

Code of Ethics

IRS Italian Remote Sensing Srl

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	CODE OF ETHICS	CE Ed. 1 Rev. 0 31.01.2024
		Page 2 of 8

Table of Contents

1. INTRODUCTION	3
2. VALUES AND PRONCIPLES.....	3
2.1 VALUES.....	3
2.2 PRINCIPLES	4
3. BEHAVIOURS.....	4
3.1 CONFLICT OF INTEREST.....	4
3.2 GIFTS, BENEFITS OR OTHER BENEFITS	5
3.3 SOCIAL RESPONSIBILITY.....	5
3.4 INFORMATION AND CONFIDENTIALITY	5
4. STAKEHOLDER'S RELATIONSHIP	5
4.1 ACCOUNTING TRANSPARENCY	5
4.2 CUSTOMER RELATIONSHIPS	5
4.3 SUPPLIER RELATIONSHIPS	6
4.4 RELATIONS WITH GOVERNMENTS AND PUBLIC INSTITUTIONS, POLITICAL AND TRADE UNION ORGANIZATIONS	6
4.5 HUMAN RESOURCES	6
4.6 ENVIRONMENTAL PROTECTION.....	7
4.7 PRIVACY PROTECTION.....	7
5. VIOLATIONS OF THE CODE OF ETHICS.....	7
6. IMPLEMENTING PROVISIONS	7

 ITALIAN REMOTE SENSING	CODE OF ETHICS	CE Ed. 1 Rev. 0 31/01/2024
		Page 3 of 8

1. INTRODUCTION

IRS ITALIAN REMOTE SENSING S.R.L. (hereinafter referred to as IRS) is an international company that operates in the Remote Sensing sector, aware of the importance and economic and environmental impact of its activities, and of playing a significant role in the market, economic development and the well-being of the people who work or collaborate with IRS.

For this reason, IRS bases its corporate culture on ethically and socially responsible behaviour, placing them at the basis of its economic, social and environmental growth.

The challenges of sustainable development and the need to take into account the interests of all legitimate stakeholders in the company's activity (Stakeholders), reinforce the importance of clearly defining the values and responsibilities that IRS recognizes, accepts, shares and assumes, helping to build a better future for everyone.

For this reason, the Code of Ethics has been prepared, the observance of which by the management and employees of IRS as well as by all those who operate in Italy and abroad, each within the scope of their functions and responsibilities, is of fundamental importance for the efficiency, reliability and reputation of the company, factors that constitute a decisive asset for the success of the company and for the improvement of the social context in which it operates.

IRS is committed to promoting knowledge of the Code and the constructive contribution on its principles by its staff and other Stakeholders.

IRS is committed to taking into consideration suggestions and observations, with the aim of confirming or integrating the Code, in any case carefully monitors its observance, preparing adequate information, prevention and control tools and procedures, ensuring the transparency of the operations and behaviors implemented, intervening, if necessary, with corrective actions.

Compliance with the Law, Regulations, statutory provisions, self-discipline codes, ethical integrity and correctness are a constant commitment and duty of the entire IRS organization.

The conduct of business and corporate activities is carried out in a framework of transparency, honesty, correctness and good faith, in full compliance with the rules established to protect competition.

In the development of both its own business activities and those in participation with partners, IRS is inspired by the protection and promotion of human rights.

Any type of discrimination, corruption, forced or child labor is repudiated.

Particular consideration is given to the recognition and protection of dignity, freedom and equality, the protection of work, trade union freedoms, health, safety and the environment.

2. VALUES AND PRINCIPLES

IRS adopts, in the management of its activities and relationships with its stakeholders, the “values” and “principles” that have allowed it to become an important player in the activity of carrying out aerial surveys and data processing.

2.1 VALUES

Below are the values that IRS adopts in its relationships with its stakeholders, and which form the foundation of its culture.

Attention for people

It considers fundamental the respect of human rights, physical, cultural and moral integrity of the employee, non-discrimination in the workplace for reasons of sex, race, language, religion, political opinions, union membership, social and personal condition. It is committed to ensuring that its people can express themselves without discrimination, offering equal opportunities to all, guarantees a work environment attentive to health and well-being, promotes a culture of maximum safety in the workplace.

 ITALIAN REMOTE SENSING	CODE OF ETHICS	CE Ed. 1 Rev. 0 31/01/2024
		Page 4 of 8

Attention for clients

The evaluation of customer needs, the comparison and understanding of their expectations allow us to offer an increasing quality of service and to make the IRS offer more targeted.

The Research for Innovation

The constant improvement of services is achieved through the valorization of the experience acquired. The ability to seize the opportunities of progress, to anticipate innovative solutions is the engine of IRS development.

Creating value

Work and commitment conducted ethically contribute to generating economic, social and cultural value for IRS, its customers, suppliers and all its stakeholders.

The need to adopt ethical behaviours: correctness, impartiality, loyalty, honesty, transparency

Correctness, impartiality, loyalty, honesty, transparency are the fundamental values constantly and necessarily present in all IRS People, and characterize their actions. The importance of informing both internal and external interlocutors in a transparent and direct way is promptly achieved through a constant dissemination of clear, truthful and correct information.

2.2 PRINCIPLES

IRS carries out its business in full compliance with the law, also supporting the rules accepted internationally as reference standards, with respect to which it undertakes to:

- conduct its business in a way that contributes to the stability and expansion of global trade and investments, in a way that complies with applicable international rules and treaties;
- promote the activity of carrying out aerial surveys and data processing in terms that reflect correct business practices;
- generate adequate profits to support its operations;
- recognize the fundamental importance of environmental issues and take them into account in all its activities;
- encourage the fight against corruption and money laundering;
- promote good business conduct through the exchange of information on our activities and procedures;
- promote transparency both internally and towards third parties with whom IRS comes into contact, respecting the confidentiality of information;
- encourage cooperation with other stakeholders.

3. BEHAVIOURS

IRS requires recipients to adopt behaviors that, in addition to strict compliance with current legislation, are inspired by correctness, impartiality, loyalty, honesty, transparency, good faith, observing the contents of this code and basing their conduct on mutual respect, cooperation and collaboration.

3.1 CONFLICT OF INTEREST

IRS requires its directors, employees, and collaborators to avoid any situation and to refrain from any activity that, in the performance of their duties, may conflict with a personal interest in relation to those of the company or that may interfere with and hinder the ability to make impartial and objective decisions in the interest of the company.

Any situation that may potentially generate a conflict of interest, or in any case jeopardize the ability to make decisions in the best interest of the companies, must be promptly communicated by the interested party to their manager.

 ITALIAN REMOTE SENSING	CODE OF ETHICS	CE Ed. 1 Rev. 0 31/01/2024
		Page 5 of 8

3.2 GIFTS, BENEFITS OR OTHER BENEFITS

IRS does not tolerate any form of corruption and therefore recipients must not offer, solicit or receive from third parties, directly or indirectly, even on holidays, gifts, benefits or other benefits (in the form of money or goods and services of any kind), with the exception of gifts that are of modest value, fall within the limits of normal courtesy and are not offered or accepted with the intention of influencing company decisions or creating obligations towards third parties.

3.3 SOCIAL RESPONSIBILITY

IRS recognizes and shares the principles of social responsibility in the exercise of business activity as a set of values that place people and the environment at the center of the company's attention.

It therefore carries out its activities in compliance with the principles of social and environmental responsibility and aims to contribute to the enrichment of the economic, intellectual and social heritage of each country and community in which it operates.

3.4 INFORMATION AND CONFIDENTIALITY

IRS information reports, intended both internally (colleagues, collaborators) and externally (customers, suppliers, institutional interlocutors) are drawn up according to the general principles contained in this code.

No confidential information relating to IRS acquired or processed by the recipients may be used, communicated to third parties or disseminated for purposes other than work-related ones. Confidential information includes all information learned in the performance of work activities, or on the occasion of them, the dissemination and use of which may cause danger or damage to the company and/or undue gain for the employee. The obligation of confidentiality continues even after the termination of the relationship with each company, in accordance with current legislation.

4. STAKEHOLDER'S RELATIONSHIP

4.1 ACCOUNTING TRANSPARENCY

IRS recognizes that the ability of the company to give itself efficient and effective operating rules is an essential tool to strengthen its reputation in terms of reliability, transparency and trust by stakeholders. In this perspective, it is therefore committed to ensuring maximum transparency and timeliness of information relevant to the company's activity. The main information tool of IRS is the company balance sheet. Truthfulness, accuracy, completeness and clarity of elementary information represent the necessary conditions that allow a transparent accounting registration activity in order to guarantee anyone the possibility of having a clear image of the economic, patrimonial and financial situation of IRS.

In order to ensure that the accounting meets the requirements mentioned above, all the supporting documentation of the activity carried out is kept in the files in compliance with the provisions in force on the matter, the accounting principles and the company procedures.

4.2 CUSTOMER RELATIONSHIPS

Customers are an integral part of IRS's assets, which pursues its business success on the markets by offering quality services at competitive conditions and in compliance with all the rules established to protect fair competition.

It is the duty of IRS staff to understand, anticipate and respond to the different needs of customers by providing them with accurate, precise and comprehensive information regarding the services offered.

A fundamental part of IRS's business activity is the provision, within the limits of the contractual provisions, of high-quality products that meet the reasonable expectations and needs of its customers and the provision of accurate and comprehensive information on the services offered.

	CODE OF ETHICS	CE Ed. 1 Rev. 0 31/01/2024
		Page 6 of 8

4.3 SUPPLIER RELATIONSHIPS

IRS is committed to seeking suitable professionalism and commitment to sharing corporate strategies in its suppliers and external collaborators and promotes the construction of long-lasting relationships for the progressive improvement of corporate performance.

IRS pursues the fair, impartial and transparent selection of its suppliers, refrains from maintaining relationships with members of criminal organizations, including those of a mafia nature, or those dedicated to the exploitation of child labor or who operate in violation of the regulations on the protection of workers' rights, as well as with individuals who operate for the purposes of national and/or international terrorism.

In procurement relationships, the supply of goods and/or services and external collaboration (including consultants, agents, etc.) IRS:

- does not preclude any individual in possession of the required requisites from being awarded a supply, adopting objective evaluation criteria according to declared and transparent methods;
- bases its behaviors on obtaining the collaboration of suppliers and external collaborators, in constantly ensuring the satisfaction of its customers' needs to an extent adequate to their legitimate expectations, in terms of quality, cost and delivery times;
- includes in contracts the confirmation of having read the Code of Ethics and the express obligation to comply with the principles contained therein;
- maintains a frank and open dialogue with suppliers and external collaborators in line with good commercial practices.

4.4 RELATIONS WITH GOVERNMENTS AND PUBLIC INSTITUTIONS, POLITICAL AND TRADE UNION ORGANIZATIONS

The relationships that IRS maintains with public institutions are based on compliance with the provisions of the law, company procedures, values of correctness, impartiality, loyalty, honesty, transparency. Relationships with political and trade union organizations are characterized by the principles of impartiality and independence.

4.5 HUMAN RESOURCES

Human resources are the central element on which IRS relies to pursue its objectives.

Professional development and growth are, together with a leadership style that enhances individual skills, integrating them through teamwork, the cornerstones of human resources management.

Team spirit and a sense of belonging are key elements to effectively achieve common objectives, to create a managerial spirit extended to all levels, to facilitate the management of the continuous changes required by the market.

The rules that IRS adopts in personnel management are reported below.

Selection, development, training and management

The selection and career development of personnel occurs without distinction of sex, race, language, religion, political opinions, personal and social conditions, solely on the basis of the results of the verification in the candidates of the presence of the professional, behavioural and attitudinal requirements foreseen by the profile of the position to be filled.

Evaluation and development of merit, competence, ability and individual potential are the basis for the training, growth and remuneration initiatives of human resources.

Work environment and protection of company assets

IRS pays constant attention to the health and quality of the work environment through scrupulous compliance with current legislation on workplace safety. In this context, it is committed to developing a work environment that

 ITALIAN REMOTE SENSING	CODE OF ETHICS	CE Ed. 1 Rev. 0 31/01/2024
		Page 7 of 8

guarantees the safety and health of all employees and collaborators. Smoking, drug use and alcohol consumption are therefore not permitted within the workplace. Each employee is required to safeguard company assets, diligently guarding and using movable and immovable assets, technological resources and IT media, equipment, company products and information and to actively contribute to maintaining an optimal standard of company safety, refraining from illicit or otherwise dangerous behaviour.

Harassment and discrimination

IRS hopes that its staff, at all levels, will collaborate to maintain a climate of mutual respect for the dignity, honor and reputation of each individual within the company and will intervene to prevent abusive, discriminatory or defamatory interpersonal behaviour. To this end, extra-work behaviours that are particularly offensive to civil sensibilities are also considered relevant.

IRS requires that in internal and external work relationships there is no harassment or discrimination of any kind against employees, suppliers and customers.

4.6 ENVIRONMENTAL PROTECTION

IRS recognizes the environment as a primary asset to be safeguarded, to this end it plans its activities seeking a balance with the needs of environmental protection and safeguarding of natural resources. It is committed to applying the legislation on environmental protection and safeguarding of natural resources by implementing a series of specific initiatives that aim to improve the use of limited resources such as energy, water, paper.

4.7 PRIVACY PROTECTION

IRS is committed to protecting information relating to its People and third parties, generated or acquired internally and in business relationships, and to avoiding any improper use of this information.

IRS intends to ensure that the processing of personal data carried out within the company takes place in compliance with the fundamental rights and freedoms, as well as the dignity of the interested parties, as required by current regulatory provisions.

5. VIOLATIONS OF THE CODE OF ETHICS

All recipients must respect and promote the application of the code of ethics, disseminate the ethical principles and values of IRS. The task of clarifying any interpretative doubts as well as the task of receiving reports of any violations of the code and proposing any improvements to the provisions of the code itself is delegated to the Legal Representative. Violation of the code constitutes a breach of contract and/or, in the case of an employee, a disciplinary offence (in this case the sanctions system provided for by the legislation, or by the National Collective Labour Agreement, applies) and may lead to compensation for any damages caused to IRS by such violation, in accordance with current legislation and applicable collective agreements.


In the event of a violation of the code emerging following a report received, the Legal Representative, after an analysis of the reported facts, decides on the possible existence or otherwise of such violations and determines any disciplinary sanction proportionate to the seriousness of the violation committed. Any request for clarification, complaint or information will be kept strictly confidential.

IRS, to protect its image and safeguard its resources, does not maintain relationships with parties who do not accept or who violate the provisions of this code of ethics.

6. IMPLEMENTING PROVISIONS

In order to pursue compliance with the principles of the code, IRS ensures:

- maximum dissemination and awareness through publication on its website;
- uniform implementation;

	CODE OF ETHICS	CE Ed. 1 Rev. 0 31/01/2024
		Page 8 of 8

- the development of checks on reports of violations of the same and the application of the related sanctions;
- periodic updating.