Diversity, Equity, and Inclusion Policy:** means the Diversity Equity and Inclusion of Antares Vision Group approved by Antares Vision and extended to the companies of Antares Vision Group through which the Group is committed to the principle of inclusion in every area of its activity;

**Group Company** means any companies in which Antares Vision has a controlling interest. According to Consolidated Financial Statements, Antares Vision controls a subsidiary if, and only if, it has: **(i)** power over the entity it has invested in (or holds valid rights that give it the current ability to control the significant activities of the entity it has invested in); **(ii)** exposure or entitlement to variable returns, deriving from its relationship with the entity it has invested in; **(iii)** the ability to exercise its power over the entity it has invested in to affect the amounts of its returns;

**Human Rights Policy** means the Human Rights Policy of Antares Vision Group approved by Antares Vision and extended to the companies of Antares Vision Group through which the guidelines necessary to safeguard the human rights of people in any country in which the Group operates are indicated;

**Recipient** has the meaning ascribed to it in Section 2 of the Introduction;

**Stakeholder** means any party with a direct or indirect interest in Antares Vision Group's business, such as customers, people working for the group, whether they are executives or employees, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local, and indigenous and tribal communities, national and international institutions, the media, and the organizations and institutions that represent them;

**Supplier** means any supplier of goods and services, including advice and professional services.

**Whistleblowing Policy** means the Whistleblowing Procedure approved by Antares Vision and extended to the companies of Antares Vision Group, through which the Group has set up reporting channels to allow whistleblowers to make report confidentially and effectively in compliance with the applicable law.

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## INTRODUCTION

### 1. THE CODE OF ETHICS AND CONDUCT

Antares Vision S.p.A. (the “**Antares Vision**”) and its subsidiaries (together with Antares Vision, the “**Antares Vision Group**” or the “**Group**”) ensure product safety and supply chain transparency through innovative technologies for quality control (inspection systems and machines), end-to-end traceability (serialization and aggregation solutions), and integrated data management (powered by artificial intelligence and integrated with blockchain).

Antares Vision Group is a globally recognized technology partner and is aware that its work contributes to the development of the economy and the market in which it operates, with **a sense of responsibility and moral integrity**.

Antares Vision Group believes that values and principles are the foundation of all activities. **Integrity, transparency, and responsibility** guide every decision and action, ensuring **compliance with laws and regulations** while promoting a culture of respect, ethical behavior, and innovation.

Antares Vision Group is committed to creating value for its stakeholders by keeping the highest standards of **professionalism and trust**. These core principles drive the Group’s mission to contribute to the well-being of individuals and communities worldwide.

In order to ensure adherence to these principles, the Group has decided to adopt this Code of Ethics and Conduct (hereinafter referred to as the “**Code of Ethics**”). The Code of Ethics is fully aligned with, and an integral part of the policies adopted and implemented by the Antares Vision Group. It reinforces and complements the policies already in place at Group-wide level, such as:

- **Human Rights policy,**
- **Diversity, Equity, and Inclusion policy,**
- **Anti-corruption policy.**

### 2. THE RECIPIENTS

The Code of Ethics has been spread out internally and it is at any moment made available to any third-party. The Code of Ethics is a guide for every person linked with Antares Vision Group, formulating shared **principles, values, ethical standards, and behavioral requirements** common to entities that make it up. The Code of Ethics applies to Antares Vision and to all its Group Companies.

The recipients of the Code of Ethics include all those individuals who hold, for each Group Company, positions of administration or control, as well as all the employees that work therein (“**Internal Recipients**”). The Code of Ethics also applies to those who collaborate with the Group in any capacity, including service providers, business partners, customers, and anyone having business relations with the Group Companies (the “**External Recipients**” collectively, Internal and External Recipients are referred to as the “**Recipients,**” and individually as a “**Recipient**”).

All Recipients are required to comply with the Code of Ethics, and acceptance may be explicitly requested when deemed appropriate. Group Company representatives are required to be familiar with the Code of Ethics’ provisions, avoid behavior in conflict with them, ask for clarifications when needed, cooperate with bodies in charge for monitoring compliance, and ensure that counterparts are aware of the Code of Ethics’ provisions.

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Compliance with the Code of Ethics is an essential part of the contractual obligations of all employees. Management must adhere to the Code of Ethics in proposing, managing, and implementing corporate projects, actions, and investments. Managers must be guided by the Code of Ethics when setting targets, and those in positions of responsibility (top-level subjects) are expected to set an example for their employees by promoting adherence to the Code of Ethics and encouraging compliance.

Additionally, managers must report any relevant information, such as control weaknesses or suspicious behavior, to the CEO, CFO, General Counsel and Internal Audit Department of Antares Vision, or alternatively to the Function involved in the issue and adjust control systems based on the Group Management's recommendations. Antares Vision Group carefully monitors adherence to the Code of Ethics, implementing adequate tools for information, prevention, and control, and takes corrective action when necessary to ensure compliance with ethical standards.

### **3. PRINCIPLES AND VALUES**

The Code of Ethics is based on the following principles and values:

#### **A. COMPLIANCE WITH LAW AND REGULATIONS**

Antares Vision Group's activities are conducted in **strict compliance with the laws and regulations** of all countries where the Group operates.

Each Group Company is committed to ensuring that all employees, directors, managers, cooperators, suppliers, and customers – as well as the staff and the officials of other third-party companies engaged in joint or coordinated activities, even temporary – comply with the laws and the regulations in force in all countries where the Group operates, as well as the organizational and procedural policies adopted by Group Companies.

The Group condemns and penalizes any behavior or conduct that violates the provisions of the Code of Ethics, even if such actions were conducted with the intention of benefiting or advantaging the Group.

#### **B. HEALTH AND SAFETY AT WORK**

The Group is committed to **providing a safe and healthy workplace for all its employees**. Antares Vision Group looks after the well-being of the workforce through the strict enforcement of safety legislation and the installation of comprehensive preventive measures. Each Group Company is committed to creating a culture of health and safety awareness, with operations in full compliance with the highest safety standards.

All Recipients are expected to contribute to a safe working environment by adhering to established safety procedures, reporting hazards in a timely manner and participating in ongoing safety training.

The Group has as its primary goal the prevention of accidents, reducing risks and keeping health and safety as a key element in all aspects of the business.

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### C. NON-DISCRIMINATION AND PROFESSIONAL GROWTH ENCOURAGEMENT

In line with the provisions set forth in the Diversity, Equity and Inclusion Policy and in the Human Rights Policy, the Group **prohibits all forms of discrimination and abuse in the workplace**, including but not limited to those based on race, color, religious belief, political and trade union affiliation, national origin, gender, sexual orientation, age, disability, medical condition, pregnancy, and gender identity.

Antares Vision Group guarantees the respect of fundamental rights of the workers, opposing any form of child labor, forced or compulsory labor, promoting a safe work environment, protecting freedom of association and collective bargaining, preventing all forms of discrimination and disciplinary practices that do not comply with human rights, ensuring compliance with working time limits established by International Labor Organization (ILO) conventions, and guaranteeing a decent wage.

In its relations with stakeholders - such as shareholders, staff, customers, suppliers, the community, and institutions - the Group adheres to principles of fairness and equality, rejecting any illegal discrimination in working conditions.

Furthermore, the Group promotes the culture of continuous learning by encouraging and considering feedback and suggestions from stakeholders. **Professional growth is guided by the performance, skills, and potential of each individual**, ensuring opportunities based on merit.

### D. DILIGENCE, TRANSPARENCY, AND ACCURACY IN THE EXECUTION OF TASKS AND CONTRACTS

**All actions, operations and transactions** decided or executed by the Group and/or by subjects acting for and on behalf of it, **must be compliant with the applicable law**, the professional **standard of integrity and the principles of transparency, verifiability, consistency, and adequacy**. Furthermore, they must be properly authorized, documented, and recorded.

Business negotiations and relationships with institutional and commercial representatives of the Group must be conducted in full compliance with the law and with the principles of fairness, transparency, and verifiability.

### E. MARKET ABUSE PREVENTION

The Group strictly **prohibits any form of insider trading, market manipulation, or misuse of confidential information** that could distort market operations or give unfair advantages.

In compliance with the provisions set forth in the Inside Information Procedure implemented by Antares Vision, Recipients are required to comply with all relevant regulations, ensuring that non-public and price-sensitive information is protected and never used for personal gain or to harm the integrity of financial markets.

Persons and entities cooperating with the Group are required to act in full compliance with applicable laws and to prevent potential market abuse. The Group provides ongoing education and resources to ensure that Recipients are aware of the laws and their responsibilities in this area.

Any violations will result in disciplinary action and could lead to significant legal consequences.

### F. BRIBERY AND CORRUPTION PREVENTION

The Group is committed to keeping the **highest standards of honesty, transparency and ethical conduct and does not tolerate any form of corruption** in its business practices.

In accordance with the Anti-corruption Policy implemented by the Group, each interaction with Public Administration and its representative, customers, consultants, suppliers, and any other stakeholders must be conducted in compliance with applicable laws and regulations and grounded in principles of integrity, fairness, and respect.

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Under no circumstances does the Group tolerate the direct or indirect offer, acceptance or promise of payments, gifts or other benefits intended to influence public officials, business partners or third parties in a way that violates the law or ethical standards. Any interactions, whether with the Public Administration or private entities, must adhere to applicable legal frameworks and contractual obligations.

## G. PROTECTION OF RECIPIENTS IN CASE OF REPORTS ON IMPROPER OR ILLEGAL CONDUCTS

**Recipients who make reports of improper or illegal conduct are protected against any detrimental action** that may result from their disclosure: this protection covers retaliation such as harassment, discrimination, or any other form of retaliation that could negatively affect the individual's employment or professional standing. No Recipient who has made a report in good faith may be exposed to retaliation in relation to the report made, even if it proves to be unfounded.

The Group has set up special communication tools, as described in the Antares Vision Group's Whistleblowing Policy ("**Whistleblowing Policy**") for those who wish to report behaviors or facts that may constitute violations of the law or internal regulations. Each Group Company is committed to protecting individuals who report improper or illegal actions, guaranteeing the confidentiality of their identity.

The Whistleblowing Policy is designed to treat all reports with the utmost seriousness and to ensure that whistleblowers are supported and updated on the status of the report throughout the investigation process.

## H. PRIVACY

The Group is committed to keeping the **highest standards of data protection for all stakeholders and third-parties in general**. The Group ensures that personal and sensitive information is collected, stored, and processed in strict compliance **with applicable domestic data protection laws and regulations** in which each Group Company operates.

Access to personal data is restricted to authorized personnel only and safeguards are in place against unauthorized access, use or disclosure. Internal policies are designed to protect the privacy of individuals and keep the confidentiality of their information.

In addition, the Group respects the privacy of all employees and stakeholders by managing personal information with the utmost care and discretion. All data collected for business purposes is only used for its intended purpose and is not disclosed to third-parties without explicit consent, unless required by law.

## I. AVOIDING CONFLICT OF INTEREST

The Group **prevents the occurrence** and direct and indirect **effects of conflicts of interest situations** in which individuals acting on its behalf may find themselves.

By keeping the highest standards of integrity, Antares Vision Group ensures that employees and representatives prioritize the best interests of the organization, avoiding any personal or commercial interests that may compromise their duties.

Transparency and trust are crucial elements to this commitment, with a clear expectation that any potential conflicts of interest be disclosed immediately so that appropriate remedial actions can be taken to mitigate risks and uphold ethical standards.



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## J. SUSTAINABILITY AND RESPECT FOR THE ENVIRONMENT

The Group's **ethical principles** are founded on a commitment to **social and environmental responsibility**. Each Group Company is dedicated to conducting its business activities in a manner that **minimizes any adverse effects on the environmental and social well-being of the communities** and ecosystems with which it interacts.

This commitment is essential to the broader mission of Antares Vision Group of operating ethically and sustainably and ensures that the Group growth is aligned with the protection of natural resources and respect for local communities.

In keeping with this commitment, the Group promotes sustainable practices that balance business performance with ecological preservation. This includes adopting environmentally friendly technologies, reducing emissions, conserving natural resources, and engaging with stakeholders to promote responsible environmental management.

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## CHAPTER I – RULES OF CONDUCT

### 1. RELATION WITH STAKEHOLDERS

The relationships of each Group Company with any interlocutor, private or public, must be conducted in compliance with the law and in accordance with the principles of correctness, transparency, and verifiability.

#### 1.1. RELATION WITH PUBLIC ADMINISTRATION AND REPRESENTATIVE OF PUBLIC AUTHORITY

All interactions with the Public Administration and Public Authority representatives must be conducted exclusively by authorized personnel, ensuring that such interactions are managed appropriately and in compliance with legal and ethical standards.

In accordance with the Anti-corruption Policy when dealing with Public Administration for representatives, officials, or employees:

- a) It is strictly forbidden to seek and/or establish personal relationships based on favoritism, influence, and interference aimed at conditioning the outcome of the relationship, either directly or indirectly.
- b) It is also forbidden to offer or accept goods or other benefits from representatives, officials, or employees of the Public Administration, even through intermediaries, unless they are gifts of minimal value in compliance with the Anti-corruption Policy.

These actions, even if offered with good intentions, could compromise the integrity of the decision-making process or be perceived as attempts to improperly influence results.

In the specific case of tenders with the Public Administration or also with public-interest entities, it is required to operate in compliance with the law, with commercial due diligence as well as with the internal procedures.

Any coercive actions, such as extortion attempts or solicitation of undue behavior by public officials or other entities representative, should report it immediately to the CEO, CFO, General Counsel and Internal Audit Department of Antares Vision, or alternatively to the Function involved in the issue.

#### 1.2. GIFTS AND PRESENTS

As disciplined in the Anti-corruption Policy no gift is allowed in any form, either received or given, that might appear as exceeding the ordinary commercial or courtesousness practices, or anyway aimed at acquiring favorable treatments in leading any activities.

It is forbidden to search and establish personal relationships with Public Administration representatives, officials, or employees, based on favor, influence, interference, aimed at conditioning the outcome of the relationship, either directly or indirectly.

It is also forbidden to offer goods or utilities to representatives, officials, or employees of the Public Administration, or to their relatives, whether EU or extra-EU countries, even through a third-party, except in case of gifts of small value and provided that they cannot be interpreted as requests for undue favors. Any violation, actual or potential, committed by the Group, its representative or by a third-party must be promptly notified through the whistleblowing procedure.

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### 1.3. RELATION WITH POLITICAL MOVEMENTS/PARTIES

The Group does not allocate contributions, benefits, or other utilities to political parties or to workers' unions, or to their representatives, except for what is provided for by the applicable norms.

### 1.4. ENVIRONMENT

The Group's production activities are managed in compliance with the existing environmental norms.

When the Group promotes, plans, or commits a plan to a third-party, it takes care to ensure that, *inter alia*, all the investigations required to check any possible environmental risks related to the intervention are performed, in order to prevent any damage.

### 1.5. EXTERNAL COMMUNICATIONS

The external communication of each Group Company must respect the principle of providing accurate and truthful information. It is strictly forbidden to communicate false or misleading information, as this could damage the reputation of the Antares Vision Group.

All information must be communicated in compliance with applicable domestic and foreign laws and in accordance with the principles of truthfulness and timeliness, safeguarding confidential information. Any statement must reflect the Group's commitment to fairness and transparency in all its dealings with the public and the market.

In compliance with Inside Information Procedure adopted by Antares Vision, it is strictly forbidden for Recipients in possession of material non-public information relating to the Group to commit any form of market abuse, including, but not limited to, the following activities:

- (a) buying, selling, or otherwise dealing in, or advising or encouraging others to buy, sell or otherwise deal in, on their own behalf or on behalf of third-parties, any securities while in possession of such information;
- (b) disclosing such information to others outside the normal course of their employment, duties, or corporate responsibilities.

Such actions not only violate the Group's ethical standards but can also result in serious legal consequences.

Only authorized persons are allowed to make public statements on behalf of the Group or its individual companies, which are responsible for ensuring that the information they release is accurate.

## 2. RELATIONS WITH THIRD-PARTIES

### 2.1 RELATION WITH CUSTOMERS AND BUYERS

The Group builds its activity around the criterion of quality, intended as the target of the customer's full satisfaction.

The Group assures correctness and transparency in the relationships with customers and buyers, in commercial negotiations and in the assumptions of contract ties and obligations.

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In taking part to any tenders, even those privately held by public-interest entities, the Group evaluates attentively the adequacy and executability of the requested performance, with a special focus on technical and economic conditions, signaling any anomaly wherever possible.

The formulation of offers will be such to guarantee compliance with adequate quality standards, proper contribution levels for employees and with existing safety measures, as well as with the time needed for their writing and approval.

The Group resorts to litigation only when its rightful claim does not find its due satisfaction with the interlocutor.

Any transaction in which the persons involved in the operations are or may appear to be in conflict of interest or deal with potentially related parties, must be regulated and managed according to the Related Parties Procedure implemented by Antares Vision.

It is forbidden to offer goods or other benefits to customers or other persons having a direct or indirect relationship with the Group or the Group Companies. Exceptions are gifts of modest value and in accordance with custom, provided they cannot be interpreted as requests for undue favors.

## 2.2 RELATION WITH SUPPLIERS

The relationships with the Group's suppliers and with professionals for any kind of consultancy (e.g. financial, tax, legal, administrative, etc.) are regulated by the law and the provisions of the Code of Ethics and are the subject of continuous and careful monitoring by the Group.

The Group relies on suppliers, contractors, subcontractors, or consultants operating in conformity with the existing norms and of the rules provided for by the Code of Ethics and the internal policies.

## 2.3 COMPETITION

The Group believes in free and fair competition and addresses its actions towards achieving competitive results that reward competence, experience, and effectiveness. The Group and its cooperators must have the correct conduct in business and in relationships with third-parties.

Particular attention must be paid to safeguarding confidential information relating to each Group Company. Similarly, employees, collaborators, consultants, and all other addressees of this Code of Ethics shall never receive or accept information or material concerning a competitor's trade secrets, the disclosure of which is not authorized.

Any action aimed at altering the conditions for fair competition is contrary to the principles and the values of the Group and is forbidden to any subject that acts on its behalf.

Under no circumstances may the pursuit of the Group's interest justify conduct by representatives or employee of the Group that do not comply with applicable laws and the rules of this Code of Ethics.

Every external communication concerning the Group, and its activities must be truthful, clear, and verifiable.

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### 3. INTERNAL RELATIONS

#### 3.1 MANAGERS AND REPRESENTATIVES

Managers and representatives are expected to behave respectfully towards all employees, colleagues, and stakeholders and to promote a positive and inclusive working environment. They must encourage open communication, value the contributions and opinions of others and keep professionalism, even in inconvenient situations.

In their role, managers must not use their position for personal gain or influence and must promptly report any potential conflicts of interest to avoid ethical violations. Transparency and integrity are fundamental to their decision-making processes to ensure that their actions best serve the interests of the organization and its employees.

Discrimination, harassment, or any form of disrespectful behavior will not be tolerated.

In addition, managers must take proactive measures to ensure that workplaces are safe, well maintained, and conducive to productivity and well-being.

#### 3.2 EMPLOYEES

Employees are required to spend their professional efforts exclusively on Group companies and must not perform any professional activities for third-parties, paid or unpaid, without prior written authorization.

All employees must avoid accepting roles or assignments that are incompatible with their professional duties or could compromise their ability to perform their job with integrity.

Antares Vision Group encourages the continuous improvement of the professionalism of its employees, even by training initiatives.

The Group recognizes the centrality of human resources as the main success factor, in the context of mutual trust and loyalty between employer and employees.

All employees are hired by the Group Companies with a regular employment contract. The work relationship takes place in compliance with the collective labor agreement of the sector and of the social security, tax, and insurance norms.

#### 3.3 INTERCOMPANY RELATIONS

The Group is committed to promoting honest, transparent, and fair communication between individual companies in order to ensure the highest standards of conduct. All interactions between Group Companies are conducted with the utmost integrity, ensuring that information is shared openly, accurately and in good faith.

Intercompany relationships are strictly managed by persons who have the authority and formal powers to undertake such communications or transactions. This ensures that all intercompany relationships are conducted in accordance with established corporate governance principles, preventing unauthorized actions and safeguarding the interests of the Group.

By upholding these standards, the Group ensures that intercompany relationships remain professional, ethical, and aligned with its core values.

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### 3.4 INTERPERSONAL RELATIONS

Recipients are expected to act with honesty, fairness, and transparency in all interpersonal relationships. All communications and actions must respect these values and foster trust and a professional atmosphere in which decisions are made with integrity and in the best interests of the Company and its stakeholders.

The Group will not tolerate any form of discrimination or behavior that may cause distress or harm to colleagues, customers or third parties. Recipients must ensure that their behavior promotes respect, inclusion, and a safe working environment free from harassment or offensive behavior.

Recipients must be aware of interpersonal relationships in the workplace and ensure that they do not create situations that could be perceived as favoritism or prejudice. All interactions must be managed with fairness and impartiality, keeping a professional and fair environment for others.

### 3.5 HEALTH AND SAFETY

Antares Vision Group guarantees the physical and moral integrity of its employees, working conditions that respect the dignity of the individual and a safe and healthy working environment, in full compliance with current regulations on the prevention of occupational accidents and the protection of workers.

Each Group Company is committed to spreading and merging a culture of safety among all its employees, developing risk awareness, and promoting responsible behavior.

## CHAPTER II – MODE OF IMPLEMENTATION

### 1. THE ADOPTION OF THE CODE OF ETHICS

The Code of Ethics was formally adopted by the Board of Directors of Antares Vision and then shared with the management bodies of each Group Company for their implementation and dissemination.

Through the adoption of the Code of Ethics, the Company adopted a set of rules:

- For the behavior in the relationships with outside interlocutors, the employees, the market, and the environment.
- For the organization and management of the Company, aimed at building an effective and efficient activity planning, execution, and control system to ensure the constant compliance of the conduct rules and to prevent their violation on part of any subject operating for the Company itself.

### 2. PREVENTION

In accordance with the regulations currently in force, and to ensure that the Group's activities are planned and managed efficiently, fairly, transparently and according to the highest quality standards, the Group has implemented organizational and management measures to prevent any behavior that is illegal or, in any case, contrary to the rules set out in the Code of Ethics and in the other policies and procedures implemented by the Group, by any person acting on behalf of the Group.

Due to the structure of its activities and the complexity of its internal organization, the Group has adopted a system of delegation of authority and functions, which provides for the assignment of tasks to individuals with the appropriate skills and competencies.

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In relation to the extension of delegated powers, the Group adopts and implements organizational and management models that provide for proper measures to ensure that activities are conducted in compliance with the law and the Code of Ethics, and that risk situations are promptly detected and remedied.

### **3. MONITORING AND ENFORCEMENT**

To ensure the effective implementation of the provisions of the Code of Ethics, the Group has in place robust monitoring mechanisms and enforcement procedures. These measures are designed to uphold ethical standards and maintain a culture of accountability across all levels of the organization.

In particular, the Group has implemented an Internal Control and Risk Management (ICRM) system to mitigate risks related to strategic, operational, compliance and financial objectives, using structured processes, tools and practices.

Compliance audits are also carried out periodically to assess adherence to the Code of Ethics and identify potential area of improvement. In addition, key performance indicators (KPIs) and stakeholder feedback are periodically collected, respectively, in order to track ethical performance and provide valuable insights for improvement.

Reported violations are promptly investigated by a dedicated Internal Audit team, ensuring fairness and impartiality. Should violations be confirmed, actions, to be proportional and appropriate depending on the kind and degree of seriousness of the conduct, shall be taken. Where systemic issues are identified, corrective measures are implemented to prevent recurrence and improve organizational practices.

The Group ensures continuous improvement through regular reviews of the Code of Ethics and its mechanisms to align with evolving standards. To this end, continuous training and awareness-raising initiatives are organized to reinforce ethical behavior and empower employees to deal effectively with ethical challenges.

### **4. WHISTLEBLOWING PROCEDURE**

The Group is constantly committed to promoting a corporate culture that encourages ethical behavior and integrity. The Group requires all Recipients, whether internal or external, to avoid any illegal or unethical behavior. The Group actively promotes an environment in which people feel safe and supported in reporting any unlawful behavior that they witness or become aware of, without fear of retaliation or negative consequences.

Each Group Company has implemented the Whistleblowing Policy adopted by Antares Vision, which is aligned with the overarching principles of the Group. The Whistleblowing Policy establishes clear procedures for reporting misconduct and provides through which reporting channels it is possible to submit a report. Specifically, by accessing the internet page <https://antaresvisiongroup.com/whistleblowing-en/>, reporters will be given the opportunity to submit, either written or oral reports, according to their choice.

All allegations are managed with the utmost seriousness and confidentiality.

The Whistleblowing Policy guarantees that all reports are overseen fairly, impartially and in full compliance with all relevant laws, domestic and foreign, and internal regulations. Any reports of misconduct are investigated without delay and, if necessary, appropriate corrective action is taken. This disciplined approach guarantees that all reports are managed transparently and with due diligence, safeguarding both the integrity of the investigation process and the protection of the whistleblower's identity.

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## 5. PENALTIES

All managers are responsible, both individually and jointly, for ensuring ethical and law-abiding conduct. They have a duty to ensure the fulfillment of these standards in their area of responsibility and, otherwise, to act appropriately. Furthermore, everyone is individually responsible for compliance with these principles and will request guidance when necessary.

Any breach of the Code of Ethics by the Recipients shall constitute a breach of Recipients' obligations and may entail, among others, a disciplinary offence.

In the event of a breach being ascertained, the sanctions provided for in the applicable law of the state in which the breach took place and in the sanction systems adopted by the respective Group Companies shall be applied.

## 6. COMMUNICATIONS AND TRAINING

Antares Vision Group promotes the awareness of the Code of Ethics among all Recipients. For this purpose, the Code of Ethics must be made available to all Recipients, according to the procedures that must be defined by each company of Antares Vision Group.

This Code of Ethics is also published, in English and Italian version, on the website of Antares Vision Group.

Any doubts concerning the application of this Code of Ethics shall be addressed to Antares Vision Legal.

Antares Vision Group must develop proper training and awareness programs regarding this Policy, to strengthen its internal culture to embrace principles and values included in the Code of Ethics and to increase awareness on the Code of Ethics among the entire Group.

## 7. UPDATE

By resolution of the Board of Directors of Antares Vision, the Code of Ethics may be modified and/or integrated.