

CD Automation Code

Smart solutions, responsible behaviour



Introduction by the Chief Executive Officer

In these years of profound change, technological, organisational and market-related, we have consolidated a culture based on integrity, respect and excellence. Today, we renew that commitment: to do the right thing, even when the spotlight is not on us; to do it for our customers, for our colleagues, for the communities in which we operate and for all our stakeholders. These values are not just words on paper: they guide our decisions and our way of working every day.

The Code and our compliance system

The Code reflects our constant focus on legality, which guides our choices and gives meaning to our work. To this end, the Organisation

has adopted a system designed to integrate, customise and enhance compliance without creating excessive organisational burdens. The organisational model adopted by CD Automation coordinates and strengthens existing safeguards: quality, health and safety, data protection, anti-money laundering, environment; and makes the use of resources more efficient, benefiting transparency, reliability and the achievement of objectives.

The objective is clear: to promote a system of self-control in which compliance with the law and ethical values are not perceived as an external imposition, but as a conscious and shared choice. It is a process of daily internalisation of principles and values that translate into behaviour: in the way we work, in mutual respect, in the protection of people and the environment in which we operate.

With this awareness, the step taken represents an opportunity for growth and responsibility for everyone and for those who place their trust in our organisation. We wish everyone the best of luck in their work, in the belief that the quality of the rules, and the loyalty in respecting them, are a safeguard of freedom, dignity and shared progress.



A handwritten signature in black ink that reads "Simone Zucchi".



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About us

CD Automation is a global company with subsidiaries, partnerships and an extensive distribution network, serving a wide range of industries united by our Shared Purpose. At the heart of our business is a culture of continuous improvement, guided by Core Values that drive every decision: we believe in extraordinary teams because they deliver exceptional results, and we put our customers' success at the centre of our innovation.

Addressing the global challenge of sustainability

Our mission is to innovate the way electrical energy is converted into heat, reducing inefficiencies and optimising the entire process. Since 1987, we have been designing and manufacturing SCR power controllers and temperature controllers, as well as software and products for the intelligent control of electro-thermal conversion processes, supporting our customers in numerous industrial sectors.

Product and service strategy

- Digital power and automation solutions for efficiency and sustainability.
- We design the best SCR controllers for optimal conversion of electrical energy into heat.
- User-centred design process: simplifying product use, inspiring, exciting and empowering customers worldwide.
- Maximum reliability and safety, with innovative services and products that help optimise processes and improve efficiency.
- We invest in customer satisfaction, continuous improvement and technological innovation.
- Local and global partnerships to reduce consumption and improve energy quality in energy-intensive industrial applications.
- Technical support for plant design and the supply of low environmental impact solutions, promoting energy efficiency practices.

Areas of application

CD Automation solutions are used in numerous industrial sectors and in renewable energy: photovoltaic and wind power generation, biodiesel, ethanol, hydrogen, thermal storage and, more generally, in all applications that require advanced power control, measurement and data recording.

Our goal is to become the trusted partner for industries seeking advanced power and process control solutions, with a focus on sustainability and results.

Act with integrity

The Code is the foundation of everything we do. Our Core Values are at the heart of who we are and guide our actions. The Code applies to all employees of CD Automation and its Subsidiaries worldwide. It is your responsibility to ensure that you read, follow and comply with it. Commitment to following the Code and acting in a manner consistent with our Core Values will build trust, earn respect and lead to success. Your integrity/our success.

We expect our agents, representatives, independent contractors, consultants, suppliers, business partners and others working on our behalf to act in accordance with the same high standards of conduct set forth in the Code.

Violations of the Code may result in disciplinary action, including termination of employment. They may also result in civil or criminal penalties for the individuals involved, as well as for CD Automation.

What would you do?

You believe that a local law may conflict with a section of our Code. What should you do?

We operate worldwide and are subject to many different laws. The Code is designed to complement, not contradict, the laws of the countries in which we operate. If you believe you are faced with such a conflict, follow the most stringent requirements. However, if you have questions about the correct course of action, contact Management before proceeding.



How to use the code

The Code is designed to provide high-level guidance on how to deal with everyday ethical situations. You will find definitions for terms and links to people and company policies, as well as real-world scenarios to give you the information you need to do the right thing.

Usually, if you follow the Code and stay true to our Core Values, the right thing to do will be clear, but there may be situations where the right path is not clear. In these situations, we count on you to use your best judgement and, if necessary, seek advice from your manager or leave a suggestion in the “Suggestion Box”.

Implementing the Code

- Is my behaviour consistent with our Core Values?
- Is it consistent with the Code?
- Do my actions demonstrate integrity?
- Am I doing what is right for CD Automation and our employees, customers, business partners, shareholders and other important stakeholders?
- Would I feel comfortable describing my actions to someone I respect?
- Would I feel comfortable if my action were made public?

If you can answer “**yes**” to all six questions, you can probably proceed. But a “**no**” or “**not sure**” to any question means you need to get help before moving forward. Remember that it is always appropriate, in all circumstances, to ask for help.

As a further reminder: company documents, training materials and policies will be amended over time to reflect updates to the Code. The terms Code, Code of Conduct and Standards of Conduct may be used interchangeably as these documents and materials are updated.



We respect each other

Guiding principle

We believe that every employee should be treated with respect and dignity.

Expected behaviors

In our commitment to Building Extraordinary Teams, we promote the kind of workplace where we can do our best work free from harassment, bullying or abuse.

Compliance with this principle

Be aware that harassment can take many forms, including:

- Physical, verbal or written
- It can occur in the workplace or in work-related situations and scenarios
- It can be inflicted by or directed at employees, but also at customers and business partners
- It can be sexual in nature, towards the same sex or the opposite sex
- It can include behaviours such as:
 - Offensive comments, jokes or images
 - Unwelcome hugs, contact or sexual advances
 - Falsehoods or racial slurs
 - Verbal or physical intimidation

Regardless of the form it takes, harassment is prohibited at CD Automation.

If you witness harassment, even if only alleged, report it! You will not suffer any retaliation for sharing your concerns.

What is meant by 'harassment'?

Any unwanted behaviour towards another person that creates an intimidating, hostile or offensive working environment.

What would you do?

A colleague confides in you that her manager makes suggestive comments about her appearance and, despite her previous refusals, continues to ask her out on dates.

She is obviously uncomfortable but says she does not want to report him. Should you respect her wishes?

Encourage your colleague to report the matter anonymously through our "Suggestion Box".

It is important to bring this to the attention of the appropriate resources, in line with our commitment to a safe and respectful workplace.

If your colleague does not raise the issue herself, you should do so. You can both count on our zero tolerance policy towards retaliation.

Inclusion and diversity

Guiding principle

We are building an inclusive community where everyone can express their opinion, be themselves and feel understood. Together we can achieve more, for each other, for our customers and for the world.



Expected behaviors

We all play a role in creating a community of belonging and inclusion. We consciously create diverse teams. We actively seek out different opinions. We are open to different points of view and ways of doing business.

We leverage our diverse talents for innovation and success

Our workplace, as well as our products and services, benefit from diverse experiences and knowledge. We respect the perspectives and cultural differences of our employees, business partners and customers, and we work together as a team to bring out the best in each other.

We focus on fairness

We treat everyone fairly, respectfully and with dignity. We make decisions based on job requirements and individual qualifications, without regard to race, colour, national origin, religion, sex, age, marital status, disability, veteran status, sexual orientation, gender identity, gender expression or any other characteristic protected by law.

What would you do?

A colleague frequently insults another member of your team. It makes you and other team members uncomfortable. What should you do?

A respectful workplace is built on the everyday actions each of us takes. If you witness a situation like this, which is not consistent with CD Automation’s commitment to inclusion and diversity, nor to a professional and respectful workplace, we encourage you to speak up.

Approach your colleague and share your concerns, if you feel comfortable doing so. Although it can be difficult, initiating such conversations and mutual understanding is how we learn and grow.

If you do not feel comfortable approaching your colleague directly, report your concerns to your manager, or you can submit an anonymous report to the “Suggestion Box”.

Responsibilities of managers

Guiding principle

We believe that managers, as positive role models who act with integrity, can inspire others to do the same.

Expected behaviors

We expect our managers to set an example for our teams by maintaining a positive and ethical tone and promoting compliance with our Core Values and Code.

Lead by example

Connect daily work to Core Values, the Code, and success. Answer employees' questions, address their concerns, and demonstrate through words and actions that there is no difference between what you expect from yourself and what you expect from others. Model the right behaviour.

Maintain an open and transparent culture

Create and support a workplace where everyone feels safe and free to ask questions, raise concerns and get support. Treat shared information with care, disclosing it only to those who need to know, while actively working to find a solution.

Be responsive

Support those who raise concerns and ensure that others do the same. This is part of our commitment to an open and transparent culture focused on continuous improvement.

Know your obligations

Immediately report any concerns about violations of the Core Values or the Code to your manager; alternatively, use the "Suggestion Box". Never ignore a potentially problematic situation.

What would you do?

You are a manager, and an employee from another team approaches you with an allegation of misconduct that they believe may be a violation of the law. The employee is afraid of causing problems for their own team. What should you do?

You are primarily responsible for the colleagues and third parties under your supervision, but as a leader you have a duty to act, regardless of who approaches you. The best approach would be to obtain some initial information from the employee raising the issue: who, what, why, when and where.

Make sure the employee raising the issue is aware that they have the option to remain anonymous, or that their identity will only be known to a few key entities. Remind them of our zero-tolerance policy on retaliation. Through the "Suggestion Box", they can be sure that the issue will be reviewed by those with the appropriate expertise to provide the right guidance.

Safety and security

Guiding principle

We promote a culture of safety and value the wellbeing of every employee in every way, beyond mere physical safety. The wellbeing of our workforce is not the responsibility of a single team, nor is it occasional, but rather a universally shared daily commitment.

Expected behaviors

We comply with health and safety requirements. We seek opportunities to continuously improve the safety of our staff and workplace.

Do your part

Take an active role in ensuring your safety and the safety of others by completing the safety training assigned to you and complying with the safety requirements that apply to your role. If you become aware of any potentially hazardous conditions or unsafe practices, report them immediately to your manager or through the “Suggestion Box”. Speak up if you see an opportunity to improve our safety practices, even if it does not involve a violation.

Staying Fit

Substance abuse can negatively affect your job performance and could put you, your colleagues and others at risk. That is why:

- We prohibit illegal substances on all company property
- We prohibit being under the influence of any substance or alcohol during working hours

There may be company-sponsored events where alcoholic beverages are permitted. In these cases, ensure that your behaviour reflects our Core Values and Code. Always use common sense and moderation.

We do not tolerate actions that threaten employees, customers, suppliers or others. Weapons are never permitted on any of the premises of the various Subsidiaries, unless permitted by law or company policy.

What would you do?

Your colleague suggests adopting a practice that will save significant time and money but poses a small security risk. Should you take the risk?

Although we are committed to continuous improvement and are open to new ideas and ways of doing things, people’s safety is paramount. Any potential change to the process must first be evaluated based on safety.

Speak freely

Guiding principle

Let's work together to promote an ethical workplace. This means reporting concerns and issues that could damage our company's reputation or compromise the good work we are doing.

Expected behaviors

We are courageous. As employees, we confront issues head-on and promptly report any behaviour that we believe violates our Core Values or the Code, knowing that CD Automation will not tolerate retaliation.

Taking responsibility

If you have questions about what is the right thing to do or if you see something that seems wrong, talk to your Manager or Management at CD Automation or your Subsidiary.

Although the 'Suggestion Box' is always available, there may be some issues that are best addressed first with your manager, such as performance Management and employee relations issues.

If you are contacted for an investigation related to a Suggestion Box report, you must cooperate.

- Follow the instructions you receive from Management
- Keep the investigation and any details confidential, and do not discuss it with other employees
- Make yourself available for an interview as requested
- Provide open, honest and transparent answers and any supporting documentation.

Do not fear any form of retaliation

Whichever resource is contacted, the report will be handled in a timely and appropriate manner. CD Automation prohibits any form of retaliation against anyone who makes a report or participates in an investigation. The company encourages reporting with peace of mind, knowing that reports can also be made anonymously and will always be listened to and treated with respect.

The company has set up a physical channel dedicated to reports, consisting of a sealed box ("**Suggestion Box**") located in a suitable and discreet area. Communications must be placed in a sealed envelope marked "Confidential - Reports." Collection and Management are carried out in compliance with confidentiality, anonymity, and personal data protection regulations.

Access to the "Suggestion Box" is reserved for Directors, who open and manage communications independently, impartially, and traceably. Each report is carefully examined to prevent and correct behavior that does not comply with company values, adopting, if necessary, appropriate protective and remedial measures.

Fair competition

Guiding principle

Innovative thinking and innovative progress—that is the reason for our success. We believe that everyone benefits from an open and competitive market.

Expected behaviors

We compete vigorously to achieve results, but we always act fairly and in accordance with our Core Values and Code. We avoid actions that could restrict competition or prevent others from competing.

Avoid improper agreements

We conduct our business in a dynamic and fair manner. Consequently, we do not enter into written or oral, formal or informal agreements with competitors or others for the purpose of:

- “Fixing” (raising, setting, or maintaining) prices on our products or services
- Dividing territories, markets, or customers
- Preventing a company from entering the market
- Refuse to work with a customer or supplier
- Reduce production, sales, or performance
- Interfere with the competitive bidding process.

What is a “competitively sensitive topic”?

- Prices and terms of sale
- Costs and profits
- Customers, territories, and markets

Be careful

Use common sense when dealing with competitors or others at industry meetings, seminars, and conferences. Do not discuss competitively sensitive topics, and if others try to do so, take swift and clear action: stop the conversation, leave the room, document what happened, and report it to Management.

Collecting information for competition purposes in the right way

Obtain information about our competitors fairly and legally, for example through research on the Internet, media sources, and industry articles, always avoiding deception and fraud.

Do not ask new employees for information about competitors; they have an obligation to protect the confidential information of their previous employers, just as our former employees have an obligation to protect ours.

Do not ask new employees to disclose confidential information about their previous employers; they have an obligation to protect the confidential information of their previous employers, just as our former employees have an obligation to protect ours.

What would you do?

During an industry meeting, a competitor comments, “The market seems to be showing signs of weakness, do you notice that too?” How should you respond?

Although the comment may seem harmless, it could have anti-competitive implications. It is best to make it clear that the topic is inappropriate, stop the conversation, and report the incident to your manager to assess the next steps.

Working with business partners

Guiding principle

Relationships with suppliers, channel partners, and other third parties are critical to our success. That's why we choose business partners who meet our high standards.

Expected behaviors

We act with integrity and transparency, and we expect the same from our partners.

Choose carefully

If you are involved in selecting a CD Automation business partner, follow internal processes and perform all necessary checks to ensure that the partner is reliable. Decisions must be based on objective criteria such as price, quality, and service, not on personal biases or interests. The actions of partners reflect on CD Automation: ensure that they understand our expectations and operate ethically, in line with our Core Values and Code.

Reporting to our partners

Our Supplier Code of Conduct sets out our expectations for business partners; some of these are also covered by the Third-Party Business Integrity Program.

If you manage or work with business partners:

- Be honest and accurate in your business dealings
- Protect their confidential information with the same care you protect ours
- Avoid any potential conflicts of interest
- Maintain high expectations, monitoring human rights and corruption
- Always report suspected violations of the Code or Core Values.



What would you do?

A supplier you have been working with for many years offers you a partnership in a new venture unrelated to your work at CD Automation. Is it permissible to consider the offer?

Probably not. Consider how this initiative might be perceived by others, especially in relation to decisions about the relationship with the supplier on behalf of CD Automation. Talk to your manager before meeting with the supplier: transparency about potential conflicts of interest, even if only alleged, is always the right choice.

Anti-corruption and anti-extortion

Guiding principle

Our success is based on innovation in our products and services. Corruption and bribery are inconsistent with our value of integrity and do not represent how we conduct business.

Expected behaviors

At CD Automation, we are bold enough to address issues that are inconsistent with our Core Values. We do not seek to influence business through inappropriate means. We believe that our products and services will achieve their deserved success. We insist that you conduct business in the right way.

Observing Fundamental Values

Do not offer or accept anything of value to win (or retain) business, influence a decision, or gain a commercial advantage.

Comply with global anti-corruption laws and our policies

Be aware that these laws apply globally and affect not only CD Automation employees and suppliers, but also third parties working under our direction or on our behalf, such as partners, distributors, sales agents, and consultants.

Always implement the Third-Party Business Integrity Program, which will help you select the right business partners who can represent our Core Values. Ask questions whenever you are unsure of what to do, and be sure to record all financial transactions completely, accurately, and transparently.

What is meant by “anything of value”?

It means “anything!” And it can be something other than a cash payment, including:

- A gift
- Travel or meals
- Service contracts
- A partnership proposal
- A loan or favor
- A charitable donation or political contribution
- A job offer for a close relative, if offered to obtain a decision or business advantage, is inappropriate.

Be mindful of interactions with government officials

We may interact with government officials on matters other than the sale of our products. This includes audits, inspections, licenses, permits, customs, and regulatory approvals. Also, remember to check with Management before providing anything of value to a government official or employee, as in some cases it is prohibited or restricted. Please refer to the Gifts, Entertainment, and Travel section for more information.

Who is a “government official”?

The term is broad and includes:

- Government employees
- Military officers
- Elected officials or candidates
- Members of political parties
- Employees of state-owned, state-controlled, or state-subsidized industries (such as healthcare)

If you are unsure whether an individual is a government official, consult with Management.



Gifts, entertainment, and travel

Guiding principle

We believe that exchanging business courtesies is a normal part of working with our customers and business partners, but we do not allow them to influence our actions or use them to try to improperly influence the actions of others.

Expected behaviors

We ensure that we neither offer nor receive anything that could improperly influence or reflect negatively on our organization or others.

Knowing what is acceptable

When does business courtesy cross the line? Our Gifts and Entertainment Policy will provide you with the relevant information. It sets out the limits on the value of gifts that may be given or received, as well as the requirements you must follow when giving or accepting gifts or forms of entertainment.

Knowing what is not acceptable

Some offers can never be accepted. In general, if a gift or form of entertainment binds you to an obligation or could in any way influence your decision-making process, it is inappropriate.

Gifts and entertainment	
All right	That's not good.
They are of modest value	Aim to influence a decision or action
They are offered only occasionally	Are excessive or lavish
They promote a legitimate business relationship	Could embarrass CD Automation
They are permitted by law	Are inappropriate or in poor taste
They comply with the policies of both companies involved	Are solicited (e.g., upon request)

Comply with company travel policies

Sometimes, the best way to demonstrate our capabilities is to invite a customer to our headquarters or an Affiliated Company so that they can see our products and services for themselves. If travel expenses are to be paid by CD Automation or an Affiliated Company, there are very specific requirements that must be met and pre-approvals must be obtained.

Be sure to read our Company Policy on Customer Travel and Entertainment, and complete a travel approval form before making an offer to pay for travel for third parties. In particular, review the company policy before agreeing to pay for travel for government officials.

Being transparent

All business courtesies offered or accepted must be accurately and completely documented in the accounting books and records.

What would you do?

You have just received a delivery at the office. It is an expensive gift from a grateful supplier. You are fairly certain that our company policies will not allow you to keep it. What steps should you take?

Return the gift and politely explain that accepting it is not in line with our policy requirements. If this is not feasible, discuss it with your manager and senior Management. Other options may include donating the item to charity or sharing it with the entire office.



Import, export, and trade compliance

Guiding principle

We comply with global laws on the import and export of our products.

Expected behaviors

We understand and comply with the import/export requirements applicable to our work, regardless of where we conduct business, documenting every transaction honestly, accurately, and completely.

Comply with economic sanctions, export controls, and anti-boycott provisions

National laws may restrict the places, people, and products with which we can do business and require specific licenses. They may also require a specific license to sell or ship our products. If you have any questions, please contact Management.

Boycott requests must also be reported, even if we do not participate in them, because CD Automation and its employees may be held liable.

Some boycott requests may also need to be reported to local government authorities, even if we do not participate in them.

Ensuring compliance upon importation

We are required to provide an accurate declaration of what we import and the customs duties associated with each item. If you have any questions about compliance or your role in the process, please contact your manager or Management.

What would you do?

You have received a request from a customer to modify an invoice to show a different final destination. What should you do?

We are required to declare imports and exports accurately and transparently. Ensure that the invoice is accurate and unmodified. Contact your manager about the request to determine the next steps to take.



Product quality

Guiding principle

We are committed to developing safe and reliable products, as well as meeting our customers' quality expectations.

Expected behaviors

We incorporate quality into everything we do and follow the processes we have in place.

Quality comes first

If you are involved in the design, development, manufacturing, testing, labeling, packaging, localization, qualification, or certification of products, please ensure that in the locations where they are manufactured and in the markets where we sell them, our products and services:

- Are manufactured in accordance with all applicable quality, safety, and efficacy requirements
- Meet all labeling, packaging, and documentation requirements
- Meet all requirements for safety registrations, inspections, prequalifications, authorizations, and processes.

Meet or exceed expectations

Observe and comply with all regulatory requirements governing the manufacture and sale of our products in the countries where you operate. Failure to comply with these requirements may not only result in lost sales, but also in a loss of trust among our customers and shareholders.

Promoting continuous improvement

If you identify any gaps, determine the root cause, establish countermeasures, and continuously improve processes to prevent recurrence. Questions or concerns about the quality or safety of our products should be directed to your manager or reported in the "Suggestion Box".

What would you do?

You are facing a deadline, and your manager instructs you to use a new, unapproved supplier to complete the project. The supplier appears to be qualified. Do you hire the supplier?

No. We only work with approved suppliers to ensure quality. Let your manager know that this supplier is not yet approved and therefore not an option. If you don't feel comfortable discussing the situation directly with your manager, then report it in the "Suggestion Box".

Company assets

Guiding principle

We provide employees with the facilities, equipment and resources necessary to do their jobs; we expect everyone at CD Automation to use them responsibly.

Expected behaviors

We use company assets for business purposes and protect them from theft, fraud, waste and abuse. We also promote impactful innovation by anticipating and thwarting new threats to our assets.

Protecting physical assets

From raw materials and machinery to office equipment and company cars, CD Automation's physical resources help us create, build and deliver a powerful portfolio of products for our customers. Please respect our policies and never lend, sell or give away these assets unless you are authorised to do so.

Protecting electronic assets

Our hardware, software and networks help drive our innovation and are provided for business purposes only. Use our technology responsibly and protect it from threats and malicious individuals. Never use them for unauthorised, non-business or illegal purposes. Limited personal use of assets such as your laptop and phone is permitted (e.g., to check the news), but ensure that such use is consistent with our Core Values and does not interfere with your work or business. Be aware that any information you create, share, store or download on our systems belongs to CD Automation, and we may monitor networks and systems to ensure compliance with our policies.

Protecting IT assets

Treat all our written, electronic or verbal information with care. Use it as permitted by our policies, and bear in mind the highest standard of protection required for personal data, confidential information and intellectual property.

What would you do?

You go to a colleague's desk to ask a question and notice that he is looking at a website with pornographic content. Your colleague sees the surprised look on your face and tells you not to worry, that he only visits these types of sites occasionally and never shares them with others. Is this legitimate?

No. Our systems should never be used to access inappropriate information or websites. Share your concerns with your manager or report the situation anonymously via the "Suggestion Box".

Confidential information and intellectual property

Guiding principle

Information affects every aspect of our business and helps us remain strategic and competitive. We recognise our fundamental obligation to protect it.

Expected behaviors

We carefully protect information and IT resources, including those entrusted to us by others.

Knowing what is reserved

Confidential information may include:

- business data, such as new product research, specifications and designs, customer lists and business plans;
- personal data, such as addresses, telephone numbers or financial information;
- information about performance, remuneration or employment data;
- information received from other companies, which we have agreed to keep confidential.

Take precautions

Label confidential information according to company policies so that its level of confidentiality is clear. Before sharing it with anyone (either inside or outside CD Automation), make sure that:

- you are authorised to do so;
- you only share the information with authorised persons who have a need to know;
- limit the amount of information shared to only what is necessary;
- verify that any third party with whom you share it has signed a confidentiality or non-disclosure agreement.

Avoid discussing confidential information in public places, such as lifts, aeroplanes or restaurants, where others may overhear.

Protect what sets us apart

CD Automation's inventions, ideas, software and trade secrets represent years of innovation and investment. Follow company policies to identify and protect them. Protection also extends to the intellectual property of partners and third parties, which must always be respected.

Intellectual property includes

- Patents
- Trademarks
- Copyrights
- Trade secrets
- Data/data analysis

Unless otherwise notified or authorised, CD Automation retains ownership of any ideas, processes, inventions or improvements developed in connection with work performed at the company, CD Automation products or technologies, or using its resources.

Privacy and data protection

Guiding principle

We respect the personal data of others and are committed to protecting it from unauthorised disclosure and any breaches.

Expected behaviors

We comply with the privacy and data security laws of the countries in which we operate and are transparent about how we process personal data. We are also adaptable, working together to develop processes that meet new data protection requirements.

Knowing what is necessary

Data privacy laws and regulations, together with CD Automation's company policies, establish how personal data must be collected, processed, transferred, stored and disposed of in a correct and secure manner. Those who handle personal data must be aware of the requirements and act with the utmost care.

Data must be:

- collected by lawful and fair means, informing the data subject when necessary;
- used only for legitimate and approved business purposes;
- limited to what is strictly necessary;
- shared only with authorised persons, internal or external, and within the limits of the law;
- protected with appropriate security measures to prevent loss, misuse or unauthorised disclosure.

What is your personal data?

Any information that can identify someone, directly or indirectly, such as:

- Name
- Address, e-mail address or IP address
- Telephone number
- Bank or credit card information
- Health information
- Information about benefits, remuneration or services

Report suspected data breaches immediately

If you believe that your personal data has been misused, accessed or disclosed, please report your concern immediately to the person in charge or submit a report to the "Suggestion Box".

What would you do?

You work in account management and oversee invoicing and credit card transactions. You put all personal data in a pile on your desk labelled "shred" and, once a week, take it to the document shredder. Are you complying with your personal data protection obligations?

No. Without a locked private office, the information remains visible and vulnerable. To comply with data protection, documents must be stored in a secure location or disposed of immediately in the document shredder.

Cyber security

Guiding principle

Technological applications and connectivity are more powerful than ever, but the risks associated with them are equally high. We understand our fundamental duty to keep data, networks and systems secure.

Expected behaviors

We are proactive. We use technology to innovate and improve the efficiency of our work, so we use company tools, implement appropriate security measures, and pay attention to situations that could expose CD Automation to cyber attacks.

Understanding reputational risk

Clicking on a suspicious link, leaving a note with your password, not updating your antivirus software: these are just a few examples of the many ways in which attacks and breaches can occur. The best way to keep our systems secure is to follow company policies, use common sense and adhere to good IT security practices:

- create secure passwords and do not share them with anyone else, even if asked;
- ensure the physical security of the information and hardware assigned to you;
- access our networks only through authorised applications and devices;
- keep your systems, browsers, and antivirus software up to date; update them when requested by CD Automation's cybersecurity team
- Be mindful of:
 - what you click on: beware of phishing scams
 - what you share: encrypt confidential information appropriately
 - what you download: stay away from suspicious files, software, or emails that could introduce malicious code.

Be aware of cyber threats

If you have any doubts about how to protect your device or notice any suspicious activity, immediately inform CD Automation's IT security manager.

What would you do?

You receive an email alerting you to unusual login activity on your work account. It is unclear from the email whether the sender is your IT department, but there is a link in the email that you can click for more details. What do you do?

Do not click on the link. It could be a phishing scam designed to obtain sensitive information about you or to gain access to our company systems. Forward the suspicious email as an attachment to CD Automation's IT security manager. They will tell you how to proceed.

Even if an email looks legitimate, it is always a good idea to check before clicking.

Conflict of interest

Guiding principle

Each of us has interests, activities and relationships outside of work, but we do not allow these to interfere with business decisions made in our capacity as employees of CD Automation.

Expected behaviors

We are transparent about situations that could create a potential conflict between our interests, or those of friends and family, and the interests of CD Automation, and we ensure that our actions on behalf of the company are always beyond reproach.

Be proactive

The best way to avoid conflicts of interest is to be aware of and prevent situations where they may arise. It is not possible to list all potential conflicts, but the most common include:

- having a financial interest in companies that buy from or sell to CD Automation;
- holding a second job with a competitor or a company that does business, or intends to do business, with CD Automation or its customers;
- holding a position that allows you to hire, promote, supervise, or influence the career decisions of other employees;
- using your position at CD Automation to obtain personal benefits not available to everyone, such as special discounts or loans;
- using company property, resources or information to obtain personal benefits or opportunities that belong to CD Automation;
- holding positions in other companies as a director, officer or consultant that interfere with your obligations to CD Automation;
- engaging in romantic relationships with people you supervise or who may influence the evaluation of their performance or compensation.

We must ask ourselves:

Could this situation interfere, even if only in appearance, with my responsibilities at CD Automation?

Could it appear to influence the decisions I make on behalf of CD Automation?

Could it appear to be a conflict to someone else?

If the answer to any of these questions is “yes” or “I’m not sure,” there may be a potential conflict, and you should seek advice from your manager before proceeding.

Communicate

If you believe you are involved in a conflict of interest, even if only potential, be open and transparent, discussing the situation immediately with your manager. Most conflicts can be avoided or reduced if reported promptly. Failure to report an actual or potential conflict can undermine trust and worsen the situation.

What would you do?

One of your suppliers asks if you would be willing to do a small job 'on the side.' You could accept and do the work after hours so that it does not interfere with your job at CD Automation. Should you seek advice before accepting?

Yes. This opportunity creates a potential conflict of interest. Even though you have no control over whether we do business with this supplier, working for both CD Automation and one of its suppliers puts you in a conflicted loyalty situation. The 'side job' could influence our business relationship with that supplier and cause others to question your ability to make objective business decisions on behalf of CD Automation.

Remember that the perception of a conflict can undermine trust and be just as damaging to our reputation as an actual conflict. You and your manager may agree on guidelines for performing this additional work, but only if you request it first.



Financial and commercial documentation

Guiding principle

We understand that accurate and comprehensive records not only positively influence sound business decisions, but also help us maintain the trust of investors, regulatory authorities and stakeholders.

Expected behaviors

In pursuing our objectives and achieving results, we recognise our responsibility to accurately document information and provide a clear and comprehensive picture of each transaction.

Maintain honest and accurate records

The integrity of our records depends not only on the finance team, but on every employee. Follow company policies, procedures, and internal controls, and obtain approvals and supporting documentation when required.

If you are involved in preparing financial or business documents, comply with all applicable legal and regulatory requirements and provide truthful, correct, accurate, and timely information.

Do not exceed your authority.

There are specific processes that define signing and spending authorities and outline the controls necessary to effectively manage our business. If you are unsure whether you have the authority to sign a document or act on behalf of CD Automation, obtain approval first.

Manage records carefully

Company policies on records management describe how to store, manage and dispose of information. Only use company-approved platforms and systems to communicate and carry out your work. Do not destroy documents that are subject to legal scrutiny. If you are asked to alter documents, discuss the request with your manager and ensure that the request is only intended to correct an existing error.

Our “records” include:

- Travel or expense reports
- Time management forms
- Safety reports
- Production or quality records
- Financial statements
- Sales reports
- Payroll documents
- Contracts or purchase orders
- Donation receipts
- Shipping documents

Pay attention

Report any of the following to the “Suggestion Box” if you notice or suspect them:

- omissions
- false, inaccurate, incomplete or misleading entries
- unrecorded funds or activities (‘off-balance sheet’ or ‘under the table’)
- advance or deferred sales or expenses to improve or obscure results
- alteration of documents.

Cooperating with inspections and investigations

Do not pressure or manipulate accountants, auditors or investigators authorised to examine CD Automation’s records.

What would you do?

Your manager asks you to change the information on an invoice without providing the documentation required to support this change. What should you do?

You are required to be honest and accurate and to make entries that fully and accurately reflect the transaction.

If you feel comfortable doing so, ask your manager for the supporting documentation and justification needed to make the change. You can also report the matter to Human Resources or make a report via the “Suggestion Box”.

This is a very important matter.



Insider Trading

Guiding principle

As employees of CD Automation, we may be privy to material non-public information (“inside information”) about our company or other companies we work with, but we never use or share such information to gain an unfair advantage.

Expected behaviors

We do not trade (buy or sell securities), nor do we offer suggestions to others so that they can trade based on inside information.

Knowing what to protect

Inside information is any information relating to CD Automation or our customers or business partners that is not available to the public but which, if known, could influence an investor to buy or sell shares. Using this type of information for trading is called insider trading, and it is illegal. Make sure you know what types of information are considered inside information and protect them in the same way you would protect any confidential information.

Do not trade or give advice based on inside information.

If you have inside information about a company (ours or anyone else’s):

- Do not buy or sell shares based on that information
- Do not give advice to others so that they can buy or sell shares based on that information
- Do not share the information with colleagues unless there is a legitimate business need to do so
- Do not share the information with family, friends or others outside CD Automation
- Ask before trading shares whenever you are unsure whether the information is considered inside information.

Inside information includes non-public information about:

- Financial profits or losses
- Financial forecasts
- New product offerings
- Strategic business plans
- Potential mergers, sales or acquisitions
- Changes in executive leadership
- Significant litigation or ongoing legal proceedings
- Government investigations and inquiries

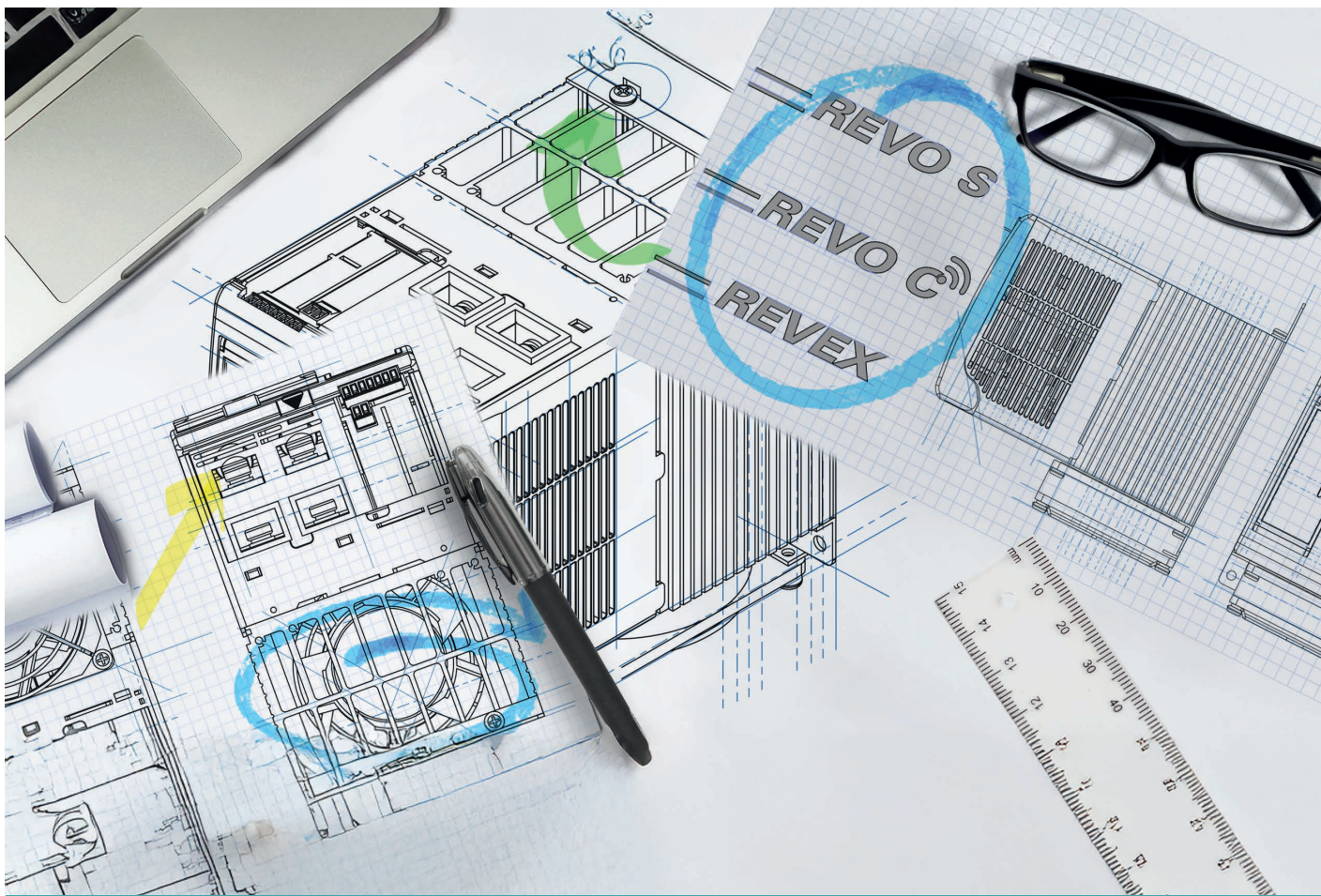
Take additional precautions

Certain persons at CD Automation and certain types of share transactions are subject to blackout periods and additional trading restrictions. Please familiarise yourself with the rules before trading.

What would you do?

While you were in a meeting with the Management team, someone mentioned a possible new acquisition. You discussed it with your partner over dinner, but warned them not to share the information with anyone else. Did you do anything wrong?

Yes. You must keep internal information confidential, even from family and friends. If your partner trades based on this information or shares the information with someone else who trades, both you and your partner could be in violation of our company policies and insider trading laws.



Advertising and Marketing

Guiding principle

We build long-term relationships with customers by demonstrating honesty and integrity in all our interactions.

Expected behaviors

We are totally customer-oriented: we work to understand their needs, provide accurate information about our products and services, and advertise and market our solutions in a truthful and appropriate manner.

Maintain confidence

Provide truthful and complete information about the quality, safety, characteristics and availability of our products. Deceive our customers, exaggerate what our products can do, promise something we cannot deliver? These actions can cause us to lose trust and are not tolerated; this is not how we conduct business.

Knowing what is required

Be familiar with and follow the requirements governing how we market and sell our products. Ensure that any claims about our products are supported by facts and that the descriptions and visuals accurately depict the products.

What would you do?

After months of building rapport, one of your customers is ready to sign a contract. But in your eagerness to make the sale, you mention some benefits associated with the product that have not yet been verified. Correct the information and you risk losing the sale?

Yes. Any statement we make must be truthful and justified. It is necessary to be honest about the characteristics and advantages of the product. If the customer signs the contract and subsequently discovers that you have not been sincere or that the product does not offer the advantages you described, not only does this damage the business relationship, but it also compromises the trust they have placed in your company.

External communication, media and social media

Guiding principle

Every verbal, written or electronic communication about CD Automation affects our reputation and brand; we ensure that the messages we share are clear, accurate and consistent.

Expected behaviors

All external enquiries should be directed to the official spokespersons designated by CD Automation.

Using social media responsibly

In any online communication (forums, blogs, chats, social media, etc.), use common sense and observe our company policies. Remember:

- Protect confidential and sensitive information entrusted to us by others
- Never post anything that could be discriminatory or that could constitute a threat, intimidation, illegal harassment or bullying
- If you comment online about any aspect of our business, make it clear that your opinions are personal and do not represent CD Automation.

What would you do?

You are reading an online article and discover that it contains inaccurate information about CD Automation. You are considering responding in the comments section to correct the misinformation. Is this permitted?

No. Even if your intentions are good, only authorised individuals may speak on behalf of CD Automation.

Please inform your manager or the CD Automation communications team about the article so that authorised individuals can respond appropriately.



Interactions with government institutions

Guiding principle

We understand that conducting business with government agencies is complex and highly regulated.

Expected behaviors

We understand our obligation to know and comply with the requirements that apply to public procurement and contracts, and to conduct ourselves according to the highest standards.

Being a good partner

Governments around the world are major customers; transparency, accountability and openness are key to maintaining good relationships. Procurement and contract requirements may vary by country and industry. Comply with all rules applicable to the locations where you operate and ensure that suppliers and third parties working on our behalf do the same. In every government contract:

- Promote procurement integrity by competing fairly and ethically throughout the bidding and negotiation process; do not seek to obtain information or influence outcomes improperly
- Protect any government property or sensitive information entrusted to us
- Ensure that all quality tests, inspections or programmes, as required, are conducted and documented correctly
- Ensure that all statements, reports, data and other disclosures you submit on behalf of CD Automation are accurate and truthful
- Be alert for fraud, waste and abuse, and report them to the “Suggestion Box”.

Competing in the right way

Every country has laws prohibiting bribery and corruption, and the laws of many countries have global reach. Violations can result in legal action, substantial fines (both for CD Automation and for you), and even imprisonment. Do not offer or accept anything of value, directly or indirectly (through a third party), to obtain an improper advantage for yourself or for CD Automation. It is prohibited to make facilitation payments to expedite the process of obtaining a permit, licence or government action. For more information, see the anti-corruption and anti-extortion section.

What would you do?

Work on government contracts requires certain security inspections, but the tool being tested has not always functioned properly, and the requirement for multiple checks seems unnecessary. Is it permissible to skip one of the inspections to save time and money?

No. Do not assume that it is not necessary. Always comply with the terms of the tender or contract and, unless you have documented approval from the government customer to do otherwise, do not skip the required inspections.

Lobbying activities

Guiding principle

As a company, we sometimes engage with elected officials on public policy issues; we always do so in full compliance with our Core Values and Code, disclosing all related activities and expenses as required.

Expected behaviors

We understand that there are very specific rules regarding lobbying activities, and as employees, you do not participate in such activities without the written approval of the appropriate company resource.

Knowing your obligations

Engaging with policymakers to seek regulatory or legislative action may be considered lobbying, for which certain requirements must be met. If you are asked to engage in this type of activity on behalf of CD Automation, obtain written approval from Management first. If you are asked to do so on behalf of an Affiliate, obtain written approval from your manager and CD Automation Management first. Unless you are specifically authorised, do not engage in lobbying on behalf of CD Automation.

What is “lobbying”?

Communicating with a government official to influence laws, regulations, policies or rules, or conducting research or other activities to support or prepare for communication with a government official.



On-site visits, inspections and audits

Guiding principle

We are committed to cooperating with all reasonable requests from the government or regulatory agencies.

Expected behaviors

We are open and transparent in our interactions and business relationships.

Requests directed to the appropriate resource

If you receive a request from a government official or agency, please contact CD Automation Management promptly for assistance.

Cooperate fully

If you are questioned as part of an investigation or audit, you have a duty to cooperate and provide honest information, sticking strictly and specifically to what is requested. Ensure that you have authorised any external requests of this kind in advance with Management and follow these guidelines:

- Always provide truthful, accurate and complete information
- Do not obstruct or improperly influence an audit or investigation
- Do not lie or make false or misleading statements, either verbally or in writing
- Never try to persuade someone else to provide false or misleading information.

What would you do?

You have just learned that a government official will be visiting your facility as part of an investigation, and a co-worker suggests that you review and clean up all your 'old files'. Is this a good idea?

No. If the 'old files' are in any way related to the upcoming investigation, they should not be destroyed, and even if the files do not appear to be related to the investigation, discuss it with CD Automation Management before destroying them to avoid even the appearance that they were destroyed in anticipation of the investigation.

Also, make sure that Management is aware of this instruction from your colleague so that they can intervene before bad advice is shared with others.

Political and charitable activities

Guiding principle

As a company, we encourage our employees to take an active role in the community and respect the political and charitable causes they choose to support.

Expected behaviors

As employees, we understand that our support for political or charitable causes is a personal matter, as are donations and volunteer activities.

We are committed to not engaging in political activities at work or allowing them to interfere with our role in the company.

Providing support in a responsible manner

At CD Automation, we respect employees who wish to engage in volunteer or community support activities. If you choose to devote time or resources to personal causes or projects, please do so in your own time and using your own resources, not those of the company.

Ensure that your activities are always legal and do not solicit colleagues to participate in your personal volunteer or charitable initiatives.

Speaking and donating on your own behalf

As a company, we do not endorse or make donations to specific candidates or political causes. Therefore, never make donations on behalf of CD Automation or an Affiliated Company, and do not expect to be reimbursed for any personal donations.

Also, remember that if you show your support for a cause or candidate, never speak or act on behalf of CD Automation: always make it clear that these are solely your own opinions.

This does not limit your legal rights as an employee: you are free to discuss your working conditions or participate in other personal activities protected by law.

What would you do?

Your manager is very open about her support for a local political candidate. She tells your team about a fundraising event this weekend and invites the whole team to attend. You don't want to attend, but you're worried that this will reflect negatively on you. What should you do?

You are not obliged to attend this event or to support your manager's choice of candidate. Your manager should not put their team in a situation like this, and the invitation is inappropriate. Tell them that this invitation makes you uncomfortable.

If they insist that you attend, you can report it in the "Suggestion Box" and share your concerns.

Environmental protection and sustainability

Guiding principle

We understand the impact our businesses can have on the environment.

We also recognise our obligation to protect it by operating cleanly and efficiently, promoting sustainable business practices.

Expected behaviors

We honour the power we have as individuals by reducing CD Automation's impact on the planet through our daily actions and inspiring others on our team to do the same.

Doing one's part

Ensure you understand the correct way to use, handle, transport, store and dispose of regulated materials. And remember: even non-regulated materials must be treated responsibly and sustainably. If you work with our business partners, let them know that we expect them to demonstrate the same commitment to environmental protection and sustainability.

Care and conservation of resources

Let's strive for continuous improvement in our daily work. Help us reduce the amount of waste CD Automation generates by recycling or reusing resources, including glass bottles, cans, paper, and plastic. Be mindful of how you use resources such as water and electricity, and conserve them whenever possible. If your job involves sourcing materials or purchasing products, consider sustainability and our environmental footprint in your decision-making.

Observe and report hazards

Be mindful in your daily work. Ensure that your actions do not harm the environment, and if you see any potential hazards, do not ignore them. Whether it concerns actions by CD Automation or one of our business partners, report it immediately to your manager or submit it to the "Suggestion Box" so that the situation can be remedied.



What would you do?

You have noticed some colleagues handling chemicals in what you believe to be a potentially dangerous manner. What should you do?

Make sure the safety officer is aware so that they can take any necessary action. Inform your colleagues of your concerns and remind them of the procedures they should follow to dispose of chemicals properly. When you raise your concern, you are not only setting an example, but also helping to make the world a better place.

Human rights

Guiding principle

We are committed to promoting human rights and dignity around the world, understanding and managing our impact on human rights in every aspect of our business.

Expected behaviors

We consider the impact of our operations on people and communities and strive to protect them by supporting laws that protect workers, prevent child labour and ensure fair labour practices.

Promoting human rights

We promote human rights through fair labour practices, wages and working hours, and by prohibiting human rights abuses such as child labour, forced labour and human trafficking.

Working with like-minded partners

We do not conduct business with suppliers or business partners who do not promote human rights. If you are involved in evaluating or selecting business partners, ensure that they have a reputation for operating legally and ethically.

Monitoring the work of partners

If you are responsible for managing relationships with business partners, actively monitor their performance, pay attention to any violations of our Core Values or Code, and immediately report any misconduct that comes to your attention.

What would you do?

You read a news story about a supplier we currently use that was accused of unsafe working conditions several years ago. Should you take any action based on this information?

Yes. Share the information with your manager or supervisor so that you can investigate and understand the partner's current practices and, if necessary, take appropriate action. We will not purchase materials or goods produced by a supplier with a history of human rights violations.

Ask yourself if your partner has a history of:

Human rights abuses?

Violations of labour laws?

Exploitation of children or use of forced labour, human trafficking or child labour?

Failure to comply with employee safety regulations?

If you answer "yes" or "not sure" to any of these questions, your partner may not share our commitment to human rights. Consider another partner or ask your manager or supervisor for help if you have questions.

Our shared commitment

We conduct business with integrity

This was true at the beginning of CD Automation, and it remains true today. When we do the right thing by acting in accordance with our Code and Core Values, we earn mutual trust and respect from our customers and business partners. Your integrity/our success is the winning formula and our shared commitment.

Always remember that if you face a difficult situation, you are not facing it alone. Contact your manager or supervisor for answers and assistance.

Living our Code every day is critical to achieving our Shared Purpose of enabling progress. Thank you for your commitment to the Code and for everything you do to build CD Automation's reputation as a company that makes the world stronger, safer and better.

For you. For the company. To grow together.







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