

CODE OF ETHICS

Mission and Values

InTheCyber Group SA

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1. PREMISE

The Code of Ethics is in line with the United Nations' request to “to embrace, support, and enact a set of core principles in the areas of human rights, labour, the environment, and anti-corruption” codified in the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

In this context, the Code of Ethics expresses the set of values and principles that InTheCyber Group (aka "ITC") has decided to adopt in the conduct of its activities and in the relationship with all its Stakeholders and it is therefore, part of ITC Governance asset.

This document is issued by ITC and adopted by all the Companies belonging to the Group, that in the last years and still share a project of collaboration in the field of Cybersecurity, using the most appropriate spread methods and training actions.

The Companies of the Group provide their activities in accordance with the principles enacted in the following Group Code of Ethics, believing that compliance with the legality, the principles and values here defined, are essential conditions for Company operations.

In particular, the Group, aiming to the constant excellence in the performance of business activities, has considered appropriate to enshrine in this document a series of ethical principles and behavioural rules with the intent to establish a *modus operandi* in order to respect the values underlying the ethical nature of the Company, within a corporate culture that considers compliance with the laws in force and the principle of legality as essential elements, also to protect its image and reputation on the market.

2. HUMAN RIGHTS AND THE INTERNATIONAL LAW OF RECOGNITION

The Code of Ethics is inspired by the main national and international laws and regulations on Human Rights such as the United Nations Charter of Rights, the European Union Charter of Rights, and the decent work agenda of the ILO (International Labour Organisation).

Although the Universal Declaration of Human Rights is not a legally binding instrument, it nevertheless plays an important moral role.

In an age marked by the triumph of technology and by more types of interdependence, Human Rights are characterized by being the backbone of morality, including the assumption of a universal logic.

They represent the most important and common system of values of the last two centuries: in fact, they outline those essential aspects of human dignity, referring to the essential dimension and basic needs of personal development.

All Companies of the Group believe the DUDU has a moral and fundamental role, they recognize Human Rights as founding principles of the Group and the individual as a moral and rational being who deserves to be treated with dignity. They also identify and pursue the four fundamental pillars of the Universal Declaration of Human Rights: dignity, freedom, equality and brotherhood.

Dignity protects the values shared by all individuals regardless of differences in religion, ethnicity or sex. **Freedom** refers to rights related to individual freedom and personal security. **Equality** is intended to ensure the political and public participation of all individuals. Finally, **brotherhood** refers to economic, social and cultural rights.

For all these reasons, the Group and all its Companies also support the International Red Cross Committee, the largest humanitarian organization in the world, based in Geneva.

3. ADDRESSES AND FIELD OF APPLICATION

The rules of the Code of Ethics apply with no exception to the employees of the ITC Group Companies and to all those who work to achieve their objectives, as members, business representatives (directors, managers, etc.), Partners, Public Bodies, external collaborators, as well as all third parties that get in touch with the Companies (suppliers, consultants, brokers, agents, customers, etc.). These are the entities the Code is addresses to.

Therefore, such entities are required to know and observe the contents of the Code of Ethics and to contribute to its implementation and promotion of its principles.

The rules listed in the Code of Ethics complement the behaviour that the Addressees are required to observe under civil, penal and administrative laws, under the regulations in force and under the obligations provided by collective bargaining and especially based on the relationship with the Companies that follow this Code of Ethics. All actions, operations and negotiations provided and the behaviour of the Addressees of this Code while providing their work are inspired by the utmost correctness in matter of management, completeness and transparency of information, formal and substantive legitimacy, clear and truthful accounting records, in accordance with the current rules and internal procedures.

The Code is valid in all national contexts in which the Group operates, considering any cultural, social, regulatory and economic diversity of specific local contexts, pursuing the fundamental principles enshrined in the Code.

The implementation of the Code of Ethics is mandatory for all Group Companies.

Starting from the date of adoption of this document, third parties operating for or on behalf of Group Companies are committed to the observance of the principles here listed by accepting specific contractual terms.

The Code of Ethics is a landmark for ITC Collaborators and Employees to which they have to relate in order to provide the daily work, actions and interpersonal relationships within the Company and towards the community and the market: no conviction of pursuing the interests and objectives of the Company legitimize the violation of the rules of the Code of Ethics, which will overcome any internal regulations, procedure or contractual relationship which may conflict with it.

ITC hopes that its Stakeholders will recognize the values on which the Code stands, that they will share them and apply them as the fundamental of business management, driven by the principles of integrity, loyalty, fairness, transparency, rules and law compliance and without any business or personal conflict.

The Group supports the development and competition of different areas by promoting and managing programmes and interventions aimed at the exploitation and diffusion of research, technological development and innovation.

It helps Companies and Public Bodies:

- **To define** policies and to manage national and international research and innovation programmes and projects;
- **To take** the opportunities offered by Group Companies in matter of research and innovation
- **To plan and manage** interventions to exploit the innovative potential of the territory.

4. MISSION

ITC Group, leading organization in Cyber Defense and Intelligence, was founded in 2008 to support Companies and Institutions in verifying the real effectiveness of the defense systems adopted and their evolution and improvement.

The Group's areas of intervention:

- **Governance_Institutional:** Critical infrastructure defense activities and support to Information Warfare and Cyber Intelligence units.
- **Legal_Corporate:** Activities with the intent to prevent, detect, restrict and neutralize malicious actions and cyber-attacks using all the techniques of Cyber Intelligence and Forensic Investigation.

The Group's Companies are leaders in the world of cyber-intelligence, data acquisition and data analysis.

In reference of the Legal_Corporate activity, the mission is to increase the real effectiveness of the defense systems adopted by Companies in order to protect their information and strategic assets.

In the Governance_Institutional activity, the mission is to help intelligence organizations, law enforcement and military forces with the best strategic, tactic and analytic solution needed to ensure the success of their operations, protecting national security and preventing any type of destabilizing activities.

This type of activity requires the import-export and transit of certain categories of goods such as the so-called "dual-use items", meaning goods that can have civilian and military use and that are subject to the EU export control regime (EU Regulation no. 428/2009).

The Group carefully and meticulously observe the European Community legislation in reference to dual-use items trade, which is also internationally recognized.

Therefore, ITC, requires and promote the compliance of the Code of Ethics aiming to consolidate its relationship of trust with all its Stakeholders: employees, customers, suppliers, partners, local authorities.

ITC is ISO 27001 and ISO 9001 certified and strives to ensure that the Companies of the Group adopt on the market, a policy of quality and safety of the product and/or service, in accordance with information security and environmental protection.

5. LAWS AND REGULATIONS COMPLIANCE

ITC is compliant with countries regulations in which provides its activities in accordance with the principles established by the Code of Ethics.

Moral integrity is a constant duty of all Addressees, therefore, they are required to know and observe the laws and regulations in force in all the countries in which they operate. This also includes attention to and compliance with the standards that govern competition, both on the national and international markets.

Addressees must relate with Public Authorities and Institutions with fairness, transparency and collaboration, in accordance with the laws and regulations and their institutional functions.

6. PATTERNS OF CONDUCT

Addressees must provide all the activities with professional commitment, moral rigour and fair management, in order to protect the Company image.

The behaviour and relationships of all Addressees, inside and outside the Company, must be inspired by transparency, fairness and mutual respect.

In this context, Directors must be the first example for all Group's members, following the principles of the Code of Ethics and the Corporate procedures while performing their duties, in order to ensure that all employees are aware and supporting them in the request for clarification or proposals for any type of updating, if necessary.

In addition, the Group trusts that the Directors will work actively in order to propose and implement projects, investments and commercial and management actions needed to preserve and increase the economic, technological and professional asset of the Company, aiming to promote and ensure the development and technological progress thanks to training courses related to the specific areas.

7. GROUP VALUES

All Addressees are committed to pursue their objectives with loyalty, reliability, honesty, proficiency and transparency, in accordance with laws and regulations in force.

This Code of Ethics expresses the commitments, values and ethical responsibilities in business management and corporate activities that all those who establish any kind of relationship with ITC must pursue.

ITC's work is based on a set of values that align ITC's approach to the Cybersecurity market and to society in which it operates.

These are the values InTheCyber is based on:

ATTENTION

We provide our work with great care and pride and we believe that everything we do requires the best of our ability in order to create value for people and companies we encounter and for ourselves, providing immediate and adequate solutions.

ITC is aware of the strategic role that has for private and public companies and pursues its Mission daily with great care and attention.

It is important that the job is well performed for the Company itself and for the ones it is addressed to.

In this context, the guiding principle of ITC's activity is the quality of service that is addressed to:

- **Customers:** to meet their specific needs with customized tools and services, providing real, targeted and lasting solutions that create value, simplifying complexity;
- **People:** to strengthen the recognition of their centrality and the awareness of the great importance that work has for them, always welcoming respectfully every individual and taking care of them, believing that the Company can represent an educational role in their life.

PASSION

We are passionate about our work and we put all our efforts to ensure that the needs, aspirations and goals of our Colleagues, Candidates and Customers are met. "We, through our work, seek to share in the effort that all people make to build happiness".

ITC sees work as a way to achieve personal fulfilment and desires and as a participation in the creation of a greater good that can last in the future.

For this reason, ITC believes that the only real way for its employees and representatives to provide their work is to be passionate about new job opportunities that respond to the needs and objectives of People and Customers met every day.

LEARNING AND INNOVATION

In a world that keeps evolving and innovating, we are driven by curiosity and a sincere desire to learn, sharing our professional and personal knowledge to support the growth and evolution of our organization and Stakeholders.

ITC is committed to develop the skills and proficiency of all employees, candidates and workers, encouraging their curiosity, protecting and enhancing their diversity, so that the energy and creativity of each person can reach full expression and fulfil everyone's potential. Continuous learning and appropriate improvements and innovations are necessary conditions to provide the best performance, creating new solutions that can respond to economic evolution and social conditions in order to support business continuity to all Stakeholders.

This is why ITC people are always available for Colleagues, Workers, Companies and Institutions, sharing their strong corporate and personal know-how, both through their professionalism and through sharing and learning, as well as volunteering.

COLLABORATION

We believe that working as a team and promoting collaboration between employees regardless of their role, is the way to achieve our ambitious goals and feel satisfied with our work.

ITC thinks that people are its greatest resource and that only their involvement in the Company mission can ensure its achievement.

This is why ITC acknowledges the fundamental values of:

- Internal communication and teamwork, to make the job satisfying and increase the sense of belonging;
- Collaboration between employees and management, which is based on mutual respect of each role, and that it is intended as the only way to achieve the common business goal;
- Interfacing with all Stakeholders, in order to ensure a good and shared growth.

Despite their roles, responsibilities and seniority, all ITC members are encouraged to create synergies and establish positive relationships with their colleagues, discussing and suggesting proposals to improve the services and processes of the Group Companies and creating value for all Stakeholders.

SUSTAINABILITY

We grow by making sure that we always value our human, financial and environmental resources, never forgetting the future of the next generations.

ITC believes that the ability of a Company to successfully maintain its harmony and performance is essential for a healthy business activity and for the fulfilment of the needs and purposes of Stakeholders.

The Company's growth must be based on the exploitation of all resources, harmonizing protection of human potential, economic performance, social responsibility and environmental sustainability.

ITC people feel that they are part of the reality they are in and not the other way round, for this reason they are committed to offer an excellent service that must satisfy the needs of the present generation without compromising the possibilities of the future ones and strengthening them instead.

ACCOUNTABILITY

We endorse respect for human rights, diversity and inclusion; we support all legislations that provide the best protection and preservation of employees, and we also play an important role in the elimination of corruption and any kind of abuse or unlawful behaviour.

Due to the activity provided, ITC is set up as the first interlocutor for Companies and Institutions and actively participate in the definition of new and better rules for the development of the market and local communities, importing and exporting global best practices in accordance with the law and following the principle of free, regulated and fair competition. It is also aware that the Good that wants to build through its daily efforts, falls under the individual responsibility of the Company's members.

Every member of ITC is required to act and communicate consciously, in accordance with the Company reputation and the Stakeholders, supporting:

1. Universally recognised human rights and protecting them;
2. Diversity and social and working inclusion, respecting the principles of equality, impartiality, protection of dignity and security of the person, against all forms of discrimination;
3. The laws of the countries in which ITC provide its services, fighting against any form of abuses and corruption;
4. All Standards that protect health and safety at work, promoting them and embracing the most effective preventive measures;

5. The environment, encouraging the most advanced initiatives, technologies and practices aimed at preserving it.

8. GENERAL PRINCIPLES OF CONDUCT ON THE RELATIONSHIP

ITC organizes its action according to strong ethical principles, supported by individual responsibility, as a way to encourage all people working there to be completely aware of the consequences of their professional choices, in order to benefit both themselves and the Organization, and also all other Stakeholders: Workers, Candidates, Customers, Institutions, Local Communities, Suppliers, Partners, Competitors and any other economic and social interlocutor.

ITC's Customers and Suppliers are required to read the Code of Ethics and to respect the policies listed, encouraging mutual collaboration and aligning with the principles listed below.

LEGALITY

ITC works with Authorities, Public Institutions, Private Companies and other Stakeholders in accordance with the law in force in the countries in which it provides its services – following a behaviour inspired by the principles of contractual transparency and fairness – committing to implement policies and working practices that support:

1. Effective abolition of child labour;
2. The elimination of all forms of forced and mandatory labour, and the fight against modern slavery and human trafficking;
3. The freedom of association and the right to collective bargaining;
4. The elimination of all forms of discrimination;
5. The respect of the labour market regulations related to health and safety at work, disciplinary procedures, working hours and remuneration;
6. The fight against all forms of corruption, including extortion and bribes. In particular, it is expressly forbidden to all business representatives to have undue relations with Public Administration, including the exchange of money, favours or gifts, any kind of pressure, false statements or any other fraudulent behaviour that violates the law, even if implemented with the mistaken intent of pursuing the interests and objectives of the Company.

IMPARTIALITY

Impartiality is the principle on which ITC builds its actions, in order to maintain a constant balance between the particular and general interests of the individual and the Company, of each Employee, User, Customer and Supplier, recognizing and enhancing diversity based on mutual respect and common sharing of values and principles of the Code of Ethics.

In particular, the principle of impartiality supports the behaviour of all those who operate within and on behalf of ITC:

1. In the relationship with Employees, Candidates and Workers, where the selection, recruitment, training, remuneration and management of human resources must be based exclusively on merit and competence, avoiding any kind of discrimination, as for example

- gender identity, religion, national or ethnic origin, cultural or social background, disability or disease, sexual orientation, age, marital status or political opinions
2. In People management, who are treated avoiding unlawful conditions or undue discomfort and promoting working conditions that allow the development of personality and professionalism;
 3. In the relationship with Customers, in order to provide qualitative services, considering their peculiarity;
 4. In the relationship with Suppliers, where ITC has no intention to preclude anyone who fulfils the requirements to compete for the conclusion of a contract, avoiding any kind of trade practice that might cause the Supplier to sign a contract unfavourable to them.

CONFIDENTIALITY

ITC is ISO 27001 certified and compliant with the GDPR, therefore it protects the privacy of all Stakeholders and the confidentiality of the information and personal data in its possession: collection, storage and processing of personal data are provided only by authorised employees, who operate under the authority of the manager in charge.

Data must be collected and processed only for specific, explicit and legitimate purposes according to the principles of adequacy, relevance and non-excess. Also, people authorised to process data are required not to use any information for purposes not related to the pursuit of business activity.

Given the sensitivity of the information and documents processed, all those operating within and on behalf of ITC undertake to comply with strict privacy procedures to protect all data, applying the laws in force and the commitments agreed, starting from the contract to specific non-disclosure agreements.

HONESTY

ITC believes that honesty is a necessary condition to acquire credibility and to establish relationships of trust with all Stakeholders, allowing to improve the operation, image and reputation of the field. Fairness and good business management must be part of the work of business representatives, outside and within the Company:

- according to a concept of the market based on respect for people, free initiative and regulatory competition, due to results and benefits of mutual interest and for the whole community;
- always respecting tangible and intangible Company assets, that means avoiding misappropriation of goods, data, commercial information, professional relationship with Candidates, Workers, Customers and Suppliers, which represent Company's assets and as such must be managed, and also in order to ensure the proper provision of services.

TRANSPARENCY

Thanks to action, communication and information, ITC adapts to the principle of transparency, which is a key element to achieve internal and external Stakeholders reliability.

Transparency is a principle of conduct, in particular for:

- Company management and contractual relations, which must be fair, clear and verifiable - whether they involve Companies Customers, Local Authorities, Public Administrations, Suppliers, Candidates and Workers;
- The cost of provided services, which must be clearly expressed and must not be in any way charged to Candidates and Workers, even if concerning recruitment and job placement;
- Company information communication to the outside, which must be true, simple, understandable, quick and accessible to everyone. In particular, no Employee or Collaborator is authorised to give personal opinions on behalf of Group Companies, including on social media. The disclosure of information and data concerning ITC and each company of the Group, as well as the use of logos, must be authorized by the managers in charge.

HEALTH AND SAFETY

According to the regulations in force, especially D.Lgs 81/2008, ITC commits to comply with all legal obligations in the matter of Hygiene, Health and Safety, starting from an accurate risk assessment and definition of prevention and protection measures, in order to promote safety in the workplace.

All Employees, Collaborators, Workers, and those who work on behalf of ITC are required:

- To be compliant with the regulations in force and to perform health and safety duties, in accordance with specific working procedures related to their working activity: no violation of any regulation or law is tolerated;
- To commit in proactively influence other Colleagues on the implementation of safe behaviors, acting as communicators on the matter of safety at work, including self-care and care of the workplace;
- To adopt behaviors based on respect, civilization, sobriety and good education between colleagues and towards third parties. ITC undertakes to prevent abusive, discriminatory or defamatory interpersonal attitudes, forbidding any dangerous behaviour, the use of coarse language, physical and moral violence, verbal aggression, harassment or bullying, applying appropriate disciplinary or sanctioning measures. ITC also requires its employees to be aware of the harmful effects of alcohol or drugs on their health and others', both inside and outside the workplace.
- For ITC this means preserving working conditions both protecting the psychophysical integrity of the worker and respecting their dignity.

ENVIROMENTAL SUSTAINABILITY

ITC develops its activities in accordance with all laws and regulations concerning environmental protection, aware that all Group Companies, despite their core business, are required to implement good consumer actions that ensure a good harmony between the use of natural resources and their regeneration.

In the analysis of the environmental impact of its activities, ITC considers and monitors the energy consumption of fuel used by the Company and consumables, raising awareness among Employees and Suppliers to operate according to the same principle.

9. DISCLOSURE AND KNOWLEDGE

It is in the interest of ITC that the Code of Ethics reaches out to all Addressees and Stakeholders and that the principles and values contained therein are shared in order to ensure the widest propagation. The Code is published on ITC website and on corporate intranets of all the Group Companies.

Companies Managers must promote with their actions the values and contents of the Code of Ethics, making sure that they are perceived and pursued by everyone.

Employees, collaborators and consultants must adapt their behaviour to the values, principles, objectives and forecasts contained in the Code of Ethics.

All Addressees, Customers, Suppliers and other Stakeholders (when possible) will be provided with the Code of Ethics, the related regulations as well as the Company procedures that regulate each specific internal function and they will also be invited to respect them.

For this reason, ITC establishes the appropriate training initiatives and invites all Addressees to request any information necessary in order to properly understand the Code of Ethics and therefore, comply with the rules contained therein.

CODE IMPLEMENTATION

It is Group Companies responsibility to control compliance, interpretation and verification of the principles contained in the Code of Ethics, focusing on:

1. Monitoring the implementation and functioning of this Code;
2. Ensuring that all Addressees are informed and trained;
3. Suggesting and validating updates related to legislative changes and to the evolution of the organization and its activities;
4. Reporting any behavior or event that differ from the principles of the Code of Ethics.