

# CODE OF ETHICS AND INTERNAL MODEL. MANDATORY RULES.



## **Code of Ethics and mandatory rules.**

### **1.- Premises.**

This document, called the Code of Ethics, regulates the set of rights and responsibilities that Shark Technology Ltd expressly assumes towards those with whom it interacts in carrying out its business.

In full harmony with the positions expressed by its members, the organization is aware of contributing with its work, with a sense of responsibility and moral integrity, to the development process of the European and international economy and to the civil growth of the planet.

**Shark Technology Ltd** believes in the value of work and considers legality, correctness and

transparency of action to be essential prerequisites for achieving its economic, productive and social objectives.

**Shark Technology Ltd** affirms the adequacy of its Code of Ethics in pursuing its social mission.

The Code of Ethics also has the aim of introducing and making binding for the company the principles and rules of conduct relevant for the reasonable prevention of crimes.

The Code of Ethics, considered as a whole and together with all the specific implementation procedures approved by the company, is considered an integral part of employment contracts, collaboration, mandates, consultancy and commercial agreements.

Violation of its provisions will therefore constitute a disciplinary offense and, as such, will be prosecuted and sanctioned by the company in the case of employees or managers with possible immediate dismissal / suspension / temporary or permanent removal from the company; as well as in the case of external collaborators, consultants, suppliers or companies in partnership or with which there are close commercial agreements, with the immediate termination of any relationship that may contravene the code of ethics or that has any type of impact, even indirect or mediated or media-related with the principles set out in the code of ethics. These principles are intended to be incorporated into every contract and relationship to which the company is a party and may result in compensation for damages caused to the organization.

As for collaborators, consultants and self-employed workers (specified below among the recipients) who provide their services to Shark Technology Ltd. and to other third parties, the signing of this Code of Ethics or an extract of it or, in any case, adhering to the provisions and principles set out therein represent a sine qua non of the stipulation of contracts of any nature between the company and such subjects. The provisions thus signed or, in any case, approved, even for conclusive facts, constitute an integral part of the contracts themselves.

Based on what has been described so far, any violations by the subjects referred to in the previous paragraph of specific provisions of the Code of Ethics, based on their severity, may also legitimize the company's withdrawal from existing contractual relationships with said subjects. and they can also be identified ex ante as causes for automatic termination of the contract.

### **2.- Recipients of the company's Code of Ethics.**

Through the adoption of the Code of Ethics, **Shark Technology Ltd** intended to define moral values, clear rules and procedures to comply with.

The Code of Ethics is aimed at:

- Members of the collegiate bodies
- Employees (both temporary and permanent)
- Project collaborators
- External and internal consultants
- Suppliers of goods and services

Any other person who can act in the name and on behalf of the company either directly or indirectly, permanently or temporarily or those who establish relations or relations with the company and work to pursue its objectives

The recipients of this Code of Ethics are required to learn its contents and respect its precepts. The Code of Ethics will be made available to them, as specified below.

The Management, or a delegate, of **Shark Technology Ltd.** is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the organization.

Company employees, in addition to respecting the regulations in force and the provisions of collective bargaining - where applicable - undertake to adapt the methods of carrying out their work activities to the purposes and provisions of this Code of Ethics.

This is true both in intra-company relationships and in relationships with parties external to the company and, in particular, with Public Administrations and other public authorities.

An essential requirement of any profitable collaboration relationship with Shark Technology Ltd is represented by the respect, by the other recipients, of the principles and provisions contained in this Code of Ethics.

In this sense, at the time of stipulating contracts or agreements with other recipients, the company provides its interlocutors with a copy of this document.

### **3.- Integrity of behavior and compliance with Laws and Regulations**

The principles listed below are considered fundamental, therefore our organization is committed to respecting them towards everyone.

Furthermore, it is essential that these values do not remain mere statements but are translated into conduct and behavior inherent to the company.

As an organization and as individuals, all recipients in the work environment are required to apply them correctly in both internal and external operations and relationships.

The fundamental values on which the company's activity is based are.

#### **Integrity in compliance with Laws and Regulations**

**I repudiate all discrimination**

**Centrality, development and valorisation of human resources and equity of authority**

**Territorial rooting**

**Transparency and business ethics**

**Quality**

**Diversity**

**Legality and the fight against terrorism and crime**

The company expects these values to define its identity and unite employees and collaborators to the global organization.

### **4.- Repudiation of all discrimination.**

In decisions that affect relationships with interested parties (personnel management and work organization, selection and management of suppliers, relationship with the surrounding community and with the institutions that represent it), **Shark Technology Ltd**

avoids any discrimination based on age , sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of your interlocutors.

#### **5.- Centrality, development and valorisation of human resources and equity of authority.**

**Shark Technology Ltd** recognizes the centrality of human resources and believes that an essential factor of success and development is the professional contribution of the people who work there.

**Shark Technology Ltd** has always placed the professionalism and individual contribution of people at the center of its work, giving continuity to a relationship style that aims to recognize everyone's work as a fundamental element of corporate and personal development.

At the same time, **Shark Technology Ltd** places dialogue, the exchange of information - at any level - the enhancement and professional updating of its collaborators and the establishment of a corporate identity and the related sense of belonging at the center of its daily work.

This value translates:

**Shark Technology Ltd** is committed to creating and providing quality services and to competing on the market according to principles of fair and free competition and transparency, maintaining correct relationships with all public, governmental and administrative institutions, with citizens and with third-party companies.

Everyone is required to operate, in any situation, with integrity, transparency, coherence and fairness, conducting every business relationship with honesty.

**Shark Technology Ltd** operates in strict compliance with the Law and works to ensure that all staff act in this sense: people must behave in compliance with the Law, whatever the context, the activities carried out and the places in which they operate.

This commitment must also apply to consultants, suppliers, customers and anyone who has relationships with our organization.

**Shark Technology Ltd** will not start or continue any relationship with anyone who does not intend to align with this principle.

#### **6.- Global territorial rooting**

**Shark Technology Ltd** aims to carry out technological development projects trying to break down and improve the frontiers of knowledge and the known at every moment. In this context, the action of the organization tends towards a direct involvement of citizenship, understood as global citizenship, of public and private institutions, of entrepreneurship and of associations on everything that concerns the applicability of its products to an improvement of the global well-being. The company takes action and will continue to take action to ensure that the companies collaborating with it comply with the same behavioral regulations and orient their activities towards the same principles and values.

**Shark Technology Ltd.** also promotes local development through a strong connection with the various actors of the global community of reference. It therefore acts in the community for the development of a rich and generative society, capable of recognizing and enhancing the resources that compose it, the skills and potential present, the gender, cultural and ethnic differences, promoting well-being, integration and social development and enhancing their recognition by users and those who physically offer the service.

## **7. Quality**

Quality is a distinctive element of our company. The organization is committed to and responsible for ensuring quality in every activity, consistent with its long-term strategy.

The activities are implemented by the company through a set of processes managed through a quality management system that offers external uniformity, transparency and improvement of the service.

## **8. Diversity**

**Shark Technology Ltd** requires from its directors, employees and collaborators behaviors that guarantee the utmost respect for the dignity of people, therefore the organization:

- It guarantees the most scrupulous observance of the rules protecting child and child labour, workers' freedoms and rights;
- Does not tolerate human rights violations;

It promotes, in the complex social fabric, integration as a form of collective enrichment.

In particular, **Shark Technology Ltd** condemns any form of discrimination based on gender, ethnic, political and religious affiliation.

## **9. Legality and fight against terrorism and crime**

The history, identity and values of the organization are expressed in a business ethic based on:

### **Reliability**

understood as a guarantee of absolute seriousness in the projects launched, in the transactions and in the commitments undertaken.

### **Solidity**

relating to an entity that rests on the defined capital bases, as demonstrated by its prolonged activity.

### **Transparency**

consequent to the conception of the social role which requires not only respect for ethical principles and work but also the implementation of methods that allow the communities of reference and social actors to have access to the information to be able to reconstruct their actions.

### **Correctness in contractual matters**

avoiding that, in existing relationships, anyone operating in the name and on behalf of the company tries to take advantage of contractual gaps or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has come to visit.

### **Protection of competition**

refraining from collusive, predatory behavior and abuse of dominant position.

**Shark Technology Ltd** believes deeply in democratic values and condemns any activity that may have the aim of terrorism or subversion of the democratic order.

The organization also condemns any activity it involves

- Forgery, counterfeiting, alternation and/or spending of coins, public credit cards and revenue stamps;
- Acceptance and processing of proceeds from criminal activities (money laundering);
- Illegal access to external IT systems;
- Illegal possession of access codes;
- Damage to equipment and data;
- Fraud in the management of electronic signature certification;
- Interceptions, impediments and interruptions of computer communications;
- Dissemination of ideas of tolerance and silence relating to the use of narcotic substances or which create any dependency;
- Incitement to carry out illicit acts or even those contrary to moral sense;
- Negligence in combating violence, damage to public property and compliance with internal regulations.

## **10. Relationships**

**Shark Technology Ltd's** relationships with any interlocutor, public or private, must be conducted in accordance with the law and in compliance with the principles of correctness, transparency and verifiability.

No form of gift is permitted that may even appear to exceed normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any business.

## **11. Competition**

**Shark Technology Ltd** believes in free and fair competition and informs its actions to obtain competitive results that reward ability, experience and efficiency.

The company and its collaborators must behave correctly in affairs of interest to the company and in relations with the Public Administration.

Any action aimed at altering the conditions of fair competition is contrary to the company policy of **Shark Technology Ltd** and is prohibited for any person acting for it.



In no case can the pursuit of the company's interests justify conduct of its top management or collaborators that is not respectful of the laws in force and compliant with the rules of this Code.

In every external communication, the information regarding **Shark Technology Ltd** and its activities must be truthful, clear and verifiable.

## **12. Financial Institutions**

The organization maintains relationships with financial institutions based on correctness and transparency, with a view to creating value for the company itself.

## **13. Public Administration**

The term Public Administration refers to any person, entity, interlocutor who can be classified as a Public Official or Public Service Representative who operates on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private concessionary partners of a public service.

**Shark Technology Ltd** inspires and adapts its conduct, in relations with the Public Administration, to the principles of correctness and honesty. On this basis, the people appointed by the company to follow any negotiation, request or institutional relationship with the Public Administration must not for any reason try to improperly influence its decisions or engage in illicit behavior, such as offering money or other usefulness, which may alter the impartiality of judgment of the representative of the Public Administration.

The people appointed by the company organization to manage relations with any authority of the Public Administration must verify that the information provided in any manner and for any reason is true, accurate and correct. The people who are allowed to have direct contact with the Public Administration on behalf of the company are the only people expressly indicated by the company itself for this purpose.

No other collaborator may have relations of any kind with the Public Administration for activities relating to the corporate purpose of the company.

When carrying out tenders, the persons appointed by the company must respect the law and the relevant regulations.

When participating in tenders or any competitive procedure, **Shark Technology Ltd** carefully evaluates the adequacy and feasibility of the requested services, with particular attention to the technical and economic conditions, promptly identifying any anomalies where possible. The formulation of the offers will be such as to allow compliance with adequate quality standards, appropriate levels of remuneration for employees and current safety measures.

## **14. Work relationships with former employees of the Public Administration**

The hiring of former employees of the Public Administration who, in the exercise of their duties, have had relationships with the company or their relatives and/or in-laws, takes place in strict compliance with the standard procedures defined by the organization for the selection of personnel.

The definition of other working and/or consultancy relationships with former employees of the

Public Administration or with their relatives and/or in-laws also takes place in strict compliance with standard procedures.

### **15. Grants and financing**

Contributions, grants or financing obtained from the European Union, the State or another Public Body, even if of modest value and/or amount, must be used for the purposes for which they were requested and granted.

The company prohibits the recipients of this Code of Ethics from using the funds received from the Public Administrations and/or professional funds for purposes other than those for which they were provided.

Similarly, in the case of participation in public tender procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practice, in particular avoiding inducing the Public Administrations to operate unduly in favor of the company.

The organization undertakes to prevent acts that direct the recipients of this Code of Ethics to carry out actions aimed at procuring illicit advantages.

### **16. Political forces, associations and institutions with interests**

The recipients of this Code of Ethics undertake:

to scrupulously observe the provisions issued by the competent institutions or Public Supervisory Authorities for compliance with the legislation in force in the sectors connected to the respective areas of activity.

no requests or requests containing untruthful declarations are presented in the ongoing investigations with Institutions and/or Public Supervisory Authorities for the purpose of obtaining public grants, contributions or subsidized financing or to unduly obtain concessions, authorisations, licenses or other documents administrative.

to comply with any request coming from the aforementioned institutions or authorities within the scope of their respective supervisory functions, providing - where requested - full collaboration and avoiding obstructionist behaviour.

### **17. Suppliers of goods and services**

The company defines collaborative relationships with its suppliers, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, the best practices in ethical matters, health and safety protection and compliance with 'environment.

Relationships with **Shark-Technology Ltd's** suppliers, including financial and consultancy contracts, are governed by the rules of this Code and are subject to constant and careful monitoring by the company.

### **18. Internal and external consultants**



The consultants are chosen in relation to their professionalism and reputation as well as their reliability and adherence to values comparable to those expressed in this document.

Relationships with consultants are based on transparent agreements and constructive dialogue aimed at achieving common objectives, consistently with the regulations and principles of this Code of Ethics.

The primary objective of **Shark-Technology Ltd** is to fully satisfy the needs of its customers. The company bases its activity on the criterion of quality, essentially understood as the objective of full customer satisfaction.

In this framework, the organization ensures the customer the best execution of the tasks entrusted and is constantly oriented towards proposing increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness.

The company provides accurate, complete and truthful information in order to allow the customer to make a rational and informed decision. It protects the privacy of its customers in accordance with the relevant regulations in force, committing itself not to communicate or disseminate the relevant personal data without prejudice to legal obligations.

In relations with customers and clients, **Shark-Technology Ltd** ensures correctness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfillment. The company also adopts a communication style based on efficiency, collaboration and courtesy.

**Shark Technology Ltd** resorts to litigation only when its legitimate claims do not find the necessary satisfaction in the interlocutor. When conducting any negotiation, situations in which the parties involved in the transactions are or may appear to have a conflict of interest must always be avoided.

### **19. Professionalism and loyalty**

Each person carries out their work activity and services with diligence, efficiency and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities connected to the obligations.

People are expected to be loyal to the company.

### **20. Honesty and legality**

As part of their work, the people of the company are required to know and diligently respect this model and the laws in force. Honesty represents the fundamental principle for all the activities of **Shark Technology Ltd**, for its initiatives and constitutes an essential value of organizational management. Relationships with stakeholders, at all levels, must be based on criteria and behaviors of correctness, collaboration, loyalty and mutual respect. Under no circumstances can the pursuit of corporate interests justify dishonest conduct.

The organization undertakes to comply with all national and international standards, laws, directives and regulations and all generally recognized practices. Furthermore, it inspires its decisions and projects to transparency and sustainable development also as a function of global

well-being.

### **21. Sense of belonging**

In carrying out their work, people pursue the general objectives and interests of **Shark Technology Ltd**. They inform their superiors or representatives without delay of situations or activities in which there could be an interest in conflict with that of the company, on the part of the people themselves or their close relatives and in any other case in which there are significant reasons of convenience. People respect the decisions that have been taken by **Shark-Technology Ltd** in this regard.

### **22. Correctness and transparency**

The staff of **Shark Technology Ltd** do not use the information, goods and equipment at their disposal for personal purposes in carrying out the function or task assigned to them. Each person does not accept or make pressure, recommendations or reports for himself or others that could cause harm to the company or undue advantages for himself, for the company or for third parties. Each person rejects and does not make promises of undue offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favoring any interest group or individual.

### **23. Mutual respect**

People engaged in any capacity in collaboration with **Shark-Technology Ltd** require and actively demonstrate respect for the tasks, skills, methods of carrying out the tasks also through the omission of their personal considerations to third parties.

### **24. Specific obligations**

Employees, collaborators and managers of **Shark Technology Ltd** must follow the instructions below:

It is a good rule that all information relating to the activities carried out within the company is within everyone's reach. Each collaborator has the task of relating to their manager and colleague in relation to the work they carry out. In case of misunderstandings or problems, it is everyone's duty to first contact their manager or contact person.

Behave in a scrupulously loyal manner and independent of conditions of any kind that could influence their actions both towards their Client and towards external organizations in relationship with them.

Do not entertain improper economic relationships or accept valuable gifts or favors of any kind from organizations that are suppliers of your Client.

Report, upon acceptance of the professional assignment or during its performance, any relationship or interest in common with external organizations that maintain relationships with your Client, likely to lead to conflicts of interest.

Once you make a commitment you follow through. Never leave a job unfinished and never take on commitments that you already know you won't be able to meet.

Courtesy and kindness are and must be the basis of every daily activity, they must also be a constant in interpersonal relationships both inside and outside the company.

Each employee is responsible for their own workplace. Everyone is responsible for the care and cleaning of the instruments at their disposal.

It is everyone's duty to share company policies and work to ensure that these are respected.

During daily activity, each collaborator should always preserve the interests and image of the company, as well as having the utmost respect for company properties.

While carrying out your business you should always evaluate the economic implications of your choices,

avoiding waste.

Email is a business tool and is not to be considered private correspondence and therefore:

Any email message (as it is work-related) can be copied and/or made public at any time;

It is not permitted to use e-mail (internal or external) for reasons not relating to the performance of assigned tasks;

It is not permitted to send or store messages (internal or external) of an offensive nature, discriminatory based on sex, language, religion, race, ethnic origin, opinion or trade union and/or political affiliation etc.

The personal computer and any other work tool supplied to the Company's staff must be kept in the best possible condition by them and cannot be used for purposes other than those of the company.

The hardware equipment made available by the company constitutes to all intents and purposes work tools and cannot be used for personal purposes.

The Internet connection is a work tool and must be used as such. The use of the Internet for private purposes is only permitted outside working hours.

Browsing the internet:

It is not permitted for those sites that do not directly relate to the performance of the assigned tasks, especially those that may reveal the employee's political, religious or trade union opinions;

The carrying out of any kind of financial transaction is not permitted, including remote banking operations, online purchases and similar except in cases directly authorized by the company and in compliance with normal purchasing procedures;

The download and installation of free software (freeware), shareware, P2P and/or FTP, taken from websites, is not permitted unless expressly authorized by the company;

Any form of registration on sites whose contents are not related to work is prohibited;

Participation, for non-professional reasons, in forums or the use of chat lines is not permitted. The storage of electronic documents of an offensive and/or discriminatory nature based on sex, language, religion, race, ethnic origin or opinion is not permitted. and trade union and/or political membership etc.

It is not permitted to set up and use email accounts external to the company.

The company car, where present, is under the total responsibility of the person to whom it was assigned, as all company assets should be used and maintained with the utmost care.

It must be conducted in full compliance with the requirements of the highway code.

It is up to the driver assigned to the vehicle to take care of cleaning, maintenance and ensuring that the car is maintained

is always in the conditions of best efficiency.

Any fines resulting from infringements of the highway code remain the responsibility of the driver.

The use of the private car for work purposes is expected and as in the case of the company car, the driver must operate in full compliance with the requirements of the highway code.

### **25. Protection of privacy**

When processing its staff data, the company complies with the provisions contained in European Regulation 679/2016.

People are given or read a privacy policy which identifies:

#### **Purpose and methods of processing**

#### **Any subjects to whom the data are communicated**

#### **Information necessary to exercise the right of access referred to in Art. 15 of the GDPR**

In cases where the law requires it, individuals are asked for specific consent to the

processing of their personal data. Any investigation into the ideas, preferences, personal tastes and in general the private life of employees and collaborators is excluded.

The same procedure is also applied for the electronic management of information and personal data.

#### **26. Obligations of department managers towards the Code of Ethics.**

Each function manager, identified as such in the organization chart, job description and/or system delegations, has the obligation to:

**Ensure compliance with the Code of Ethics by the subjects directly or indirectly subordinated to it  
responsibility**

**Represent an example for your employees/collaborators with your behavior**

**Ensure that employees understand that the provisions contained in this Code of Ethics constitute an integral part of their work performance**

**Promptly report any reports or special needs from your subordinates to the General Management or any delegate or to the Supervisory Body.**

##### **26.1 Protection of company assets**

Each recipient is required to work diligently to protect company assets from improper or incorrect use.

People must know and implement the provisions of internal policies regarding information security in order to guarantee integrity, confidentiality and availability.

Information and know-how must be protected with the utmost confidentiality.

#### **27. Obligations for all employees, collaborators and managers towards the Code of Ethics.**

Each employee is required to know the provisions contained in the Code of Ethics or referred to by it as well as the relevant legal provisions that regulate the activity carried out within the scope of his function which constitute an integral part of each individual's work performance.

The employee who has news of alleged illicit conduct is required to communicate the information he or she has regarding such conduct only to his or her superiors or to the Supervisory Body and/or to the General Management in the manner established by the internal system.

The General Management adopts monitoring systems on the actual reading and understanding of the documents required by law by employees, collaborators, etc., by means of anonymous tests, activating the most appropriate actions to constantly increase the level of dissemination and understanding of the related contents.

Employees also have the obligation to

**Refrain from behavior contrary to these provisions and rules**

**Contact your superiors or the SB and/or delegate responsible for managing the prevention model for the necessary clarifications on the application methods of the Code of Ethics or the relevant regulations**

**Promptly report any information regarding possible violations of the Code of Ethics to at least one of the subjects indicated above**

**Collaborate with the organization in the event of any investigations aimed at verifying and possibly sanctioning possible violations**

These behavioral requirements are also required of external consultants and collaborators of all kinds.

#### **28. Confidential information about third parties.**

Company personnel must refrain from using illicit means to acquire confidential information on other third-party organizations and bodies.

Those who, within the framework of a contractual relationship, become aware of confidential information about other subjects will be required to make exclusively the use foreseen in the contract in question.

Without proper authorization, people cannot ask for, receive or use confidential information regarding third parties. If you learn confidential information about another person that is not already subject to a non-disclosure agreement or other form of protection, you will need to contact your manager for assistance in processing such information.

Each person is required to work diligently in order to protect company assets through responsible behavior and in line with the operating procedures established to regulate their use by precisely documenting their use.

#### **29. Use of company assets.**

In particular, each staff must:

**Use the goods entrusted to him scrupulously and sparingly**

**Avoid improper use of company assets that could cause damage or reduce efficiency**

**are in any case in conflict with the company interest**

**Adequately guard the resources entrusted to him and promptly inform the relevant units**

**any threats or harmful events for the company**

As regards IT applications, everyone is expressly required to:

**Scrupulously adopt the provisions of the company security policies by asking for written authorization from the relevant manager before using any application.**

### **30. Data processing.**

In the processing of customers' personal data, the organization complies with the provisions contained in European Regulation 679/2016.

A privacy policy is obtained that identifies

**Purpose and methods of processing**

**Any subjects to whom the data are communicated**

### **31. Contracts and communications to customers**

Contracts and communications to customers by the company must always be:

**Clear and simple, formulated with language as close as possible to that normally used by the interlocutors**

**Compliant with current regulations and such as not to constitute evasive or otherwise incorrect practices**

**Complete so as not to overlook any relevant element for the purposes of the customer's decision.**

### **32. Integrity and independence of relationships.**

Relationships with suppliers, including those concerning financial and consultancy contracts, are subject to constant monitoring by the company.

The stipulation of a contract with a supplier must always be based on extremely clear relationships, avoiding, where possible, forms of dependence.

The documents exchanged with suppliers must be appropriately archived: in particular, those of an accounting nature must be kept for the periods established by current legislation.

### **33. Choice of supplier.**

Where not indicated by the contracting authority, the supplier selection and purchasing processes are important:

**In search of the maximum competitive advantage for the company**

**To granting equal opportunities to suppliers**

**To loyalty**

**To impartiality**

The selection of suppliers and the determination of the purchasing conditions are based on an objective evaluation of the quality, the price of the good or service, its actual availability as well as the guarantees of assistance and timeliness.



A further selection criterion is the exclusion of suppliers who have ongoing criminal proceedings for procurement or other matters of a mafia nature.

### **34. Correctness and loyalty**

**Shark Technology Ltd** intends to conduct relations with the Public Administration with maximum transparency and ethical behavior. These relationships, which must take place in compliance with current legislation, are based on the general principles of correctness and loyalty so as not to compromise the integrity of both parties.

### **35. Gifts, freebies and benefits.**

No person in the company can give money or offer economic advantages or other types of benefits to Public Administration subjects for the purpose of obtaining assignments or other personal advantages or for the company itself.

Any form of gift that could be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring preferential treatment in the conduct of any activity connected to the company is not permitted.

In this sense, a "normal commercial practice or courtesy" with a value of less than €100.00 is considered a gift.

In particular, any form of gift to Italian and external public officials or their family members that could influence their independence of judgment with the aim of obtaining more favorable treatments or undue benefits or advantages of various kinds is prohibited.

By gift we mean any type of benefit: not only material goods but also, for example, free participation in conferences, training courses, the promise of a job offer, etc.

The above cannot be circumvented by resorting to third parties: in this regard, not only illicit payments made directly to entities or their employees but also illicit payments made to people acting on behalf of such entities are considered acts of corruption.

On the occasion of anniversaries, anniversaries and/or holidays, the donation of goods is permitted as long as they are of a modest amount and in any case within the limits decided by the Board of Directors or the General Management, subject to adequate communication to the Supervisory Body in order to allow the appropriate checks.

However, if a person in the company receives explicit or implicit requests for benefits from a member of the Public Administration, he immediately informs the Board of Directors or the person to whom he is required to report for the adoption of appropriate checks and initiatives.

### **36. External effectiveness of the Code of Ethics.**

Anyone acting in the name and on behalf of **Shark-Technology Ltd** comes into contact with third parties with whom the organization intends to undertake commercial relations or is required to have relations of an institutional, social, political or any nature with them, has the obligation to:

Inform these subjects of the commitments and obligations imposed by the Code of Ethics  
Demand compliance with the obligations of the Code of Ethics in carrying out their activities  
Adopt the necessary initiatives in the event of refusal by third parties to adapt to the Code of Ethics or failure or partial execution of the commitment undertaken to observe the provisions contained in the Code of Ethics itself, informing the General Management or the delegates and the Supervisory Body.

All recipients must ensure that every decision taken as part of their activities is taken in the interests of the company.

All recipients are required to avoid any activity or situation of personal interest that constitutes or could constitute, even potentially, a conflict between their own interests and those of the organization and, in any case, they must comply with the specific procedures adopted by the company in the field.

All recipients of the Code of Ethics must refrain from taking advantage of their relationship with the company purpose of favoring oneself or third parties to the detriment or disadvantage of the organization itself.

Every employee is prohibited from taking part, directly or indirectly, in any capacity, in commercial initiatives that are in direct competition with the company unless such participation has been previously communicated to the competent Board of Directors and approved by the same. , having heard the opinion of the SB.

In the event that situations of conflict of interest, even potential, are identified, both internal and external to the company's activity, each person involved is required to refrain from engaging in the conflicting conduct by promptly notifying the Supervisory Body to which is responsible for assessing the existence, on a case-by-case basis, of any incompatibility or prejudicial situations.

### **37. Competitive practices**

For the company it is of primary importance that the market is based on fair and fair competition.

The company is committed to scrupulously observing the relevant laws and collaborating with market regulatory authorities.

In particular:

**Compete fairly on the market by respecting competition rules**

**It undertakes to provide correct information about its business both internally and externally or in response to legitimate requests.**

**It ensures the truthfulness and correctness of the company data relating to financial statements, reports and other official documents.**

### **38. Organizational principles and transparency of accounting**

Shark Technology Ltd ensures that the organizational system is based on the criterion of separation between those who decide, those who execute and those who control. In particular, the organization makes all operations verifiable because they are recorded.

The company binds those who carry out the audit function to the truthfulness and correctness of the data and information.

Each operation and/or activity must be lawful, authorised, coherent, documented, verifiable, in compliance with the principle of traceability and company procedures according to the criteria of prudence and protection of company interests.

The company procedures must allow the carrying out of controls on the operations, on the authorization processes and on the execution of the operations themselves.

Each collaborator who carries out operations involving sums of money, goods or other benefits that can be economically assessed as belonging to the company must reasonably provide the appropriate evidence in order to allow the verification of the aforementioned operations.

The company's accounting responds to the generally accepted principles of truth, accuracy, completeness and transparency of the recorded data.

The recipients of this Code of Ethics undertake to abstain from any behavior, active or omissive, which directly or indirectly violates the regulatory principles and/or internal procedures relating to the formation of company documents.

### **39. Prevention, controls, checks.**

**Shark Technology Ltd** guarantees the availability, through competent people, to provide all the information and viewing of documents, and necessary requests to the audit and control bodies.

The company guarantees accessibility to all information and documents to those entitled to it and provides, through the availability of its directors and employees, responsible for their function, all the information that facilitates the exercise of supervisory functions.

The organization prohibits its administrators and employees and/or collaborators from making false declarations rather than the presentation of false documents or attesting untrue situations, even through IT systems, with the aim of unduly receiving public funds and/or obtaining and maintaining any concessions.

In compliance with current legislation and with a view to the planning and management of company activities aimed at efficiency, correctness, transparency and quality, Shark Technology Ltd adopts organizational and management measures suitable to prevent illicit behavior or in any case contrary to the rules of this Code by any person acting for the company.

Due to the structure of the activities and the organizational complexity, the company adopts a system of delegation of powers and functions, providing in explicit and specific terms for the assignment of tasks to people with suitable expertise.

**Shark Technology Ltd** guarantees the availability, through competent people, to provide all the information and viewing of documents, and necessary requests to the audit and control bodies.

The company guarantees accessibility to all information and documents to those entitled to it and provides, through the availability of its directors and employees, responsible for their function, all the information that facilitates the exercise of supervisory functions.

The recipients of this Code of Ethics are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to allow:

**Accurate accounting records**

**The immediate identification of the underlying characteristics and motivations**

**The easy formal and chronological reconstruction**

**The verification of the decision, authorization and implementation process, in terms of legitimacy, coherence and**

**congruity as well as the identification of the various levels of responsibility**

The recipients of this Code of Ethics who become aware of cases of omission, falsification or neglect in accounting records or supporting documentation are required to promptly report them to their superior or to the Supervisory Body and/or General Management.

The company promotes training and updating in order to make the recipients of this Code of Ethics aware of the rules (laws or regulations, internal provisions, provisions of trade associations) which govern the training and management of accounting documentation.

### **40. Reporting problems and suspected violations.**

Violations of the Code of Ethics, possibly committed by the recipients, are subject to the disciplinary system provided for by the Company Model.

In fact, it is specified that in the event of violations of the Code of Ethics, the company adopts disciplinary measures against those responsible for the violations themselves, where deemed necessary for the protection of the organisation's interests, which may go as far as expulsion from the company. of those responsible in addition to compensation for any damage resulting from the violations; all of this, with or without notice at the sole discretion of the organisation.

Failure to comply with the rules of the Code of Ethics by members of the corporate bodies may result in the adoption, by the competent corporate bodies, of the most suitable measures provided for and permitted by law.

Violations of the rules of the Code of Ethics by employees constitute a failure to fulfill the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to their relevance as a disciplinary offence.

Violations committed by suppliers and external collaborators will be sanctioned (including dismissal or dismissal) in accordance with the provisions of the relevant contractual assignments and in any case at the sole discretion of the organization, barring more significant violations of the law.

Particular attention is given to the processing of IT data through internal systems: any problem and suspected violation must be immediately communicated to the IT services manager and/or to the General Management for appropriate action.

### **41. Supervision regarding the implementation of the Code of Ethics.**

The task of verifying the implementation and application of the Code of Ethics falls on:

#### **Board of Directors**

##### **General direction**

##### **Coordinators**

**Supervisory Body: this body, in particular, in addition to monitoring compliance with the Code of Ethics, having for this purpose access to all the company's sources of information, suggests appropriate updates to the Code itself, also on the basis of reports received from the personal**

The SB is responsible for the following tasks:

**Communicate to the General Management, for the adoption of appropriate measures, the reports received regarding violations of the Code of Ethics**

**Express binding opinions regarding the review of the most relevant policies and procedures in order to guarantee consistency with the Code of Ethics**

**Contribute to the periodic review of the Code of Ethics: to this end, the SB formulates appropriate proposals to the Board of Directors which evaluates them and, if necessary, approves and formalizes them**

The SB maintains the requirements of autonomy and independence, assumes powers of investigation and control as well as powers of initiative to carry out the assigned functions.

### **42. Disciplinary measures resulting from violations of the Code of Ethics.**

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by staff as well as by subjects having business relationships with the company.

Violation of the principles and behaviors indicated in the Code of Ethics compromises the relationship of trust between the company and the perpetrators of the violation, be they directors, employees, consultants, collaborators, customers or suppliers.

For details of the disciplinary system and sanctioning mechanisms, please refer to this Model.

In general, violations will be prosecuted in the following terms:

As regards employees (including members of the corporate bodies and of the Supervisory Body itself) through adequate disciplinary measures, regardless of the possible criminal relevance of the behavior and the establishment of criminal proceedings in cases where the conduct constitutes a crime. In particular, the sanctions will comply with the rules and logic of the applied employment contract. Disciplinary measures range from reprimand or warning to suspension without pay, demotion and, in the most serious cases, dismissal. Before taking disciplinary action, the interested party is given the opportunity to explain his behavior. The decision is however unquestionable.

As regards consultants, collaborators, customers, suppliers and other subjects having contractual relationships with the company, specific methods for terminating the contractual relationship will be activated.

Furthermore, any compensation for damages that the company may suffer as a result of the violation by the above-mentioned subjects of the provisions contained in the Code of Ethics is reserved.

### **43. Operating procedures and decision-making protocols.**

This Code of Ethics forms an integral part and constitutes the implementation of the Internal Model adopted by the company for the purpose of preventing crimes committed in the interest or to the advantage of the organization itself by the subjects indicated in the organization.

In order to prevent violations of current regulations, as well as of the Code of Ethics itself, **Shark Technology Ltd** provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the subjects responsible for the decision-making, authorization and carrying out the operations themselves.

### **44. Dissemination, communication and training.**

In order to prevent violations of current regulations, as well as of the Code of Ethics itself, the company provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the subjects responsible for the decision-making, authorization and carrying out the operations themselves. This Code of Ethics is brought to the attention of all internal and external subjects interested or otherwise involved in the company's mission through specific communication and training activities.

#### **45. System of delegations.**

Apart from the already qualified subjects (General Management), the company uses a system of delegations on the basis of which certain activities can only be carried out by subjects expressly authorized to do so because they have power attributed through a specific official delegation and/or or notarial power of attorney.

It is in fact necessary that the individual operations are carried out in the various phases by different subjects, whose skills are clearly defined and known within the organization in order to avoid unlimited or excessive powers being attributed to individual subjects.

#### **48. Essential condition of any relationship with the company.**

This Code of Ethics constitutes an essential and non-questionable condition and therefore accepted by any person, employee, manager and collaborator or supplier or consultant who has in any capacity to do with **Shark Technology Ltd**.

The ascertainment of any violation, and the related dispute, determine the company's right to terminate any type of relationship in any subordinate or external or contractual or managerial condition.

The same is published on the company website and is available to everyone.

Working or collaborating in any capacity with **Shark Technology Ltd** means accepting this Code of Ethics.

#### **47. Approval process and changes.**

This Code of Ethics was originally approved by the company Board of Directors/shareholders' meeting on the following date.

Date of last approval/update of the Code of Ethics = 05.01.2024

Any variation and/or addition to this Code of Ethics will be approved by the Board of Directors after consulting the Supervisory Body and promptly disseminated to all recipients of the same, in particular:

The SB periodically reviews the Code of Ethics for legislative or corporate changes and proposes changes and/or additions

The Board of Directors examines the proposals of the SB and decides accordingly, making the approved changes immediately operational.

Sofia 05.01.2024

Shark Technology Ltd