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MOVIMODA ONE S.R.L.

Registered Office in Parma (PR), Strada della Repubblica No. 66

ORGANIZATIONAL, MANAGEMENT AND CONTROL MODEL

Attachment 1 Code of Ethics

Pursuant to Legislative Decree No. 231 of 8 June 2001
on the “Administrative Liability of Companies”

This “Organizational, Management and Control Model” (hereinafter the “Model”) of Movimoda One S.r.l. (hereinafter the “Company” or “Movimoda One”) has been drafted in accordance with the provisions of Articles 6 and 7 of Legislative Decree 231 of 2001, as amended (hereinafter the “Decree”).

It has been adopted by the Company through a resolution of the Board of Directors and will be effectively implemented through its progressive application (including any adjustments that may become necessary due to legislative changes or updates) by the Board of Directors itself and the Supervisory Body.

The “Model” serves as a direct management reference and constitutes the instrument designed for the prevention of criminal offenses provided for by the Decree, in compliance with the corporate ethics policy adopted by the Company.

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PREAMBLE

This document, entitled Code of Ethics, governs the set of rights and responsibilities that the company expressly assumes toward those with whom it interacts in the course of its activities.

Fully aligned with the positions expressed and protected by the accreditation system to which it adheres, the organization is aware that through its actions, with a sense of responsibility and moral integrity, it contributes to the development of the Italian economy and the civil growth of the country.

The company believes in the value of work and considers legality, fairness, and transparency in its actions as essential prerequisites for achieving its economic, productive, and social objectives.

The company affirms the consistency of its Code of Ethics in pursuing its social mission.

The Code of Ethics also aims to introduce and make binding for the company the principles and rules of conduct relevant for the reasonable prevention of the offenses indicated in Legislative Decree 231/2001.

The Code of Ethics, considered as a whole and together with all specific implementing procedures approved by the company, is regarded as an integral part of existing and future employment contracts, pursuant to Article 2104 of the Italian Civil Code (Diligence of the Employee).

Violations of its provisions will, therefore, constitute a disciplinary offense and, as such, will be pursued and sanctioned by the company and may result in compensation for damages caused to the organization.

With regard to collaborators, consultants, and independent contractors (further specified among the recipients) who provide their services to the company, as well as other third parties, the signing of this Code of Ethics, or an extract thereof, or, in any case, adherence to the provisions and principles contained therein, represents a “conditio sine qua non” for the conclusion of contracts of any kind between the company and these parties. The provisions thus signed or, in any case, approved, even through conclusive acts, constitute an integral part of the contracts themselves.

In light of the above, any violations by the subjects referred to in the preceding paragraph of specific provisions of the Code of Ethics, depending on their severity, may justify the company’s termination of existing contractual relationships with such parties and may also be identified in advance as grounds for automatic termination of the contract pursuant to Article 1456 of the Italian Civil Code (express termination clause).

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RECIPIENTS

Through the adoption of the Code of Ethics, the company aims to define moral values, clear rules, and procedures to follow.

The Code of Ethics is directed at:

- members of collegial bodies;
- employees (both fixed-term and permanent);
- project collaborators;
- external and internal consultants;
- suppliers of goods and services;
- any other person who may act in the name and on behalf of the company, whether directly or indirectly, permanently or temporarily, or those who establish relationships with the company and work to pursue its objectives.

Recipients of this Code of Ethics are required to learn its contents and comply with its provisions.

The Code of Ethics will be made available to them as specified below. The company's management, or a delegate, is responsible for the effective implementation of the Code of Ethics and for its dissemination both inside and outside the organization.

Company employees, in addition to complying with applicable laws and provisions of collective bargaining agreements, where applicable, commit to adapting their work practices to the purposes and provisions set forth in this Code of Ethics.

This applies both to internal company relations and to relations with external parties, particularly Public Administrations and other public authorities.

A fundamental requirement for any productive collaboration with the company is the respect, by other recipients, of the principles and provisions contained in this Code of Ethics.

Accordingly, at the time of signing contracts or agreements with other recipients, the company provides its counterparts with a copy of this document.

BEHAVIORAL PRINCIPLES FOR THE ORGANIZATION

The principles listed below are considered fundamental, and our organization is committed to respecting them in its dealings with everyone.

It is, however, essential that these values do not remain mere statements but are translated into conduct and behaviors inherent to the company.

As an organization and as individuals, all recipients are required, within the workplace, to apply them correctly in both internal and external operations and relationships.

The fundamental values on which the company's activities are based are:

- integrity in compliance with laws and regulations;

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- rejection of all forms of discrimination;
- centrality, development, and enhancement of human resources and fairness in the exercise of authority;
- territorial rootedness;
- transparency and business ethics;
- quality;
- diversity;
- legality and opposition to terrorism and criminal activity.

The company expects these values to define its identity and to unite employees and collaborators with the overall organization.

Integrity in compliance with Laws and Regulations

The company is committed to delivering and providing quality services and to competing in the market according to principles of fair and free competition and transparency, maintaining proper relations with all public, governmental, and administrative institutions, with citizens, and with third-party businesses.

Everyone is required to act, in any situation, with integrity, transparency, consistency, and fairness, conducting all business relationships honestly.

The company operates in strict compliance with the Law and works to ensure that all personnel act accordingly: individuals must behave in accordance with the Law, regardless of the context, the activities carried out, or the locations in which they operate.

This commitment also applies to consultants, suppliers, clients, and anyone who has dealings with our organization.

The company will neither initiate nor continue any relationship with those who do not intend to align with this principle.

Rejection of all forms of discrimination

In decisions that affect relationships with stakeholders (personnel management and work organization, selection and management of suppliers, relationships with the surrounding community and the institutions that represent it), our organization avoids any discrimination based on age, gender, sexual orientation, health status, race, nationality, political opinions, or religious beliefs of its counterparts.

Centrality, development, and enhancement of human resources and fairness in the exercise of authority

The company recognizes the central importance of human resources and considers the professional contribution of its people to be an essential factor for success and development.

The company has always placed professionalism and individual contribution at the heart of its operations, maintaining a relational approach that recognizes each person's work as a fundamental element of both corporate and personal development.

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At the same time, the company prioritizes in its daily operations dialogue, information sharing at all levels, professional development and training of its collaborators, and the creation of a corporate identity and a corresponding sense of belonging.

This value is expressed through:

- the creation of a work environment that enhances each individual's contribution and potential through gradual empowerment of personnel;
- the establishment of a relational system that favors teamwork over hierarchical relationships;
- the daily effort aimed at sharing skills and knowledge, also through the use of innovative systems.

The company places the highest importance on those who carry out their work within the organization, contributing to its development, as it is through human resources that the company is able to provide, develop, improve, and ensure optimal management of its services.

Without prejudice to legal and contractual provisions regarding employees' duties, employees are expected to demonstrate professionalism, dedication to work, loyalty, a collaborative spirit, mutual respect, a sense of belonging, and integrity.

In managing contractual relationships that involve hierarchical structures, our company is committed to ensuring that authority is exercised fairly and correctly, avoiding any form of abuse. In particular, the company guarantees that authority will not be used in a way that undermines the dignity or autonomy of individuals.

These values must, in any case, be safeguarded when making decisions regarding work organization.

Local roots / Territorial integration

The company aims to carry out projects that directly involve citizens, public and private institutions, entrepreneurs, and associations in all matters related to health education, prevention, and the management of personal well-being. The company takes action, and will continue to do so, to ensure that the entities it collaborates with comply with the same behavioral standards and align their activities with the same principles and values.

Furthermore, the company promotes local development through a strong connection with the various actors in the relevant territorial community. It therefore operates within the local community to foster a rich and generative society, capable of recognizing and enhancing the resources it comprises, the skills and potential present, and gender, cultural, and ethnic differences, while promoting well-being, integration, and social development, and ensuring that both users and service providers acknowledge and value these contributions.

Transparency and business ethics

The organization's history, identity, and values are reflected in a business ethics grounded in:

- Reliability: ensuring absolute seriousness and commitment in all projects, transactions, and obligations undertaken;

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- **Solidity:** based on well-established financial foundations, as demonstrated by the organization's long-standing operations;
- **Transparency:** guided by the organization's social responsibility, requiring not only adherence to ethical principles and practices but also the implementation of processes that allow communities and stakeholders to access information and evaluate the organization's activities;
- **Fairness in contractual relations:** ensuring that no one acting on behalf of the company exploits contractual gaps or unforeseen circumstances to renegotiate agreements solely to take advantage of a counterpart's dependency or vulnerability;
- **Protection of competition:** refraining from collusive, predatory, or abusive behaviors that could distort market fairness.

Quality

Quality is a core distinguishing feature of our company. The organization is fully committed to, and accountable for, ensuring quality in all its activities, in line with its long-term strategy. Operations are carried out through a set of well-managed processes, guided by rules and procedures that are tailored for each warehouse to meet diverse customer requirements and specific logistical needs.

Diversity

The company expects its directors, employees, and collaborators to act in a manner that fully respects human dignity. In line with this principle, the organization:

- ensures full compliance with laws protecting against child labor and safeguarding workers' rights and freedoms;
- guarantees the right of individuals to freely join trade unions;
- strictly prohibits any violations of human rights;
- fosters social integration as a means of collective enrichment.

The company firmly condemns all forms of discrimination based on gender, ethnicity, political beliefs, or religion.

Legality and the fight against terrorism and crime

The company is firmly committed to democratic values and condemns any activity aimed at terrorism or the subversion of the democratic order.

In addition, the organization strictly prohibits and condemns any activities involving:

- falsification, counterfeiting, alteration, or use of currency, public credit instruments, or stamped values;
- acceptance or processing of proceeds from criminal activities (money laundering);
- unauthorized access to external IT systems;

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- unlawful possession of access credentials;
- damage to equipment or data;
- fraud in the management of electronic signature certification;
- interception, obstruction, or disruption of computer communications;
- promotion of tolerance or silence regarding drug use or other addictive behaviors;
- incitement to commit illegal acts or actions contrary to moral standards;
- negligence in preventing violence, damage to public property, or breaches of internal regulations.

SOCIAL ACTORS

Client

The company's primary objective is the full satisfaction of its customers' needs.

Within this framework, the organization ensures clients the best possible execution of the assignments entrusted to it and is constantly focused on proposing increasingly advanced and innovative solutions, with an emphasis on integration, effectiveness, efficiency, and cost-effectiveness.

The company provides accurate, complete, and truthful information in order to enable customers to make rational and informed decisions. It protects its customers' privacy in accordance with applicable laws and regulations, undertaking not to disclose or disseminate personal data, except as required by law.

The company also adopts a communication style based on efficiency, cooperation, and courtesy.

Financial institutions

The organization maintains relationships with financial institutions based on fairness and transparency, with the aim of creating value for the company itself. For this reason, financial institutions are selected on the basis of their reputation, including their adherence to values comparable to those expressed in this Code of Ethics.

Suppliers

Suppliers of goods and services

The company establishes collaborative relationships with its suppliers, in compliance with applicable laws and regulations and with the principles set out in this Code of Ethics, paying due attention to the highest professional standards, best ethical practices, the protection of health and safety, and respect for the environment.

Internal and external consultants

Consultants are selected on the basis of their professionalism, reputation, reliability, as well as their adherence to values comparable to those expressed in this document. Relationships with consultants are based on transparent agreements and constructive dialogue aimed at achieving shared objectives, in accordance with applicable regulations and the principles of this Code of Ethics.

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Public administration

The term *Public Administration* refers to any person, entity, or counterpart that can be classified as a Public Official or Person in Charge of a Public Service, acting on behalf of central or local Public Administration, Supervisory Authorities, Independent Authorities, European Institutions, as well as private partners holding a Public Service concession.

The company aligns and adjusts its conduct, in dealings with the Public Administration, to the principles of fairness and honesty. On this basis, individuals appointed by the company to handle any negotiation, request, or institutional relationship with the Public Administration, whether Italian or foreign, must under no circumstances attempt to improperly influence decisions or engage in unlawful behavior, such as offering money or other benefits, that could compromise the impartiality of the Public Administration representative.

Individuals assigned by the company to manage relations with any Public Administration authority must ensure that all information provided, by any means and in any form, is truthful, accurate, and correct. Only persons expressly designated by the company are permitted to have direct contact with the Public Administration on behalf of the company.

No other employee or collaborator may engage in any form of contact with the Public Administration concerning the company's business activities.

In the conduct of tenders or public procurement, individuals appointed by the company must comply with the law and applicable regulations.

Employment relationships with former Public Administration employees

The hiring of former Public Administration employees who, in the exercise of their duties, have had relationships with the company, or of their relatives and/or in-laws, is carried out in strict compliance with the standard procedures established by the organization for personnel selection. Likewise, the establishment of any other employment or consultancy relationships with former Public Administration employees, or with their relatives and/or in-laws, is conducted in strict adherence to the standard procedures.

Subsidies and funding

Any contributions, subsidies, or funding obtained from the European Union, the State, or other Public Entities, even if of modest value or amount, must be used for the purposes for which they were requested and granted.

The company prohibits the recipients of this Code of Ethics from using funds received from Public Administrations and/or interprofessional funds for purposes other than those for which they were provided.

Similarly, in the event of participation in public procurement procedures, the recipients of this Code of Ethics are required to act in compliance with the law and sound commercial practice, avoiding, in particular, any attempt to improperly influence Public Administration authorities in favor of the company.

The organization is committed to preventing acts that may lead the recipients of this Code of Ethics to engage in conduct aimed at obtaining unlawful advantages. It is also considered illegal to use altered or falsified statements or documents, to omit information, or, in general, to engage in artifices or deceptions aimed at obtaining concessions, authorizations, funding, or contributions from the European Union, the State, or other Public Entities.

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Public regulatory authorities.

The recipients of this Code of Ethics undertake to:

- strictly comply with the provisions issued by the competent institutions or Public Supervisory Authorities to ensure adherence to the applicable laws in sectors related to their respective areas of activity;
- refrain from submitting, in the course of investigations or proceedings involving institutions and/or Public Supervisory Authorities, any applications or requests containing untrue statements in order to obtain public disbursements, contributions, subsidized funding, or to unduly secure concessions, authorizations, licenses, or other administrative acts;
- comply with any request from the aforementioned institutions or Authorities within the scope of their supervisory functions, providing full cooperation when required and avoiding obstructive behavior.

Political parties, associations, and interest-representing institutions

The company engages transparently with all political parties, local associations, and public institutions (both local and national) in order to appropriately represent its positions on topics and issues of interest.

CODE OF CONDUCT FOR PERSONNEL

Professionalism

Each individual carries out their work and duties with diligence, efficiency, and integrity, making the best use of the tools and time available and taking responsibility for the obligations involved.

Loyalty

Individuals are required to be loyal to the company.

Honesty

Within the scope of their work activities, company personnel are required to be familiar with and diligently comply with the 231 Model and applicable laws. Honesty represents a fundamental principle for all company activities and initiatives and constitutes an essential value in organizational management.

Relationships with stakeholders, at all levels, must be guided by principles and behaviors of fairness, cooperation, loyalty, and mutual respect. Under no circumstances may the pursuit of the company's interests justify dishonest conduct.

Legality

The organization is committed to complying with all national and international laws, regulations, directives, and generally recognized practices. Furthermore, it guides its decisions and actions with a focus on the protection of the public interest entrusted to it.

Fairness and transparency

People do not use information, assets, or equipment available to them in the performance of their duties or assigned tasks for personal purposes. Each individual does not accept or exert, for themselves or others, pressures, recommendations, or reports that could harm the company or provide undue advantages to themselves, the company, or third parties. Each individual rejects and does not make promises of improper offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favoring any interest group or individual.

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Confidentiality

Individuals ensure the highest level of confidentiality regarding news and information that constitute the company's assets or relate to its business activities, in compliance with legal provisions, applicable regulations, and internal procedures. Furthermore, company personnel are required not to use confidential information for purposes unrelated to the performance of their duties.

Responsibility towards the community

The company, aware of its social role in its reference area, in economic and social development, and in the general well-being of the community, intends to operate with respect for both national and local communities, supporting initiatives of cultural and social value in order to enhance its reputation and legitimacy to operate.

Conflict of interest resolution

In the performance of their work activities, individuals pursue the company's overall objectives and interests. They promptly inform their superiors or designated contacts of any situations or activities in which there may be a conflict of interest with the company, either involving themselves or their close relatives, as well as in any other case where significant considerations of convenience arise. Individuals comply with the decisions made by the company in this regard.

Sense of belonging

In the performance of their work activities, individuals strive to do everything that does not hinder or in any way undermine the development of a sense of belonging among people toward their organization, work group, or external parties.

Mutual respect

All individuals involved, in any capacity, in collaboration with the Company require and actively demonstrate respect for roles, competencies, and work practices, including by refraining from expressing personal opinions to third parties.

Specific obligations

The Company's employees shall comply with the instructions set out below:

Transparency

As a general principle, all information relating to the activities carried out within the Company should be accessible to everyone.

Each collaborator is required to liaise with their direct supervisor and colleagues regarding the tasks they perform.

In the event of misunderstandings or issues, it is the duty of each individual to first consult with their direct supervisor or designated contact person.

Individuals shall act with scrupulous loyalty and independence, free from any form of influence that could affect their conduct, both in relation to their Client and in relation to external Organizations that maintain relationships with the Client.

They shall not engage in improper financial relationships, nor accept gifts of value or favors of any kind from Organizations or suppliers of the Client.

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Upon acceptance of the professional assignment, or during its execution, any relationship or shared interest with external Organizations that maintain relationships with the Client and that may give rise to conflicts of interest must be disclosed.

Consistency

Once a commitment is undertaken, it must be fulfilled. Work shall never be left unfinished, and commitments shall never be assumed when one is already aware of being unable to meet them.

Courtesy and kindness

Courtesy and kindness are and must remain the foundation of all daily activities; they must also be consistently demonstrated in interpersonal relationships, both within the Company and with external parties.

Punctuality

If one is going to be late for an appointment, it is good practice to notify the relevant parties before the agreed time; doing so afterward is considered discourteous. Punctuality is a form of respect toward those who are waiting.

Confidentiality

All information and data handled in the workplace are the property of the Company and are confidential; they must be treated as such. In particular, work-related issues or situations should never be discussed in public places where they may be overheard, or in the presence of individuals who are not authorized to access such information.

Professionalism

Being professional means understanding all appropriate behaviors and possessing everything necessary to perform one's work to the highest standard, while taking into account the needs of both clients and the Company. Regardless of the activity being carried out, it is always essential to act professionally.

Work Environment

Everyone should have the ability to understand the dynamics underlying interpersonal relationships and adopt behavior consistent with the relevant context, always striving to maintain a courteous, friendly, and collaborative atmosphere with colleagues.

Loyalty and Corporate Respect

It is the duty of everyone to uphold the Company's policies and to ensure they are respected. In daily activities, each collaborator should consistently safeguard the Company's interests and reputation, while showing the utmost respect for Company property. When carrying out their duties, individuals should always consider the economic implications of their decisions and avoid any waste.

Respect for the Client

The Company, like all businesses in a free market, exists thanks to its clients. Respect, kindness, and courtesy should be consistently demonstrated by everyone who interacts with the organization.

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Workstation

Each collaborator is responsible for their own workstation. It is each individual's duty to maintain and keep clean the tools and equipment at their disposal.

Personal computer

The personal computers provided must be maintained in optimal condition, and no software other than that specified in the Company's configuration may be installed.

Hardware equipment supplied by the Company constitutes work tools and may not be used for personal purposes.

In particular, the files contained on such devices are Company property and may not be arbitrarily damaged or destroyed.

The use of hardware devices for copying and/or storing files and data—such as USB drives, laptops, optical disks, burners, or any other electronic storage media—is strictly prohibited, unless expressly authorized in advance by the Company.

Internet

Internet access is a work tool and, as such, must be used accordingly.

Use of the Internet for personal purposes is only permitted outside working hours.

Internet use:

- Is not allowed for websites that are not directly related to the performance of assigned duties, particularly those that may reveal an employee's political, religious, or union opinions.
- Is not allowed for any type of financial transaction, including remote banking, online purchases, and similar activities, except in cases explicitly authorized by the Company and in compliance with standard purchasing procedures.
- Is not allowed to download or install free software (freeware), shareware, P2P, and/or FTP programs from the Internet, unless expressly authorized by the Company.
- Registration to websites whose content is not work-related is strictly prohibited.
- Participation in forums or use of chat lines for non-professional reasons is not permitted. Likewise, storing electronic documents containing offensive and/or discriminatory content based on sex, language, religion, race, ethnic origin, opinion, union affiliation, political beliefs, or similar is strictly prohibited.

Email

Email is a Company tool and should not be considered private correspondence. Accordingly:

- Any email message (as it relates to work activities) may be copied and/or disclosed at any time.
- The use of email (both internal and external) for purposes unrelated to the performance of assigned duties is not permitted.

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- It is prohibited to send or store messages (internal or external) containing offensive or discriminatory content based on sex, language, religion, race, ethnic origin, opinion, union affiliation, political beliefs, or similar.
- The configuration or use of email accounts external to the Company is not permitted.

Mobile Phones

The use of mobile phones is subject to rules of proper conduct that should always be observed. Being a work tool, mobile phones should always be kept on silent mode during meetings and client appointments, especially when on the client's premises.

Personal use of mobile phones should be kept to a minimum and reserved for emergencies only.

Company Vehicles

The company vehicle is under the full responsibility of the person to whom it has been assigned.

Like all Company assets, it must be used and maintained with the utmost care.

It must be driven in full compliance with the requirements of the Highway Code.

The assigned driver is responsible for the vehicle's cleanliness, maintenance, and ensuring that it is always in optimal working condition.

Any fines resulting from violations of traffic laws remain the responsibility of the driver.

Private Vehicles

The use of a private vehicle for work purposes is permitted, and, as with a company vehicle, the driver must operate in full compliance with the requirements of the Highway Code.

Any fines resulting from traffic violations remain the responsibility of the driver.

CODE OF CONDUCT

Introduction

The rules set out in this section are intended to guide the recipients of this Code of Ethics regarding the attitudes and behaviors to be observed while carrying out various Company activities, in accordance with the values on which this document is based.

All recipients of this Code of Ethics must conduct themselves with integrity and transparency in the performance of their duties, thereby contributing to the effectiveness of the internal control system in safeguarding the Company's value.

In compliance with applicable laws, all recipients must maintain an approach characterized by cooperation with the Company's governing bodies and regulatory authorities.

Relations with Personnel

Personnel Selection

The evaluation of personnel for recruitment or collaboration is carried out based on the alignment of candidates' profiles with the expected requirements and internal needs, ensuring equal opportunities for all applicants. The information requested is strictly related to the assessment of the professional and psycho-attitudinal aspects of the candidate, respecting their privacy and personal opinions.

In its selection activities, the General Management implements appropriate measures to prevent favoritism or any form of preferential treatment and conducts a careful selection process based not

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only on mandatory requirements but also on preferential criteria established by the Board of Directors.

Establishment of the Employment Relationship

Personnel are hired under a regular employment contract, professional service agreement, or internship arrangement; no form of irregular or unauthorized work is tolerated.

Integrity and Protection of the Individual

In the context of personnel management and development processes, as well as during selection, decisions are based on the alignment between the required profiles and the individuals' qualifications and/or on merit-based considerations. Access to roles and assignments is determined by skills and competencies. Furthermore, consistent with overall work efficiency, flexible work arrangements are encouraged to support employees on maternity leave as well as those who need to care for their children.

Health and Safety

The Company is committed to providing a work environment that protects the health and safety of its personnel, promoting and consolidating a culture of safety, raising awareness of risks, and encouraging responsible behavior by all employees.

The Company also acts to preserve, primarily through preventive measures, the health and safety of its workers. Among its main objectives is the protection of human resources, seeking synergies not only internally but also with suppliers, external consultants, and clients involved in Company activities.

All employees are required to comply with internal rules and procedures regarding risk prevention and health and safety protection, and to promptly report any deficiencies or violations of applicable regulations.

The Company adopts general measures to safeguard health and safety in the workplace as prescribed by law, with particular reference to Legislative Decree 81/08 and subsequent amendments. The organization is committed to strict compliance with all regulations concerning workplace health and safety for employees, collaborators, and users. In particular, the Company:

- Defines operational procedures to follow and coordinates activities related to occupational health and safety;
- Ensures the application of current regulations, including through the preparation of risk assessment documents and the definition of work procedures aligned with current safety standards;
- Continuously monitors legislative updates and implements them accordingly.

The Company also undertakes to ensure:

- Assessment of all health and safety risks;
- Planning of preventive measures integrating operational conditions and the influence of environmental and organizational factors;

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- Elimination of risks, or where this is not possible, their reduction to a minimum based on current technical knowledge;
- Compliance with ergonomic principles in workplace design, equipment selection, and the definition of work methods and service delivery, particularly to reduce the effects of monotonous or repetitive work;
- Reduction of risks at the source;
- Replacement of hazardous elements with non-hazardous or less hazardous ones;
- Minimization of the number of workers exposed to risk;
- Limited use of chemical, physical, and biological agents in the workplace;
- Priority of collective protection measures over individual protection measures;
- Health monitoring of workers;
- Removal of workers from risk exposure for personal health reasons and, where possible, reassignment to other tasks;
- Adequate information and training for workers, managers, supervisors, the Workers' Safety Representative (RLS), and all personnel;
- Proper instructions for workers;
- Participation and consultation of workers and the RLS;
- Planning of measures aimed at continuously improving safety levels, including adoption of codes of conduct and best practices;
- Emergency procedures for first aid, fire fighting, worker evacuation, and serious and immediate hazards;
- Use of warning and safety signs;
- Regular maintenance of premises, equipment, and systems, with particular attention to any safety devices in accordance with manufacturers' instructions;
- Adequate instructions and training for employees, collaborators, and users in accordance with legal requirements and the applicable National Collective Labour Agreement (CCNL).

Privacy Protection

In processing the personal data of its personnel, the Company complies with the provisions of European Regulation 679/2016 (GDPR). Individuals are provided with a privacy notice specifying:

- The purposes and methods of data processing;
- Any parties to whom the data may be disclosed;
- The information necessary to exercise the right of access under Article 15 of the GDPR.

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Where required by law, individuals are asked to provide specific consent for the processing of their personal data. Any investigation into employees' or collaborators' ideas, preferences, personal tastes, or, more generally, private life is strictly prohibited.

The same procedures apply to the electronic management of personal information and data.

Environmental Protection

The organization is committed to protecting the environment by complying with national and EU legislation and regulations.

It undertakes to prevent pollution and to raise awareness among employees and collaborators on environmental issues.

Doveri del personale

Individuals must act with integrity to fulfill the obligations set forth in their employment contract and in this Code of Ethics, ensuring the required performance.

Delegations and Responsibilities

Through specific resolutions and/or dedicated procedures, the duties, responsibilities, and authority of directors, employees, and collaborators are defined. These duties, responsibilities, and authority must be understood, accepted, and respected.

Obligations of Function Managers Regarding the Code of Ethics

Each function manager, as identified in the organizational chart, job description, and/or delegation system, is required to:

- Ensure compliance with the Code of Ethics by individuals directly or indirectly under their responsibility;
- Set an example for their employees/collaborators through their own conduct;
- Promote understanding among employees that the provisions of this Code of Ethics form an integral part of their work performance;
- Promptly report to General Management, any designated delegate, or the Supervisory Body (O.d.V.) any reports or specific needs from their subordinates.

Failure by function managers to comply with the obligations set forth in this chapter may result in the application of disciplinary measures, as provided by the disciplinary system.

Obligations of All Employees Regarding the Code of Ethics and Company-Produced Documentation

Each employee is required to be familiar with the provisions contained in the Code of Ethics, as well as those referenced therein, and with the applicable legal regulations governing the activities performed within their role, which form an integral part of each employee's work performance.

An employee who becomes aware of alleged unlawful conduct is obliged to report such information only to their direct supervisor, the Supervisory Body (O.d.V.), and/or General Management, following the procedures established by the internal reporting system.

General Management implements monitoring systems to ensure that employees, collaborators, and other relevant personnel have actually read and understood mandatory legal documents,

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using anonymous tests and taking appropriate actions to continuously increase awareness and comprehension of the content.

Employees are also required to:

- Refrain from behaviors that violate these provisions and regulations;
- Consult their direct supervisors, the O.d.V., or any designated delegate responsible for managing the prevention model for guidance on the application of the Code of Ethics or relevant regulations;
- Promptly report to at least one of the aforementioned parties any information regarding possible violations of the Code of Ethics;
- Cooperate with the organization in any investigations aimed at verifying and, if necessary, sanctioning potential violations.

These behavioral requirements also apply to external consultants and all types of collaborators.

Protection of Company Assets

Each recipient is required to act diligently to protect Company assets from improper or incorrect use.

Individuals must be aware of and implement internal policies regarding information security to ensure integrity, confidentiality, and availability.

Information and know-how must be protected with the highest level of confidentiality. Key data acquired or generated by the Company in the course of its activities must be considered confidential and treated with appropriate care; this also includes information obtained from or concerning third parties (clients, contacts, partners, employees, etc.).

Persons who, in the performance of their duties, come into possession of confidential information, materials, or documents must inform their supervisors.

Both during and after the termination of employment with the Company, individuals may use confidential data exclusively in the interest of the Company and never for personal benefit or for the benefit of third parties.

Confidential Information Regarding Third Parties

Company personnel must refrain from using illicit means to obtain confidential information about other organizations or third parties.

Those who, within the scope of a contractual relationship, become aware of confidential information concerning other parties are required to use it solely for the purposes specified in the contract.

Without proper authorization, individuals may not request, receive, or use confidential information regarding third parties. If confidential information about another party is acquired that is not already subject to a non-disclosure agreement or other protective measures, the individual must consult their supervisor for guidance on how to handle such information.

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Use of Company Assets

Every individual is required to act diligently to protect Company assets through responsible behavior in line with the operational procedures established to regulate their use, accurately documenting their utilization.

In particular, all personnel must:

- Use the assets entrusted to them carefully and sparingly;
- Avoid improper use of Company assets that could cause damage, reduce efficiency, or otherwise conflict with the Company's interests;
- Properly safeguard the resources entrusted to them and promptly inform the relevant departments of any threats or harmful events affecting the Company.

Regarding IT applications, each individual is specifically required to:

- Strictly follow the Company's security policies to avoid compromising the functionality and protection of IT systems;
- Refrain from sending threatening or offensive emails, using inappropriate language, or making comments that could harm individuals or the Company's image;
- Avoid browsing websites with indecent, offensive, or non-professional content.

Relations with Clients

For further details, reference should also be made to the operational procedures of the management system.

Impartiality

The Company is committed to providing its products and services without any discrimination among different types of clients.

Contracts and Communications with Clients

Contracts and communications with clients by the Company must always be:

- Clear and simple, using language as close as possible to that normally used by the recipients;
- Compliant with current regulations and structured so as not to constitute evasive or otherwise improper practices;
- Complete, so as not to omit any element relevant to the client's decision-making.

Staff Conduct Towards Clients

The conduct of Company personnel towards clients is guided by availability, respect, and courtesy, with a focus on fostering a collaborative relationship and maintaining a high level of professionalism.

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Data Processing

In processing clients' personal data, the Organization complies with the provisions of European Regulation 679/2016 (GDPR).

A privacy notice is provided, specifying:

- The purposes and methods of data processing;
- Any parties to whom the data may be disclosed;
- The information necessary to exercise the right of access under Article 15 of the GDPR.

Where required by law, clients are asked to provide specific consent for the processing of their personal data. Any investigation into clients' ideas, preferences, personal tastes, or, more generally, private life is strictly prohibited.

Personnel are required to handle all data with the utmost discretion and confidentiality, particularly with regard to internal parties. The same procedures apply to the electronic management of personal information and data.

Relations with Suppliers

Supplier Selection

Purchasing processes are guided by the principles of:

- Seeking the greatest competitive advantage for the Company;
- Ensuring equal opportunities for suppliers;
- Acting with fairness;
- Maintaining impartiality.

The selection of suppliers and the determination of purchasing conditions are based on an objective evaluation of quality, price, actual availability of the goods or services, as well as guarantees of support and timeliness.

An additional selection criterion is the exclusion of suppliers who are subject to criminal proceedings related to contracts or other activities of a mafia-related nature.

Integrity and Independence in Relations

Relations with suppliers, including those concerning financial and consulting contracts, are subject to continuous monitoring by the Company.

Entering into a contract with a supplier must always be based on clear and transparent relationships, avoiding, wherever possible, any forms of dependency.

Documents exchanged with suppliers must be properly archived; in particular, accounting-related documents must be retained for the periods required by current legislation.

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Relations with Public Authorities

This section addresses the relationships between the Company and public authorities.

Correctness and Fairness

The Company aims to conduct its relationships with Public Authorities with the highest standards of transparency and ethical behavior. Such relationships, which must comply with applicable laws, are guided by the general principles of correctness and fairness so as not to compromise the integrity of either party.

Gifts, Presents, and Benefits

No employee of the Company may give money or offer economic advantages or any other type of benefit to representatives of Public Authorities in order to obtain assignments or other personal or corporate benefits.

No form of gift is allowed that could be interpreted as exceeding normal commercial or courtesy practices, or that is intended to secure preferential treatment in the conduct of any activity related to the Company. In this context, a “normal commercial or courtesy practice” is considered a gift with a value of less than €100.00.

Specifically, any form of gift to Italian or foreign public officials, or to their family members, that could influence their independence of judgment to obtain more favorable treatment, undue services, or other advantages, is strictly prohibited.

A gift is understood as any type of benefit: not only tangible goods but also, for example, free participation in conferences, training courses, promises of employment, etc.

The above rules cannot be circumvented through third parties: acts of corruption include not only illicit payments made directly to public authorities or their employees, but also payments made to persons acting on their behalf.

On the occasion of anniversaries, holidays, or similar events, the donation of modest gifts is permitted, provided it is within limits approved by the Board of Directors or General Management and communicated to the Supervisory Body (O.d.V.) with proper documentation to allow appropriate verification.

If a Company employee receives explicit or implicit requests for benefits from a member of a Public Authority, they must immediately inform the Board of Directors or the relevant reporting authority so that appropriate checks and actions can be taken.

External Relations

This section covers the details regarding the Company's external relations.

External Effectiveness of the Code of Ethics

Anyone acting in the name and on behalf of the Company who comes into contact with third parties—with whom the Organization intends to establish commercial relations or with whom it must maintain institutional, social, political, or any other type of relations—is obliged to:

- Inform such parties of the commitments and obligations imposed by the Code of Ethics.

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- Ensure that the obligations of the Code of Ethics are respected in the performance of their activities.
- Take the necessary actions in the event that third parties refuse to comply with the Code of Ethics, or in cases of incomplete or non-performance of their commitment to observe the provisions of the Code, promptly informing General Management or its delegates and the Supervisory Body (O.d.V.).

Conflict of Interest

All recipients must ensure that any decision made in the course of their activities is taken in the best interest of the company.

All recipients are required to avoid any activity or situation of personal interest that constitutes, or could potentially constitute, a conflict between their own interests and those of the organization. In any case, they must comply with the specific procedures adopted by the company on this matter.

All recipients of the Code of Ethics must refrain from taking advantage of their relationship with the company to benefit themselves or third parties to the detriment or disadvantage of the organization.

Employees are prohibited from participating, directly or indirectly, in any commercial initiatives that place them in direct competition with the company, unless such participation has been previously communicated to the competent Board of Directors and approved by it, after consulting the Supervisory Body (O.d.V.).

In the event that actual or potential conflicts of interest are identified, whether internal or external to the company's activities, each involved party is required to refrain from engaging in the conflicting conduct and promptly inform the O.d.V., which will assess, case by case, the existence of any incompatibility or situation of prejudice.

Competitive Practices

For the company, it is of primary importance that the market is based on fair and honest competition.

The company is committed to scrupulously complying with applicable laws and to cooperating with market regulatory authorities. In particular:

- it undertakes to carry out activities in accordance with the purpose of the law for the supply of goods and services assigned through formal agreements with public entities, including economic bodies and publicly-owned companies;
- it competes fairly in the market, respecting competition rules;
- it is committed to providing accurate information about its activities, both internally and externally, in response to legitimate requests;
- it ensures the truthfulness and accuracy of corporate data related to financial statements, reports, and other official documents.

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Gifts and Benefits

See the previous chapter: “Gifts, Presents, and Benefits.”

APPLICATION MECHANISMS OF THE CODE OF ETHICS

Organizational Principles

The company ensures that the organizational system is based on the principle of separation between those who decide, those who execute, and those who control. In particular, the organization makes all operations verifiable because they are properly recorded.

The company requires that individuals performing audit or review functions ensure the accuracy and correctness of data and information.

Every operation and/or activity must be lawful, authorized, consistent, documented, and verifiable, in accordance with the principle of traceability and company procedures, following criteria of prudence and safeguarding the company’s interests.

Company procedures must allow for controls over operations, authorization processes, and the execution of the operations themselves.

Any employee or collaborator carrying out operations involving money, assets, or other economically quantifiable benefits belonging to the company must reasonably provide appropriate evidence to allow verification of these operations.

Controls and Verifications

The company ensures, through competent personnel, the availability of all information and access to documents, as well as any requests necessary for auditing and control bodies.

The company guarantees access to all information and documents to entitled parties and, through the availability of its administrators and employees responsible for their functions, provides all information that facilitates the exercise of supervisory duties.

The organization prohibits its administrators, employees, and/or collaborators from making false statements or presenting false documents, or documents certifying untrue situations, including via IT systems, with the aim of unlawfully obtaining public funds and/or acquiring or maintaining any benefits.

Supervision Regarding the Implementation of the Code of Ethics

The task of verifying the implementation and application of the Code of Ethics falls to:

- The Board of Directors
- The General Management
- Coordinators
- The Supervisory Body (Organismo di Vigilanza, O.d.V.): in particular, this body, in addition to monitoring compliance with the Code of Ethics, has access to all sources of information within the company for this purpose and recommends appropriate updates to the Code, also based on reports received from personnel.

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The following duties are assigned to the O.d.V.:

- Communicate to General Management, for the adoption of appropriate measures, any reports received regarding violations of the Code of Ethics
- Provide binding opinions regarding the review of the most significant policies and procedures to ensure consistency with the Code of Ethics
- Contribute to the periodic review of the Code of Ethics: to this end, the O.d.V. formulates proposals to the Board of Directors, which evaluates, approves, and formalizes them as appropriate

The O.d.V. maintains autonomy and independence, assumes investigative and control powers, as well as the authority to initiate actions necessary for the fulfillment of its assigned functions.

Reporting Issues or Suspected Violations

Any violations of the Code of Ethics by recipients are subject to the disciplinary framework outlined in the company's 231 Model.

In the event of a breach, the company may take disciplinary action against those responsible, whenever necessary to safeguard the organization's interests. Such measures may include termination of employment, in addition to compensation for any resulting damages.

Non-compliance with the Code of Ethics by members of corporate bodies may lead the competent authorities within the organization to implement the most appropriate measures permitted under the law.

For employees, violations of the Code of Ethics constitute a breach of employment obligations, with all associated contractual and legal consequences, including classification as a disciplinary offense.

Suppliers and external collaborators are subject to sanctions in accordance with the terms of their contractual agreements, without prejudice to more serious legal violations.

Special attention is given to the handling of data within internal IT systems: any issues or suspected breaches must be reported immediately to the IT Manager and/or General Management for appropriate action.

Disciplinary actions ensuing from violations

The provisions of this Code of Ethics form an integral part of the contractual obligations assumed by employees as well as by parties having business relationships with the company.

Violations of the principles and conduct set out in the Code of Ethics undermine the trust relationship between the company and the parties responsible for the violation, whether they are directors, employees, consultants, collaborators, clients, or suppliers.

For details on the disciplinary system and sanctioning mechanisms, reference should be made to the company's adopted 231 Model.

In general, violations will be addressed as follows:

- For employees (including members of corporate bodies and the Supervisory Board): appropriate disciplinary measures will be applied, regardless of any criminal relevance of the conduct or the initiation of criminal proceedings if the behavior constitutes an offense. Sanctions will be consistent with the rules and principles of the applicable employment contract. Disciplinary measures may range from warnings or reprimands to unpaid

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suspension, demotion, and, in the most serious cases, dismissal. Prior to any disciplinary action, the individual concerned will be given the opportunity to explain their behavior.

- For consultants, collaborators, clients, suppliers, and other parties with contractual relationships with the company: specific procedures will be implemented to resolve the contractual relationship.

Furthermore, the company reserves the right to claim compensation for any damages it may suffer as a result of violations of the provisions contained in the Code of Ethics by the parties mentioned above.

Public service assignment

When performing public service activities, the company applies the following conduct:

- Respect for the principles of impartiality, as typically required in public administration;
- Non-acceptance of benefits, money, or any form of undue advantage;
- Rejection of any illegitimate influence from third parties;
- Avoidance of conflicts of interest by its appointees.

Confidentiality

Recipients are required to maintain the highest level of confidentiality regarding information, documents, studies, initiatives, projects, and contracts encountered in the performance of their duties.

The company implements measures to protect the information it manages and to prevent access by unauthorized personnel.

Dissemination, Communication, and Training

This Code of Ethics is made known to all internal and external parties concerned or otherwise involved in the company's mission through appropriate communication and training activities.

Operational procedures and decision-making protocols

This Code of Ethics is an integral part of and implements the 231 Model adopted by the company for the prevention of crimes committed in the interest or to the benefit of the organization by the individuals specified in Legislative Decree 231 of June 8, 2001. In order to prevent violations of applicable laws as well as of the Code of Ethics itself, the company has established the adoption of specific procedures by all those involved in the operational process. These procedures are aimed at identifying the individuals responsible for the decision-making, authorization, and execution of operations.

Delegation system

Apart from the already qualified individuals, the company utilizes a delegation system, under which certain activities may only be carried out by individuals expressly authorized to do so, as they hold specific powers granted through an official delegation and/or notarial power of attorney. It is essential that each operation is performed in its various stages by different individuals, whose responsibilities are clearly defined and well understood within the organization, in order to avoid granting unlimited or excessive powers to any single individual.

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FINAL PROVISIONS

Conflicts with the Code of Ethics

In cases where any provision of this Code of Ethics conflicts with the provisions outlined in internal regulations or procedures, the Code of Ethics shall prevail over any such provisions.

Approval and Amendment Process

This Code of Ethics was initially approved by the company's Board of Directors.

Any amendments and/or additions to this Code of Ethics will be approved by the Board of Directors, following consultation with the Supervisory Board (OdV), and will be promptly communicated to all recipients, particularly:

- The Supervisory Board (OdV) periodically reviews the Code of Ethics for any legislative or corporate changes and proposes any necessary amendments and/or additions.
- Any amendments and/or additions will be developed, upon the mandate of the Board of Directors, either by a third party following a formal assignment or by the Supervisory Board (OdV) upon an extension of its current mandate.
- The Board of Directors reviews the proposals and decides accordingly, making the approved amendments immediately effective.