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## SENECA Code of Ethics

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## 1. Introduction and Purpose

For about 40 years, **SENECA** has been a key player in interface, signal conditioning, fieldbus, and wireless technologies for industrial automation. Its mission is to develop innovative and reliable instrumentation that simplifies customers' work, offering solutions to acquire, convert, isolate, display, and safely transmit industrial signals—via cable, bus, radio, or IoT/Cloud platforms.

As one of the first companies in Europe to design galvanic isolators and signal conditioners, **SENECA** offers a wide catalog of cost-effective, high-performance devices and systems for comprehensive data handling: from signal power supply to data storage and analysis.

This **Code of Ethics** defines the principles and values that inspire **SENECA** in carrying out its activities, promoting ethical, responsible, and law-abiding behavior.

It also represents the company's commitment to quality, reliability, and continuous improvement, in line with ISO 9001 standards, for which **SENECA** has been certified since 1997.

The Code is binding for all employees, suppliers, consultants, and corporate stakeholders.

## 2. Corporate Values

**The company's values form the foundation of SENECA's identity and organizational culture.**

They guide strategic decisions, internal and external relationships, and day-to-day interactions with all stakeholders. In line with its corporate mission and international reference standards, **SENECA adopts and promotes a responsible and sustainable vision of business**, based on shared and non-negotiable principles.

In particular, the company recognizes, respects, and is committed to promoting the following core values:

- Legality and integrity
- Social and environmental responsibility
- Fairness and transparency
- Respect for individuals and diversity
- Customer and quality orientation

## 3. Rights, Duties, and Conduct of Employees

### 3.1 Diligence and Good Faith

Every employee or collaborator must act loyally and in good faith, respecting the obligations set forth in their contract and ensuring the required performance.

They must also be familiar with, adhere to, and formally acknowledge the contents of this Code, basing their conduct on respect, cooperation, and mutual collaboration, and committing not to engage in any behavior that violates its principles.

Moreover, they are required to report their work activities accurately and in a timely manner.

### 3.2 Conflict of Interest

Each employee or collaborator must carry out their work exclusively in the interest of **SENECA**, avoiding any situation of conflict between their personal economic activities—including those involving family members—and their corporate duties or roles, which could harm **SENECA's** operations or result in unlawful personal gain.

By way of example, though not exhaustively, the following may constitute such situations:

- Accepting money, gifts, or favors of any kind from individuals, companies, or entities that have business dealings or ongoing negotiations with **SENECA**;
- Using one's corporate position or information acquired through work to benefit personal interests;
- Initiating, negotiating, or finalizing deals and/or contracts in the name of or on behalf of **SENECA** with family members or partners, or with companies or legal entities in which the employee has an interest or ownership.

Before accepting any paid assignment—whether advisory, managerial, administrative, or other—on behalf of another party, or in the event of a potential conflict of interest as described

above, the employee is required to notify the company in advance.

### 3.3 Confidentiality and Protection of Intellectual Property

Employees and collaborators are required to maintain the highest level of confidentiality regarding any information, documents, and data acquired during the performance of their work activities.

It is strictly forbidden to disclose any confidential information to third parties, even after the termination of the working relationship, unless specifically authorized to do so.

"Confidential information" includes, but is not limited to: projects, software, schematics, drawings, technical and accounting data, customer and supplier lists, contracts, know-how, digital content, photographic or audiovisual materials, as well as all information relating to **SENECA's** organization, processes, and intangible assets.

Employees and collaborators are required to:

- Refrain from making unauthorized copies of confidential information or materials, whether physical or digital;
- Not transmit, send, or disclose confidential content via email, external devices, or unauthorized cloud platforms;
- Securely store corporate documents and data, preventing access by unauthorized individuals;
- Return all company materials upon termination of the working relationship, deleting any copies from personal devices;
- Maintain confidentiality even after the end of the collaboration, in accordance with applicable laws, including the provisions of the GDPR (EU Regulation 2016/679).

### 3.4 Protection of Company Assets

Every employee or collaborator is required to act diligently to protect company assets from improper or inappropriate use.

In particular, with regard to IT applications, each employee must strictly follow the company's security policies to avoid compromising the functionality and security of IT systems.

Furthermore, each employee or collaborator is required to:

- Avoid making unauthorized copies of licensed software for personal use or for third parties;
- Ensure that company security regulations are also followed by collaborators or third parties operating on behalf of **SENECA**;
- Use corporate email and internet tools for permitted purposes only, refraining from sending offensive, threatening, or damaging messages that could harm the company's or others' reputation;
- Refrain from browsing websites containing child pornography, pornography, illegal content, or material unrelated to work activities.

## 4. Relations with Stakeholders

**SENECA bases its relationships with external parties—clients, suppliers, business partners, public and private entities—on principles of fairness, transparency, and legality.**

Every interaction must reflect mutual respect, good faith, and compliance with applicable national and international laws.

In an increasingly complex and interconnected context, it is essential that all external relations be managed ethically and responsibly, to preserve and strengthen the company's reputation, market trust, and long-term partnerships.


### 4.1 Transparency and Fairness with Suppliers and Customers

**SENECA** is committed to ensuring that relationships with suppliers and customers are based on objective criteria of quality, reliability, contractual compliance, and mutual benefit.

All collaborators must act professionally, avoid deceptive or unfair practices, and ensure that every commercial transaction is clearly documented and traceable.

### 4.2 Prohibition of Corruption, Favoritism, and Bribery

All forms of active or passive, direct or indirect corruption are strictly prohibited.

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No gifts, benefits, or favors are permitted if they could even potentially influence decisions or secure improper advantages. Employees must refrain from accepting gifts or courtesies that exceed symbolic value or could create a conflict of interest, and must promptly report any irregularities.

#### 4.3 Lawful Relations with Public Authorities

In dealings with public authorities, SENECA operates in full compliance with legal requirements, adopting transparent and cooperative behavior.

It is strictly forbidden to promise or offer money or benefits to influence administrative, inspection, or authorization decisions. All relations with public entities must be managed exclusively by authorized personnel and must be fully documented and traceable.

### 5. Sustainability and Environment

**SENECA recognizes environmental protection as an integral part of its ethical and social responsibility.**

In line with the principles of sustainable development and the goals of the 2030 Agenda, the company is committed to minimizing the environmental impact of its activities and promoting a conscious and efficient use of resources.

Environmental sustainability is not only a regulatory requirement, but a guiding value in strategic decisions, production processes, product design, and supply chain management.

#### 5.1 Compliance with Environmental Regulations

All corporate activities must comply with applicable environmental laws, European and international regulations, and, where relevant, voluntary standards (e.g., ISO 14001). SENECA is committed to continuously updating its practices to meet evolving legislation and industry best practices.

#### 5.2 Reducing Environmental Impact

The company pursues concrete objectives to reduce both direct and indirect environmental impacts, such as emissions, energy consumption, waste production, and the use of polluting materials. Efficient, eco-friendly, and durable technological solutions are promoted, including through process digitalization and ongoing innovation.

#### 5.3 Responsible Use of Natural Resources

The use of natural resources must be guided by responsibility and awareness, avoiding waste and prioritizing reuse and recycling. All collaborators are encouraged to adopt environmentally responsible behaviors and actively contribute to the company's environmental goals. Suppliers are also assessed based on their environmental awareness and commitment.

### 6. Protection of Individual and Personal Data

**SENECA recognizes the centrality of the individual as one of the fundamental principles of its ethical and responsible conduct.**

Respect for human dignity, fundamental rights, health, and safety, along with the protection of personal data, are essential conditions for a healthy, fair, and transparent work environment. The company is committed to creating and maintaining a workplace where each individual is valued, heard, and protected.

In line with shared ethical, social, and cultural values, with national and international regulations, and with its own internal guidelines, **SENECA promotes behaviors based on fairness, honesty, inclusion, and social responsibility** toward all stakeholders: employees, collaborators, shareholders, customers, suppliers, institutions, and civil society.

#### 6.1 Workplace Safety

Protecting the health and safety of workers is an absolute priority. The company strictly complies with Legislative Decree 81/2008 and all applicable regulations, promoting a culture of prevention, continuous training, and risk awareness. Management systems are in place to ensure safe, ergonomic, and hazard-free environments, including through equipment maintenance, timely reporting of anomalies, and active employee involvement.

#### 6.2 Prevention of Harassment, Discrimination, and Workplace Bullying

SENECA fosters a workplace environment based on respect, collaboration, and inclusion, opposing all forms of harassment, abuse of power, discrimination, intimidation, or mobbing.

No behavior that undermines personal dignity will be tolerated—whether based on gender, ethnicity, religion, sexual orientation, age, disability, political beliefs, or union affiliation.

Any reported incident will be promptly investigated and, if confirmed, sanctioned in accordance with applicable laws and company policies.

#### 6.3 Promotion of an Inclusive Work Environment

The company actively promotes equal opportunity, diversity, and inclusion, supporting fair and merit-based professional growth paths.

Recruitment, training, and development policies are oriented toward enhancing individual skills without bias.

Organizational well-being is pursued through listening tools, ongoing dialogue, and attention to work-life balance.

#### 6.4 Human Rights and Social Responsibility

SENECA adheres to the principles enshrined in international labor conventions and is committed to:

- Rejecting child and forced labor
- Respecting freedom of association and collective bargaining
- Ensuring fair working hours, wages, and conditions
- Opposing any form of disciplinary abuse
- Contributing to sustainable development through low-impact production practices

#### 6.5 Protection of Personal Data

In conducting its business activities, SENECA processes personal data of employees, collaborators, clients, and third parties in compliance with EU Regulation 2016/679 (GDPR) and the Italian Privacy Code.

The company is committed to ensuring confidentiality, security, and fairness in data processing by:

- Providing specific authorization to designated personnel
- Adopting appropriate technical and organizational measures
- Offering continuous training on data protection
- Defining and maintaining up-to-date internal policies and procedures


All recipients of the Code of Ethics are required, within the scope of their duties, to process personal data only within the limits of their authorized access and in full compliance with applicable regulations.

### 7. Whistleblowing (reporting system)

**SENECA, aware of the importance of establishing appropriate reporting channels to safeguard the integrity of the company and ensure compliance with the principles of legality, fairness, and transparency—also toward third parties—in the conduct of business activities, as expressly stated in this Code of Ethics, has implemented specific internal reporting channels** in accordance with Legislative Decree 24/2023, which transposes EU Directive 2019/1937 on "whistleblowing."

SENECA has therefore made multiple reporting channels available to its employees and collaborators, including a dedicated software application accessible—also to third parties—via the Internet.

In compliance with Legislative Decree 24/2023, the software guarantees absolute confidentiality and encryption of the

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identity of the whistleblower, the person involved, and any individuals mentioned in the report, as well as the content and related documentation.

Reports must be made in good faith, be detailed, and based on specific and consistent factual elements, in order to preserve the effectiveness of the reporting tool.

Anyone who, with willful misconduct or gross negligence, submits reports that are later found to be unfounded may be subject to disciplinary action.

Clear information on the reporting channels made available by SENECA, the procedures to follow, and the criteria for submitting such reports (both internal and external) can be found in the **"Whistleblowing Notice"** published in the dedicated section of SENECA's website:

<https://www.seneca.it/azienda/informazioni-legali/>

and is also available to all employees via the company intranet for consultation.

## 8. Responsibilities, Controls, and Sanctions

**Compliance with this Code of Ethics is a duty for all individuals operating, in any capacity, in the name and on behalf of SENECA.**

Every employee, collaborator, manager, or business partner is required to understand, uphold, and adhere to the principles expressed herein, actively contributing to the promotion of a corporate culture based on ethics, transparency, and responsibility.

### 8.1 Individual and Organizational Responsibilities

All company collaborators, regardless of their role or position, are expected to:

- Operate in compliance with applicable laws, internal procedures, and the principles of this Code of Ethics.
- Maintain honest, loyal, and transparent behavior in the performance of their duties.
- Report any violations or behaviors inconsistent with the company's values.

Function managers and executives are additionally responsible for:

- Promoting the application of the Code within their area of responsibility.
- Monitoring the conduct of their team members.
- Serving as ethical and managerial role models.

### 8.2 Monitoring and Oversight System

SENECA has implemented internal tools for control and oversight to ensure effective application of the Code of Ethics, including:

- Periodic audits and internal reviews to assess compliance with regulations, procedures, and ethical standards.
- Regular updates of the Code based on regulatory changes, organizational developments, and internal feedback.
- Supervision by Management and company leaders to ensure ongoing oversight of conduct and ethical risks.

Although the company does not formally adhere to Legislative Decree 231/2001, it nonetheless adopts organizational and preventive measures inspired by principles of good governance, transparency, and accountability.

### 8.3 Disciplinary System

Non-compliance with the Code of Ethics may result in disciplinary actions, determined according to the seriousness of the infraction and in accordance with applicable laws and the relevant National Collective Labor Agreement (CCNL).

Examples of such sanctions may include:

- Verbal or written warnings
- Temporary suspensions
- Measures up to and including termination of employment or collaboration

Any violations committed by third parties (e.g., suppliers, consultants, partners) may result in the termination of the contractual relationship.

## 9. Updating, Implementation, and Dissemination

**This Code of Ethics is a dynamic document and serves as a point of reference for the identity and organizational culture of SENECA.**

Its effectiveness depends on the awareness, commitment, and consistent behavior of all individuals involved in the company's activities.

### 9.1 Periodic Review

The Code is periodically reviewed and, if necessary, updated by Management, including upon proposals from department heads or in response to regulatory, organizational, or strategic changes.

Each updated version is formally approved, dated, and made available to all intended recipients. The document becomes effective from the date of its approval.

### 9.2 Application Guidelines

All employees, collaborators, consultants, suppliers, and stakeholders are required to comply with the principles set forth in the Code of Ethics.

Its content supplements the obligations arising from employment contracts, internal regulations, and applicable laws. Function managers must oversee compliance with the Code and support the proper interpretation of its contents.

Management ensures the monitoring of the Code's effective application through internal audits, analysis of reports, and periodic reviews of organizational behavior.

### 9.3 Dissemination and Accessibility

The Code of Ethics is available:

- On the company website: [www.seneca.it](http://www.seneca.it)
- On the company intranet
- In digital and/or printed form for new hires and qualified partners

All recipients must read, understand, and adhere to the principles it contains. To this end, **SENECA promotes specific awareness and training initiatives.**