



Code of Ethics



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President's letter

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History of versions



Dear colleagues, partners and stakeholders,

it is with great pride that I present to you our Code of Ethics, a document that embodies the founding values of our Company and guides our daily actions in an ever-changing global market.

As a multinational company, we work in a context characterized by cultural, regulatory, and social diversities. These diversities enrich our work but also require high and shared standards of conduct.

This Code was created to define our principles and guidelines, which help in decision making and ensure ethical, responsible, and transparent behavior.

Our commitment is based on essential values: respect for people, promotion of diversity, integrity in professional relationships, and contribution to sustainable development.

We want to contribute positively to the progress and well-being of our workers and of those communities in which we operate, by setting a great example.



This Code of Ethics is not just a set of rules but a real tool for growth and cohesion. It is intended to anticipate the challenges of the future by fostering a corporate culture based on mutual trust, transparency, and excellence.

I am confident that each of you will both adopt and understand the principles in this document, contributing to the strengthening of our reputation and the creation of a respectful, inclusive, and responsible working environment.

I highly recommend that you all turn this Code of Ethics your main point of reference in the face of challenges. Together, we can consolidate our success and build a strong, sustainable future, fully aligned with the values that set us apart.

Thank you for your commitment and for the contribution you make every day to our Company.

Sincerely,

Stefano Sonzogni

President



Introduction 01

The MEI Code of Ethics contains the fundamental principles that guide our business. We strongly believe that these principles are not mere statements; they constitute our ethical and moral values, which lead to a better working environment for everyone and, consequently, bring results and benefits to the entire Company and all Recipients of this Code.



02 Definitions

“Customer/s”: refers to MEI’s customers;

“Code” or “Code of Ethics”: refers to this Code of Ethics document;

“Collaborator/s”: refers to those who, directly or indirectly, permanently or temporarily, have a collaboration or consultancy relationship with MEI, or perform assignments on behalf of and/or in the name of MEI, including distributors and agents;

“Recipient/s”: refers to the subjects indicated in the following art. 3;

“Employee/s”: refers to subordinate or quasi-subordinate workers, including project collaborators, temporary workers, interns, apprentices, etc.;

“Supplier/s”: refers to suppliers of goods or services for MEI;

“MEI” or “Company”: refers to MEI S.r.l. and all companies of the MEI group;

“Supervisor/s”: refers to people who hold supervisory roles and/or are directly responsible for managing Employees or Collaborators.



Scope and Recipients of the Code 03

The Recipients of the Code, which are required to observe the principles contained herein, are:

- those who perform, even de facto, management, administration, direction, or control functions for MEI or any of its organizational unit, including corporate bodies (Directors, Auditors, Organismo di Vigilanza, etc.);
- Employees and Collaborators;
- all subjects who, being involved in contractual relationships of collaboration with MEI, act in its name or on its behalf;
- Suppliers.

The Code of Ethics is valid for all companies of the MEI group.



04 Communication and Dissemination

The Code of Ethics is available in the various languages of the countries where MEI and the Group companies are located.

The Code of Ethics is available and is published on the MEI website at the following link <https://meisystem.com/it/legal>.

MEI, with the help of the management, is committed to spreading the Code of Ethics and raising awareness among Recipients about its contents.

Employees and Collaborators are required to be informed about the content of the Code of Ethics and to adapt their conduct to the principles indicated herein, seeking clarification from their Supervisor or the Organismo di Vigilanza if necessary and reporting any violations through the channels indicated in this document.



Principles 05

5.1 Work and Person

MEI respects and protects the fundamental human rights and promotes mutual respect and collaboration to ensure an environment and working conditions that respect dignity and moral integrity.

MEI supports the principles of equal opportunity and inclusivity, valuing diversity as an opportunity of dialogue and development. The Company does not tolerate discriminatory behavior based on race, religion, age, health, political and union opinions, nationality, sexual orientation, or any personal characteristic.

MEI rejects any behavior that violates or limits the freedom, personality, and professionalism of individuals, and therefore by way of example prohibits acts of mobbing, intimidation, abuse of authority, harassment, and any activity that (even potentially) may constitute exploitation, forced labor, subjugation or slavery.

MEI also rejects any form of child labor exploitation, recognizing, on the other hand, the importance of allowed training and internship collaborations and developing relations with educational or training institutions to this end.

The Company considers it essential to promote a model of corporate social responsibility, which allows the business objectives to meet the well-being and the needs of Employees.

MMEI uses only regular employment contracts in compliance with applicable legislation and expressly prohibits any form of irregular work (including the engagement of non-EU citizens without a regular residence permit). MEI's salary policy is based on adequacy, fairness, and objectivity. MEI cares about the professional improvement of each Employee, and therefore proposes initiatives and programs of training and skill updates.

Employees and Collaborators of MEI cannot engage in political activities during working hours; any involvement in such activities is recognized as personal.

WHAT TO DO?

- Recipients are encouraged to actively contribute to creating a serene and respectful work environment by refraining from behaviors that contrast with the principles outlined in this paragraph.
- MEI invites Recipients to report any discriminatory conduct or situations detrimental to the dignity of individuals through the channels indicated in this Code, maintaining the confidentiality and sensitivity required by the case.

5.2 Health and Safety

To protect the physical and mental integrity of individuals, MEI implements necessary and adequate safety and hygiene measures, raising awareness among its Employees and Collaborators – by arranging specific training and information activities – about respecting these measures and adopting responsible behaviors to prevent risks.

MEI is particularly attentive to the care and cleanliness of company spaces and assets, which contribute to ensuring an adequate and comfortable working environment.

MEI strongly disapproves of the use of alcohol or drugs, gambling, and other forms of addiction, not only when they affect work performance, but also because they compromise the health and lives of individuals.

MEI cares about the health and well-being of its Employees and Collaborators, and to this end implements and promotes welfare policies.

WHAT TO DO?

- Employees and Collaborators, as well as Recipients visiting MEI, are required to follow the safety rules and guidelines of MEI's facilities.
- All Recipients are asked to collaborate with those responsible for the company's health and safety system (for example, by reporting possible risks), thus becoming active and diligent participants in protecting everyone's health and safety.
- It is important not to neglect any situation that could, even potentially, constitute a risk to health and safety.
- Employees are asked to help keep company spaces clean and in order, following MEI's instructions.



5.3 Environment and Territory

MEI recognizes that the environment is a precious asset and a primary value for business operations and is committed to preserving it and promoting a culture of environmental protection and valorization. This topic is considered in strategic and business choices as well as in the management of operative and production activities of the company, within the vision of commitment to a corporate social responsibility that integrates the culture of sustainability and its implementation in the company's process and activities.

Environmental protection is particularly relevant as a criterion for choosing technologies and solutions adopted in MEI products, in order to align research and technological innovation with the principle of sustainable and responsible development. MEI commits to become part of an environmentally conscious supply chain, allowing Customers and end-users to benefit from the related advantages.

The optimization of natural resource use and waste reduction is promoted and encouraged. MEI's premises are designed and managed considering the protection of the environment and the surrounding territory, minimizing polluting activities and complying with applicable waste management laws.

MEI aims to contribute to the well-being and growth of the communities where its premises are located, also respecting (and encouraging to respect) cultural and landscape heritage.

WHAT TO DO?

Employees must avoid any form of pollution, avoid wasting water or energy, and follow the rules for waste separation.

5.4 Relations with Customers, Suppliers, and Collaborators

MEI ensures that relations with Customers, Suppliers, and Collaborators are based on fairness, transparency, and good faith, encouraging dialogue, and recognizing that mutual trust and collaboration contribute to the well-being and progress of all.

MEI engages Collaborators and has relations with Customers and Suppliers that have a reliable reputation, perform their activities following the laws and the ethical principles of this Code.

In particular, the Company has relations with Suppliers and Collaborators based on criteria of quality, competitiveness, professionalism and respect of the rules.

MEI offers its Customers high-quality products and guarantees a high-level service attentive to Customer needs.

WHAT TO DO?

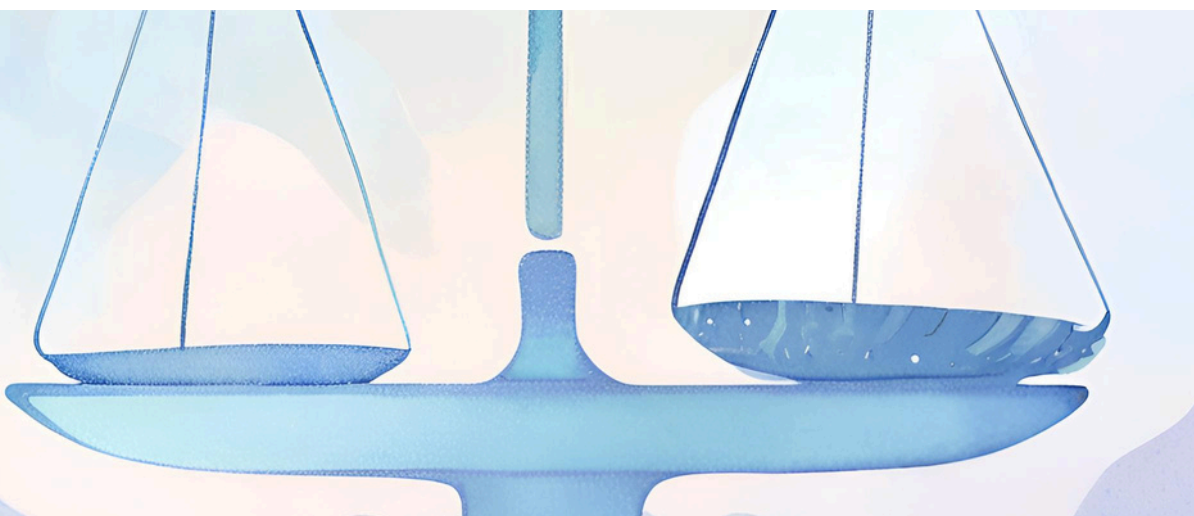
- Employees and Collaborators are encouraged to adopt a correct and transparent attitude towards any external party and to work with professionalism and availability.
- Customers, Suppliers and Collaborators must be provided with all the support necessary for the proper continuation and/or completion of the contractual relationship, also through constant attention to suggestions and complains.

5.5 Legality

MEI recognizes that legality is essential for a company's life and therefore guides Recipients to respect applicable laws and regulations, encouraging transparent and honest behaviors.

MEI's activities and organization comply with applicable financial and accounting management regulations, corporate obligations, document management, and transaction traceability.

MEI prohibits conduct aimed at improper influencing, obtaining undue advantages, or constituting bribery, and likewise it is prohibited to accept benefits if they are offered in an attempt to obtain favoritism. This prohibition applies in particular to relations with Public Administrations, Control Authorities, and Judicial Authorities.



MEI asks Recipients to avoid any conflict of interest between personal interests and the Company's.

MEI categorically prohibits money laundering, receiving stolen goods, and self-laundering.

In no case can the pursuit of the Company's interest or obtaining an advantage for it justify illegal or dishonest behavior.

WHAT TO DO?

- In case of doubt, Employees and Collaborators must verify the legality of a conduct, and for this purpose, they can refer to their Supervisors or the legal department.
- MEI can only be represented by those who have been expressly authorized and within the limits indicated by such authorization; relations with Public Administrations, Control Authorities, and Judicial Authorities can only be conducted by Employees expressly authorized for this purpose.
- If a situation arises that could lead to a conflict of interest, this risk must be promptly reported to the Supervisor or MEI contact.
- In case of gifts being offered by Customers or Suppliers, it is not appropriate for Employees to accept the goods personally, therefore MEI requires them to bring the goods to the Company for re-distribution or donation to charity.
- Recipients must avoid any behavior that may fall under the prohibitions of bribery as illustrated above; if Recipients have doubts about whether a request may fall under the prohibited behaviors, they must verify, also by referring to their Supervisor or MEI contact.

5.6 Information and Intellectual Property

MEI is committed to keeping the confidentiality of confidential information it becomes aware of and invites Recipients to do the same, avoiding the improper or incorrect use of such information or use finalized to pursue improper interests or obtain undue advantages.

MEI recognizes the importance of protecting the privacy of individuals and aligns its activities and management with the related applicable regulations and best practices.

The technical and commercial knowledge developed, know-how, and intellectual properties of MEI are Company assets and, as a fundamental resource, each Recipient (especially Employees and Collaborators) must not disclose them to third parties and must use them according to the provided instructions, aware that improper use or disclosure of such knowledge would cause irreparable damage to MEI.

For Employees, these obligations remain even after the termination of the employment relationship.

WHAT TO DO?

- Employees and Collaborators are required to follow the instructions and apply the measures set by MEI for the protection of confidentiality and information security.
- In case of doubt about the confidential or secret nature of information and/or the appropriateness of sharing certain information with colleagues or external parties, Employees must refer to their Supervisor or the legal department.
- Recipients can use the MEI trademark only if specifically authorized and within the limits of such authorization.

5.7 Communication Means, and use of social media and the website

In the context of work activities or mutual relations, MEI invites Recipients to use social media responsibly and professionally, in accordance with the principles of this Code.

Only Employees duly authorized can publish content on the website or on the company's social media, as well as have relations with the media or communication means.

In view of the enormous resonance and reputational impact that may result, MEI invites the Recipients to the utmost care in deciding the contents and materials to be disclosed, in compliance with the law and in full respect of people's freedom, integrity and dignity, as well as without damaging, even indirectly, the Company's image, reputation and credibility. MEI Employees must refrain from any communication, behavior, or statement that could damage the Company's image.

WHAT TO DO

- Employees and Collaborators must use social media responsibly, carefully evaluating which content to be published.
- Employees and Collaborators must not disclose false or confidential information, nor attempt to damage MEI's image.

5.8 Donations and Charity

MEI actively engages in charitable initiatives and social commitment and promotes them among its Employees. To this end, MEI has established the MEI Foundation, which is constantly engaged in charity activities and projects worldwide.



06 Non-compliance with the Code of Ethics

Compliance with the principles of this Code must be considered an essential part of the contractual obligations of all MEI Employees under applicable law. Therefore, violating the principles of this Code may result in disciplinary proceedings and, if necessary, appropriate measures.

In the most serious cases, non-compliance with the principles of this Code may also constitute grounds for termination of the employment contract or immediate revocation of any mandate, proxy, and powers granted.

Similarly, any violations by other Recipients of the principles of this Code will be evaluated for the continuation of contractual relationships.

Modello ex 231/2001

This Code of Ethics is an integral part of the “Modello di Organizzazione, Gestione e Controllo” pursuant to Legislative Decree 231/2001 approved by the Board of Directors of MEI S.r.l.

08 Reporting Violations of the Code of Ethics

If Recipients become aware of behavior that violates this Code of Ethics, they can report it to their Supervisor or their MEI contact.

It is also possible to make such a report through the dedicated channel set up by MEI in accordance with Legislative Decree 24/2023, following the Whistleblowing procedure. This system ensures that the identity of the persons involved and the content of the report remains confidential, and prohibits any form of retaliation against those who report violations observed in the context of their work and collaboration with MEI.

History of versions

Versions	Approval	Approval date	Notes
1.0	Board of Directors of Mei Srl	22/11/2024	First version of the document