



Code of Ethics

In compliance to Art. 6, comma 2-bis, letter b) of D.Lgs 231/2001

Approved by



Fabrizio Scortecci (Administrator)

Date 30/12/2025



TABLE OF CONTENTS

1. COMPANY PROFILE	ERRORE. IL SEGNA LIBRO NON È DEFINITO.
1.1. COMPANY PROFILE	3
1.2. INTRODUCTION	ERRORE. IL SEGNA LIBRO NON È DEFINITO.
2. GENERAL PRINCIPLES	4
2.1. RECIPIENTS OF THE CODE OF ETHICS	4
2.2. DISTRIBUTION OF THE CODE OF ETHICS.....	4
2.3. FUNDAMENTAL RIGHTS	4
2.4. VALUE OF HUMAN RESOURCES.....	4
3. RULES OF CONDUCT	5
3.1. COMMITMENTS OF MANAGEMENT	5
3.2. DUTIES OF EMPLOYEES.....	5
3.3. USE OF COMPANY ASSETS AND EQUIPMENT.....	6
3.4. CONFLICT OF INTEREST	6
3.5. CONFIDENTIALITY	7
3.6. PROFESSIONAL CONDUCT.....	7
3.7. FREE COMPETITION	7
3.8. RELATIONS WITH SUPPLIERS	8
3.9. RELATIONS WITH CUSTOMERS	8
3.10. RELATIONS WITH PUBLIC INSTITUTIONS	8
3.11. DISCLOSURE OF INFORMATION TO EXTERNAL PARTIES.....	8
3.12. INTERNAL CONTROL	9
3.13. ACCOUNTING TRANSPARENCY	9
3.14. CONFIDENTIALITY OF SENSITIVE DATA	9
4. SPECIAL PROVISIONS: IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS	10
4.1. VIOLATION OF THE CODE OF ETHICS – DISCIPLINARY MEASURES	10



1. PORTRAIT

1.1. Company profile

AEROSPAZIO Tecnologie is an Italian SME founded in 2000 with the aim of providing testing and engineering services in the fields of vacuum technology and Electric Space Propulsion to European industries and R&D organisations. The company has a specific expertise in the Electrical Propulsion qualification testing and for such scope has developed a world class system of test facilities with extended diagnostics and vacuum chambers up to 140 cu.m. volume.

1.2. Scope of the document

The Code of Ethics is the document of moral rights and duties that defines the ethical–social responsibility of Aerospazio Tecnologie Srl; it complies with Legislative Decree no. 231 of June 8, 2001, and aims to prevent unlawful or irresponsible behaviour by anyone acting in the name and/or on behalf of the Company. It defines the responsibilities of each corporate subject toward all parties involved in company activities, namely customers, suppliers, shareholders, employees, collaborators, public institutions, and anyone else interested in the company’s activity.

Recipients of this Code of Ethics are required to fully comply with the principles and values contained herein, as well as to protect the image and reputation of the Company and preserve the integrity of its human, social, and economic assets.

Through this Code of Ethics, Aerospazio Tecnologie Srl intends to present itself to the market as a company that upholds high moral values such as compliance with laws, respect for workers and the environment, fair competition, and fidelity to the principles and values of democracy, equality, and solidarity.



2. GENERAL PRINCIPLES

2.1. Recipients of the Code of Ethics

All recipients of this Code of Ethics are required to know its content and comply with its principles.

Company employees, in addition to complying with applicable laws and collective labour agreements, undertake within their activities and functions to adhere to responsibilities toward both internal and external parties, acting with cohesion, cooperation, and trust, in compliance with applicable laws and regulations in any situation or context. They undertake to comply with this Code of Ethics, contribute to its implementation, and report any deficiencies or violations. Management must comply with it when proposing and implementing projects, investments, and actions aimed at increasing the company's economic value and the well-being of employees, customers, and suppliers.

2.2. Distribution of the Code of Ethics

The Management of Aerospazio Tecnologie Srl undertakes to disseminate the Code of Ethics internally and externally and to carefully monitor its observance to ensure transparency of actions and conduct and, where necessary, to intervene with corrective actions.

Employees must promptly report violations of the Code of Ethics so that Management may take all necessary actions to protect and restore compliance with rules and laws.

2.3. Fundamental Rights

Aerospazio Tecnologie Srl operates respecting the fundamental rights of every individual, protecting their moral integrity and ensuring equal opportunities.

Within the Company, a positive working environment is promoted in which everyone can work in compliance with laws, shared principles, and values. The Company does not tolerate any form of isolation, exploitation, harassment, or discrimination for personal or professional reasons. Any form of discrimination based on race, language, colour, faith or religion, political affiliation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, or economic and social condition is expressly prohibited.

2.4. Value of Human Resources

Aerospazio Tecnologie Srl recognizes that employees and collaborators are an indispensable factor for the company's success; therefore, it promotes their development, autonomy, and involvement in company decisions. Through training programs and courses, it is committed to increasing individual and group skills, convinced that professional growth and individual contribution, within an environment characterized by team spirit and sense of belonging, are fundamental elements for company development.

3. RULES OF CONDUCT

3.1. Commitments of Management

The Management of Aerospazio Tecnologie Srl, aware of its responsibilities, is inspired by the principles contained in this Code of Ethics and undertakes to orient its activities toward values of honesty, integrity in pursuing company objectives, loyalty, fairness, respect for people and rules and mutual cooperation. In particular, directors undertake to conduct the company responsibly, establishing relationships with collaborators based on mutual respect and constructive cooperation, fostering a sense of belonging to Aerospazio Tecnologie Srl.

Aerospazio Tecnologie Srl also considers employee motivation fundamental; therefore, it undertakes to implement and maintain a correct, valid, and motivating flow of information so as to make employees aware of the importance of each person's role for the company.

More specifically, Aerospazio Tecnologie Srl undertakes:

- To ensure dissemination of the Code of Ethics among employees and external collaborators;
- To provide all possible clarification regarding interpretation and implementation of the Code's rules, particularly concerning application within company procedures;
- To carry out checks regarding any report of violation and, where violations occur, to adopt appropriate sanctioning measures;
- To adopt all safety measures and ensure the physical integrity and moral dignity of workers.

Aerospazio Tecnologie Srl guarantees protection and safety in workplaces for its personnel and third parties, committing to compliance with occupational safety regulations and promoting safety in all workplaces, even beyond explicit legal obligations.

The Company ensures equal opportunity and manages career and salary advancement accordingly, maintaining continuous and balanced comparison with the reference market and ensuring transparency, seriousness, fairness, and clarity in evaluation methods.

Aerospazio Tecnologie Srl undertakes to operate with respect for the environment, promoting environmental awareness and waste prevention among all parties connected with the company and always acting in compliance with applicable laws.

3.2. Duties of Employees

Beyond legal and contractual obligations, employees are required to demonstrate professionalism, honesty, dedication, loyalty, a spirit of collaboration and mutual respect.

The spirit of Aerospazio Tecnologie Srl also provides that each employee participates in company activities with enthusiasm, the desire to improve skills, and awareness that each employee's professional contribution is the main key to the company's success.

All employees are guaranteed equal opportunities to express their professional potential.

Each employee must in particular:

- Refrain from conduct contrary to this Code of Ethics;
- Promptly report to Management any information regarding possible violations;

	Code of Ethics	Ref.	CCoE
		Is./Rev.	2.0
		Date	30/12/2025
		Page	6 / 10

- Maintain conduct inspired by maximum transparency, fairness, and legality, performing activities with commitment and professional rigor and acting to safeguard the company's reputation;
- Perform duties with maximum efficiency, regardless of level of responsibility, following instructions from higher hierarchical levels;
- Contribute with colleagues and superiors to achieving common objectives.

Relations among employees must be based on the utmost mutual respect, fairness, cooperation and civil coexistence.

Employees and external collaborators must constantly share acquired skills and continuously improve them through personal initiative and company tools.

The Company promotes continuous improvement, teamwork, and a sense of belonging, paying particular attention to time management and decision-making skills, with the aim of achieving excellence from the individual level to the corporate level.

With regard to third parties, each employee must inform them of the principles contained in this Code, require compliance, and report non-compliance to Management.

3.3. Use of Company Assets and Equipment

Each employee must use company infrastructure, equipment, tools, and materials with the utmost care. It is strictly forbidden to use company assets for private purposes or in competition with company activities; any improper use must be promptly reported to Management.

Company assets include premises, furnishings, equipment, tools, company vehicles, computers, servers, photocopiers, printers, telephone, fax, stationery, and all IT system functions (databases, software, internet, email, etc.).

Use of company assets outside the company is permitted only for work-related reasons such as travel or smart working. Other uses must be expressly authorized by Management.

3.4. Conflict of Interest

To avoid conflicts of interest, all activities performed by employees must be carried out transparently, correctly, and lawfully exclusively in the interest of the company.

Employees must avoid any situation in which conflicts may arise with company interests or that could compromise impartial decision-making. They must avoid conflicts between company duties and personal or family economic interests. Any conflict must be promptly reported to Management.

Situations considered conflicts of interest include:

- Economic interests of employees or their families competing with or conflicting with company interests;
- Employment or work activities of any kind with customers, suppliers, or competitors;
- Acceptance of economic benefits or advantages of any kind from customers, suppliers, or competitors.

The above list is illustrative and not exhaustive; any situation that may prejudice impartiality or serenity in decision-making must be reported to Management.

	Code of Ethics	Ref.	CCoE
		Is./Rev.	2.0
		Date	30/12/2025
		Page	7 / 10

3.5. Confidentiality

Each employee is required to maintain the strictest confidentiality regarding all information concerning the company, its employees, organization, production methods, and any information known through work duties.

Disclosure of any company-related information that could damage the company is strictly prohibited.

Employees must:

- Use information only for purposes related to their duties;
- Communicate information only within established procedures;
- Store information so it cannot be accessed by unauthorized parties;
- Verify any restrictions concerning third-party information and obtain consent when required.

3.6. Professional Conduct

Aerospazio Tecnologie Srl conducts its activities according to principles of loyalty, fairness, efficiency, and fair competition.

All employees and collaborators acting on behalf of the company must behave professionally and respectfully toward customers regardless of the business involved.

Offering or promising money, gifts, or benefits of any kind to customer employees or their families is prohibited, except for small gifts (under €100) or items of customary use, which must be authorized, documented, and properly recorded.

Management must be promptly informed if any gift or benefit is improperly offered or received. Christmas gifts or courtesy items must also be reported for evaluation.

Employees must perform duties with professionalism, reliability, accuracy, courtesy, and politeness, documenting their work and verifying results to facilitate information exchange.

The work environment must be constructive and cooperative, promoting knowledge sharing and growth. If difficulties arise in performing assigned tasks, Management must be informed promptly for support or replacement. Tasks should never be accepted without proper qualifications.

All conduct must always be honest and transparent in compliance with this Code and in the customer's interest.

3.7. Free Competition

All employees, while pursuing the best results, must comply with regulations on free competition and the principles of this Code.

It is strictly forbidden to exchange information or agreements with competitors regarding negotiations, prices, discounts, or economic conditions contrary to fair competition. Any doubtful situation must be reported to Management.

	Code of Ethics	Ref.	CCoE
		Is./Rev.	2.0
		Date	30/12/2025
		Page	8 / 10

3.8. Relations with Suppliers

The Company selects suppliers with maximum transparency and seriousness, evaluating quality, reliability, efficiency, and cost-effectiveness. Purchasing processes are based on principles of free competition.

Employees dealing with suppliers must:

- Select and manage suppliers according to internal procedures;
- Maintain close cooperation to ensure quality, delivery compliance, and cost control;
- Respect contractual conditions and foster trust and open dialogue;
- Promptly inform Management of any supplier reliability issues.

3.9. Relations with Customers

The Company places the customer at the centre of its activities, ensuring maximum product and service quality through continuous improvement.

All commitments to customers must be fulfilled with punctuality, precision, and dedication. Conduct must be professional, helpful, and courteous.

Employees must:

- Follow internal procedures for customer management;
- Provide precise and accurate product information;
- Advise customers, when necessary, in their exclusive interest;
- Ensure truthfulness and clarity in communications.

3.10. Relations with Public Institutions

Employees responsible for requesting or managing public funding or contributions must ensure they are used exclusively for their intended purposes and maintain clear and accurate documentation.

3.11. Disclosure of Information to External Parties

All information disclosed externally must be truthful, clear, and transparent. Relations with media are reserved for Management. Employees must refrain from giving statements on behalf of the company unless authorized.

Public communications or publications must be previously agreed with Management and comply with this Code's principles.

Disclosure of information about projects, investments, or negotiations is prohibited. False or misleading information is strictly forbidden.

Promising gifts or benefits to influence media activities is not allowed.

The company and its staff must convey an external image consistent with its reputation and prestige.

	Code of Ethics	Ref.	CCoE
		Is./Rev.	2.0
		Date	30/12/2025
		Page	9 / 10

3.12. Internal Control

Aerospazio Tecnologie Srl promotes awareness of internal controls to ensure efficiency, effectiveness, asset protection, and compliance with laws and procedures.

All employees are responsible for establishing, maintaining, and monitoring internal control systems within their roles.

3.13. Accounting Transparency

Every action and transaction must be properly authorized, recorded, legitimate, and consistent.

All actions must be supported by accurate documentation allowing correct accounting registration and reconstruction of decision processes.

Employees must ensure timely and clear documentation that is easily traceable and verifiable.

Documentation must be systematically archived according to logical criteria. Electronic archives may be used where provided.

Use of company funds for illegal or improper purposes is strictly prohibited. Unauthorized payments or illegal remuneration are forbidden.

Any negligence, omission, or falsification must be promptly reported to Management.

3.14. Confidentiality of Sensitive Data

The Company collects confidential data and undertakes to comply with privacy regulations.

Data may not be used for purposes other than those for which they were collected unless expressly authorized. Data are processed with automated tools only for the time necessary to achieve their purposes.

Data protection must be ensured through appropriate security measures.



4. SPECIAL PROVISIONS: IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

4.1. Violation of the Code of Ethics – Disciplinary Measures

Employees and collaborators must comply fully with this Code of Ethics. Compliance constitutes an essential part of contractual obligations under Article 2104 of the Italian Civil Code and relevant contracts.

Violation of this Code constitutes breach of contractual obligations and may lead to sanctions or disciplinary measures provided for in applicable collective agreements.

Everyone must promptly report non-compliant conduct. Whistleblowers acting in good faith must be protected against retaliation or discrimination, and confidentiality of identity will be ensured, subject to legal obligations.

The Company will take appropriate measures against violators.

Disciplinary measures may include verbal or written warning, suspension, immediate termination of employment or business relationship, or any other appropriate measure.

Some violations may also be prosecuted civilly or criminally by authorities.

End of Document