

CODE OF CONDUCT

of IDE Trade SA

(Status as of 28 February 2022)

Summary

A. RULES OF ETHICS AND COMPLIANCE	3
1. HUMAN RIGHTS AND EQUAL TREATMENT	3
2. WHAT IS COMPLIANCE?	3
3. BASIC CONDUCT REQUIREMENTS	4
3.1 What conduct do I need to conduct to comply with the rules	4
3.2 Diversity, respect and courtesy	4
3.3 Exemplary role	4
4. RELATIONS WITH COMMERCIAL PARTNERS AND THIRD PARTIES	4
4.1 Fight against corruption	5
4.2 Donations and sponsorship	5
4.3 Prohibition of money laundering	5
4.4 Competition protection	6
4.5 Horizontal competition agreements	6
4.6 Vertical competition agreements	6
4.7 License agreements	6
4.8 Guarantee of compliance with export control regulations	6
4.9 Integrity with the value chain	7
5. FIGHT AGAINST CONFLICTS OF INTEREST	7
6. TRANSPARENT INFORMATION MANAGEMENT	7
6.1 Information and confidentiality	7
6.2 Data protection and information security	8
6.3 Behavior on social media	8
6.4 Documentation and storage	8
6.5 Financial transactions and commercial documents	8
6.6 Management of privileged information	8
7. CORPORATE PROPERTY PROTECTION	8
B. COMPLIANCE WITH THE PRINCIPLES	9
8. OBLIGATION TO COMPLY	9
9. TRANSPARENCY AND REPORTING OF MISCONDUCT	9
10. MANAGEMENT OF SUSPICIOUS CASES	9
11. CONSEQUENCES OF VIOLATIONS	9
C. MANAGEMENT OF THE VERSIONS	10
12. IMPLEMENTATION	10
13. RELATED DOCUMENTS	10
14. CHANGE MANAGEMENT	10

A. RULES OF ETHICS AND COMPLIANCE

1. HUMAN RIGHTS AND EQUAL TREATMENT

IDE Trade offers all its collaborators equal opportunities and does not tolerate, as a fundamental principle, any kind of discrimination based on ethnic origin, nationality and social background, sex, religion or personal beliefs, political opinion, handicap, age, sexual identity or membership. to a workers' organization.

Furthermore, IDE Trade does not tolerate any kind of **human trafficking** or any type of related activity. This includes, among others, the use of misleading or fraudulent methods in the process of hiring collaborators, the request for payment of commissions for the recruitment of potential employees as well as the destruction, theft or confiscation of documents of ' identity of collaborators, such as eg. passports or driver's licenses, or prevent an employee from accessing their identity documents.

IDE Trade does not tolerate any form of child labor. Employing young people must not harm their physical and mental development.

In IDE Trade we pay attention to and protect the dignity of our collaborators and we treat them with respect. We are committed to ensuring that all employees can work in a work environment free from sexual, mental and physical harassment

At IDE Trade, the protection of health and safety in the workplace have the highest priority. IDE Trade ensures the protection of work and health in the workplace within the framework of the national provisions in force from time to time at the offices, eg. through the rigorous observance of the law regarding the employment of certain persons in charge of safety. The workstations are set up in compliance with the generally recognized rules on safety and occupational medicine, so that the work performance can take place without accidents and in the presence of reduced disturbing factors. IDE Trade supports the constant improvement of the working environment, in particular the safety of collaborators at all national and international offices.

Each manager of IDE Trade is responsible and is required to know all the safety requirements that are decisive for their specific area and to adequately instruct their collaborators in this regard. Responsibility for compliance with these requirements lies equally with superiors and employees - in their personal interest, but also in the interest of the company.

IDE Trade intends to minimize the risks and dangers that could compromise the safety and health of collaborators and third parties. Through continuous improvements of the working environment, adequate means such as eg. ergonomic aids and protective devices, as well as through numerous prevention programs and health promotion measures, IDE Trade protects and promotes the health, performance capacity and job satisfaction of employees.

2. WHAT IS COMPLIANCE?

IDE Trade interprets compliance to an even wider extent and identifies within it a **fundamental task of each individual employee** to protect the integrity and reputation of the company beyond geographical and cultural borders.

To provide assistance in the event of questions and difficulties relating to compliance, IDE Trade has a reference figure within its organization, the Head of Compliance.

This organization helps our employees to avoid possible compliance risks in the most effective way in their daily business by defining adequate rules, structures and processes, clearly identifying violations and offering specific advice.

3. BASIC CONDUCT REQUIREMENTS

3.1 What conduct do I need to conduct to comply with the rules

Therefore, in the event that a colleague, a business partner or a third party suggests or requests us, for example, to behave that does not comply with the rules by giving inconsistent arguments, such as for example. “Local customs”, “widespread sector practices” or “cultural needs”, we respond with a categorical refusal and report the situation to the Compliance Organization (see Point 2.2.)!

In addition to **observing the laws and regulations**, in the context of everyday work we must also **respect**, in particular, the commonly applied company standards, contractual conditions and, above all, the **internal rules of the company**.

The latter include in particular, in addition to the directives of the various departments, also the provisions on compliance of IDE Trade.

3.2 Diversity, respect and courtesy

Our collaborators belong to many different cultures worldwide and have different backgrounds and experiences behind them. We expect our collaborators **to relate to each other with an attitude free from prejudice and oriented towards the promotion of this diversity**. This prerequisite is essential to ensure the productivity of each individual employee and the establishment of a pleasant working climate in general.

In the same way, we believe that the basic rules of mutual respect and courtesy are essential and, it goes without saying, must form the basis of any interpersonal relationship. **Let's show the same open attitude towards our business partners and third parties**.

It is also the duty of our leaders regularly take steps to strengthen a lasting awareness of compliance ("**awareness**") of employees.

3.3 Exemplary role

The Board of Directors and the executives play a role of strong representation of IDE Trade in the eyes of all the stakeholders. They therefore take on an **exemplary role** not only vis-à-vis employees, business partners or state authorities, but also the general public in particular. This role must be performed with the highest degree of **integrity in business management**. All managers must commit to actively living, promoting and overseeing the culture of compliance in IDE Trade.

A fundamental prerequisite in this regard is that all collaborators who work in the sphere of responsibility of an executive make their collaborators aware of the compliance requirements applicable to the respective operating area.

4. RELATIONS WITH COMMERCIAL PARTNERS AND THIRD PARTIES

We therefore consider it extremely important to take business decisions that are always based on objective criteria such as quality, reliability, competitiveness, observance of recognized compliance standards (e.g. UN or OECD conventions / guidelines), as well as on the principles of good business management.

The selection of serious and upright business partners and, consequently, the **protection of the reputation of the company and its collaborators have top priority for IDE Trade**.

As IDE Trade we place ourselves towards our customers, whether they are public or private sector operators and regardless of the historical duration of the commercial relationship, always in the name of transparency, impartiality and due professional distance.

In this regard, we take due account of the specific compliance regulations of our business partners and pursue a uniform interpretation of compliance in the business relationship.

We therefore consider it extremely important to take business decisions that are always based on objective criteria such as quality, reliability, competitiveness, observance of recognized compliance standards (e.g. UN or OECD conventions / guidelines), as well as on the principles of good business management.

4.1 Fight against corruption

IDE Trade opposes any form of corruption and prohibits its collaborators and representatives as well as any other person acting in the name or on behalf of IDE Trade from implementing any form of undue influence.

Therefore, in the context of relations with commercial partners, officials or third parties participating in commercial transactions, IDE Trade is not allowed in any case to request, promise or accept material or intangible advantages that could give the impression of a conditioning of the business decisions. Likewise, commercial partners, public officials or third parties participating in commercial operations are not allowed under any circumstances to promise, offer or guarantee personal advantages with the intent of obtaining an order, securing a deal or procuring any to IDE Trade. other type of undue advantage. Depending on the type of recipient, internal value limits apply to the acceptance and provision of permitted gifts, the extent of which may vary from one country to another by virtue of legal provisions or differences in purchasing power. .

Furthermore, the collaborators of IDE Trade do not resort **to any kind of "bribes"** (ie the payment of modest sums of money or the provision of material services in favor of officials to obtain a simplification or speeding up of administrative procedures or official acts).*

* For example, for customs clearance, issuing of visas, etc. If the refusal of a bribe were to put personal safety at risk, in exceptional situations it could be indicated to provide this type of payment. However, this circumstance must subsequently be promptly communicated in writing to the Manager responsible for the Corporate Compliance.

4.2 Donations and sponsorship

IDE Trade is aware of its responsibility and, for this reason, it engages in charitable works with donations both in cash and in kind. These must always be **adequate, transparent and compliant with current law**.

Any donation commitment, in particular in favor of political parties and institutions close to them, as well as the sponsorship of cultural and social events or sporting events, must always be undertaken on the basis of the internal directives in force in IDE Trade.

4.3 Prohibition of money laundering

IDE Trade takes all necessary measures to combat money laundering in its area of influence.

Our collaborators do not carry out, either independently or in collaboration with third parties, any type of action that could constitute a violation of the applicable laws on money laundering. **The incoming and outgoing payment transactions are primarily subject to the supervision of the usual banks of the company.** Individual monetary or non-monetary transactions that meet certain internal company risk criteria are further thoroughly verified through internal systems and processes. In the event that there is a suspicion of money laundering, the Administration / Finance function contacts the supervisory authorities. The Head of Compliance provides support by offering advice in case of need.

4.4 Competition protection

IDE Trade promotes free and fair competition and categorically rejects entrepreneurial behavior or commercial agreements that hinder, limit or distort competition.

4.5 Horizontal competition agreements

They banned all the agreements competition horizontal between companies operating at the same economic level:

- agreements with competitors regarding conduct on the market or the definition of prices and conditions
- distribution of markets, customers, territorial areas, products, etc.
- agreements on sales quotas
- creation of purchasing cooperations with supply obligations
- assignment of assignments for benchmarking services for the purpose of an illicit exchange of information

Also prohibited are concerted conduct, unofficial interviews or informal agreements that produce a limitation of competition. The mere appearance of agreements of this kind should also be avoided.

On the occasion of events such as eg. meetings of sector associations, trade fairs or specialist conferences, during which IDE Trade collaborators meet representatives of the competition, **we limit the communication to neutral and harmless discussion topics from the point of view of competition.**

When we exchange information with competitors, we pay attention not to give or receive any information which might provide clues on current market behavior or future IDE Trade. Likewise, we do not provide information about customers and supplier relationships, prices and any changes to them, costs and calculations as well as future capacities or plans.

4.6 Vertical competition agreements

Vertical competition agreements between companies operating at different economic levels are prohibited, eg. between suppliers and customers, which may entail limitations in the definition of prices and commercial conditions with third parties. **Such agreements could include:**

- more favorable clauses
- exclusivity constraints with a duration of more than 5 years (coverage of total needs, exclusive supply)
- competition prohibitions
- price constraints for resale
- (minimum prices, fixed price components, price increases)

4.7 License agreements

License agreements must not contain limitations that go beyond the content of copyright.

4.8 Guarantee of compliance with export control regulations

As an exporter of weapons and other goods potentially subject to limitation of exports, FDI Trade strictly complies with all the relevant legal provisions on foreign trade. These include, in particular, the Swiss law on foreign trade, the Swiss law on the control of weapons of war (LMB, OMB, LBDI, OBDI, OCCC, OICoM and LEmb), as well as external regulations such as eg. the US International Traffic in Arms Regulations (ITAR) for the respective scope.

4.9 Integrity with the value chain

Integrity is the set of moral, ethical and regulatory rules to which a company or a person is oriented in the private, social and entrepreneurial sphere of their life.

For the purpose of further confirmation, before entering into any contract we submit certain categories of business partners, eg. distribution or cooperation partner, to a special integrity check. In order to protect our reputation and ensure a partnership based on trust, we also expect **the same law-abiding behavior and attitude** from our suppliers, service partners and customers. For this, the “integrity” is a crucial selection criterion for cooperation with Commercial Partners.

5. FIGHT AGAINST CONFLICTS OF INTEREST

Any type of behavior on the part of our collaborators or agents working on behalf of our company (e.g. sales agents, consultants or cooperation partners) that could lead to a conflict with the commitment made to contribute to well-being is not tolerated. corporate.

For this, the **choice of Business Partners**, the establishment of business relationships, personnel decisions, the submission of offers, authorization procedures or comparable business decisions must be made exclusively **on the basis of understandable economic considerations** or objective criteria and in accordance with current processes.

The existence of financial or other shareholdings in IDE Trade's commercial partner companies which, in the event of a deal being concluded, could have a positive impact on the employee concerned, must be promptly reported to avoid cases of conflict.

The **secondary activities** must be **promptly reported** by the collaborators in the context of the HR processes in force and must essentially be organized in such a way as not to conflict with the main performance obligation established in the employment contract. Competition with the core business is prohibited. The rules in force regarding working hours must be respected.

The existence of **personal relationships** of a collaborator with customers, suppliers, candidates or officials with decision-making competence at authorities which, in the event of a deal being concluded, could have a positive impact on the collaborator concerned, must be **promptly communicated to their direct manager before the conclusion of the transaction** in order to exclude any conflicts of interest.*

* This does not apply to owning minority comparable shares or interests in large corporations or corporations.

6. TRANSPARENT INFORMATION MANAGEMENT

6.1 Information and confidentiality

In addition to the general indications relating to the protection of trade and business secrets, the special features of the protection of confidential information and materials must also be observed in the defense sector.

The protection of confidential information and materials in the economy guarantees the **protection and secrecy of classified information** and constitutes, for IDE Trade, the commercial prerequisite for obtaining public contracts (national and international). Classified information is a case, subject or knowledge that must be kept secret in the public interest, regardless of the form in which it is represented. They are classified by an official body on the basis of their vulnerability. The security officers of IDE Trade are responsible on a technical level for observing the protection of confidentiality. In addition to this, an official protection of confidential information and materials is ensured by each employee in compliance with the applicable regulatory requirements in this regard.

6.2 Data protection and information security

The international electronic exchange of information is a decisive prerequisite for our business success as well as for the efficient work of our employees. However, since the advantages of electronic communication can be associated with risks for information security and data protection, it is the responsibility of each employee to protect the information from unauthorized third party access and to treat this information confidentially, even to the 'inside the company' (**"Need-to-Know" principle**).

Taking effective prevention measures against these risks is the responsibility of both our managers and each individual and is an important component of our IT and information security management.

6.3 Behavior on social media

IDE Trade recognizes the global importance of social media (eg Facebook, Twitter or YouTube) and is directly active on different channels as a member of the digital community. For this reason, IDE Trade appreciates that each employee has a strong bond with their company both professionally and privately and that they contribute to nurturing a positive image by mentioning their employer in a responsible way.

At the same time, we insist on the need to use **due caution** in the use of social media so that, in the broad spectrum of opinions and information expressed on the Internet, IDE Trade can remain protected from any damage to reputation.

In this regard, when using social media, IDE Trade collaborators must not, in particular, express opinions or personal positions on behalf of the company, provide untrue information about its activity, express unjustified evaluations on IDE Trade's business or use IT devices in violation of IDE Trade's internal regulations.

6.4 Documentation and storage

Our company always complies with commercial, tax and special law retention periods for paper and electronic documents and structures the related documentation clearly.

6.5 Financial transactions and commercial documents

All financial transactions are recorded and carried out according to the indications relating to correct accounting. Our accounting documentation is available at any time for checks by the competent internal or external bodies.

IDE Trade collaborators do not produce false documentation or make changes to the documentation with the result of showing incorrect or falsified company circumstances.

6.6 Management of privileged information

Employees are not allowed to pursue personal gains for themselves or others through the use of internal company knowledge. The same applies to the unauthorized dissemination of such privileged knowledge. It is possible to distinguish between permanent and project-specific privileged knowledge.

7. CORPORATE PROPERTY PROTECTION

In IDE Trade we use company resources and assets exclusively **for the benefit of the company**. All IDE Trade collaborators are responsible not only for safeguarding the company's own properties, but also for protecting the property of customers entrusted to the company. We use company and customer properties while always acting responsibly. We avoid waste and fight the illegal use of assets.

B. COMPLIANCE WITH THE PRINCIPLES

8. OBLIGATION TO COMPLY

These corporate principles cannot regulate all single conceivable cases. **Therefore, each employee is required to adapt their behavior independently and responsibly.**

In this regard, these corporate principles must be observed in such a way that all the persons concerned are already protected a priori even from the emergence of situations that could give rise to the suspicion of an illegal act or behavior.

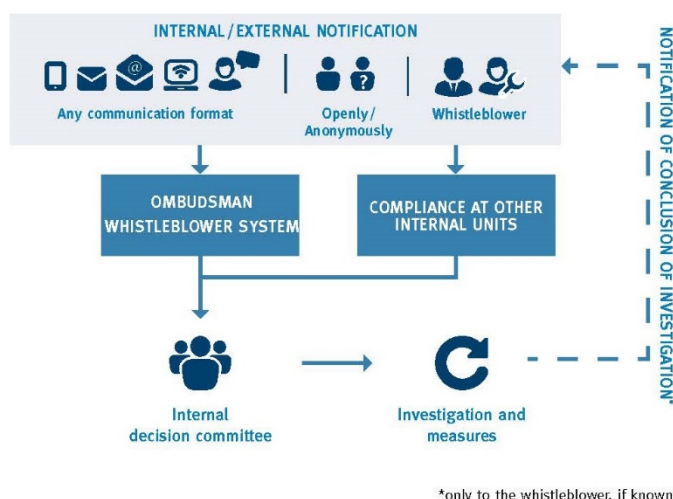
9. TRANSPARENCY AND REPORTING OF MISCONDUCT

Anyone of our collaborators who knows or has valid reasons to believe that the aforementioned corporate principles have been or will be violated, must immediately report it to one of the following contacts:

- Head of Compliance (all types of violations)
- External Ombudsman (all types of violations)
- Electronic reporting system (all types of violations)
- Data protection officer (data protection breaches)
- Administration (reports of suspected money laundering)
- Personnel department (violation of ethical standards, conflicts of interest)

If you wish to make an **anonymous report**, in addition to the possibility of contacting the internal functions confidentially, it is also possible to resort to an external Ombudsman or to various reporting systems.

10. MANAGEMENT OF SUSPICIOUS CASES



11. CONSEQUENCES OF VIOLATIONS

Violations of these principles of conduct can not only compromise the economic success of IDE Trade, but also, and above all, harm every single employee and affect their professional future.

For this reason, the company does not tolerate any damage to its reputation and to the image of its collaborators or agents as a result of an action or conduct that is not allowed.

C. MANAGEMENT OF THE VERSIONS

12. IMPLEMENTATION

The Code of Conduct is initially made available in Italian and English.

The Board of Directors is required to promptly implement this Code of Conduct in their respective areas of competence, involving the Head of Compliance.

13. RELATED DOCUMENTS

In force

- Code of Ethics of IDE Trade SA (Ver. 01 Rev. 1);
- Code of Conduct of IDE Trade SA (Ver. 01 Rev. 1);
- Anti-Corruption Guidelines of IDE Trade SA (Ver. 01 Rev. 0);
- Organization chart / Job description of IDE Trade SA (Ver. 01 Rev. 1)
- Business Partners' Code of Conduct of IDE Trade SA (Ver. 01 Rev. 0);
- Suppliers' Code of Conduct of IDE Trade SA (Ver. 01 Rev. 0);
- Self-disclosure Business Partner verification of IDE Trade SA (Ver. 01 Rev. 0);
- Data Protection Guidelines (GDPR) of IDE Trade SA (Ver. 01 Rev. 0);
- Corporate job description of IDE Trade S A(Ver. 01 Rev. 0)
- No. 13 Operating Procedures (Ver. 01 Rev. 0)

As well as other related documents are held at the IDE Trade headquarters and are made available upon simple request, or on the Corporate website.

14. CHANGE MANAGEMENT

The Code of Conduct is made available on request in the updated version and its application is binding starting from the date of approval by the Board of Directors.

Any changes are always communicated through the communication channels available to IDE Trade. Please keep yourself updated on the version in force from time to time.

IDE Trade SA
Corso Elvezia, 16
9600 Lugano
Switzerland
Tel.: +41 (0)91 921 02 25
Email: info@idetrade.ch