

CODE OF ETHICAL CONDUCT

of NPE Srl

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Sede Legale e Operativa:

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Cod. Fiscale 04831590262 - P.IVA 04831590262 - R.I TV-BL 04831590262 - R.E.A BL - 401959

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INTRODUCTION

Company Management has approved NPE's Code of Ethics, with the aim of clearly defining the set of ethical principles that the Company recognizes, accepts and shares.

The introduction of the Code of Ethics stems from the need to identify, articulate, integrate and harmonize the organizational conduct of Management and of all the Company's collaborators.

To the extent that the values and ethical principles that NPE considers fundamental become the point of reference for the everyday conduct of all collaborators, inspiring their behavior and actions, the foundations are strengthened for the correct and healthy functioning and development of the Company, in support of achieving ambitious and sustainable long-term objectives, in the interest of stakeholders, collaborators and the territories in which it operates, while enhancing on a global scale the reputation of its products and, consequently, of its name.

This revision of the Code of Ethics incorporates the principles already in force with new references to whistleblowing, information security (cybersecurity), environmental protection and sustainability, gender equality and inclusion, prevention of harassment and inappropriate conduct, pay equity and flexible work arrangements (remote working), confirming NPE's commitment to the continuous improvement of its ethical, social and organizational standards.

1. FOREWORD

NPE (hereinafter also the "Company") operates in the electronic board sector, engaged in developing solutions, designing, testing and manufacturing embedded systems for its customers, who belong to multiple industries.

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The Company bases the conduct of its business on compliance with the ethical principles set out in this Code of Ethics and on compliance with applicable laws. It is aware that the goal of creating sustained value for investors and other stakeholders must coexist with the ethical principles set out in this Code.

In pursuing its objectives, the Company complies with the following general principles:

- full and constant compliance with the laws in force in the countries in which the Company operates;
- the maintenance of accounting records inspired by the principles of clarity, transparency and timeliness, together with provision for control;
- fairness in relations with the members of the corporate bodies and with the Company's employees, in relations with third parties (suppliers, customers and Public Administration) and in the Company's representation mechanisms, including during negotiations with external parties, so as to avoid possible conflicts of interest.

2. SCOPE OF APPLICATION AND ADDRESSEES

The Company attaches fundamental value, in the conduct of its business, to the principles and rules of conduct set out in this Code of Ethics (hereinafter, the “Code”); it likewise considers it essential to apply the contents of this document in order to ensure transparency and legality in all activities connected in any way with the Company.

The following are required to comply with the principles set out in this Code: the corporate bodies and their members, employees (persons bound to the Company by an employment relationship, including executives), collaborators (including interns), even on a temporary basis, external consultants, suppliers, customers, contractors, agents and other parties acting in the name and/or on behalf of the Company on the basis of a mandate or other contractual relationship (hereinafter, collectively, the “Addressees”).

The Company takes action to inform and raise the awareness of all Addressees regarding the content of the Code, as it evolves, and to bring it to the attention of third parties as set out in paragraph 12.

3. ETHICAL PRINCIPLES

This Code is intended to set out the Company's following fundamental ethical principles.

3.1. Legality

The Company regards legality as an essential value in the conduct of its business. It therefore undertakes to comply with the laws and regulations in force and applicable in every country in which it operates, with the provisions of this Code, with any voluntary codes of conduct to which the Company has subscribed, as well as with the Company's regulations and procedures in force, in addition to generally recognized practices.

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This commitment is equally essential for consultants, suppliers, customers and anyone having dealings with the Company. The Company will neither initiate nor continue any relationship with parties who do not intend to align themselves with this principle.

Under no circumstances does the pursuit of the Company's interest justify or render acceptable conduct that conflicts with the provisions of law or regulation.

Addressees must be aware of the applicable laws, regulations and the resulting conduct to be adopted; should Addressees have any doubt as to how to proceed in the conduct of their respective activities while complying with applicable laws and regulations, they may contact the Company, which will promptly provide adequate guidance.

The Company ensures that appropriate training, information and ongoing awareness-raising activities will be carried out regarding the provisions of this Code and their practical application.

3.2. Loyalty and transparency

All activities carried out in the name and on behalf of the Company are guided by the principles of loyalty and transparency, fairness and good faith, both in the primary sense of fidelity to the Company's values, points of reference and principles, and in the relationships connecting individual Addressees and the Company with the market.

Accordingly, every relationship, whether internal or external to the Company, must be conducted in compliance with the laws and regulations applicable from time to time, as well as with the provisions of this Code.

3.3. Social fairness and the value of the individual

The Company respects the fundamental rights of the persons with whom it interacts in any capacity, safeguarding their physical and moral integrity.

The Company rejects and condemns all forms of discrimination, including those based on age, sex, gender identity, sexual orientation, health status, disability, race, nationality, cultural background, political opinions and religious beliefs, and membership of associations and trade unions.

To this end, any inquiry into the ideas, preferences or personal tastes of employees, members of the corporate bodies and the Company's collaborators, as well as of Addressees in general, is prohibited.

For matters relating to gender equality, inclusion and the prevention of harassment and inappropriate conduct in the workplace, please refer to paragraphs 3.9 and 10.5, respectively.

3.4. Diligence and professionalism

The members of the corporate bodies, employees and collaborators are committed to performing their duties with diligence and professionalism, paying the utmost attention to the ongoing creation of excellent products and services, conceived and continuously improved through research aimed at ensuring:

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- the safety and well-being of the user,
- the economy and durability of the product,
- the highest possible level of environmental compatibility of production.

Such persons undertake to act in the Company's interest, pursuing goals of effectiveness and efficiency, while being aware that ethics is of primary importance to the Company and that, consequently, conduct that, although ostensibly aimed at benefiting the Company, conflicts with applicable laws or with the provisions of this Code will not be tolerated in any way. The Company also pays constant attention to the involvement of collaborators — at every level and of every kind — in achieving the Company's development goals, through their empowerment and the enhancement of their respective skills.

3.5. Protection of confidentiality and data protection

The Company protects the confidentiality of the information and data in its possession, acting in compliance with the applicable laws and regulations on the matter.

The Company also guarantees the protection of personal data and privacy in compliance with applicable laws and regulations on the matter (including EU Regulation 2016/679 – GDPR).

To safeguard the confidentiality and integrity of company information and of the data processed, the Company also adopts information security (cybersecurity) measures described in paragraphs 3.10 and 9.

With regard to these matters, please also refer to par. 4.1.5.

3.6. Protection of the Company's image

Compliance with the ethical principles set out in this Code is a fundamental requirement for building and maintaining a good reputation, as well as a factor that decisively contributes to achieving the Company's objectives and success, fostering relationships with investors, customers, suppliers and the community at large.

By complying with the provisions of this Code, Addressees contribute to protecting the Company's image and good reputation.

3.7. Environmental protection and sustainability

The Company's activities are guided by the principle of safeguarding the environment and public health, in compliance with the specific applicable regulations.

The Company, being aware of the effects of its activities on economic and social development and on the general well-being of the community, plans its activities seeking a balance between economic initiatives and environmental needs, with due regard also for future generations.

This commitment ensures that projects, processes, methodologies and materials take into account developments in scientific research and best practices in environmental matters, with the aim of respecting the local area, preventing pollution and protecting the environment and landscape.

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In light of its electronic board assembly business, the Company operates in compliance with the technical and environmental regulations specific to the sector, including, by way of example, the RoHS Directive (restriction of the use of hazardous substances in electrical and electronic equipment), the REACH Regulation on chemical substances and Legislative Decree No. 152 of 2006 on the management of waste electrical and electronic equipment, and requires the same commitment from its component and material suppliers.

- ***Sustainability and corporate social responsibility***

NPE pursues economic, social and environmental sustainability goals, in the belief that long-term value creation must go hand in hand with responsibility towards the communities and territories in which it operates. To this end, the Company:

- promotes initiatives for energy efficiency and reduction of the environmental footprint of its activities, products and production processes;
- promotes the responsible use of natural resources and the reduction, reuse and recycling of materials [for example, for packaging in accordance with Regulation (EU) 2025/40 “PPWR”], where technically and economically feasible;
- selects its suppliers and partners also taking into account their commitment to environmental matters and social responsibility;
- promotes a culture of sustainability among its employees and collaborators, including through training and awareness-raising initiatives.

3.8. Attention to consumers and customers

In the conduct of its business, the Company considers attention to its current and future consumers to be of fundamental importance. Listening to their diverse needs is a source of inspiration for offering superior solutions capable of anticipating and influencing new market trends.

The Company's customers take up the challenge arising from consumer expectations, calling for distinctive innovation, product reliability and attention to service quality.

The Company therefore undertakes to guarantee consumers and customers competence, punctuality, attentiveness, openness, courtesy, cooperation and passion in ensuring high quality standards, offering the highest level of service.

3.9. Gender equality, equal opportunities and inclusion

NPE recognizes diversity as a factor of enrichment and growth and promotes an inclusive work environment in which every person can express their potential regardless of gender, age, sexual orientation, gender identity, marital status, disability, nationality, ethnic origin, religious beliefs or political opinions.

The Company undertakes to guarantee equal opportunities for access to employment, professional growth and career development, adopting selection, evaluation and promotion processes based exclusively on criteria of merit, competence and performance, as already provided for in paragraphs 10.1 and 10.3.

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NPE promotes gender equality at every stage of the employment relationship — from selection to remuneration (see par. 10.3), from training to access to positions of responsibility — and fosters initiatives aimed at removing any obstacles, including cultural ones, to the full participation of all persons in the Company's life.

The Company does not tolerate discriminatory, harassing or offensive conduct; for the related prevention and management procedures, please refer to paragraph 10.5.

3.10. Information security (cybersecurity)

NPE regards the security of information and IT systems as essential for protecting its corporate assets and the data of its employees, customers and suppliers, as well as for ensuring the Company's operational continuity.

NPE adopts technical and organizational security measures in compliance with NIS2, as an important entity.

All Addressees are required to adopt prudent and responsible conduct in the use of the IT and digital tools made available by the Company, as more fully governed by paragraph 9 and by the internal IT Regulation.

4. STANDARDS OF CONDUCT IN THE MANAGEMENT OF ACTIVITIES

4.1. General principles

- **4.1.1. Compliance with applicable law**

Every operation and transaction must be legitimate, authorized, consistent and appropriate, in compliance with applicable law and with the provisions of this Code, of any voluntary codes of conduct to which the Company has subscribed, as well as of the Company's regulations and procedures in force.

In particular, the Company and Addressees, in carrying out their activities, act in full compliance with national and international laws and regulations, including laws relating to tax matters, the protection of industrial property and privacy, competition and antitrust rules, and rules on market abuse.

- **4.1.2. Conflicts of interest**

Should an Addressee find themselves, whether directly or indirectly, in a situation of even merely potential conflict with the Company's interests, they are required to inform their line manager and/or their contact person, who is responsible for assessing — either directly or with the involvement of the bodies designated and/or identified by internal regulations — whether a conflict actually exists and for adopting appropriate measures.

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Furthermore, the corporate bodies, employees and collaborators, as well as those acting in the name and on behalf of the Company, must ensure that every business decision is made in the Company's interest, in line with the principles of proper corporate and business management of the Company itself. They must therefore avoid all situations and activities in which a conflict of interest could arise between economic, personal or family activities and the duties performed, such as to interfere with or impair their ability to make decisions impartially and objectively.

Addressees shall avoid any abuse of their position for the purpose of obtaining undue advantages for themselves or for others, in compliance with applicable laws and regulations.

- **4.1.3. Care in commercial transactions**

In commercial transactions, care is required in the receipt and disbursement of coins, banknotes, credit instruments and securities in general, in order to avoid the risk of counterfeit items being placed on the market.

- **4.1.4. Contributions and sponsorships**

Any contributions or sponsorships made by the Company in favor of non-profit organizations and/or associations must be granted within the limits of, and in compliance with, applicable laws and regulations.

The power to allocate such sums for the contributions and sponsorships defined in this paragraph rests with the management bodies, in compliance with the powers delegated to them and the related limits.

Such initiatives (relating to social, environmental, sporting, entertainment or artistic matters) presuppose a prior check on the good standing of the beneficiary.

- **4.1.5. Confidentiality of company information and protection of privacy**

Addressees are required to comply with the principle of confidentiality set out in paragraph 3.5, ensuring, in general, the utmost discretion with regard to news and information concerning the Company's assets or relating to the Company's business or that of third parties connected with it.

In particular, each Addressee is required not to use confidential information for purposes unrelated to the performance of their duties and tasks.

Furthermore, the Company ensures that it processes the personal data of its employees, customers, suppliers, third parties or other Addressees provided or communicated to it in the course of its activities (hereinafter, "Personal Data") in full compliance with applicable national and European legislation in force from time to time.

In particular, the Company ensures that it does not disclose Personal Data, except where disclosure to Addressees or third parties is necessary for the proper conduct of its activities.

As already indicated in par. 3.3, any inquiry into the ideas, preferences, personal tastes and, in general, the private life of employees and other Addressees in general is prohibited, except for data strictly necessary for

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the proper performance of the employment relationship, which will in any case be processed in compliance with the relevant legislation.

- **4.1.6. Communications with the outside environment**

In addition to the foregoing regarding confidentiality, communication and disclosure to the outside world (including through the mass media) of news, information and data relating to the Company must respect the right to information and is reserved exclusively to the Company functions designated for that purpose; under no circumstances is it permitted to disclose false or misleading news or comments.

All communication activities are carried out in compliance with applicable laws, rules and professional conduct practices, and are performed with clarity, transparency, timeliness and accuracy.

Any form of pressure on, or attempt to gain favorable treatment from, the media is avoided.

Information must be clear, complete, truthful and not misleading, such as to enable its recipients to make informed decisions. Among confidential information, particular importance is attached to inside information, namely precise information concerning the Company that has not been made public and that, if disclosed, would be likely to have a significant effect on the price of the Parent Company's shares.

Employees, particularly in their use of social media and online platforms, are required to:

- not disclose confidential or unauthorized information relating to the Company;
- refrain from posting content that could harm the reputation or image of NPE, its employees, customers or suppliers;
- avoid expressing opinions that could be attributed to the Company without authorization.

- **4.1.7. Prohibition of transactions aimed at money laundering**

Addressees must never be involved in activities involving the laundering of money derived from criminal activities, in strict compliance with anti-money-laundering laws.

For this reason, employees and collaborators, prior to establishing any business relationship, are required to verify the information available on business counterparties, consultants and suppliers, in order to ascertain their moral integrity and compliance with the law in conducting their business.

The Company complies with the application of anti-money-laundering laws, both national and international, in any competent jurisdiction, as well as with the laws, regulations and measures of the Competent Authorities on tax matters.

The Company also ensures the transparency of every transaction in accordance with anti-money-laundering laws.

- **4.1.8. Protection of industrial and intellectual property**

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The Company acts in full compliance with the industrial and intellectual property rights legitimately held by third parties, as well as with the laws, regulations and conventions, including at EU and/or international level, protecting such rights.

In this regard, all Addressees must respect the legitimate industrial and intellectual property rights of third parties and refrain from the unauthorized use of such rights.

- **4.1.9. Combating organized crime**

The Company condemns and combats all forms of organized crime, including of a mafia-type nature.

For this reason, Addressees will be required to prevent the risk of criminal infiltration through careful verification of the good standing and reliability of business counterparties, with the consequent exclusion of any counterparty suspected of belonging to, being connected with, or facilitating criminal organizations.

- **4.1.10. Compliance with export control regulations and dual-use goods**

In carrying out its business activities with foreign counterparties, the Company undertakes to comply with national, European and international regulations on export controls, dual-use goods, and embargoes or economic sanctions adopted by the competent Authorities. Addressees involved in transactions with foreign parties are required to verify, to the extent within their competence, that business counterparties are not subject to restrictive measures or embargoes, refraining from entering into transactions in violation of such provisions.

4.2. Relations with customers

Meeting customer requirements and building constructive relationships are fundamental objectives for the Company.

The Company aims to be a reliable and dependable partner for its customers and intends to develop its markets by adhering to this principle and by providing products and services of the highest quality and standard.

Relations with customers must be conducted in compliance with the laws and regulations applicable from time to time, as well as with the provisions of this Code and with the Company's regulations and procedures in force.

In particular, relations with customers must be guided by fairness, courtesy, professionalism and helpfulness, satisfying customers impartially and in compliance with established quality standards. In this regard, the Company periodically monitors the quality of its products, honoring the commitments made to customers and always operating within the limits of the law.

In their relations with customers, directors, employees, agents and collaborators are required to:

- develop and maintain favorable and lasting relationships, characterized by the utmost efficiency, cooperation and courtesy;
- honor the commitments and obligations undertaken towards them;

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- provide accurate, complete, truthful and timely information so as to enable the customer to make an informed decision;
- operate within the framework of applicable law, requiring strict compliance with it, and in observance of the Company's regulations and procedures in force;
- specifically comply with the provisions of paragraph 5 where customers are representatives of the Public Administration.

Addressees are prohibited from being involved, in any capacity, in the marketing of products and services having characteristics (in terms of origin, provenance, quality or quantity) different from those declared or agreed, or bearing names, trademarks or distinctive signs likely to mislead the end consumer as to the quality, origin and provenance of the products/services offered.

4.3. Relations with suppliers

In relations with suppliers, selection processes must be based on objective competitive comparison (in terms of skills, competitiveness, quality, fairness, reputability, reputation, price, and performance and assistance guarantees), avoiding any form of favoritism or discrimination.

Purchasing processes are aimed, on the one hand, at seeking the maximum value for the Company and granting equal opportunities to every supplier, and, on the other, at transparency, loyalty and cooperation during both the pre-contractual and contractual stages.

Suppliers themselves, in maintaining any kind of relationship with the Company, are required to fully comply with the provisions of law and of this Code.

The Company's suppliers must ensure that their employees are provided with working conditions based on respect for fundamental human rights, international Conventions and applicable laws.

In particular:

- the use of child labor is absolutely prohibited and considered unacceptable. The age of workers engaged in production must not be lower than the legal minimum age permitted in each country;
- the exploitation of child and other labor, the use of forced labor, physical or psychological abuse, or corporal punishment are considered absolutely unacceptable and will result in the immediate termination of any and all relationships between the supplier and the Company;
- the remuneration and benefits of workers engaged in production must comply with local regulations and laws and be in line with the provisions of applicable international conventions.

Suppliers must ensure that every form of production is carried out through manufacturing processes that adequately protect workers' health in a manner appropriate to the production processes actually used.

Suppliers are also required to pass this Code on to their own sub-suppliers.

With regard to the procurement of electronic components, the Company promotes responsible sourcing practices along its supply chain, paying attention, where relevant, to the provenance of critical minerals (such as tin, tantalum, tungsten and gold) in order to prevent, insofar as within its power, the risk that such minerals

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may originate from conflict zones or high-risk areas, in accordance with the relevant international standards on the matter [Regulation (EU) 2017/821 “Conflict Minerals”].

In their relations with suppliers, directors, employees and collaborators are required to:

- establish efficient, transparent and cooperative relationships, maintaining an open and frank dialogue in line with best commercial practice;
- secure suppliers' cooperation in consistently ensuring the most favorable ratio between quality, cost and delivery times;
- require compliance with contractually agreed conditions;
- require suppliers to comply with the provisions of this Code of Ethics;
- operate within the framework of applicable law, requiring strict compliance with it, and in observance of the Company's regulations and procedures in force.

In particular, the conclusion of a contract with a supplier must always be based on relationships of the utmost clarity, avoiding, where possible, forms of dependency.

4.4. Relations with consultants, agents, business intermediaries and other collaborators

Given the general principles established by this Code with regard to relations with suppliers, it is hereby specified that, in relations with consultants, agents, business intermediaries and other collaborators, directors and employees are required to:

- carefully assess whether it is appropriate to make use of the services of consultants, agents, business intermediaries or other collaborators, and select counterparties of appropriate professional standing and reputation;
- establish efficient, transparent and cooperative relationships, maintaining an open and frank dialogue in line with best commercial practice;
- secure such parties' cooperation in consistently ensuring the most favorable ratio between quality of performance and cost;
- require compliance with contractually agreed conditions;
- require such parties to comply with the provisions of this Code of Ethics and include a specific provision to that effect in contracts;
- operate within the framework of applicable law, requiring strict compliance with it, and in observance of the Company's regulations and procedures in force.

Furthermore, the Company does not maintain business relationships with parties (natural or legal persons) known, or reasonably believed, to be engaged in unlawful activities relating to offenses punishable under immigration law, and condemns any conduct aimed at encouraging or otherwise facilitating, in any form, illegal immigration.

5. RELATIONS WITH PUBLIC ADMINISTRATION

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The undertaking of commitments and the management of relations, of whatever nature, with the Public Administration (to be understood in the broadest sense, so as to also include the Public Administration of foreign States, as well as all those parties who may be so classified under applicable national, European and international law and under current doctrinal and case-law interpretations, thus including public officials, persons entrusted with a public service, and private entities entrusted with a public service, as well as private parties subject to public-law regulation) are conducted in strict compliance with applicable national, European and international laws and applicable regulations.

Addressees involved in any type of relationship with the Public Administration are required to observe the utmost transparency, clarity and fairness in order to establish a relationship of the highest professionalism and cooperation.

It is not permitted, even through an intermediary, to offer money or gifts to managers, officials or employees of the Public Administration, or to their relatives, except in the case of goods or benefits of modest value.

No corrupt practices are permitted in dealings with the Public Administration:

- in requesting and managing authorizations, permits/licenses;
- during inspection visits or audits;
- during reporting activities of any kind;
- in concluding any commercial transaction.

In countries where it is customary to offer gifts to customers or other parties as a token of courtesy, such gifts must be of an appropriate nature and value, must not conflict with the provisions of law and regulation temporarily in force there, and must in no case be construed as consideration in exchange for requested favors and/or preferential treatment.

When a business negotiation, request and/or relationship with the Public Administration is under way, the personnel involved must not seek to influence the counterparty's decisions, including officials who negotiate or make decisions on behalf of the Public Administration.

In the specific case of participating in a tender with the Public Administration, activities must be conducted in compliance with the law and with the Regulations applicable from time to time, and with proper commercial practice.

If the Company uses an entity and/or third party to represent it in its dealings with the Public Administration, the same directives applicable to the members of the corporate bodies, employees and collaborators of the Company itself shall apply to that entity, its corporate body members/employees and/or collaborators.

Furthermore, the Company may not be represented by third parties whose involvement could give rise to a conflict of interest.

In the course of a business negotiation, request and/or relationship with the Public Administration, the following actions must not be undertaken (directly and/or indirectly):

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- examining and/or proposing business and/or employment opportunities that could personally benefit employees of the Public Administration;
- offering and/or providing gifts (of any kind and nature);
- soliciting and/or obtaining confidential information that could compromise the integrity or reputation of either or both parties.

Relations with the Judicial Authorities and Judicial Police bodies, of every order and level, must be conducted with the utmost transparency, fairness and cooperation; in this regard, Addressees — particularly if involved in judicial proceedings — must refrain from adopting reticent or evasive conduct, or conduct that might, even indirectly and/or unintentionally, hinder the work of the bodies of Justice. Likewise, Addressees must refrain from any pressure or threat, including through the use of physical violence, as well as from any offer of money or other benefit, aimed at inducing a person not to testify or to give false testimony before a Judicial Authority.

The Company requires Addressees to offer the utmost availability and cooperation to anyone carrying out inspections and checks on behalf of any Public Administration.

It is prohibited to destroy or alter records, minutes, accounting entries and any other type of document useful for investigations by the competent Authorities, or to lie to or make false statements to them.

6. RELATIONS WITH OTHER STAKEHOLDERS

6.1. Trade associations, trade unions and political parties

NPE does not, in any way, contribute to the financing of political parties, movements, committees or organizations, or of trade unions representing workers, or of their representatives or candidates, with respect to whom a situation of conflict of interest could arise.

The Company refrains from engaging in conduct aimed at exerting direct or indirect pressure on political figures, while it may cooperate financially with non-political associations solely for specific projects, based on the following criteria:

- a purpose connected with the Company's business;
- a clear and documentable allocation of resources;
- express authorization from the functions responsible for managing such relationships within the Company.

6.2. Competitors

The Company shares and intends to protect the value of fair competition, refraining from conduct contrary to this principle, whether collusive, predatory and/or amounting to abuse of a dominant position.

Fair competition in the market is understood to mean the creation and offering of quality products and services that meet customers' needs and comply with contractual promises.

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In particular, the Company and Addressees avoid practices that harm the laws and regulations protecting competition, and refrain from engaging in undue pressure, threats, violence or fraudulent means aimed at preventing or disrupting, in any way, the conduct of others' business activities, just as they avoid engaging in other conduct that could distort competition in the acquisition of goods and services, for example through the corruption of private contractual counterparties.

7. GIVING AND ACCEPTING GIFTS OR OTHER BENEFITS

Addressees are not permitted (whether directly or through third parties) to give, promise, offer or receive to/from anyone — whether customers, suppliers, consultants or others — any gift (money, goods, services or other benefit) that could even be interpreted as exceeding normal commercial or courtesy practices, or as being intended to secure preferential treatment in the conduct of any activity connected with the Company, or as being aimed at influencing the recipient and inducing conduct contrary to their professional duties or duties of loyalty, or otherwise likely to distort competition (e.g., promises of financial advantages, favors, recommendations, job offers, or prize trips of dubious nature).

In countries where it is customary to offer gifts to customers or other parties as a token of courtesy, such gifts must be of an appropriate nature and value, must not conflict with the provisions of law and regulation temporarily in force there, and must in no case be construed as consideration in exchange for requested favors and/or preferential treatment.

Should an Addressee receive offers, promises and/or requests for gifts or benefits — other than gifts of a customary commercial nature or of modest value — they are required to immediately inform their line manager, or their contact person, who is responsible for assessing — either directly or with the involvement of the bodies designated and/or identified by applicable company rules — the guidelines and parameters to be adopted for handling the “case”, as well as whether a risk actually exists and for adopting appropriate measures.

8. ADMINISTRATIVE AND ACCOUNTING MANAGEMENT

Each Addressee, to the extent of their own responsibility, is responsible for the truthful, complete, regular, clear and accurate keeping of accounting records, which must be prepared in accordance with applicable law and regulations, so as to allow, at any time, the reconstruction of the transactions carried out, thanks to complete supporting documentation that is properly filed.

Anyone who becomes aware of omissions, falsifications or negligence in accounting records or supporting documentation is required to promptly report this to their immediate line manager or to the relevant control bodies, or by using the reporting channels referred to in paragraph 11. All of the Company's actions and transactions must be adequately recorded, so as to make it possible to verify the decision-making, authorization and execution process.

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For each entry, adequate traceability support is provided in order to enable, at any time, checks to be carried out confirming the characteristics and reasons for the transaction and identifying who authorized, carried out, recorded and verified the transaction itself.

9. DILIGENCE IN THE USE OF COMPANY ASSETS AND INFORMATION SECURITY (CYBERSECURITY)

Every member of the corporate bodies, employee, collaborator and external party is required to safeguard and use with diligence the Company's assets and equipment made available to them for the performance of their duties and tasks, avoiding any improper use that could damage them or reduce their efficiency, or using them for personal purposes.

With particular regard to IT systems (hardware/software) and communication systems (telephones/internet, etc.), their use must comply with security procedures, the Company's regulations in force, and the rules applicable from time to time. Under no circumstances is it permitted to alter the operation of a Company telematic or IT system or the data and information contained therein.

- *Information security and protection of information*

In addition to the foregoing, and consistently with the ethical principle set out in paragraph 3.10, all Addressees who use the Company's IT systems, networks, devices and applications are required to:

- diligently safeguard their access credentials (username, password, authentication devices), refrain from sharing them with third parties, and adopt strong passwords, changing them periodically in accordance with Company guidelines;
- not install unauthorized software, applications or devices on Company systems, and not disable or bypass the security measures (antivirus, firewall, multi-factor authentication systems) put in place by the Company;
- exercise particular caution when opening attachments, e-mail messages or links from unknown or suspicious senders, in order to prevent phishing, malware and other forms of cyber attack;
- promptly report to the relevant IT function any information security incident, suspected data breach, or anomaly encountered in the use of Company systems;
- exercise adequate caution in the use of mobile devices and in remote access to Company systems, including in the context of flexible and remote work arrangements (see par. 10.2), in order to ensure the protection of Company data and information even outside Company premises;
- take part in the training and awareness-raising activities periodically organized by the Company on information security matters.

The internal IT Regulation is the reference document governing the rules of conduct and the use of IT systems within the Company.

The Company, for its part, undertakes to adopt and keep up to date technical and organizational security measures proportionate to the risks identified, in compliance with applicable law on the protection of personal data and on the security of networks and information systems.

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10. HUMAN RESOURCES MANAGEMENT

10.1. Personnel selection and recruitment

Human Resources are regarded as a primary factor in achieving the Company's objectives, by virtue of the professional and personal contribution they provide, within a relationship based on loyalty, fairness and mutual trust.

The evaluation of personnel to be hired is carried out based on the match between candidates' profiles and those expected, and the Company's needs, in compliance with equal opportunities for all interested parties, without distinction as to gender, age, disability or other personal condition (see par. 3.9).

The information requested is strictly related to verifying the aspects required by the professional and psycho-aptitude profile, in compliance with the candidate's privacy and opinions.

The function responsible for selection, within the limits of the information available, adopts appropriate measures to avoid favoritism, nepotism or forms of patronage during the selection and recruitment stages.

10.2. Employment relationship, remote working and flexible work arrangements

Respect for the freedom and personal dignity of female and male employees and of all collaborators is one of the Company's founding values.

Personnel are hired under a regular employment contract; no form of irregular employment is tolerated.

Relationships between the various hierarchical levels (relating to the different levels of responsibility existing within the Company) must be based on loyalty, fairness and correctness, in accordance with the principles set out above.

The use of child labor is absolutely prohibited and considered unacceptable. The age of workers may not be lower than the legal minimum age permitted.

The exploitation of child and other labor, the use of forced labor, physical or psychological abuse, or corporal punishment are considered absolutely unacceptable.

The Company rejects any form of exploitation or taking advantage of any worker's state of need, and refrains from any relationship with intermediaries who are even merely suspected of recruiting labor by taking advantage of such a state of need.

The hiring of foreign personnel without a valid residence permit, as required under the laws applicable in the country of employment, is specifically prohibited.

Upon establishment of the employment relationship, each worker receives accurate information regarding:

- the characteristics of the role and duties to be performed, also taking into account any possible risks to health and safety associated with the work activity;

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- regulatory and pay-related elements, as governed by the applicable national collective bargaining agreement.

Such information is presented to the worker in such a way that acceptance of the position is based on genuine understanding.

- ***Remote working and flexible work arrangements***

Consistent with organizational and production needs and in compliance with applicable legislation on remote/agile working (Law No. 81 of 22 May 2017, as subsequently amended and supplemented), the Company promotes, where duties allow, the use of flexible work arrangements, including remote working, as a tool for reconciling professional and private life and improving organizational well-being.

The Company guarantees those who make use of such flexible work arrangements the same opportunities for professional growth, access to training, work tools and Company information as personnel who carry out their activities at Company premises, in compliance with the right to disconnect and with the need to protect health and safety, including in remote working arrangements.

10.3. Personnel management and pay equity

The Company avoids any form of discrimination against its employees and collaborators, offering equal opportunities in employment and career advancement.

In personnel management and development processes, as well as during selection, decisions are based on the match between expected profiles and the profiles held by employees and collaborators (for example, in the case of promotion or transfer) and/or on merit-based considerations (for example, the allocation of incentives based on results achieved).

Access to roles and positions is likewise determined by taking into account skills and abilities; furthermore, to the extent compatible with the overall efficiency of the work, flexible work arrangements are encouraged that facilitate the management of maternity, paternity and, more generally, childcare.

Personnel evaluation is carried out in a broad and documented manner, involving managers, the relevant personnel function and, where possible, persons who have interacted with the person being evaluated.

The Company undertakes to rigorously comply with applicable legislation regarding working hours, rest periods, weekly rest, mandatory leave and holidays.

It also undertakes to grant workers pay proportionate to the quality and quantity of the work performed, and in any case in line with the provisions of the applicable collective bargaining agreement.

The Company condemns the use of degrading or potentially dangerous working conditions, surveillance methods or accommodation arrangements, which are considered absolutely unacceptable.

- ***Gender pay equity***

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NPE undertakes to ensure pay equity between male and female workers performing equal duties with equal responsibilities, experience and performance, in accordance with the principles of applicable legislation on gender pay equality (Law No. 162 of 5 November 2021 and subsequent implementing provisions).

The Company periodically monitors any pay gaps not justified by objective factors and adopts the corrective actions deemed necessary, as part of a broader commitment to gender equality and equal opportunities referred to in paragraph 3.9.

10.4. Occupational health and safety

The Company offers working conditions that respect individual dignity and psycho-physical integrity, and safe and healthy work environments, in compliance with applicable laws and workers' rights.

In particular, the Company carries out its activities with particular attention to the work environment and to the health and safety of its personnel and of third parties, undertaking to fully comply with applicable legislation on the matter. Each Addressee is required to take the utmost care in order to prevent the risk of workplace accidents and occupational illnesses. Each Addressee is therefore required to pay the utmost attention in carrying out their activities, strictly observing all established safety and prevention measures, and complying with the instructions and directives issued by those to whom the Company has delegated the fulfillment of obligations relating to health and safety in the workplace.

The fundamental principles and criteria guiding the Company's decisions on occupational health and safety are as follows:

- avoid risks;
- assess risks that cannot be avoided;
- combat risks at their source;
- adapt work to the individual, particularly with regard to the design of workstations and the choice of work equipment and work and production methods, in particular in order to reduce monotonous and repetitive work and to lessen its effects on health;
- take account of the state of the art;
- replace what is dangerous with what is not dangerous, or is less dangerous;
- plan prevention, aiming at a coherent whole that integrates technology, work organization, working conditions, social relations and the influence of factors relating to the working environment;
- give priority to collective protective measures over individual protective measures;
- provide workers with appropriate instructions regarding the rules and procedures to be adopted in order to avoid possible risks to health and safety associated with their work activity.

In light of its electronic board assembly business, the Company pays particular attention to the specific risks connected with its production processes (for example: chemical risk, risk of electrostatic discharge – ESD, manual handling of loads, exposure to noise), identified and assessed in the Company's Risk Assessment Document (DVR), to which reference should be made for the related prevention and protection measures.

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10.5. Prevention of harassment and inappropriate conduct in the workplace

NPE does not tolerate any form of harassment (sexual, moral or psychological), mobbing, victimization, bullying, or intimidating, offensive, hostile or discriminatory conduct in the workplace, whether occurring between colleagues, between line managers and staff, or towards customers, suppliers or other third parties interacting with the Company.

By way of example, the following are considered unacceptable conduct: unwelcome requests or pressure of a sexual nature, comments, gestures or jokes with sexual or discriminatory connotations, the systematic isolation of a person, the repeated denigration of their work or of the person themselves, threats, intimidation and any other conduct harmful to the dignity and psycho-physical integrity of workers.

Anyone who believes they have been subjected to, or has witnessed, conduct of this nature may report it, without fear of retaliation, to their line manager, to the Human Resources function, or by using the reporting channels referred to in paragraph 11 below (whistleblowing).

The Company guarantees the utmost confidentiality in handling the reports received, promptly carries out impartial internal investigations and adopts, where necessary, disciplinary and organizational measures suitable for putting an end to the conduct complained of and for protecting the person involved, while respecting the right to be heard and the dignity of all parties concerned.

11. REPORTING OF MISCONDUCT (WHISTLEBLOWING)

NPE promotes a corporate culture based on legality, transparency and accountability, encouraging Addressees to report, in good faith and on the basis of factual elements, unlawful conduct or violations of this Code of Ethics, of Company procedures or of applicable law, of which they have become aware in the course of their work or professional activity.

In accordance with Legislative Decree No. 24 of 10 March 2023, implementing Directive (EU) 2019/1937, the Company has established one or more internal reporting channels that guarantee the confidentiality of the identity of the reporting person, of the person involved and of the content of the report, as well as adequate measures to protect against any form of retaliation, discrimination or direct or indirect penalization against those who report in good faith.

Reports may concern, by way of example and not exhaustively: violations of national or European laws or regulations, fraudulent or corrupt conduct, violations relating to occupational health and safety, environmental protection, personal data protection and information security, discrimination, harassment or other violations of the principles and provisions of this Code of Ethics.

The Company expressly prohibits any act of retaliation, even indirect, against those who make a report in good faith, even where the report proves unfounded following the investigations carried out. On the other hand, reports made with intent or gross negligence and found to be unfounded, or used improperly for purposes unrelated to the protection of the public or Company interest, are subject to disciplinary assessment.

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The operational procedures for activating, managing and following up on reports — including the dedicated channels, the parties responsible for handling them and the response times — are governed by a specific Company procedure, made available to all Addressees and periodically updated.

12. DISSEMINATION AND UPDATING OF THE CODE OF ETHICS

In order to promote and ensure adequate awareness, the Company disseminates the Code of Ethics to Addressees through appropriate, effective and adequate information activities and communication channels.

For this purpose too, this Code is published on the Company's website and on the Company Intranet.

The Company also undertakes to update the contents whenever changes in circumstances, in applicable legislation, in the environment or in the Company's organization make this advisable and necessary.

13. MONITORING OF COMPLIANCE WITH THE CODE OF ETHICS AND CONSEQUENCES OF VIOLATION

The Company implements and applies procedures and provides specific instructions to ensure that Addressees comply with this Code.

Violation of the Code, of the policies and procedures adopted by the Company, or of applicable laws or rules, will result in disciplinary sanctions, including possible termination of the employment relationship and/or termination of the business relationship.

For any clarification regarding the interpretation or application of this Code, Company personnel may contact Company Management.

Violation or suspected violation of the Code of Ethics must be reported in accordance with the procedures adopted by the Company on the matter, including, where applicable, the whistleblowing channel referred to in paragraph 11.

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