

# BLINK S.r.l.

---

## CODE OF ETHICS AND CONDUCT

APPROVED BY THE SOLE DIRECTOR ON  
[25/05/2021]

---

LAST UPDATE: [25/05/2021]

**blink**  
MARINE



---

# CONTENTS

**Introduction..... 02**  
**The Group's values ..... 03**  
**Addressees ..... 04**  
**Ethical principles of conduct ..... 05**  
**Standards/Rules of conduct towards stakeholders .....07**

---

# INTRODUCTION

Blink S.r.l. is a company whose corporate purpose is the design and production of push-button panels and CAN bus electronic control units for mobile machinery and marine.

Blink S.r.l. has decided to adopt this Code of Ethics (hereinafter also referred to as the "Code"), which contains the values, principles and rules of conduct that the company follows while carrying out its business, in order to create the conditions for the correct

application of specific policies and procedures.

The Code of Ethics formalises the commitments and responsibilities required of shareholders, members of corporate bodies, managers, employees and all those who operate under the direction, control and in the interest of the Company. It also expresses the relationship that Blink S.r.l. has with all its stakeholders and represents a landmark for them.

---

# THE GROUP'S VALUES

**The values contained in Blink's Code must be accepted and implemented by all those who operate and act within the Group.**

## THE CREATION OF VALUE

The Company always strives for excellence in serving customers and achieving maximum value for shareholders and stakeholders, through a conduct that is and must always be based on integrity and professionalism.

## PROFESSIONALISM

Working collaboratively, as part of a team, with competent staff committed to guaranteeing the quality of the services offered is one of the essential elements of the company.  
It integrates professionals with different disciplines, cultures and experiences, aiming at preparing the young members, who represent the majority of the team.

---

# ADDRESSEES

This Code applies to every person belonging to the Blink S.r.l. organisation. (hereinafter referred to as the "addressees").

Addressees include shareholders, members of corporate bodies, all employees, professionals and collaborators of the Company and all those who, directly or indirectly, permanently or temporarily, operate with Blink S.r.l..

Therefore, all the addressees are required to take note of the contents of this Code of Ethics, to observe and respect it.

Blink S.r.l. is committed to ensuring that everyone is aware of the Code and provides for the correct sanctioning measures in case of its violation.

---

# ETHICAL PRINCIPLES OF CONDUCT

## COMPLIANCE WITH THE LAW

Blink S.r.l. identifies as a mandatory principle the compliance with the laws in force in all the countries in which it operates, (the observance) of contracts or relations with the Public Administration and with other private parties and undertakes to ensure that they are respected, exercised by all the addressees of the Code of Ethics.

The adoption of any conduct contrary to the provisions of this Code will be sanctioned; moreover, any conduct and action that is considered an offence, in particular pursuant to Legislative Decree 231/01, is prohibited.

## HONESTY, FAIRNESS AND CONFLICT OF INTEREST

The values of honesty and fairness represent the fundamental principles of Blink S.r.l. to which the conduct of all recipients must aspire.

Blink S.r.l. undertakes to prevent addressees from pursuing interests that are divergent or conflicting with those of the Company and from pursuing personal benefits from its activities. Therefore, the addressees are bound to avoid situations of conflict with the interests of the Company, which could interfere with their ability to take decisions impartially.

Any conflict of interest must be promptly communicated to the Administrative Body.

## LOYALTY AND FIDELITY

The Company establishes and maintains a relationship of reciprocal loyalty and trust with each addressee, which is expressed in the prohibition for each of them to undertake working or consulting relations on behalf of third parties without the prior authorisation of Blink S.r.l., as well as to carry out any activity incompatible with the duties assumed towards the Company.

## RESPECT FOR THE INDIVIDUAL

Blink S.r.l. recognises the contribution of each person within the Company and favours a working environment that promotes the physical and moral integrity of each person and develops a sense of belonging, condemning all forms of discrimination, harassment, threats to the person that could induce him/her to act illegally or contrary to the Code of Ethics. The Company complies with the current legislation on health and safety at work.

Blink S.r.l. is committed to insuring a fair, productive and non-discriminatory work environment in which everyone is valued according to their personal contribution.

Therefore, everyone must work to promote fairness and to ensure an environment without discrimination and harassment, in compliance with all applicable law.

Blink S.r.l. promotes and takes all necessary measures within its organization for the elimination of any form of forced or coerced labour.

Blink S.r.l. expressly refuses the use of child labour within its organization, respecting the minimum age for recruitment established by the applicable legislation and taking all necessary measures to ensure compliance.

Blink S.r.l. rejects any manifestation of abuse of authority or physical, psychological and moral harassment, as well as any other conduct likely to generate an intimidating or offensive environment towards people rights.

---

#### PROTECTION OF THE ENVIRONMENT

The Company is committed to promoting sustainable development, focused on the efficient use of the tangible and intangible resources entrusted to it, in order to respect the environment.

#### TRANSPARENCY AND COMPLETENESS OF INFORMATION

Blink S.r.l. guarantees a correct and transparent circulation of information to all recipients regarding its management and relations with them.

#### PRIVACY AND CONFIDENTIALITY OF INFORMATION

Blink S.r.l. is committed to ensuring that the data collected and the information relating to all stakeholders, of which it has come into possession, is treated confidentially and is meant for the exclusive pursuit by the Company of its duties. Recipients are obliged to protect the confidentiality of this information and comply with the privacy legislation (Legislative Decree 196/2003), if not sanctions will be applied. In this regard, the Company shall ensure that third parties who may come into possession of confidential information sign a confidentiality agreement.

With reference to inside information, it is forbidden for all recipients to use it (either directly or through an intermediary) for personal transactions or to disclose it to third parties.

---

# ETHICAL PRINCIPLES OF CONDUCT

## ANTI-MONEY LAUNDERING

Blink S.r.l. is committed to complying with all the legislation regarding money laundering, and therefore not to be involved in any case concerning money laundering deriving from illegal or criminal activities.

## USE OF COMPANY RESOURCES AND COMPUTER SYSTEMS

The improper use of Blink's assets by the addressees is expressly forbidden; whom must use them responsibly and avoid their personal use or use by third parties.

The falsification of any Company document is forbidden.

The use of Blink's computer resources by each addressee must be compliant with the Company's business activities;

Therefore, any behaviour that may damage, alter or destroy computer systems and any use of such resources for illegal purposes or purposes contrary to the Company's activity is prohibited. Moreover, it is forbidden to install software products or databases in violation of the contractual user licence agreements, as well as to illegally access computer or telematic systems protected by security measures, or even the mere disclosure to third parties of codes, passwords, keywords to access the same systems.

## RESPECT FOR FREE COMPETITION

The Company supports correct and fair competition, as it recognises that the Company's reputation and its sustainable development in the market in which it operates may derive from it.

Therefore, the Company represses any unfair behaviour that benefits it or leads it to violate the law.

## GIFTS, PRESENTS AND BENEFITS

No form of gift or benefit is allowed, neither received nor offered or promised, that exceeds normal commercial or courtesy practices, or in any case aimed at acquiring favourable treatment in the conduction of any activity related to Blink S.r.l.

It is also forbidden to give or offer money or other benefits to employees, directors and consultants of Blink S.r.l., customers, suppliers and competitors, in order to carry out or omit actions in violation of the obligations inherent to their office or to the obligations of loyalty.

In particular, any form of gift to public officials or employees of the Public Administration and their relatives, whether Italian or foreign, is forbidden.

This principle cannot be departed from, even in countries where the offering of gifts and presents is considered customary.



---

## STANDARDS/RULES OF CONDUCT TOWARDS STAKEHOLDERS

### TOWARDS CUSTOMERS

The behaviour of all employees, partners and collaborators of Blink S.r.l. towards customers must be based on responsibility and courtesy. The Company aims at establishing a collaborative and professional relationship.

Each customer is required to become aware of and comply with this Code in order to maintain the relationship.

### TOWARDS SUPPLIERS

The selection of suppliers and business partners is based on the achievement of an advantage in terms of price, on obtaining the highest competence regarding the service provided and on the possession of adequate requirements.

The relationship with them is based on collaboration, mutual loyalty and transparency in the relationship.

The Company requires its business partners to comply with this Code of Ethics, with the aim of aligning the principles of conduct of both parties. To this end, contractual agreements shall include clauses providing for the knowledge of and the compliance with this Code. This is without prejudice to the possibility for the Company to provide for and interrupt any future collaboration with suppliers who, while performing their activities, do not respect the principles of conduct of the Code of Ethics.

### TOWARDS THE PUBLIC ADMINISTRATION

Blink S.r.l. maintains relations with Public Administrations based on transparency, correctness and collaboration. The assumption of such commitments is reserved exclusively for directors

and partners to whom internal procedures allow it. In the event of business negotiations or any relationship with the Public Administration, the addressees must not influence in any way the decisions of the counterparty, nor those of the officials who negotiate or make decisions on behalf of the Institutions or Public Administration.

Furthermore, it is expressly forbidden to offer personal advantages to employees and officials of the Public Administration, to try to obtain confidential information that may damage the reputation of the parties and to conceal information requested by the Public Administration.

In all the aforementioned relations, the Company promotes the full implementation of the applicable legislation, with particular regard to Model 231/01. In case of participation in tenders called by the Public Administration, the Company shall fully comply with the law and the correct business procedure to be followed for participation.

### CONTRIBUTIONS

Blink S.r.l. refrains from making any contribution, direct or indirect, to parties, movements, committees and political organisations and trade unions, including their candidates.

Contributions may only be made, in accordance with the law, to non-profit associations with regular articles of association and deeds of incorporation.

### TOWARDS PUBLIC SUPERVISORY AUTHORITIES

In its relations with the Public Surveillance Authorities and the Control Bodies (such as, for example, the Antitrust Authority, the Authority for the Protection of Personal Data, CONSOB, the Bank of Italy, Borsa Italiana S.p.A.), the Company complies with the principle of maximum cooperation, especially in the case of questions and requests for information. The Company also undertakes to be transparent in representing its position vis-à-vis the aforementioned bodies and to avoid manipulating data in order to obtain advantages of any kind.

*Blink S.r.l.*  
*Via Montefeltro, 6 - 20156 Milano (MI) - Italy*  
*Tel. +39 (02) 3088583 - Fax +39 (02) 33406697*