

DAT CODE OF CONDUCT

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Dear employees,

We at DAT Italia aspire to be successful together with the other affiliated companies of DAT Group through quality, innovation, reliability and fair competition.

Our business activities are characterized by the principles set forth in our Code of Conduct and the principles of a businessperson acting with integrity in accordance with the statutory regulations and internal policies and codes of behaviour. Our success depends to a large extent on the positive reputation of our company, which is impacted significantly by the conduct of each employee.

Kind regards,

your DAT Italia Management



Alessandro Serra

We are aware of the steadily growing risk of legal infractions due to the complexity and multiplicity of national and international statutory requirements. Complying with all legal regulations is central to our philosophy. Our focus here is on early awareness training and timely prevention of potential breaches.

As an expression of (personal) responsibility according to our Code of Conduct, every employee is responsible for ensuring that his or her conduct is in accordance with the principles set forth below. By complying with these principles, you contribute to ensure that we continue our successful course in the future.

1. GENERAL PROVISIONS

Our Code of Conduct must be observed by all employees of DAT Italia regardless of the position they hold within our company. Managers shall always act as role models for the employees assigned to them and provide support where needed.

The aim of the following rules is firstly to illustrate to our employees the conduct that is ethically and legally binding for them, and secondly to make it clear to third parties that acting in a legally compliant manner is a top priority for DAT Italia.

All employees shall always and unrestrictedly act in the interest of our company. To this end, only transactions that are legally compliant shall be entered into by us. Transactions that violate legal regulations are never to the economic benefit of the company. We refrain from such business.

Every business decision is made based on commercial discretion. In addition to a prudent and responsible handling of our financial and other resources, this also specifically includes compliance with internal approval provisions and other rules.

Furthermore, fair and conscientious behavior both among ourselves and with our customers and business partners is of particular importance to us.

We respect and protect the privacy of every person and comply with the laws on data protection. We do not allow any harassment or discrimination of our employees and we take consistent action against any violations that come to our attention.



2. LEGAL COMPLIANCE

Acting in a legally compliant manner is our top priority.

We comply with all relevant legal regulations.

Recognizing questionable situations as well as applying and complying with relevant regulations in day-to-day work are an important precondition for the lasting economic success of DAT Italia since breaches of laws and regulations may result in high monetary fines, exclusions from public tenders, further administrative sanctions as well as damages claims and reputational losses. Offences may also result in individuals being subject to criminal investigations.

We expect our employees to conduct themselves at all times in accordance with the law and to comply with applicable laws as well as internal rules and requirements.

Conduct by which you may expose yourself, your colleagues or DAT Italia to illegal practices is not tolerated.

Uncertainties or doubts in special situations must therefore be clarified by consulting with the line manager or the management.

3. MUTUAL RESPECT AND NON DISCRIMINATORY BEHAVIOUR

Our actions are characterised by mutual respect and fairness.

DAT Italia expects all employees to deal respectfully both with each other and with business partners. Intimidating, hostile, harassing, or offensive conduct is not tolerated at DAT Italia. We promote diversity and equal opportunity in our company and allow no discrimination, regardless of whether it is based on

- gender, nationality or origin
- religion
- sexual orientation
- political or trade union activities
- age or other characteristics.

The strict prohibition of child labour and forced labour must be observed.

4. COMPETITION

We are committed to free and fair competition.

We are convinced that DAT Italia is competitive due to the quality and innovative power of its products and services. We therefore comply with all laws serving to protect competition.

Agreements of any kind which result in or intend to result in a restraint on competition, including but not limited to agreements on prices, territories, or customer allocations, are prohibited.

The same applies to the improper sharing of information between competitors.

Anti-trust law also applies vertically, i.e. in relationships with suppliers and customers. There must therefore also be no restraints on competition, such as, for instance, so-called resale price maintenance (encroachment on our customers' freedom to set prices for third parties).

- **Do not enter into any agreements with our competitors** concerning prices, discounts, capacities, sharing of markets and customers, or sale or purchase terms and conditions.
- When you have contacts with competitors (e.g. at trade fairs or in the context of association work) also ensure **that no information of any kind** is received or passed on which enables **conclusions to be drawn about the current or future market behaviour** of the party providing the information and which is not publicly freely available.
- Observe the **prohibition against so-called vertical agreements in relationships with suppliers and customers**. Avoid restrictions on the freedom of our customers to set their prices and supply terms for their business

partners themselves. Caution is also necessary in relation to non-compete clauses, exclusivity arrangements and exclusivity clauses.

- Distinguishing between permitted and prohibited actions is sometimes difficult in operational business. Contact your line manager or the management or obtain legal advice if you have any questions or are unclear about anything.
- Please note that **different countries have different laws** and regulations in the area of antitrust law. The above regulations are based on German law and may differ from the regulations and framework conditions in your country.

5. ANTI-CORRUPTION

We reject corruption of any kind.

Corrupt behaviour by individuals damages the reputation of DAT Group and jeopardises our business success. We therefore disassociate ourselves from any form of corruption or bribery.

Influencing decisions by granting or accepting unjustified benefits and advantages of any kind is not tolerated. We undertake to comply with the applicable laws against bribery and corruption.

Our business relationships with suppliers, customers, cooperation partners and public agencies are based exclusively on objective criteria such as quality, innovative power, reliability, and competitive prices.

Corruption may arise in a wide range of business situations. We are therefore required to examine our business processes and actions to ensure that they are lawful.

- **Invitations and gifts** must keep within the bounds of what is **customary in business or appropriate and be in accordance with applicable legal requirements**.
- Accepting or giving cash or cash-like benefits is **not permitted under any circumstances**.
- Make sure that invitations and gifts **cannot be interpreted as unlawfully influencing** of business decisions.
- Special care is required in the case of **public officials or representatives of authorities**. Invitations and gifts in connection with this group of people are generally inappropriate and must therefore not be issued or made.

- You should note that it is not just the actual granting or acceptance of unfair advantages that is prohibited. **Simply offering or promising a corresponding advantage or demanding it or having it promised to oneself is sufficient**.
- Note that **different anti-corruption laws and regulations** must be followed in different countries. The above regulations are based on German law and may differ from the regulations and framework conditions in your country.
- Contact your line manager or the management or obtain legal advice in case of doubt.

6. INTERNATIONAL TRADE LAW & SANCTIONS

As an internationally operating software company compliance with international trade regulations must be observed.

Software or other technologies may in some cases be subject to trade restrictions, such as import and export restrictions or embargoes, so that their use is prohibited or only permitted with approval.

- We comply with any international trade law restrictions that may exist.
- Before entering into business relationships you shall ensure that the person or company in question is not on the relevant sanctions lists.
- Breaches may also be punishable under criminal law. In case of doubt contact your line manager or the management or get legal advice and do not enter into any contracts before clarifying the facts in question.



7. PROHIBITION AGAINST MONEY LAUNDERING

We ensure that we do not support money laundering.

Money laundering is intended to disguise money that stems from illegal activities or has an illegal origin by funnelling it into legal economic circulation. Breaches of the relevant money laundering laws are punishable by fines or imprisonment.

- Take care with whom you do business.
- Be careful if there are indications of money laundering, e.g. a customer's desire for settlement of invoices or invoicing to companies that are different from the business partner.
- We do not accept cash payments.
- Contact your line manager or the management in case of doubt or get legal advice.

8. CONFLICTS OF INTEREST & ANNCILLARY ACTIVITY

We avoid any kind of conflict with the interests of DAT Italia.

We expect loyalty and integrity from all employees in the context of their work at DAT Italia. Transactions must be carried out exclusively in the best interest of DAT Italia and may not be influenced or adversely affected by private interests or private contacts with customers, suppliers, competitors and other business partners.

We therefore ensure that we avoid situations where private and professional interests might

conflict or even give the impression that this is the case.

In addition, economic dependencies of third parties upon DAT Italia may not be exploited to their disadvantage.

Potential conflicts between personal interests of employees and the interests of DAT Italia must be disclosed to the line managers and reviewed. Transparency is particularly important in such a situation.

Ancillary activities is only permitted with the prior written consent of DAT Italia.

This applies in particular to ancillary activities with competitors or business partners of DAT Italia. The same applies to supporting or participating in competitors or business partners of DAT Italia.

9. COMPANY ASSETS & CUSTOMER PROPERTY

We protect assets and trade secrets of DAT Italia.

We handle assets and equipment of DAT Italia responsibly and protect them from misuse. These assets and equipment include buildings, equipment, inventories, products, office equipment and computer systems as well as intangible assets. The latter includes software, patents, trademarks, copyrights and other

intellectual property rights, trade secrets and know-how. DAT Italia equipment such as laptops, telephones etc. must be used exclusively for business purposes unless private use is expressly permitted.

We similarly respect the property and property rights of our suppliers, customers, and other business partners.



10. DATA PROTECTION & INFORMATION PROTECTION

We comply strictly with the statutory requirements on the protection and security of personal data and we protect our trade secrets.

Compliance with the laws on data protection in the processing of personal data and the security of other business and technical data must be ensured in all business activities.

When handling personal data, we limit ourselves to specified, defined, clear purposes. We carefully ensure that we do not disclose personal data either within or outside DAT Italia unless we are statutorily authorised to do so or there is a corresponding legitimate business-related need or administrative obligation.

We take care to protect data from unauthorised disclosure and misuse. In cases of doubt about the correct handling of data, contact your data protection officer or line manager or get legal advice on data protection law.

Trade secrets, confidential information and our intellectual property are among our most valuable assets. For this reason, we take the greatest care to protect these assets and we also respect the intellectual property of others.

Confidential information or trade secrets of DAT Group or confidential information or trade secrets that we receive from our business partners or about which we learn must not be passed to third parties (including family members, friends, and acquaintances) or used for anything other than business purposes.

Confidential information may therefore not be shared on social media or public platforms either.

11. HEALTH AND SAFETY & MINIMUM WAGE

Promoting health and safety at work and complying with the minimum wage legislation are standard practice for us.

The health and safety of its employees is particularly important to DAT Italia. We are guided by the applicable standards and statutory requirements relating to occupational health and safety

and ensure that our employees receive corresponding training.

DAT Italia supports any measures to ensure and improve safety at the workplace. We also comply with the statutory minimum wage provisions.

Each employee is required to comply with the safety regulations to protect their own health.

12. ENVIRONMENTAL PROTECTION & SUSTAINABILITY

We keep a close eye on environmental protection

We are committed to environmentally friendly and sustainable use of materials and resources. We therefore expect the conduct of our

employees to be energy-efficient and environmentally friendly and to be implemented and considered on their own initiative. Regulations which serve to protect the environment must be observed by our employees at all times and must not be circumvented.

13. IMPLEMENTATION & CONTACT

These provisions on acting responsibly are supplemented by additional directives and notices.

If you have any questions regarding this Code of Conduct or if you are in any doubt as to the right course of conduct please contact your line manager or the management.

DISCLAIMER

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