

Tadiran Italia Code of Ethics

1. Premise

Tadiran Italia was founded at the end of January 2025 as an Italian extension of Tadiran Group Ltd, a multinational group with sixty years of previous activity, the main air conditioning company in Israel and leader in the service sector and major distribution channels.

The mission pursued by Tadiran Italia is to offer its customers advanced HVAC systems that combine and promote people's well-being, energy efficiency and sustainable innovation in the environment. It is fully consistent with the objectives pursued by Tadiran Group Ltd.

Entrepreneurial growth and technological innovation are goals to strive for in constant compliance with an "ethical" approach to the market and to all stakeholders, based on the principles of centrality of the person, integrity, transparency, legality, social and environmental sustainability and shared responsibility.

In order to clearly, unambiguously and collectively affirm these identity values that are the basis of daily operations, the Company has adopted this Code of Ethics, as a set of rules of conduct inspired by honesty, integrity, fairness, in full compliance with the laws and regulations in force, and aimed at preserving the company's image, credibility and reputation.

2. Scope and Recipients

This Code of Ethics is the expression of a constant and concrete commitment to a more sustainable and inclusive future, according to legality and in compliance with the general obligations of diligence, fairness and loyalty, which qualify the fulfilment of work performance and behaviour in the workplace.

The Code is binding for managers, directors, employees (i.e. all persons linked by subordinate employment relationships) and for all those who, although external to the Company, have direct or indirect, stable or temporary relations with the Company (e.g. collaborators in any capacity, consultants, agents, suppliers, business partners, customers) on the basis of a mandate or other contractual relationship.

All the above-mentioned parties are therefore required to observe the principles enshrined and avoid conduct that does not comply with them, under no circumstances the claim to act in the interest of Tadiran Italia justifies the adoption of conduct in contrast with the values enshrined in this document. The Code of Ethics is in fact an integral part of the employment relationship: compliance with the established rules must be considered an essential part of the contractual obligations of employees pursuant to art. 2104 of the Civil Code.

It is the Company's responsibility to ensure that the recipients of the Code are aware of the relevant rules, governed by law or by internal procedures and regulations, which govern the activity carried out by the Company and constitute the framework for the application of the precepts of this document.

The Code does not derogate from any reference rule relating to the company's scope of operations. It is subject to periodic review to ensure that it is constantly updated; If, due to supervening needs, significant changes or additions occur to the contents sanctioned, immediate notice must be given. In addition to the knowledge and implementation of the prescribed principles and rules of conduct, each recipient must be an active part in the promotion of the Code by suggesting any proposals for improvement to the Management.

3. Violations

The violation of the precepts of the Code (or of any reference rule) by employees involves non-fulfillment of the primary obligations of the employment relationship, or disciplinary offence, in compliance with the procedures provided for by art. 7 of the Workers' Statute, with all legal consequences, including the interruption of the employment relationship, and compensation for damages.

Given that compliance with the Code of Ethics must be considered an integral part of the contractual obligations assumed by collaborators and/or persons having business relations with the company, violation of the rules provided therein may constitute a breach of contractual obligations, with all legal consequences, including the termination of the contract and/or assignment and compensation for damages.

Any recipient who becomes aware of a violation of the precepts of the Code, as an active part in the promotion of the same, is required to report it according to the guidelines described in paragraph 11 ("Procedure for the management of reports and complaints concerning violations of the Code of Ethics"). In this case, the company undertakes to safeguard the anonymity of the complainant and to ensure that he or she is not the victim of any form of retaliation.

4. Information and training

The Code is transmitted to the aforementioned internal and external interlocutors through specific communication activities and is published on the Company's website. In order to ensure the correct understanding of this document, the Company prepares and delivers a periodic training plan. These illustrative initiatives are differentiated in relation to the role and responsibility of the recipients. The

goal is to ensure full adherence to the essence of this Code of Ethics as a concrete commitment to a corporate culture based on integrity, innovation and collective well-being.

Ignorance of the contents does not justify any violation of the Code, in fact, consultation meetings of employees with their superiors are promoted on any relevant issue in order to ensure a complete and correct understanding of the contents sanctioned.

5. Reference principles

a. Legality

Tadiran Italia considers legality an essential value in the conduct of business activities. Therefore, it undertakes to comply with the laws and regulations in force relating to its business, internal procedures, generally recognized practices and the precepts set forth in this document. As mentioned above, all recipients of the Code are required to comply with these rules.

b. Integrity, fairness, loyalty and transparency

All the operations carried out and the conduct of each person in the performance of the function or assignment conferred are based on compliance with the principles of integrity, fairness and good faith, loyalty and transparency, both in terms of loyalty to the values, references and principles embraced, and in the relationships that connect the individual recipients and the Company to the market. There is universal substantial consistency between the inspiring principles and the activities carried out that represent their full expression. Tadiran Italia undertakes to provide all recipients of the Code, in a clear, complete and timely manner, with information relating to the actions carried out at all levels of the company.

Transparency is expressed in the adoption of management tools open to dialogue with its interlocutors with the aim of meeting the expectations of information and knowledge of the economic, social and environmental impacts of company activities.

c. Diligence, professionalism and drive for innovation

In Tadiran Italia, the entire collective structure is constantly oriented towards carrying out its services with diligence and professionalism, pursuing objectives of effectiveness and efficiency with methods of execution of the service also in agile / smart working mode. The attitude to improvement is promoted through technological, digital, organizational and managerial innovation, in the mandatory assumption that telematic progress is achieved with respect for the person.

d. Social sustainability

Respect for inviolable human rights is an essential value. For this reason, the Company promotes and defends the dignity and physical and moral integrity of people in all circumstances and in the name of social equity, rejects any discrimination based on age, sex, nationality, state of health, sexual, religious or political orientation, membership of trade unions, or social and personal conditions.

Tadiran Italia embraces the principles enshrined in the Universal Declaration of Human Rights, and recognized by the International Labour Organization. No threatening behaviour aimed at inducing individuals to adopt actions that violate their moral or personal beliefs and preferences is tolerated. The enhancement of individuality in different identities is a salient feature of the company's creed in the name of social justice, and is expressed in the promotion of inclusion and professional growth of everyone, in the name of equal opportunities.

In full respect of the personal opinions of the corporate structure, during working hours it is forbidden to practice political activity and at the same time as the public exercise of the same, to use the name or structures of the company.

e. Collaboration and cooperation

Tadiran Italia values collaboration and cooperation between workers, including those from different company areas, and between the company and its external stakeholders, in order to create shared value and fully implement the Code; therefore, it has established a supportive, pleasant and cohesive work environment, while encouraging teamwork and the expression of originality, innovation and creativity for the collective benefit.

f. Conflicts of interest

The Company, in line with the values of honesty and fairness, undertakes to implement the necessary measures to prevent and avoid actual or potential phenomena of conflicts of interest. They exist when there is a conflict between the corporate mission and the purposes of the recipient of the Code (or of a relative or competitor of whose interests the individual is the spokesperson). If this case is represented, the recipient is required to give transparent and timely notice to his or her hierarchical superior/contact person, who is responsible for assessing - on his own or with the involvement of the bodies in charge and/or identified by the internal regulations - the actual existence of a conflict and the adoption of the appropriate measures. Given that managers, directors, employees and collaborators are required to take decisions in the interest of the Company, they respect the decisions that are taken by the company in this regard, refraining, in any case, from carrying out transactions in conflict of interest.

By way of example and not limited to, the following situations may give rise to a conflict of interest:

- performing operational functions on the part of the employee or having economic or financial interests with customers, suppliers, competitors or business partners;
- using one's position within the Company or the information acquired through work to receive undue personal benefits from customers or disclosing information constituting the company's intangible assets with consequent damage to the company;
- engaging in personal and family economic activities in conflict with the pursuit of the company mission.

g. Health and Safety at Work

In full respect of the integrity of the person, Tadiran Italia guarantees safe and healthy working conditions and environments, in compliance with the regulations in force on the subject and the rights of workers. Auditing, occupational safety procedures, and protective measures are taken to reduce health and safety risks.

h. Environmental sustainability

Tadiran Italia, being active in the HVAC systems and energy saving sector, promotes environmental sustainability with concrete initiatives.

The environment is considered a primary asset; in fact, investments are being made in the use and development of clean, sustainable and energy-efficient technologies, in line with global decarbonisation goals. The objective is to reduce the direct and indirect environmental impact of the company's activities, through processes designed to contribute, in line with the mission, to the ecological transition, and to preserve natural resources for the benefit of future generations.

The Company is constantly committed to identifying areas for improvement in the rational use of energy resources, offering integrated solutions with renewable sources, promoting a universal culture of sustainability, and choosing partners and suppliers who share the same principles and assess the environmental impact of their products and services.

i. Fair competition

The Company conducts commercial operations in full compliance with free and fair competition, repudiating collusive, predatory and/or abusive conduct in accordance with the regulations in force on the subject.

j. Fight against corruption

In relations between employees, collaborators, business partners, customers and suppliers, Tadiran Italia prohibits all forms of corruption, even attempted, in compliance with the principles of legality and integrity and to protect the company's reputation. Therefore, the offer, promise, payment or acceptance, even in a personal or indirect capacity, of any form of free gift or benefit, which is in

excess of normal commercial practices or courtesy, or in any case aimed at acquiring undue and unfair advantages in the performance of commercial relations, is not permitted under any circumstances.

Acts of commercial courtesy towards third parties, as well as the receipt of the same, are permitted, provided that they are of modest value and, in any case, traceable and such as not to compromise the integrity and independence of judgment of the recipient.

On this issue, efforts are made to raise awareness about respecting the principles of honesty and transparency among both employees and external stakeholders (collaborators, business partners, institutions, etc.).

k. Financial integrity, anti-money laundering and the fight against organised crime

Every economic and financial transaction must be traced, i.e. correctly authorised, verifiable, legitimate, consistent and congruous, in compliance with the principles of integrity and transparency and the provisions of laws, regulations and measures issued by the Competent Authorities in fiscal and tax matters.

The Company, in strict compliance with anti-money laundering laws, prohibits the use of its economic-financial system from being oriented towards the purposes of money laundering and financing terrorism (or any other criminal activity) by its customers, suppliers, employees, collaborators and other stakeholders.

In this perspective, before establishing any commercial relationship, a careful check is carried out on the information available on the counterparties in order to ascertain their reliability and the legitimacy of their activity and to prevent the risk of criminal infiltration (including by criminal organizations, including those of a mafia nature). It follows that any counterparty involved in criminal activities of any kind is excluded, including in the case in which it is suspected of belonging, contiguity or facilitation to criminal organizations.

l. Confidentiality and protection of the company's intangible assets

Managers, directors, employees, collaborators and business partners ensure the utmost confidentiality with regard to company news and information constituting the company's intangible assets (e.g. proprietary information, financial results, commercial information, computer software, internal procedures, management and strategic decisions, or other information that is not known to the public), in compliance with the provisions of the law, current regulations, this Code of Ethics and internal procedures.

Careful and responsible conduct is required in the management of confidential information, the use of which, both within the Company and in relations with third parties, is not permitted for purposes unrelated to the pursuit of the exclusive interest of the company or outside the exercise

of its function. It is forbidden to disclose, publish, share or use in any way the company's intangible assets in order to obtain personal profit or to cause damage to the company.

The obligation to keep the information confidential remains even after the termination of the employment relationship without time limits.

m. Protection of personal data

In compliance with current privacy legislation (GDPR, i.e. EU Regulation 2016/679, "General Data Protection Regulation" and "Privacy Code", i.e. Legislative Decree 196/2003, updated by Legislative Decree 101/2018) Tadiran Italia protects the personal information of the recipients of the Code, ensuring that the processing of the same is carried out in a lawful and correct manner, for legitimate and declared purposes and for a period of time not exceeding that necessary for the pursuit of the latter. Adequate information is ensured of the subjects whose personal data are acquired.

n. Image protection

Compliance with the principles set out in this Code by directors, managers, employees, collaborators and business partners is an indispensable condition for the protection of the corporate image, as well as maintaining a good reputation of the Company, with commercial counterparts and the community in general. The performance of acts detrimental to the corporate image constitutes a disciplinary offence.

o. Protection of the company's tangible assets

Managers, directors, employees and collaborators are required to use movable and immovable property, technological resources and IT supports, equipment and company products diligently, through responsible conduct in line with the principles and rules of conduct governed by this Code and with the operating procedures set up to regulate their use.

To this end, each person is responsible for safeguarding, conserving and defending the Company's assets and resources entrusted to him or her as part of his or her activity and is required to use them in a manner that is consistent to the social interest (not pursuing personal needs), as well as to the law, public order or morality, preventing and avoiding improper use for personal purposes that may cause damage or that are in contrast with the social interest or damaging the reputation of Tadiran Italia, or use by unauthorized third parties.

With regard to the Company's own IT tools, it is forbidden to adopt conduct that may damage, alter or destroy computer or telematic systems and computer programs.

It is also expressly forbidden to illegally enter computer or telematic systems protected by security measures or to remain there against the express or tacit will of those (including Tadiran management) who have the right to exclude it, as well as to obtain, disseminate, communicate and/or deliver codes, keywords or other means suitable for access to computer or telematic

systems protected by security measures, or, in any case, provide indications or instructions suitable for the aforementioned purpose.

p. Information systems, internet and social networks

IT tools act as a decisive resource in order to establish an open, proactive and transparent dialogue between employees, business partners, customers and stakeholders through social media and more traditional means of communication.

The recipients of this Code are prohibited from using company computer systems or social networks, which may result in an offence against the freedom, integrity and dignity of persons, especially minors, or which may generate undue intrusion or damage to the computer systems of others. Given the breadth of the resonance on these digital channels and the consequent reputational effects, the recipients of this Code are required to diligently consider what content to disseminate.

Even in the use of one's own private social channels, the observance of correctness, sobriety, loyalty to the Company is necessary. Employees are therefore prohibited from publishing on their own initiative, even in the name of the group, commercial information or information relating to other employees, competitors, customers or suppliers, disseminating content that is harmful to the Company's image, and opening a social page in addition to the official one.

6. Internal rules of conduct

6.1 Prohibition of harassing behaviour

Tadiran Italia prohibits any conduct that may cause disturbance to third parties, with interference in the private life of others and in the relational life of others.

Therefore, harassing sexual behaviour is not allowed, such as:

- implicit or explicit requests for offensive or otherwise unwelcome sexual performances;
- implicit or explicit promises of benefits and privileges or career advancement in exchange for sexual services, and retaliation or threats in case of refusal;
- unwanted and inappropriate physical contact;
- verbal appreciation of the body, gender or sexual orientation, considered offensive.

Likewise, harassing conduct of a moral nature is prohibited, including:

- acts that cause damage to the image of others, such as offenses, intimidation, slander, insults, reprimands, dissemination of confidential information, insinuations, and any other action aimed at diminishing the value of the person and the results achieved by him or her in the workplace;

- behaviour detrimental to the professionalism of the individual, such as ungrounded threats of dismissal, forced resignation, unjustified transfers, wage discrimination, prejudice to career progression prospects, assignment of improper tasks, actions that create demotivation or distrust in the person;
- attempts at marginalization and isolation, such as unwanted changes of tasks or work colleagues with persecutory intent, limitations of the faculties of expression or excesses of control.

Such conduct is likely to integrate the extremes of the crime of harassment and constitute a serious disciplinary offence.

6.2 Prohibition of possession of pornographic material

The Company prohibits the viewing, downloading, storing, reproduction and transmission of pornographic material or virtual images relating to the sexual sphere within its premises, or in any other place attributable to it, by any electronic means of its ownership.

6.3 Prohibition of smoking, alcohol and drugs

Tadiran Italia imposes a ban on smoking in all workplaces, according to current legislation.

Managers, administrators, employees and collaborators are required to contribute to maintaining the work environment that respects the sensitivity and safety of others and therefore it is forbidden:

- work under the influence of alcohol, drugs or substances of similar effect;
- consume or sell drugs for any reason during the course of work.

The Company promotes the social actions provided for in this matter by collective bargaining.

6.4 Control and transparency

Managers, directors, employees and collaborators undertake, in accordance with their respective functions and duties, to ensure that the facts relating to the management of the company are represented correctly and truthfully in the Company's documents.

Any accounting record must be made in an accurate, honest and reasonably detailed manner consistent with both applicable legal requirements and the accounting requirements and internal control methods of the group. For example, a correct and accurate number of hours in which the work was performed must be reported.

The documents certifying the accounting recording activity must be drawn up in such a way as to allow the rapid reconstruction of the same, the identification of any error, as well as the degree of responsibility within the individual operational process.

To the extent of their competence, the aforementioned parties are obliged to check the correctness and truthfulness of the accounting records and communicate any errors, omissions and/or

falsifications of the same to the persons in charge. Destroying or modifying documents (whether in paper, email, or any other form) in response to or in anticipation of a judicial proceeding or government investigation of any kind constitutes criminal prosecution.

7. Relations with stakeholders

Tadiran Italia establishes a constructive dialogue with its interlocutors in respect of mutual interests.

7.1 Customer Relations

Commercial relations with customers are based on the principles of fairness, courtesy, diligence, professionalism, transparency, competence and availability, in compliance with the law and regulations in force, as well as the provisions of this Code and the company procedures in force.

Tadiran Italia is committed to being a reliable and safe partner for its customers and intends to develop its markets by providing products of high quality standards and sustainable profile.

Meeting customer demands and establishing constructive relationships in compliance with the principles of fair competition are fundamental objectives. As mentioned above, customers are recipients of this Code, therefore they are also required to comply with the principles enshrined.

In its relationships, the Company guarantees equal treatment between customers, both actual and potential, and promotes and implements dialogue initiatives to ensure the timeliness and quality of communication in order to encourage mutual collaboration.

Tadiran Italia informs the actual and potential customer in a complete and immediate way about the characteristics, functions, costs and risks of the service offered. Communications must be clear, carried out in language that is as direct and commonly used as possible, complete and truthful in order to ensure that the customer makes an informed and thoughtful decision regarding the business relationship. Promotional initiatives that could lead customers to misperceive the products are prohibited. Customer feedback on the services offered is collected by the Company proactively and is functional to a constant improvement in terms of relationships that arise. Any complaints made by customers are handled in a transparent, fair and timely manner.

In the supply of renewable energy systems, the Company supports customers in the ecological transition, promoting sustainable development in order to cause positive, tangible and measurable social and environmental impacts.

The non-judicial solution of possible conflicts that have arisen is encouraged, through conciliation procedures between the parties.

Tadiran Italia requires its technical and installation customers to comply with the technical, environmental and safety regulations of the sector in which it operates. Extensive training support is provided in order to guarantee quality interventions in compliance with operational standards. The installer is considered an ambassador of his corporate identity: professionalism, competence and reliability are essential.

7.2 Relations with clients for tender procedures

When participating in tenders issued by customers or potential customers, Tadiran Italia guarantees:

- that its conduct is based on compliance with the principles of fairness, transparency and good faith;
- that during the examination phase of the call for tenders, the adequacy and executability of the services requested are previously verified;
- that all the data and information required during the selection of participants and functional to the award of the tender are provided;
- that their participation with the relevant information relating to the management of the call is covered by secrecy.

7.3 Supplier Relations

In relations with suppliers, the selection processes are based on the criterion of transparency and based on an objective competitive comparison (in terms of skills, competitiveness, efficiency, fairness, respectability, reputation of competitors and quality and price of the goods supplied), according to procedures that comply with applicable laws and with full rejection of any form of favoritism or discrimination.

The purchasing processes are based on the granting of equal opportunities in the selection of each supplier, the search for maximum value for the Company to guarantee the innovation and excellence of the products purchased, to meet customer expectations in terms of quality, cost and delivery times, to promote the company's reputation, and transparency, efficiency, loyalty and collaboration of relationships even in the contractual phase.

For the purposes of establishing and continuing business relationships, suppliers, with whom Tadiran Italia undertakes to maintain a frank and open dialogue, are required to fully comply with the provisions of the law, the precepts of this Code and the principles of protection of the person, the health and safety of workers and the environment.

Collusive conduct, corrupt practices, payment of undue benefits aimed at influencing or compensating employees are prohibited.

7.4 Relations with business partners

Tadiran Italia collaborates with partners who share the same identity values: responsible innovation, ethics, sustainability. Long-term relationships based on shared goals are encouraged.

8. Relations with the Public Administration and Institutions

The relations of Tadiran Italia's managers, directors, employees and collaborators with institutions and public administration are based on the principles of fairness, transparency, loyalty and collaboration, in compliance with national, European and international laws in force and applicable regulations.

The aforementioned subjects, in the context of relations with Institutions or Public Officials, are required to avoid situations or activities that may lead to conflicts of interest with the Company or that could interfere with their ability to make impartial decisions. Any type of conduct of a collusive nature or likely to prejudice the principles expressed in this Code is rejected. With regard to the Public Administration, corrupt practices are not allowed in the request and management of authorizations, permits/concessions, on the occasion of inspections or inspections and during reporting activities of any kind.

In addition, managers, directors, employees and collaborators are required to refrain from undertaking (directly or indirectly) the following actions during their relations with Institutions and/or Public Officials:

- a) examining or proposing employment and/or commercial opportunities that may benefit employees of the Institutions or public officials or public service officers;
- b) offering, providing, promoting or accepting gifts, favours (except in the case of acts of courtesy of modest value) or commercial or behavioural practices that are not based on transparency, fairness and loyalty and, in any case, that do not comply with the applicable legislation in force;
- c) soliciting or obtaining confidential information that may compromise the integrity or reputation of both parties or that in any case violates equal treatment and public procurement procedures activated by Institutions or Public Officials.

9. Relations with Public Supervisory Authorities

In communications with the Public Supervisory Authorities (by way of example but not limited to, the Italian Competition Authority, the National Commission for Companies and the Stock Exchange, the Italian Communications Authority and the Italian Data Protection Authority), in responses to requests or acts of inspection (questions, interpellation, requests for information related to ongoing

or completed professional assignments, etc.), or in any case with regard to the discussion of relevant issues, the Company adheres to the principles of transparency and professional fairness.

More specifically, it works to:

- adopt an attitude of maximum availability and collaboration;
- operate through the communication channels provided for this purpose with institutional interlocutors at national and international, community and territorial level;
- represent their interests and positions in a transparent, rigorous and consistent manner, avoiding collusive and/or corrupt attitudes;
- avoid falsification and/or alteration of data, statements and/or reports in order to obtain an undue advantage or any other benefit for the Company.

10. Relations with the community

The Company, operating as an actor in sustainable development, promotes social values and in the environment in which it operates, sponsors programs of public bodies aimed at realizing utility and benefits for the community, social and cultural initiatives consistent with its mission and corporate vision, and activities of foundations and associations, providing sponsorships, employing disadvantaged populations, encouraging volunteering and similar activities, in compliance with the regulations in force and the principles of the Code.

Contributions, sponsorships or disbursements in general are issued in favor of events and initiatives of a social, cultural, environmental, educational, sporting and artistic nature, aimed at the realization of events, studies, research, conferences and seminars relating to issues of corporate interest. Under no circumstances may a contribution, sponsorship or disbursement be granted to private citizens, individuals, political or religious parties and/or organizations, workers' trade unions or patronage organizations.

11. Procedure for the management of reports and complaints regarding violations of the Code of Ethics

This procedure is aimed at analytically identifying the key steps in order to correctly manage complaints, claims and reports of violation of the principles provided for by the Code.

The recipient of the Code who becomes aware of a breach of its provisions is required to carefully, diligently, and sensibly verify the available information and the validity of the findings, also with the help of his or her manager or contact person.

The reporting methods are twofold:

- by post to Tadiran Italia S.r.l., Via Cal Piccole 49, 31044 Montebelluna (TV), for the attention of the General Manager and the Board of Directors;
- by e-mail to: codicetico@tadiran.it.

The Company safeguards the anonymity of the complainant and ensures that he or she is not the victim of any form of retaliation.

All complaints received are treated with absolute confidentiality and discretion, recorded and kept, qualified (through archiving or activation of investigations on the matter) with explanation of the founding reasons for the decision, and subjected, where deemed necessary, to the verification process with information to the interested parties.

In order to carry out the necessary checks in relation to the complaint received, the Board of Directors may, at its discretion, request the support of any function having the necessary professionalism and/or knowledge. It is assessed whether, for the purposes of carrying out the investigation, it is necessary to inform the complainant and/or the infringer in advance.

This procedure is suspended or interrupted at any time if the complaint is unfounded and, if the bad faith of the whistleblower is ascertained, the judicial body reserves the right to propose the initiation of proceedings against him.

At the end of the investigation, in compliance with the necessary confidentiality criteria, the Board of Directors communicates the results that have emerged and any measures proposed to remedy the irregularities found to the person in charge of the violation. Subsequently, the degree of non-compliance with the precepts of the Code and the consequences to be adopted with regard to the author will be assessed collectively by the aforementioned figures.