

CODE OF ETHICS AND SUSTAINABILITY Rototype SpA for Social Responsibility and Environmental Sustainability

1. Presentation

The **Code of Ethics and Sustainability** of **Rototype SpA** declares the Corporate commitment and responsibility, and its primary purpose is to build trust among all employees, partners, Customers, suppliers, government entities, and the community. The provisions of this document are based on the objectives of innovation and technological development of products, services, and the Corporate culture of Rototype SpA, oriented towards safety, ethical governance, sustainability, and social responsibility.

Therefore, its standards reflect the organization's culture, reinforcing and ensuring the values that perpetuate a culture of innovation, empathy, and sustainability, including the principles of honesty, transparency, and a policy of good conduct, also for the purpose of achieving an ethical profit.

Rototype SpA requires its shareholders, directors, employees, suppliers, and Stakeholders involved in Corporate life to respect the principles of this Code of Ethics and Sustainability. This Code of Ethics has been referenced and expressed in the Corporate Quality, Safety, and Sustainability Policy starting from October 3, 2022, and is included in the Corporate document management system for Quality, Safety, and Sustainability (SAQDQPG0025).

2. Company History

Rototype SpA, an Italian Company founded in 1962, offers solutions to banking systems to improve their operational processes. It is a family-owned Company, with headquarters and a research and development department in Calenzano (Florence) and a software development department in Milan.

Since the beginning, Rototype SpA has focused on the research, development, and production of software products and services, and through an experienced and professional team of collaborators, which has allowed the Company to grow into one of the world leaders in the banking system.

These services include communication network review, systems integration, customized software, and project management encompassing all aspects of a successful implementation and customer satisfaction.

For production, Rototype SpA selects qualified suppliers who operate with specific quality control plans, environmental, and safety policies.

Rototype SpA markets its products and services worldwide, and today, with the subsidiary Rototype SpA Middle East in Dubai, United Arab Emirates, confirms direct global contact with its Customers, distributors, and suppliers. The office offers Middle Eastern and African partners and Customers closer access to strategically located exhibition facilities, direct meetings with Customers, and market accessibility, enabling Rototype SpA to improve products and services and release new solutions that meet market needs, always in compliance with social responsibility and sustainability policies.

3. Purpose

Rototype SpA has been serving the banking sector in technological automation and digital transformation for over half a century. The development and innovation of our solutions are driven by the needs and market compliance of our Customers and Stakeholders, and since obtaining the UNI EN ISO 9001 certification in July 2000, Rototype SpA has structured and managed its organization to include the following purposes:

- Corporate welfare and workplace safety;
- Ethics and transparency of decision-making processes;
- Product and process quality;
- Respect for the environment and sustainability policies;
- Data protection.

4. Values

- **Innovation:** we understand that the transformation towards a sustainable world requires investment in innovation, which is fully applied to all Corporate processes, both in product development and in Corporate organization.
- **Empathy:** we consider the ability to see through the eyes of the other as essential to develop, deliver results, and generate better relationships among Stakeholders.
- **Sustainability:** we think about preserving the environment so as not to compromise the natural resources of future generations.

5. Scope

This Code of Ethics and Sustainability contains the main ethical, moral, and social responsibility guidelines that must guide internal, Corporate, and governance relationships, as well as external relationships with all interested parties. The provisions of this document are decided and managed by the company's top management, who are deeply committed to the effective implementation and compliance with the rules of conduct set forth herein.

6. Corporate Image and Culture

Every collaborator, considered here not only direct but also indirect (supplier and service provider), carries the image of the Company with them, and behaviors contrary to ethics, morals, and current national and international laws are not tolerated, both within the work environment and outside of it.

7. Sustainable Development

Among Rototype SpA's priorities is contributing to the 2030 Agenda for sustainable development of the planet, adopted in September 2015 by 19 member states of the United Nations (UN).

The solutions offered by the Company are oriented towards achieving the following Sustainable Development Goals (SDGs):

- Gender equality;
- Clean water and sanitation;
- Renewable energy;
- Decent work and economic growth;
- Innovation and infrastructure;
- Sustainable cities and communities;
- Responsible consumption;
- Fight against climate change.

8. Governance

Decisions made within the Company, whether they are internal, Corporate, or relating to any form of Corporate structure, must be made in accordance with the following guidelines:

- No decisions can be made that are contrary to Italian legislation or international legislation to which the company is subject for its commercial activities and/or is a party to signed international agreements;
- No decisions can be made that are contrary to this code of ethics and sustainability, to Corporate values or culture;
- They must be inspired by compliance with the principles expressed in Legislative Decree 231/01.

In case of doubt about any decision, or in the presence of any conflict of interest, the direct superior or General Manager of the company must be consulted.

In case of violation, the direct superior, the General Manager, or, as appropriate, the Shareholders must be contacted.

9. Conflict of Interest

A conflict of interest occurs whenever a benefit on one's own initiative conflicts with the ethics or interests of the Company.

It is considered a conflict of interest and, therefore, it is strictly forbidden to receive advantages and gifts; to purchase shares of companies on the basis of insider information; to acquire products or services under privileged conditions from the company's suppliers; to acquire shares in suppliers; to offer advantages and gifts based on a close relationship. An employee may refer relatives and friends to a Rototype SpA supplier, provided they are not responsible for hiring and/or do not influence the decision-making process in any way. The referral of relatives and friends for job offers at suppliers or Customers should be avoided so as not to generate expectations of tacit or explicit remuneration commitment. In case of doubt about any situation regarding a conflict of interest, the direct superior or the General Management must be consulted.

In case of violation, the direct superior, the General Manager, or, as appropriate, the Shareholders must be contacted.

10. Relations

The relationship between employees (internal and external) must be based on total respect, regardless of the existing hierarchy, and therefore, under no circumstances are the following permitted:

- behaviors that favor or discriminate against any employee based on social status, color, gender and sexual orientation, origin, race, age, religion, marital status, or physical condition;
- behaviors that cause intimate or public embarrassment;
- behaviors that violate any labor rule or regulation;
- behaviors that put any employee at risk.

The conducts indicated above will be treated with the necessary rigor, regardless of whether they occur inside or outside the company premises.

All relationships with Customers, suppliers, and Stakeholders in general must respect:

- Prohibition of behaviors that favor or discriminate against any person based on social status, color, gender and sexual orientation, origin, race, age, religion, marital status, or physical condition;
- Prohibition of behaviors that cause any intimate or public embarrassment;
- Transparency in the relationship, prioritizing clarity and providing the information requested by Customers that is not protected by secrecy;

- Prioritizing customer satisfaction without violating any ethical standard or Corporate culture;
- Respecting consumer protection regulations;
- Broad access to clarifications on support or doubts about the service provided;
- Compliance with the General Data Protection Regulation (GDPR - Regulation (EU) 2016/679 and subsequent amendments) on matters relating to data processing and handling and to new legal obligations and/or national and international standards;
- All relationships with suppliers must be conducted on the basis of the guidelines of this Code and, therefore, suppliers must observe this Code;
- Selecting suppliers based on objective criteria, considering higher quality, price, competence, credibility, market reputation, and sustainability policies.

Rototype SpA encourages paths of peace and tolerance, respecting the customs and traditions of all our Suppliers and Customers in every Country in which we operate.

11. Democracy and Freedom in the Workplace

Rototype SpA recommends a commitment to democratic management in the work environment. Work relationships must always be conducted with transparency, integrity, respect, equality, freedom, and collectivity. Building an environment of diverse opinions encourages participation and team integration. The results of this management will be richer and more motivating.

12. Prevention of Moral and Sexual Harassment

Moral harassment is considered conduct that exposes the employee to humiliating situations, and can occur in the face of unacceptable and abusive behavior. Sexual harassment is considered non-consensual sexual harassment and is not tolerated, through inappropriate behavior in the work relationship, whether verbal or physical. Relationships between colleagues are not prohibited, respecting Corporate rules of common sense, productivity, and confidentiality of information.

13. Confidentiality and Secrecy

All internal information is protected by industrial secrecy and may under no circumstances be disclosed, shared, or communicated externally without the express consent of the company. This secrecy also concerns information relating to employees.

14. Support and Whistleblowing Channel

In case of doubt as to whether or not this Code is respected regarding a conduct, the employee will have access to support via the following email address: info@rototype.com

If a conduct is identified that violates or compromises compliance with the provisions of this Code of conduct, the employee must report it through the Reporting Channel: info@rototype.com

However, if at the end of the investigation it is proven that the complainant aimed to denigrate or damage a Colleague, the sanctions provided for non-compliance with this Code may be applied.

Anyone who is aware of unethical conduct and fails to report it may be held liable for the damage caused by the conduct, as well as for the coercive measures applied to those who acted improperly.

15. Handling of Non-Conformities and Incidents

Once the non-conformity is identified, whether through the Reporting Channel, the Audit, or any other way or means, the situation will be immediately addressed according to the internal procedure of the Company's Management System for Quality, Safety, and Sustainability SAQDQPO004.

Employees who act or are involved in unethical behavior and in violation of the provisions of this Code will be subject to:

- Warning and adjustment process, in the case of minor conduct, considered as that which does not represent a risk to the customer and does not represent any ethical or legal infraction, in compliance with labor law regulations;
- Dismissal for just cause, without prejudice to applicable civil and criminal actions in cases of conduct contrary to this Code of Ethics and Sustainability or to the Law in force, in compliance with labor law regulations.

16. General Provisions

It is worth noting that, in some cases, even in the absence of a legal prohibition, conduct may be considered unethical and, consequently, must be eliminated from the conduct of Rototype SpA employees.

Rototype SpA is committed to eradicating child or forced labor and, therefore, does not employ minors under the age of 16 and requires its suppliers and service providers to adopt the same principles.

Corporate Compliance referred to in the previous points is not addressed as a sum of fulfillments, but represents the integrated reading of the various regulatory sources (PPWR,

CSRD, EED, CBAM, Pay Transparency, and CSDDD, EUDR) in order to establish a coherent governance roadmap for Corporate adjustment and transformation processes.

The main ESG directives and regulations, as far as applicable to the Rototype context, outline differentiated obligations by scope and perimeter, which our Company undertakes to understand and integrate into its organizational processes.

The provisions of this Code do not exhaust all possible ethical issues connected to business activities, not limiting the development and commitment towards sustainable paths, as well as any coercive measure for any conduct harmful to common sense, ethics, and morals.

This Code enters into force thus updated from April 14, 2026, without an expiration date. Calenzano, Florence (Italy).

Version published on April 14, 2026

The General Management