

Company Code of Ethics

Principles, values and terms of application of Italian Leg. Decree 231/2001
regarding "Administrative liability of legal entities"

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1. FOREWORD

This Company Code of Ethics (hereinafter briefly referred to as "**Code**") identifies and collects the ethical principles and values of the Company FlySight hereafter briefly indicated with the term "**Company**") which must necessarily inspire, beyond and regardless of what is provided for by law, the conduct and behaviour of those operating in the interest of the Company, both inside and outside the company organization, to all collaborators or consultants, regardless of contract or assignment type, to collaborators in any capacity from supplier companies providing goods and services and carrying out works for the company.

The Code is an essential element of the organization, management and control model adopted by the Company pursuant to and for the purposes of Legislative Decree nr. 231/2001 as it integrates the latter in terms of expression and communication of the values and rules of conduct considered as decisive by the Company.

The task of supervising the compliance with the Code of Ethics, disseminating its ethical principles and values and clarifying any interpretative doubts, is delegated to the Supervisory Body established by the Company pursuant to Legislative Decree nr. 231/2001.

2. GOALS OF THE COMPANY

The Company is a company operating on the national and international market in the Aerospace, Defence and Security.

The competitive strength of the Company is based on the extraordinary cutting-edge technology of excellence of its products, on its technological and research capacity and on the special quality and professional competence of its employees and collaborators.

The Company's mission is to constantly improve its know-how and profitability together with maximizing the satisfaction of both customers and its employees, in order to maintain and increase corporate value.

The declared objectives are pursued through the adoption of logics of efficiency and openness to the market, in the context of fair competition with other operators, and giving strong priority to the growth of its skills and the continuous improvement of the quality of the products and services offered.

In the awareness that a company is evaluated, as well as for the achieved economic results and for the quality of its production, also on the basis of its ability to produce value and create well-being for the community, with this Code the Company means:

- **Defining and explaining** the values and principles that form its activities and relations with employees, collaborators, business partners, shareholders,

institutions and in general with any other stakeholder;

- **Pointing** the principles of conduct to which the recipients of this Code are bound;
- **Empowering** those who operate in the sphere of action of the Company in order to comply with these principles, preparing a specific sanctioning system that ensures the effectiveness and efficacy of this Code.

The Company hopes that the Code, strongly desired by the Company Management, expresses – regardless of any input and/or corporate directive – the common feeling of its community and responds to the need to communicate, even externally, the values of the Company.

The Company undertakes to adopt all prevention and control measures deemed as appropriate in order to ensure, within the sphere of its operations, full compliance with current laws and regulations, supervisory regulations, sector self-regulatory standards, internal rules and regulations in every geographical context and at all decision-making and executive levels.

The recipients, in due compliance with the laws, legislations and regulations in force, are required to conform their actions and behaviors to the principles, objectives and commitments provided for in this Code.

This Code constitutes application of the provisions pursuant to Art. 6 of Legislative Decree nr. 231 dated 8/JUN/2001, integrating the regulatory framework which the Company is subject to regulatory framework which the Company is subject to.

3. COMPANY VALUES AND GENERAL PRINCIPLES OF CONDUCT

The Company and all those involved, for any reason, in the activities of the corporate enterprise, are required to comply with the following values and operating principles:

I. LEGALITY

scrupulous observance of all laws, regulations, administrative measures and in general of all regulatory provisions, both directly applicable to the Company's business activity, both of more general application;

II. FAIRNESS, IMPARTIALITY, AND HONESTY

the Company and each of its employees and collaborators must operate in accordance with professional ethics and internal regulations, cooperating with institutional authorities and internal control bodies. In relationships with employees, collaborators, suppliers, customers, etc. The Company operates respecting the principles of freedom, human dignity, respect for diversity, and equal opportunities. Pursuing the company's interest can never justify behavior contrary to principles of

fairness, transparency, honesty, and professionalism. In carrying out activities, it is always necessary to avoid actions that create potential conflicts of interest with company objectives. Especially, personal favors, whether economic or otherwise, should never be accepted if they raise suspicion of compromising independence in judgment or conduct;

III. RESPECT FOR INDIVIDUALS

respect should be understood as transparency, sincerity, and understanding towards individuals working with us. Moments of criticism should always be constructive and aim for improvement: actions or behaviors may be criticized, never the individual. Relationships between workers, at all levels, should be based on criteria and behaviors of fairness, collaboration, loyalty, and mutual respect. Colleagues should maintain relationships based on principles of civilized coexistence, fair cooperation, and active collaboration, demonstrating respect and appropriate discretion in human and professional relationships, avoiding behaviors or attitudes expressing discrimination based on gender, sexual orientation, geographic origin, race, ethnicity, religious or political beliefs. Respecting human dignity involves a commitment to collaboration among colleagues and an effort to enhance human resources. These principles imply that behaviors (at all levels and degrees of responsibility) should always aim to facilitate the best possible performance of each worker and promote and enhance their professional qualities during their activities.;

IV. DEVELOPMENT OF HUMAN RESOURCES

through respect for the physical and cultural integrity of the person and his involvement in paths of professional growth and participation in business purposes. In decisions affecting relationships with its external and internal counterparts, the Company considers it essential to eliminate all forms of discrimination based on age, sex, sexual preferences, health status, race, nationality, political opinions, and religious beliefs. The Company condemns any behavior aimed at discrimination of any kind, practices contrary to human rights, dignity, and integrity, whether moral or physical. The Company is committed to not using or supporting the use of child labor. The Company supports and respects human rights in accordance with the UN Universal Declaration of Human Rights and the Charter of Fundamental Rights of the European Union.

The Company recognizes the centrality of human resources as the main success factor of any business activity, within a framework of mutual loyalty and trust between the company and its workers. Therefore, it safeguards and promotes the value of human resources to enhance and improve the professionalism, experience,

and knowledge assets of each employee and collaborator, also through training initiatives. Professionalism is a determining value for achieving business objectives. The Company constantly encourages the development of professional skills of its employees, providing suitable resources for their training and professional updating. Resources are valued through the recognition of individual merits and by encouraging the enrichment of their knowledge assets. To ensure the correct fulfillment of ethical principles and procedures, the Company involves more employees in each process. In particular, it always distinguishes the role of those who perform from those who carry out control functions. Involving multiple subjects minimizes the risk of interpersonal relationships that are inconsistent with the company's intentions. Even in terms of inspection and authorization functions, the Company encourages a variety of company representatives to minimize the risk.;

V. QUALITY OF SW PRODUCT AND RELATED SERVICES

the Company directs its activity towards the satisfaction and protection of its customers. For this reason, company processes aim to achieve high quality standards while fully respecting property rights and protection related to the execution of a process or part of it. Constant commitment to research in all areas of intervention to promote and chase – in pursuit of a strategic design – the maximum degree of innovation of products and industrial processes, also through the opportunities of technological development and subsidized finance for the purpose of cost containment and quality improvement;

VI. RESPECT AND PROTECTION OF THE ENVIRONMENT

awareness of the decisive importance of minimizing the environmental impact of production activities and guaranteeing its employees and collaborators a healthy and safe workplace. To this purpose, the Company fully complies with applicable environmental laws and regulations, fully complying with current legislation and adopting advanced technologies;

VII. PRIVACY POLICY

the Company complies with the applicable legal provisions regarding the processing of personal data (UE GDPR 679/2016).

With particular regard to the processing of employees' personal data, the Company prepares specific precautions aimed to informing each employee about the nature of the personal data being processed by the Company, the methods of processing, the areas of communication and, in general, about any other data relating to his person.

VIII. HEALTH PROTECTION

the Company provides its staff, regardless of the type of employment contract, with working conditions that respect individual dignity, in safe and healthy working environments that ensure their physical and moral integrity. Work relations are carried out in compliance with the applicable collective contractual regulations and social security, tax, and insurance regulations. Personnel management decisions are based on value assessment criteria, following a meritocratic logic, also applicable to roles or assignments access. The Company promotes actions so that hierarchical relationships maintained with employees do not undermine their dignity, professionalism, or autonomy;

IX. WORKERS' INTEGRITY

respecting the physical and cultural integrity of individuals represents an ethical value for FLYSIGHT, which ensures working conditions that respect individual dignity and suitable working environments. To this end, FLYSIGHT conducts activities with technical, organizational, and economic conditions ensuring adequate accident prevention and a healthy and safe working environment, fully complying with current legislation and adopting necessary defining, cautionary, and precautionary rules. FLYSIGHT is committed to disseminating and consolidating a safety culture, developing risk awareness, and promoting responsible behavior among all collaborators;

X. UNFAIR COMPETITION

the Company aims to protect the value of fair competition by refraining from implementing collusive, intimidating, or abusive behaviors towards its competitors, as regulated by civil codes and complementary norms or regulations. Behaviors of individuals in relation to the Company must always be guided by fairness, ethics, compliance with current laws, and good commercial practices. Also, upon becoming aware of sensitive and confidential information concerning processes, products, or anything relevant to its customers, even operating in a competitive environment, it refrains from actions that might be considered compromising in terms of competitive market scenarios for its clients;

XI. CONFLICTS OF INTEREST

conflict of interest situations, beyond what is established by current regulations regarding company administration, must always be declared and consequently managed to avoid prejudices for clients, suppliers, or any party involved;

XII. INFORMATION MANAGEMENT

the Company is committed to managing the flow of information towards stakeholders so that it is always complete, clear, and transparent, ensuring that technical data or financial, accounting, or management content meet the

requirements of truthfulness, completeness, and accuracy. The company also ensures the confidentiality of information in its possession, defining and updating procedures for personal data processing in compliance with current regulations;

XIII. FAIRNESS AND INTEGRITY OF RELATIONS WITH THE PUBLIC ADMINISTRATION

in the management of any relationship or possible contact with representatives of the Public Administration, fairness of treatment and integrity of conduct must be guaranteed, in full compliance with institutional functions. The Company rejects any pressure, favoritism, "special" treatment aimed at obtaining undue or gratuitous benefits in the personal interest of those who work, of the public subject and/or of the Company itself;

XIV. VALUE OF REPUTATION

the Company, aware of the importance of its activities and their impact on economic and social development, pays utmost attention to balancing its objectives with the general interests of the territory, region, and the entire nation. For this reason, the company conducts its activities fully respecting local and national communities, associations, institutions, to gain a high level of reputation that contributes to legitimizing its actions within the community. A good reputation and image of the Company represent an essential intangible asset. A good reputation facilitates relationships with commercial, entrepreneurial, and financial partners, both public and private. Pursuing a good reputation allows for decision-making and implementation, reducing possible elements of conflict and organizing work in an atmosphere of mutual respect, without necessarily resorting to authoritative interventions;

XV. JOINT VENTURE ESTABLISHMENT

in the event of establishing a joint venture, the Company is committed to favoring, within relationships with grouped companies, a fair distribution of responsibilities and any compensation for damages. The Company also commits not to present to the Contracting Party, within the same tender procedure, either directly or indirectly, an offer that competes with what has been presented by the joint venture. In carrying out activities related to the joint venture, the Company commits to respecting current regulations and common principles of professional ethics, as well as to the correct management and use of received sensitive or confidential information.

4. RECIPIENTS

This Code of Ethics regards the conduct of the members of the Corporate Bodies, employees and collaborators as well as all those who work to achieve the Company's

goals.

The recipients are required to protect, through their own internal and external conduct, the reputation and image of the Company and its assets.

It is primarily the responsibility of the Governing Bodies to give practicality to the values and principles contained in the Code, taking responsibility internally and externally and strengthening trust, cohesion and team spirit.

The principles contained in the Code integrate the rules of conduct that each recipient is required to observe, both in compliance with the general obligations of diligence, correctness and loyalty that must always characterize the work performance, pursuant to the provisions of articles 2104 and 2105 of the Italian Civil Code and collective bargaining or Company regulations, and with reference to any additional codes adopted by the Company to rule particular aspects or for adherence to sector conduct rules.

The Code is brought to the attention of all recipients by means of adequate communication tools (*including but not limited to: display on Company website, in the communication documents available to Employees*).

In particular, each employee is required to read and know the Code in its entirety, to actively contribute to its implementation and to report any shortcomings..

All those who establish any relationship of collaboration with the Company are required to comply with the rules and principles set out in this Code.

Under no circumstances the claim to act in the interest of the Company may justify the adoption of conduct contrary to those set out in the Company Code of Ethics.

The Code also applies to the activities carried out by the Company abroad, while considering the differences existing from a legislation, social, economic and cultural point of view.

The violation of the rules of this Code affects the trust relationship established with the Company and may lead to disciplinary actions, for employees, to compliance with the procedures pursuant to Article 7 of Italian Law 300/1970, the National Collective Labour Agreements and the disciplinary codes adopted by the Company.

5. ETHICAL PRINCIPLES IN THE INDIVIDUAL DIMENSION

5.1 ETHICS WITH THE COMPANY

Without prejudice to the obligations and provisions of national and collective bargaining regulations in force, each employee and collaborator must avoid behaviors contrary to the company's ethics, as identified in this Code of Ethics, which may reflect on the company's reputation and image.

5.2 HONESTY, IMPARTIALITY, AND RESPECT FOR RULES

Honesty represents the ethical reference principle for all activities carried out by the Company to fulfill its mission. Relationships with stakeholders, at all levels, must be guided by principles of fairness, collaboration, loyalty, and mutual respect. In carrying out their duties, employees and collaborators of the Company prioritize compliance with the law over any other interest, guiding their decisions and behaviors according to the responsibilities assigned. Under no circumstances can pursuing the Company's interest justify personal conduct in violation of current laws or the rules of this Code. Discriminatory behaviors based on age, gender, sexuality, health status, race, nationality, political or union opinions, or religious beliefs of its interlocutors are prohibited. The employee must reject undue pressures, flattery, or requests for favors that compromise the honesty or impartiality of their duties, promptly reporting them to their superiors or, if the undue pressures come from their superiors, to the competent human resources office. When influencing procedures for assigning works, services, or supplies, in a contentious process or in internal and/or external staff selections, employees cannot accept or consider recommendations or reports, under any name, in any form, favoring or harming participants or involved parties. Employees aspiring to promotions, transfers, or other measures should not use improper methods to influence decision-makers, nor should they request others to do so. In dealing with practices, employees must respect the chronological order of requests or priorities, based on the type of activity performed.

5.3 USE OF COMPANY ASSETS

Company assets are assigned to personnel based on work activities; therefore, their use should be limited to performing assigned duties. Personnel commit to diligently operate to safeguard company assets, acting responsibly and in accordance with operational procedures and company directives regulating their use. In particular, these individuals must:

- Use the assets entrusted to them, such as equipment, company vehicles, personal computers, printers, communication tools like mobile phones, etc., with respect, scrupulousness, and moderation.
- Avoid improper use of company assets that could cause damage, reduce efficiency, or conflict with the company's interests.

- Use company provisions exclusively for performing assigned work duties. Thus, using company resources for personal or competing purposes with the company's activities is strictly prohibited.

It is prohibited to alter the functioning of equipment, machinery, or computer systems or illegally intervene in any way with data, information, or programs contained in or relevant to a computer or telecommunication system.

5.4 INFORMATION MANAGEMENT

Employees and collaborators, in the exercise of their work functions, who come into possession of confidential information and sensitive data, must use such data only for purposes permitted by laws or internal rules, avoiding using them for private purposes of their own or others. This obligation extends to non-confidential information or documents they hold for office-related reasons. They access documents and information for which they are authorized and allow access to third parties only in cases provided by law and to colleagues for service reasons, following office instructions. Employees and collaborators of the Company must maintain maximum confidentiality even outside working hours to safeguard company know-how. Therefore, while respecting privacy protection rules, they observe office secrecy and keep confidential the information learned in the course of their duties. The duty of confidentiality must be observed even after the cessation of the employment relationship.

The Company attaches strategic importance to its IT resources. The Company policy aims to protect its IT resources by implementing security controls to prevent unauthorized disclosure, alteration, or destruction of non-public information, disruption of information processing services provided to users, and theft of our company's resources. All our company's collaborators are required to ensure that the use of our IT resources, including the Internet, email, and other online resources, and the use of hardware and software align with our business objectives. Our company is committed to respecting the privacy rights of customers, suppliers, all partners, and employees.

5.5 ETHICS AND PROFESSIONAL PRACTICE OF SOFTWARE DEVELOPMENT

Software developers must commit to making the analysis, specification, design, development, testing, and maintenance of software a respected profession with beneficial effects. In line with their commitment to public health, physical safety, and the well-being of the public, software developers must adhere to the following eight principles:

- Public – Software developers must act in line with the public interest.
- Client – and employer. Software developers must act in a manner consistent with

the interests of their clients and employers while being in line with the public interest.

- Product – Software developers must ensure that their products and changes applied to them meet the highest professional standards.
- Judgment – Software developers must maintain integrity and independence in their professional judgment.
- Management – Managers and leaders of software developers must endorse and promote an ethical approach to software development and maintenance management.
- Profession – Software developers must advance the integrity and reputation of the profession, remaining in line with the public interest.
- Colleagues – Software developers must be loyal and supportive of their colleagues.
- Self – Software developers must continuously improve their professional practice throughout their careers and promote an ethical approach to it. Human resources are considered a fundamental element for the Company.

6. IMPLEMENTATION OF THE CODE OF ETHICS

This Code of Ethics, formally adopted by the Company, is duly referred within the Company Management System and Company policies.

Any changes and/or updates that may be necessary will be then prepared by the competent/involved bodies and expressly supervised by the Supervisory Body and approved by the Chief Executive Officer.

6.1 KNOWLEDGE AND UNDERSTANDING OF THE CODE OF ETHICS

The Code of Ethics is brought to the attention of internal and external involved parties of the Company by means of specific communication and dissemination activities.

The Code of Ethics is distributed to all employees in occasion of the recruitment and to all third parties who enter into a business relationship with the Company.

The Company ensures adequate knowledge and understanding of the Code of Ethics by all personnel through information/training programs defined according to the rules established by the Management System.

This document consists of 11 (eleven) pages.

The Management
Andrea Masini, FlySight Chief Executive Officer