



## CODE OF ETHICS





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# THE COMPANY

Established in 1957, Atos has gradually extended its market area thanks to a unique mix of strengths with organization and methods of a multinational combined with the flexibility, responsiveness, service and customer focus, typical of a private company.

Now Atos is a Group operating in more than 80 countries, with 9 production sites in Italy, China, USA and India with over 750 professionals who share the same passion for innovation, technology and creativity.

A sales network around the world to provide custom and tailored solutions with high reactivity, speed and problem-solving.

Quality is the shared priority at all levels, according to the company mission: **we believe in the value of technology, and we are constantly searching for innovation and quality thanks to its people's value.**

Atos invests in training as an essential lever for the development and enhancement of its human capital.

The smart electrohydraulic is the vision that sums up the four values leading Atos actions: **responsibility, excellence, innovation, and passion.**

For Atos, being smart means courage and determination to define new standards of excellence.

A new approach in which each process is analysed and optimized: from design to production, from delivery to after-sales service Atos has always undertaken to respect the fundamental values of honesty, diligence, responsibility, correctness, loyalty, integrity, transparency, and mutual respect with regard to all the parties concerned, starting from its employees. This undertaking is translated into the respect of legislation and regulations on social, environmental and tax matters, fair competition, and anti-corruption. The same undertaking is also required from every subject that is in relation to Atos.



# CODE OF ETHICS

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Atos has decided to express in a Code of Ethics the ethical commitments and responsibilities that Atos assumes in the conduct of business and corporate activities.

This Code explicitly sets out the values in which Atos believes, the guiding principles, the rules of conduct that enrich Atos's decision-making processes and the duties and responsibilities which must inspire the behaviour of the subjects who operate in Atos and with Atos.

The Code of Ethics represents a fundamental and essential tool for guiding the behaviour and conduct of the subjects who work for Atos, in order to avoid carrying out actions that could damage Atos itself.

This Code of Ethics, adopted by the Board of Directors of the Parent Company on 5<sup>th</sup> October 2023, constitutes a single document for the entire Group and as such all directly or indirectly controlled companies are required to accept it and implement the contents with the adjustments required by applicable local regulations, possibly approving their own Codes of Ethics or Codes of Conduct whose principles are similar, and in any case do not conflict in any way with those of this Code.

Atos will actively work to ensure the dissemination and knowledge of the Code of Ethics to all interested parties, the deepening and updating of the same as well as to verify the effective application of the values and principles enshrined therein and sanction any violations.



# EMPLOYEES

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Atos places value on its human resources as a factor of fundamental importance for its entrepreneurial activity. The management of human resources is based on the respect for the personality and professionalism of each person without discriminations of gender, age, race, class, national origin, religion, disability, sexual orientation, trade union membership or political opinion.

## **HEALTH AND SAFETY IN THE WORKPLACE**

Atos and its affiliated companies undertake to guarantee a healthy and safe workplace, minimizing the risks and the threats present through measures for the prevention of accidents and regular and documented training on Health and Safety.

Atos undertakes to create a work environment that guarantees its employees in any capacity and at any level, conditions that respect health, safety, and personal dignity.

Atos, in compliance with applicable current provisions, undertakes to protect the health of workers, preparing all necessary and appropriate measures, in view of guaranteeing the absolute compliance of workplaces with standards on safety and hygiene.

The "culture" of health and safety is spread by Atos through training and communication moments and is achieved through continuous updating of methodologies and systems, carrying out an analytical risk assessment of the criticality of the processes and resources to be protected.

As part of their duties, Atos employees are required to comply with all the safety measures and company guidelines regarding accident prevention and to actively cooperate in the process of risk prevention and health and safety protection for themselves, colleagues and third parties.

Atos' employees are also required to preserve the integrity of the corporate assets with responsible behaviour by respecting the procedures established for the correct use of the corporate assets and tools, which must not be used for purposes other than their own within the ambit of the activity of the Company.

## **HARASSMENT AND BULLYING**

Atos does not allow harassment of any kind whatsoever, whether moral, mental or sexual, to and from any level in the company, in internal and external work relations.

Atos refuses any action that could constitute abuse of authority and, more generally, that violates the dignity and psycho-physical integrity of the person.

## **CHILD LABOUR**

Atos repudiates any form of labour exploitation. It refuses to use work performed by minors and does not in any way resort to child labour provided by third parties.

## **ASSOCIATIONS AND TRADE UNIONS**

Atos ensures the right of every worker to join and form trade unions of their choice and the right to collective bargaining.

## **SELECTION AND MANAGEMENT OF HUMAN RESOURCES**

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Atos develops the aptitudes and potential of the personnel who collaborate in various capacities with Atos so that the abilities and legitimate aspirations of individuals find full realization in the achievement of corporate objectives.

Atos undertakes to adopt criteria of impartiality, merit, competence, and professionalism for any decision concerning relations with employees, collaborators and self-employed workers in any capacity operating for the same. The selection and hiring of personnel are guided by the principles of correctness, transparency, and impartiality. Atos hires resources whose profiles effectively meet Atos's needs, operating - as for the management of resources already in the workforce - choices exclusively based on criteria of professionalism and competence and banning any form of favouritism.

Recruitment takes place in compliance with the legislation on labour law or any other provision in force and therefore on the basis of regular employment contracts, as no form of employment relationship is allowed that is not compliant or in any case elusive of the provisions in force.

In compliance with contractual regulations, equal job opportunities and professional developments are offered, based on skills, potential and professional qualifications without discrimination or favouritism, ensuring fair treatment based on individual skills and abilities. Personnel receives accurate information on the characteristics of the function and the tasks to be performed, on the regulatory elements and the minimum wage levels as regulated by the applicable national collective labour agreement and receives the employment documents and any personal protective equipment.

## **CONFLICT OF INTERESTS**

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In carrying out the activities, any situation in which the subjects involved in the transactions are, or may even appear to be, in conflict of interest or for serious reasons of convenience must be avoided. By conflict of interest we mean the case in which an employee and/or collaborator works to satisfy an interest other than that of Atos to obtain a personal advantage.

Constitute, by way of example but not limited to and in addition to the cases defined by law, conflicts of interest:

- the exploitation of one's functional position for the realization of conflicting interests with those of Atos;
- the use of the information acquired due to or during one's work for one's own benefit or that of third parties.



# THE BUSINESS

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The company recognizes customer satisfaction as the fundamental element for the success of its business. This central objective is subordinate to the principles of legality, honesty, correctness, and transparency.

## **QUALITY AND SAFETY OF THE PRODUCTS**

Atos attributes priority importance to the safety and quality of its products.

A selection of the raw materials and of the packaging is made to ensure the respect of the regulations of the countries where the product is to be sent.

This is followed by a meticulous sequence of tests to which the finished products are subjected.

## **PROTECTION OF COMPETITION**

Atos believes in correct and fair competition as a fundamental element for its development. In disputing market shares, it chooses to operate in respect of the principle of integrity and the respect of legislation on competition and antitrust laws.

## **MONEY LAUNDERING AND LEGALITY**

Atos rejects any form whatsoever of money laundering from unlawful or criminal activities, undertaking to respect all the national and international provisions on money laundering.

In the same way, any form whatsoever of corruption, infringement of trust and undue appropriation is prohibited.

Offering, directly or indirectly, money, gifts or benefits of any nature of any nature and kind, personally, to suppliers, to employees of the Public Administration, to third parties from whom undue advantages may be obtained, is strictly forbidden.

Acts of commercial courtesy are allowed on condition that they are of modest value and such as not to compromise the integrity and the reputation of one of the parties and not to influence the autonomy of the judgement of the recipient.

Only duly designated and authorized company functions may enter commitments with the Public Administration and with public institutions.

## **RELATIONS WITH SUPPLIERS**

The relations with suppliers are based on principles of transparency, loyalty, integrity, confidentiality, honesty, diligence, professionalism, and objectivity of judgement. The selection of suppliers is made based on an objective and transparent assessment. Atos undertakes to ensure maximum vigilance with all the suppliers in relation to the observation of the Code of Ethics.

## **ACCOUNTING AND MANAGEMENT ACCURACY**

Atos ensures that every transaction is based on adequate documentation and can be verified. The principles observed in accounting and management are correctness, completeness, and transparency, fully complying with the legislation currently in force.

## **RULES OF CONDUCT IN SOCIAL AND PROFESSIONAL CONTEXTS**

Atos promotes professional behavior that is respectful of corporate values and appropriate to the context during Company events or dinners with clients and suppliers, in order to protect the Company's image and reputation.

During such events, Atos allows the moderate and responsible consumption of alcoholic beverages. To ensure maximum safety and operational integrity, it is strictly prohibited to consume alcoholic beverages before or while driving any vehicle (company or personal) used to attend Company events.



# SOCIAL RESPONSIBILITY

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Atos considers Corporate Social Responsibility an integral part of the operating and managerial policy of the company. Some of the topics to which Atos is committed are:

## **ENVIRONMENTAL SUSTAINABILITY**

Atos considers the environment a primary asset to be safeguarded and plans its activities to this end by seeking a balance between economic initiatives and the essential needs of environmental protection. Atos operates in compliance with current legislation and takes steps to limit the environmental impact of its activities. Atos undertakes to comply with the obligations, prohibitions and restrictions regarding the use of specific substances, their disposal and recycling and to implement actions aimed at the continuous improvement of its performance in environmental matters, at the control and reduction of the use of dangerous substances, energy saving, water saving, minimization of waste production and recovery and recycling of the same.

Atos undertakes to verify the application of the environmental policy to promote activities aimed at preserving the environment for future generations and enhancing natural resources.

## **ALCOHOL OR DRUGS**

Atos is committed to creating and maintaining a safe, healthy, and productive work environment. The Company recognizes that the abuse - or improper use - of alcohol, drugs, and other similar substances by its employees and collaborators negatively affects their duty to perform efficiently and can have serious harmful consequences for them themselves, on the safety, efficiency and productivity of other employees and the Company.

The use, possession or distribution of alcohol and illicit drugs on Company premises is strictly prohibited.

During Company events or dinners with clients and suppliers, the Atos Group allows the moderate and responsible consumption of alcoholic beverages, in accordance with corporate values and in line with the professional context. In any case, the consumption of alcoholic beverages is not permitted for those who are required to drive after the event.

# WHISTLEBLOWING

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To prevent and deter violations of public interests, the internal market, the environment, health, protection and welfare of animals, as well as environmental crimes and unlawful conduct, Atos has designed and created a reporting channel that will be managed by an impartial service in a secure manner and such as to guarantee the confidentiality of the identity of the reporting person and the protection of any third parties mentioned in the report.

The complete procedure can be found at the link [www.atos.com/en-it/whistleblowing](http://www.atos.com/en-it/whistleblowing)



**atos**   
the **smart** electrohydraulics



[WWW.ATOS.COM](http://WWW.ATOS.COM)