

## CODE OF CONDUCT

### Summary

<b>INTRODUCTION</b> .....	<b>2</b>
<b>ARTICLE 1 – GENERAL PRINCIPLES AND VALUES</b> .....	<b>2</b>
<b>ARTICLE 2 – LIABILITY TO BUSINESS PARTNER</b> .....	<b>2</b>
TRANSPARENCY IN COMMUNICATION WITH CUSTOMERS.....	2
COMPETITION LAWS.....	2
RESPECT AND PROMOTION OF THE “LEGALITY CULTURE” .....	2
<b>ARTICLE 3 - RESPECT FOR PEOPLE AND RESPONSIBILITY TOWARDS EMPLOYEES</b> .....	<b>2</b>
OUR PEOPLE.....	2
RESPECT FOR HUMAN RIGHTS .....	2
EQUAL OPPORTUNITIES AND RESPECT .....	2
DIVERSIFIED WORKFORCE .....	2
HEALTH AND SAFETY AT WORKPLACE .....	2
COMPLIANCE WITH LABOUR LEGISLATION .....	3
<b>ARTICLE 4 – RESPONSIBILITY TOWARDS THE COMPANY</b> .....	<b>3</b>
COMPLIANCE WITH SAFETY .....	3
RESPECT FOR COMPANY GOODS AND SERVICES.....	3
RESPECT FOR INTELLECTUAL PROPERTY .....	3
PROTECTION OF COMMERCIAL SECRECY .....	3
PRIVACY AND DATA PROTECTION .....	3
PROTECTION OF CONFIDENTIALITY .....	4
AVOID POSSIBLE CONFLICTS OF INTEREST.....	4
USE OF SOCIAL MEDIA .....	4
<b>ARTICLE 5 – ENVIRONMENT AND COMMUNITY</b> .....	<b>4</b>
<b>ARTICLE 6 – ACCOUNTANCY AND CONTROL</b> .....	<b>4</b>
<b>ARTICLE 7 – INSTITUTIONS, PUBLIC BODIES AND CIVIL SERVANTS</b> .....	<b>4</b>
<b>ARTICLE 8 – PRESERVE AND PROTECT THE ENVIRONMENT</b> .....	<b>5</b>
<b>ARTICLE 9 – REPORT VIOLATIONS</b> .....	<b>5</b>

## **Introduction**

The Code of Conduct adopted by the governance body of the Company sets out the values of ethics and the principles of conduct on the basis of which the Company informs its business activities.

The corporate bodies, employees, suppliers, customers, partners and partners of the Company are informed of the provisions of the Code of Conduct so that they observe them and constantly inspire their behavior, in whatever context they are called to work with the Company.

The Code of Conduct aims to ensure that all employees and all those who work with the Company act with the highest level of integrity, comply with applicable laws and build a better future for our company and the community.

The key function of the Code of Conduct is to help the whole Company make decisions when situations are not clear and help keep the course, acting as a guide when the path to take is uncertain since our workplace, as the world we live in, is dynamic, is growing and changing, offering us new challenges every day. The Code of Conduct is, therefore, a valuable resource that reflects who we are as a Company.

Within the Company we expect everyone, including our partners, customers, suppliers and contractors, to work ethically and transparently, to be responsible for their work, in line with the Code of Conduct and all applicable laws and regulations. Everyone is therefore required to read, follow and understand the Code of Conduct. If potential violations are detected, we must take action and seek help in case of doubt.

We take our commitment to integrity seriously. Anyone who violates the Code of Conduct or our policies will be subject to disciplinary action, until fired, in accordance with applicable laws. Any violation of the Code of Conduct will be examined in an impartial and fair manner by the competent/s function/s. Any doubt about a potential conflict must still be brought to the attention of the Legal and Compliance office.

## **Article 1 - General Principles and Values**

The Company constantly pursues growth, observing the law and safeguarding the values of fairness and integrity.

Every entrepreneurial choice of the Company is aimed at creating value in compliance with the criteria of competitiveness and competition, the interests of customers and the rights of the parties involved. The Company does not pursue illicit purposes and does not use illicit means to achieve its objectives both in relations with institutions and public officials and in relations with private companies, both with regard to the community and employees, partners, suppliers and customers; in fact, the Company avoids any fraudulent, abusive, collusive or evasive practice of rules and strives to prevent unfair damage from its activities.

In carrying out its activities, the Company takes into account the socio-economic realities with which it is called to interact, as well as the social, economic and cultural specificities of the environments and contexts in which it operates, while ensuring that such harmonisation does not constitute a reason for non-compliance with the principles and values to which one's business is characterised.

The Company is strongly oriented towards a participatory management style, that is achieved through the example, trust, communication, the enhancement of its employees, all aimed at building a team spirit, so that each working group can always express a value greater than the sum of the individuals.

## **Article 2 - Liability to business partner**

*Transparency in communication with customers*

**Our customers are our priority and it is essential for us to obtain their trust thanks to transparent, correct and accurate communication.**

### *Competition Laws*

**Competition is the basis of a healthy market and the Company is strongly in favour of a market as free, fair and open as possible; therefore, in operating within the market the Company respects the rules and laws that protect competition, both at national and international level.**

### *Respect and promotion of the "legality culture"*

The Company acts in compliance with all current regulations, not tolerating activities that are in favour of corruption and for this reason it sets up models of organization, internal and control procedures suitable for preventing and contrasting any unlawful behaviour, and constantly promoting the "culture of legality" among all recipients. To pursue this key principle, the Company makes the utmost effort, as far as its competence is concerned, to prevent and contrast corruption, money laundering and any other form of crime.

No one - administrator, manager, or other employee, or partner - may directly or indirectly give, offer, claim, promise, authorize, solicit or accept any amount of money or other utility (including gifts or gifts that are outside the normal customs, exceed the modest value or can affect its performance) in connection with the work carried out for the Company, regardless of moment or reason.

## **Article 3 - Respect for people and responsibility towards employees**

### *Our people*

The Company values the uniqueness of each individual, respecting the diversity of all employees and collaborators and guarantees everyone equal chances of success. Every working relationship is based on respect for the individual, fairness, without any discrimination related to sex, race, religious belief, health conditions, political opinions, age or marital status, recognising equal opportunities for all and believing that the contribution of each individual to work processes is an indispensable and qualifying element for the development of the Company and for the enhancement of the people who work in it.

### *Respect for human rights*

Fundamental principle for the Company is that all human beings deserve to be treated with dignity and respect; therefore, the Company considers fundamental the respect of labour laws and human rights, also by ensuring respect for the moral and physical integrity of the individual and the protection of the health and safety of its employees in the workplace.

### *Equal opportunities and respect*

Our employees come from different backgrounds and are bearers of unique talents and perspectives for the Company. It's crucial for us to respect the diversity of our employees and make sure that everyone in the workplace has the same opportunities for achievement and success. Among our main goals is therefore to train and promote our employees on the sole basis of their qualifications and their merits, regardless of race, colour, sex, sexual orientation, gender identity, language, religion, political or other opinion, nation or social level, disability, birth or any other condition.

### *A diversified workforce*

All members of our workforce deserve to be treated fairly and respectfully. We will keep the working environment free from harassment and other improper behaviour. The Company does not tolerate any activity that creates an intimidating, discriminatory, humiliating or offensive work environment.

### *Health and safety at workplace*

Ensuring a healthy and safe workplace is essential for the well-being of employees and collaborators, so the Company ensures compliance with all legal provisions on health and safety at work, including through decision-making and compliance with fundamental principles and criteria. Therefore, the Company guarantees:

- limitation of risks;
- analysis and assessment of avoidable risks;
- balancing work to man, in particular with regard to the design of workplaces and the choice of work equipment and production methods, in particular to mitigate monotonous and repetitive work and to reduce effects of such work on health;
- consideration of and respect for developments in technology;
- replacing what is dangerous with what is not dangerous or less dangerous;
- planning of prevention, aiming at a coherent complex that integrates technique, organization of work, working conditions, social relations and the influence of factors in the working environment;
- prioritisation of collective protection measures over personal protection measures;
- the provision of appropriate instructions to workers.

#### *Compliance with labour legislation*

The Company respects and undertakes to ensure that its suppliers also comply with current labour legislation, with particular attention to child labour.

### **Article 4 – Responsibility towards the Company**

#### *Compliance with safety*

According to the Company, respect for the environment and safety are fundamental. Therefore, it is committed to implement all the principles and rules that provide for the protection of the health of workers and, pursuant to T.U.81/2008, to ensure maximum office security for employees, external collaborators and guests of the Company headquarters. In the same way, the Company considers it necessary for a healthy and lasting collaboration with its suppliers that they commit to respect these values, too.

#### *Respect for Company goods and services*

Business assets are necessary for the effective performance of work, therefore, the protection of the same is required. For business goods, reference is made both to physical goods (e.g. equipment, plants and stocks) to which the Company calls for proper use, safeguarding them from damage, failure or breakage; and to electronic goods (e.g. e-mail, Internet access, telephones, PCs, software and hardware) to which each employee is obliged to proper use and custody.

#### *Respect for intellectual property*

The Company guarantees the protection of trademarks and distinctive signs or patents, models or designs, ensuring the non-use of industrial property rights or intellectual works of third parties outside the cases permitted by law. All employees and collaborators must treat with due confidentiality and protect the ideas, models and other forms of intellectual property developed within the business activity, in relation to which the Company may obtain, in its own name, patent coverage or any other type of protection of intellectual property rights, without prejudice to the individual rights of employees and collaborators recognised by law.

The Company undertakes not to carry out projects and/or products that may result in violation of the intellectual property rights of third parties and to ensure that among its internal and external collaborators the activity of duplication, reproduction, possession, use, rental, distribution and dissemination of works covered by copyright, both in accordance with copyright law and for the

preparation of teaching materials and for the use of videos, software, photographic images, etc.

All employees and collaborators are bound by the terms of the license agreements, in any case where the Company is licensed to use the properties of a third party.

#### *Protection of commercial secrecy*

Every employee has a duty to protect trade secrets and confidential information. Your responsibility will be not to show, disclose, disseminate in any way confidential business practices or other information deemed confidential.

#### *Privacy and data protection*

In carrying out its activities, the Company collects a significant amount of personal data and confidential information that it undertakes to process ensuring compliance with the principles set out in Regulation (EU) 2016/679 ("GDPR") and acting in a fair manner and with the utmost respect for the data subject's right to privacy and the protection of his or her data. To this end, the Company guarantees high levels of security in the selection and use of its IT systems for the processing of personal data.

The Company also guarantees to collect and process data with integrity, avoiding even the possible suspicion of illegal or improper conduct.

#### *Protection of confidentiality*

The Company respects the confidential information of our stakeholders, ensuring the adoption of measures to maintain confidentiality; for this reason it treats with the utmost care and diligence all confidential information, taking all precautions to prevent unauthorised disclosure.

#### *Avoid possible conflicts of interest*

The primary goal of the Company is to make employees feel an integral and fundamental part of the activity carried out. However, this may mean that the employee and/or the collaborator may be involved in an activity or in a situation carrying a conflict of interest between the latter and the Company, thus making it difficult for him or her to carry out his work in an objective and effective manner. A conflict of interest, even if only suspicious, can damage the Company and its reputation, therefore, all employees and collaborators are required to avoid conflicts of interest and never use the Company's position to gain personal benefits. For this reason, any conflict of interest, even if only potential, must be immediately reported to your supervisor, or to the Human Resources office, or to the Legal and Compliance office or through other channels made available by the Company.

#### *Use of social media*

Social media is now an important tool to gain more visibility, create and maintain contacts with friends, family and third parties, but also a way to present yourself to the outside world. For this reason, the Company believes that it is important to use social media in an appropriate and common sense, always remembering that what we express on social media reflects who we are, as individuals, but also as a Company.

### **Article 5 - Environment and Community**

The Company ensures compliance with all laws on the protection of the environment and the territory; therefore, it ensures that the use of dangerous products takes place in strict compliance with current regulations. The Company undertakes to take all necessary measures to avoid accidents that could harm the community and the environment, thus always ensuring the safety of the products and services offered.

### **Article 6 - Accountancy and Control**

The Company ensures the adequacy as well as the correct and effective functioning of the accounting structure adopted, ensuring the regular keeping of accounts and the correct recording in the accounting records of the operating events, in compliance with regulatory rules and principles. It is essential to adopt planning and control models that are consistent and appropriate to its accounting structure; therefore, the Company ensures that all transactions carried out are duly authorised, documented, verifiable, legitimate, consistent, recorded and accounted for.

All business processes adopted are indicative of management based on rigorous economic analysis and prudent risk assessments, to ensure the optimal use of assets and resources. The Company ensures the lawful origin of the money, goods and utilities used; and ensures the correspondence of the financial statements to the results of the accounting records and their compliance with the rules and regulatory principles.

### **Article 7 – Institutions, public bodies and civil servants**

If the relationships with customers and suppliers involve relationships with institutions, public bodies and with entities that perform public functions or provide public services, the Company ensures absolute compliance with the law, the principles established by the Code of Conduct and the provisions of the organisational and management model adopted. The Company shall refrain from any offer, promise or payment of money or other use that may affect the performance of the duties of the office or service of a public officer or public servant; in addition, it shall refrain from any fraudulent practice to the detriment of a public body and of a public company or entity carrying out public functions or services and from any conduct instrumental in the fraudulent and undue receipt of contributions, funding, grants or other grants from public institutions and bodies.

The Company ensures the correct and timely use of contributions, funding, grants and other disbursements of public institutions and bodies and abstains from and censors any initiative to induce directors, mayors, employees, collaborators and third parties in general not to make statements to the judicial authority or to express reticent and/or false statements.

### **Article 8 - Preserve and protect the Environment**

The Company is constantly committed to minimising the environmental impact of its direct and indirect activities as well as its products. Our constant commitment is, in fact, the continuous development of technologies that are able to follow our increasingly paperless oriented line of work. In fact, one of our principles is to be responsible to the environment in everything we do, in order to contribute to the development of a sustainable society.

### **Article 9 – Report violations**

In the event that the employee or collaborator is a witness or becomes aware of violations of the Company's Code of Conduct, policies or procedures, it is required to report the fact, unless local laws provide otherwise. In the management and reporting of doubts related to violations, the employee can take action having different levels of action available:

- your manager is the closest resource you can relate to;
- where the issue concerns managers, however, the employee can turn to their manager's manager.

In addition, any employee and/or collaborator can always:

- contact the Legal and Compliance office;
- proceed with a report in anonymous form through other channels made available to the Company.

Should the Company receive a report, it will be required to initiate the necessary checks and investigations, ensuring that information relating to allegations of violations is evaluated by the competent management and assigned to the most appropriate level of investigation. Where the outcome of the investigation confirms that incorrect behaviour has occurred, appropriate corrective measures shall be defined, irrespective of the level or position of the person concerned.

Unless prohibited by local law, all reports and/or complaints may be made anonymously. Where the report/complaint is not made anonymously, the Company undertakes to share the information provided and the identity of the reporting agent only if absolutely necessary and only with those responsible for the checks and investigations and with those who must take corrective action. The Company does not tolerate and will never tolerate any kind of retaliation against those who, in good faith, make a report of a possible violation of the Code of Conduct. It is now specified that anyone who, contrary to the foregoing, retaliates against such persons will be subject to disciplinary action, including dismissal.