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PIÙ MOVIMODA S.R.L.

Registered Office in Naples (NA), Piazza dei Martiri No. 30

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 Entities"

This "Organizational, Management and Control Model" (hereinafter the "Model") of Più Movimoda S.r.l. (hereinafter the "Company" or "Più Movimoda") has been prepared in implementation of the provisions set forth in Articles 6 and 7 of Legislative Decree No. 231 of 2001, as subsequently amended and supplemented (hereinafter the "Decree").

It was adopted by the Company by resolution of the Board of Directors and shall be effectively implemented through its progressive application (including any amendments that may become necessary as a result of legislative changes and developments in this regard) by the Board of Directors itself and by the Supervisory Body.

The "Model" represents the direct management reference framework designed as the instrument aimed at preventing the criminal offences 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 towards those with whom it interacts in the conduct of its business.

In full alignment with the positions expressed and protected by the accreditation system to which it adheres, the organization is aware that, through its operations—carried out with a sense of responsibility and moral integrity—it contributes to the development of the Italian economy and to the country's civil growth.

The Company believes in the value of work and considers legality, fairness, and transparency in conduct to be essential prerequisites for achieving its economic, production, and social objectives.

The Company affirms the appropriateness of its Code of Ethics in pursuing its corporate mission.

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

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

Any violation of its provisions shall therefore constitute a disciplinary offence and, as such, shall be pursued and sanctioned by the Company and may result in compensation for damages caused to the organization.

With regard to collaborators, consultants, and self-employed workers (identified below among the addressees) who perform activities on behalf of the Company, as well as other third parties, the signing of this Code of Ethics or an excerpt thereof—or, in any case, adherence to its provisions and principles—shall constitute a *conditio sine qua non* for the execution of contracts of any kind between the Company and such parties. The provisions thus signed or otherwise approved, including by conduct, shall form an integral part of such contracts.

In light of the foregoing, any violations by the parties referred to in the preceding paragraph of specific provisions of the Code of Ethics may, depending on their seriousness, entitle the Company to withdraw from 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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ADDRESSEES

By adopting the Code of Ethics, the Company intends to define moral values, clear rules, and procedures to be followed.

The Code of Ethics is addressed to:

- members of corporate bodies;
- employees (both fixed-term and permanent);
- project-based collaborators;
- external and internal consultants;
- suppliers of goods and services;
- any other party who may act in the name and on behalf of the Company, directly or indirectly, on a permanent or temporary basis, or those who establish relationships with the Company and operate to pursue its objectives.

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

The Code of Ethics shall be made available to them as specified below.

The Company's Management, or a delegate thereof, is responsible for the effective implementation of the Code of Ethics and for its dissemination both within and outside the organization.

Company employees, in addition to complying with applicable laws and collective bargaining agreements where applicable, undertake to align the performance of their work with the purposes and provisions set out 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.

Compliance with the principles and provisions contained in this Code of Ethics is an essential requirement for any fruitful collaborative relationship with the Company.

Accordingly, at the time of entering into contracts or agreements with other recipients, the Company provides them with a copy of this document.

PRINCIPLES OF CONDUCT FOR THE ORGANIZATION

The principles listed below are considered fundamental, and the organization undertakes to comply with them towards all parties.

It is essential that these values do not remain mere statements but are translated into conduct and behavior inherent in the Company.

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

The fundamental values underlying the Company's activities are:

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- integrity in compliance with Laws and Regulations;
- rejection of all forms of discrimination;
- centrality, development, and enhancement of human resources and fairness in the exercise of authority;
- local rootedness;
- transparency and business ethics;
- quality;
- diversity;
- legality and the fight against terrorism and crime.

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

Integrity in Compliance with Laws and Regulations

The Company undertakes to provide high-quality services and to compete in the market according to principles of fair and free competition and transparency, maintaining proper relations with all public, governmental, and administrative institutions, citizens, and third-party companies.

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 strives to ensure that all personnel act accordingly: individuals must behave in compliance with the law regardless of the context, activities performed, or locations in which they operate.

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

The Company shall not initiate or continue any relationship with parties unwilling to align with this principle.

Rejection of All Forms of Discrimination

In decisions affecting relations with stakeholders (personnel management and work organization, selection and management of suppliers, relations with the local community and its representative institutions), the organization avoids any discrimination based on age, gender, sexual orientation, health status, race, nationality, political opinions, or religious beliefs.

Centrality, Development and Enhancement of Human Resources and Fairness in the Exercise of Authority

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

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The Company has always placed professionalism and individual contribution at the center of its operations, maintaining a relationship style that recognizes each person's work as a fundamental element of both corporate and personal development.

At the same time, the Company promotes dialogue, information exchange at all levels, professional development and training of its collaborators, and the creation of a corporate identity and sense of belonging.

This value is reflected in:

- the creation of a work environment capable of enhancing individual contributions and potential through gradual empowerment;
- the development of a relationship system that favors teamwork over hierarchical relationships;
- daily efforts aimed at sharing skills and knowledge, including through innovative systems.

The Company attaches the utmost importance to those who work within its organization, 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 required to demonstrate professionalism, dedication, loyalty, team spirit, mutual respect, a sense of belonging, and integrity.

In managing contractual relationships involving hierarchical relations, the Company undertakes to ensure that authority is exercised fairly and properly and that any form of abuse is avoided; in particular, the Company ensures that authority does not become an exercise of power detrimental to the dignity and autonomy of the individual.

These values must always be safeguarded when making decisions regarding work organization.

Local Rootedness

The Company aims to implement projects designed to directly involve citizens, public and private institutions, businesses, and associations in matters relating to health education, prevention, and personal well-being. The Company acts—and will continue to act—to ensure that the entities collaborating with it comply with the same standards of conduct and orient their activities toward the same principles and values.

The Company also promotes local development through strong connections with the various stakeholders within the local community. It operates within the local community to foster the development of a rich and generative society, capable of recognizing and enhancing its resources, skills, and potential, as well as gender, cultural, and ethnic differences, promoting well-being, integration, and social development, and enhancing recognition by both service users and those who physically provide the services.

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Transparency and Business Ethics

The history, identity, and values of the organization are expressed through a business ethics founded on:

- Reliability: understood as a guarantee of absolute seriousness in launched projects, transactions, and undertaken commitments;
- Stability: referring to an entity based on solid financial foundations, as evidenced by its long-standing operations;
- Transparency: deriving from its conception of social responsibility, which requires not only compliance with ethical principles and standards but also the adoption of methods enabling reference communities and social stakeholders to access information and understand its activities;
- Fairness in contractual matters: avoiding, in existing relationships, any attempt by those acting in the name and on behalf of the Company to exploit contractual gaps or unforeseen events to renegotiate agreements solely to take advantage of a counterpart's position of dependence or weakness;
- Protection of competition: refraining from collusive, predatory, or abuse-of-dominant-position practices.

Quality

Quality is a distinctive element of the Company. The organization is committed to and responsible for ensuring quality in every activity, in line with its long-term strategy.

The Company carries out its activities through a set of processes managed by rules and procedures tailored to each warehouse, according to different customer requirements and logistical specifications.

Diversity

The Company requires its directors, employees, and collaborators to behave in a manner that guarantees the utmost respect for human dignity. Therefore, the organization:

- ensures strict compliance with regulations protecting child labor and minors, as well as workers' freedoms and rights;
- guarantees conditions allowing free membership in trade unions;
- does not tolerate violations of human rights;
- promotes integration within the broader social fabric as a form of collective enrichment.

The Company condemns all forms of discrimination based on gender, ethnic origin, political affiliation, or religion.

Legality and the Fight Against Terrorism and Crime

The Company firmly believes in democratic values and condemns any activity aimed at terrorism or subversion of the democratic order.

The organization also condemns any activity involving:

- forgery, counterfeiting, alteration, and/or circulation of currency, public credit cards, or revenue stamps;
- acceptance and handling of proceeds from criminal activities (money laundering);

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- unauthorized access to external IT systems;
- unlawful possession of access codes;
- damage to equipment or data;
- fraud in the management of electronic signature certification;
- unlawful interception, obstruction, or interruption of IT communications;
- dissemination of ideas promoting tolerance or silence (omertà) regarding drug use or any form of addiction;
- incitement to commit unlawful acts or acts contrary to moral principles;
- negligence in combating violence, damage to public property, and non-compliance with internal regulations.

SOCIAL STAKEHOLDERS

Customers

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

In this context, the organization ensures the best possible execution of entrusted assignments and is constantly oriented toward proposing increasingly advanced and innovative solutions, with a focus on integration, effectiveness, efficiency, and cost-effectiveness.

The Company provides accurate, complete, and truthful information to enable customers to make rational and informed decisions. It protects customer privacy in accordance with applicable regulations and undertakes not to disclose or disseminate personal data, except as required by law.

The Company 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.

For this reason, financial institutions are selected based on their reputation and adherence to values comparable to those expressed in this Code of Ethics.

Suppliers

Suppliers of Goods and Services

The Company establishes collaborative relationships with suppliers in compliance with applicable regulations and the principles of this Code of Ethics, with attention to the highest professional standards and best practices in ethics, health and safety protection, and environmental protection.

Internal and External Consultants

Consultants are selected based on professionalism, reputation, reliability, and adherence to values comparable to those expressed in this document.

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Relationships with consultants are based on transparent agreements and constructive dialogue aimed at achieving common objectives, in compliance with regulations and the principles of this Code of Ethics.

Public Administration

The term Public Administration refers to any person or entity qualifying as a Public Official or Person in Charge of a Public Service acting on behalf of central or local Public Administration bodies, Supervisory Authorities, Independent Authorities, European Institutions, or private partners entrusted with a Public Service.

In its relations with the Public Administration, the Company bases its conduct on principles of fairness and honesty. Accordingly, individuals appointed by the Company to manage any negotiation, request, or institutional relationship with the Public Administration—whether Italian or foreign—must not improperly influence its decisions or engage in unlawful conduct, such as offering money or other benefits that could affect the impartial judgment of a Public Administration representative.

Individuals assigned to manage relations with Public Administration authorities must ensure that any information provided, in any form and for any purpose, is truthful, accurate, and correct. Only those expressly authorized by the Company may have direct contact with the Public Administration on its behalf.

No other collaborator may engage in any form of relationship with the Public Administration regarding activities falling within the Company's corporate purpose.

In public procurement procedures, Company representatives must comply with applicable laws and regulations.

Employment Relationships with Former Public Administration Employees

The hiring of former Public Administration employees who, in the exercise of their duties, had dealings with the Company—or their relatives and/or in-laws—must be carried out in strict compliance with the Company's standard personnel selection procedures.

The establishment of other employment and/or consultancy relationships with former Public Administration employees or their relatives and/or in-laws must also comply strictly with standard procedures.

Grants and Funding

Contributions, grants, or funding obtained from the European Union, the State, or any other Public Authority, even if of modest value, must be used for the purposes for which they were requested and granted.

The Company prohibits 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 disbursed.

Similarly, when participating in public procedures, recipients of this Code of Ethics must operate in compliance with the law and sound commercial practices, avoiding in particular inducing Public Administrations to act improperly in favor of the Company.

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The organization undertakes to prevent actions that may lead recipients of this Code of Ethics to obtain unlawful advantages.

It also constitutes unlawful conduct to use altered or falsified statements or documents, omit information, or engage in deceptive practices aimed at obtaining concessions, authorizations, funding, or contributions from the European Union, the State, or any other Public Authority.

Public Supervisory Authorities

The recipients of this Code of Ethics undertake:

- to strictly comply with the provisions issued by the competent institutions or Public Supervisory Authorities in order to ensure compliance with applicable regulations in the sectors related to their respective areas of activity;
- not to submit, within the framework of investigations or proceedings involving Institutions and/or Public Supervisory Authorities, applications or requests containing untruthful statements for the purpose of obtaining public grants, contributions, subsidized financing, or improperly obtaining concessions, authorizations, licenses, or other administrative acts;
- to comply with any request from the above-mentioned institutions or authorities within the scope of their supervisory functions, providing — where required — full cooperation and refraining from any obstructive conduct.

Political Parties, Associations and Interest-Based Institutions

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

PRINCIPLES OF CONDUCT TO BE OBSERVED BY PERSONNEL

Professionalism

Each individual performs their work and duties with diligence, efficiency, and fairness, making the best use of the tools and time available and assuming responsibility for the related obligations.

Loyalty

Individuals are required to act loyally toward the Company.

Honesty

In the performance of their work activities, Company personnel are required to be familiar with and diligently comply with Model 231 and applicable laws. Honesty represents the fundamental principle for all Company activities and initiatives and constitutes an essential value of organizational management. Relations with stakeholders at all levels must be based on fairness, cooperation, loyalty, and mutual respect. Under no circumstances may the pursuit of Company interests justify dishonest conduct.

Legality

The organization undertakes to comply with all applicable national and international laws, regulations, directives, and generally recognized practices. It also bases its decisions and conduct on safeguarding the public interest entrusted to it.

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Fairness and Transparency

Individuals may not use for personal purposes any information, assets, or equipment available to them in the performance of their duties. No individual may accept or exert pressure, recommendations, or solicitations that could harm the Company or result in undue advantages for themselves, the Company, or third parties. Individuals must reject and refrain from making promises of improper payments or other benefits. The Company operates in a clear and transparent manner, without favoring any interest group or individual.

Confidentiality

Individuals ensure the utmost confidentiality regarding information and data constituting the Company's assets or relating to its activities, in compliance with legal provisions, applicable regulations, and internal procedures. Company personnel are also required not to use confidential information for purposes unrelated to the performance of their duties.

Responsibility Toward the Community

Aware of its social role within the local area, in economic and social development, and in the general well-being of the community, the Company intends to operate in compliance with national and local communities, supporting cultural and social initiatives in order to enhance its reputation and legitimacy to operate.

Resolution of Conflicts of Interest

In carrying out their work activities, individuals pursue the general objectives and interests of the Company. They must promptly inform their superiors or contact persons of any situations or activities in which they or their close relatives may have interests conflicting with those of the Company, or in any other case where significant reasons of appropriateness arise. Individuals must comply with the decisions adopted by the Company in this regard.

Sense of Belonging

In performing their duties, individuals must pursue conduct that does not hinder or prejudice the development of a sense of belonging to the organization, work group, or third parties.

Mutual Respect

All persons collaborating with the Company, in any capacity, must both demand and actively demonstrate respect for the duties, skills, and working methods of others, including by refraining from expressing personal considerations to third parties.

Specific Obligations for Employees

Company employees must comply with the instructions set out below:

Transparency

It is good practice that all information concerning activities carried out within the Company be accessible to those concerned. Each collaborator must keep their manager and colleagues informed regarding the tasks performed. In the event of misunderstandings or problems, everyone has the duty to first consult their manager or designated contact person.

Employees must act with scrupulous loyalty and independence from any form of influence that could affect their conduct toward their Client or external organizations connected with them.

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They must not engage in improper financial relationships nor accept valuable gifts or favors from organizations or suppliers of their Client.

Upon accepting a professional assignment, or during its performance, they must disclose any relationships or shared interests with external organizations dealing with their Client that could give rise to conflicts of interest.

Consistency

Once a commitment is undertaken, it must be fulfilled. Work should never be left incomplete, nor should commitments be accepted if it is already known that they cannot be honored.

Courtesy and Kindness

Courtesy and kindness must form the basis of daily activities and be a constant in interpersonal relationships, both internally and externally.

Punctuality

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

Confidentiality

All information and data handled in the workplace are Company property and confidential and must be treated as such. Work-related issues should never be discussed in public places where conversations may be overheard or in the presence of persons not entitled to the information.

Professionalism

Being professional means knowing and applying appropriate conduct and doing what is necessary to perform one's work to the highest standards, taking into account the needs of customers and the Company.

Professionalism is required in every activity.

Work Environment

Everyone should understand the dynamics underlying interpersonal relationships and adopt behavior consistent with the context, always striving to maintain a courteous, cordial, and cooperative atmosphere with colleagues.

Loyalty and Respect for the Company

Everyone has the duty to share Company policies and ensure they are respected. In daily activities, each collaborator must safeguard the Company's interests and image and show the utmost respect for Company property. Economic implications of decisions must always be considered, avoiding waste.

Respect for the Customer

Like all companies operating in a free market, the Company depends on its customers. Respect, kindness, and courtesy must always characterize interactions with the organization.

Workstation

Each collaborator is responsible for their workstation, including maintaining cleanliness and care of assigned equipment.

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Personal computers

Company-issued personal computers must be kept in optimal condition. No software may be installed other than that provided under Company configuration. Hardware provided by the Company constitutes work equipment and may not be used for personal purposes.

Files stored therein are Company assets and may not be arbitrarily damaged or destroyed.

It is strictly prohibited to use hardware devices for copying and/or storing files and data (such as USB drives, laptops, optical discs, burners, or other electronic storage media) without prior express authorization from the Company.

Internet

Internet access is a work tool and must be used as such. Personal use is permitted only outside working hours.

Internet browsing:

- must relate directly to assigned duties and may not involve sites revealing political, religious, or trade union opinions;
- must not involve financial transactions (including remote banking or online purchases), except where expressly authorized and in compliance with standard purchasing procedures;
- must not involve downloading or installing freeware, shareware, P2P, and/or FTP software without express authorization;
- must not involve registration on sites unrelated to work activities;
- must not involve participation in forums or chat rooms for non-professional reasons, nor storage of offensive or discriminatory content.

Email

Email is a Company tool and not private correspondence. Therefore:

- any work-related email may be copied and/or disclosed at any time;
- email may not be used for non-work-related purposes;
- offensive or discriminatory messages may not be sent or stored;
- external email accounts may not be configured or used for Company business.

Mobile Phones

Mobile phones are work tools and must be used appropriately. They should be kept silent during meetings and customer visits. Personal use must be limited to emergencies.

Company Vehicles

Company vehicles are the full responsibility of the assigned user and must be used and maintained with the utmost care. They must be driven in full compliance with traffic regulations. The assigned driver is responsible for cleanliness, maintenance, and ensuring optimal operating

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conditions.

Traffic fines remain the responsibility of the driver.

Private Vehicles

When used for work purposes, private vehicles must also comply fully with traffic regulations. Any fines remain the responsibility of the driver.

CRITERIA OF CONDUCT

Introduction

The rules in this section aim to guide recipients of this Code of Ethics in adopting appropriate attitudes and behaviors in line with the values set forth herein.

All recipients must act correctly and transparently in carrying out their functions, contributing to the effectiveness of the internal control system in safeguarding Company value.

In compliance with the law, recipients must maintain an attitude of openness toward corporate bodies and supervisory authorities.

Relations With Personnel

Personnel Selection

Personnel are selected based on alignment between candidate profiles and Company needs, ensuring equal opportunities. Information requested is strictly related to professional and aptitude assessment, respecting privacy and opinions. The General Management adopts measures to prevent favoritism and conducts careful selection based on mandatory and Board-approved preferential criteria.

Establishment of Employment Relationship

Personnel are hired under regular employment, professional service, or internship contracts. Any form of irregular employment is not tolerated.

Integrity and Protection of the Individual

Personnel management and development decisions are based on merit and competence. Access to roles and assignments depends on skills and abilities. Flexible work arrangements are encouraged, where compatible with efficiency, to support maternity and childcare needs.

Health and Safety

The Company undertakes to provide a work environment that protects the health and safety of its personnel, promoting a culture of safety and responsible behavior.

It operates primarily through preventive actions to safeguard workers' health and safety and seeks synergies with suppliers, consultants, and customers.

All employees must comply with risk prevention and health and safety procedures and promptly report deficiencies or non-compliance.

The Company adopts the general health and safety measures required by law, particularly Legislative Decree 81/2008 as amended, and ensures:

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- risk assessment;
- preventive planning integrating operational and environmental factors;
- elimination or minimization of risks;
- ergonomic workplace design;
- risk reduction at source;
- substitution of hazardous elements;
- limitation of exposed workers;
- limited use of hazardous agents;
- priority of collective over individual protective measures;
- health surveillance;
- reassignment where necessary for health reasons;
- adequate information and training;
- worker consultation and participation;
- continuous improvement of safety standards;
- emergency measures (first aid, fire prevention, evacuation);
- use of safety signage;
- regular maintenance of premises and equipment;
- adequate instructions and training in accordance with applicable law and collective bargaining agreements.

Privacy Protection

In processing employee data, the company complies with the provisions of European Regulation 679/2016. Employees are provided with a privacy notice that specifies:

- the purposes and methods of data processing
- any recipients of the data
- information necessary for exercising the right of access under Article 15 of the GDPR

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

The same procedure applies to the electronic management of information and personal data.

Environmental Protection

The organization is committed to environmental protection by complying with national and EU legislation and regulations. It undertakes to prevent pollution and to raise awareness among employees and collaborators regarding environmental issues.

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Duties of Personnel

Employees must act honestly to fulfill the obligations set forth in their employment contract and the provisions of the Code of Ethics, ensuring the required performance.

Delegations and Responsibilities

Specific resolutions and/or procedures define the duties, responsibilities, and powers of administrators, employees, and collaborators. These duties, responsibilities, and powers must be known, accepted, and respected.

Responsibilities of Functional Managers Regarding the Code of Ethics

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

- ensure compliance with the Code of Ethics by those directly or indirectly under their supervision
- set an example for their employees/collaborators through their own behavior
- ensure that employees understand that the provisions of this Code of Ethics are an integral part of their work performance
- promptly report to General Management, any delegate, or the Supervisory Body (O.d.V.) any reports or specific needs from their subordinates

Failure of functional managers to comply with these obligations may result in disciplinary sanctions, as provided by the sanctioning system.

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

All employees must be familiar with the provisions of the Code of Ethics, as well as the applicable laws regulating activities within their role, which form an integral part of their work performance. Employees who become aware of alleged illegal conduct must report such information only to their superiors, the O.d.V., and/or General Management, following the procedures outlined in the internal system.

General Management monitors the actual reading and understanding of mandatory legal documents by employees and collaborators through anonymous tests and takes appropriate actions to continuously improve knowledge and comprehension.

Employees are also required to:

- refrain from behavior contrary to these provisions and regulations
- consult their superiors, O.d.V., or delegate responsible for the prevention model for guidance on applying the Code of Ethics or applicable laws
- promptly report to at least one of the above parties any possible violations of the Code of Ethics
- cooperate with the organization during any investigations to verify and, if necessary, sanction potential violations

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

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Protection of Company Assets

Recipients must act diligently to protect company assets from misuse or improper use. Employees must comply with internal information security policies to ensure integrity, confidentiality, and availability.

Information and know-how must be protected with maximum confidentiality. Significant data acquired or generated by the company must be considered confidential, including information concerning third parties (clients, contacts, partners, employees, etc.). Employees who come into possession of confidential information, materials, or documents must inform their superiors.

During and after employment, confidential data may only be used in the company's interest, never for personal gain or third-party benefit.

Confidential Information of Third Parties

Employees must refrain from illicitly obtaining confidential information about other organizations or entities.

Those who, within a contractual relationship, become aware of confidential information about other parties must use it solely as stipulated in the contract. Without proper authorization, employees may not request, receive, or use confidential information regarding third parties. If employees learn of confidential information not subject to a non-disclosure agreement or other protections, they must consult their supervisor for guidance on handling such information.

Use of Company Assets

Employees must use company assets diligently, responsibly, and according to operational procedures, documenting their use accurately. Specifically, employees must:

- use assigned assets carefully and sparingly
- avoid improper use that could cause damage or reduced efficiency or conflict with company interests
- properly safeguard resources and promptly inform responsible units of any threats or incidents

Regarding IT applications, employees must:

- strictly follow company security policies to protect system functionality and security
- refrain from sending threatening or abusive emails, using inappropriate language, or making offensive comments that could harm people or the company's image
- avoid visiting inappropriate or non-work-related websites

Relations with Clients

For detailed procedures, refer to the company's operational management system.

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Impartiality

The company is committed to offering products and services without discrimination among different types of clients.

Contracts and Communications with Clients

Company contracts and communications must always be:

- clear and simple, using language familiar to the recipients
- compliant with current laws and not misleading or improper
- complete, ensuring no relevant information is omitted that could affect client decisions

Employee Behavior Toward Clients

Employees must be available, respectful, and courteous, maintaining a collaborative and professional relationship with clients.

Data Processing

In handling clients' personal data, the organization complies with European Regulation 679/2016. A privacy notice is provided that specifies:

- purposes and methods of data processing
- any recipients of the data
- information necessary for exercising the right of access under Article 15 of the GDPR

Where required, clients are asked for specific consent for data processing. Investigations into clients' ideas, preferences, personal tastes, or private life are prohibited. Employees must handle client data with maximum discretion and confidentiality, including electronic data management.

Relations with Suppliers

Supplier Selection

Purchasing processes are essential to:

- achieve maximum competitive advantage for the company
- ensure equal opportunities for suppliers
- maintain fairness and impartiality

Supplier selection and purchase terms are based on objective evaluation of quality, price, availability, and support guarantees. Suppliers under criminal investigation for mafia-related activities are excluded.

Integrity and Independence in Supplier Relations

All supplier relationships, including financial and consultancy contracts, are constantly monitored. Contracts with suppliers must be based on transparency, avoiding dependency. Documents exchanged with suppliers must be properly archived, particularly accounting documents in compliance with legal retention periods.

Relations with Public Authorities

This section addresses the relationships between the company and public administrations.

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Correctness and Fairness

The company intends to conduct its relations with public authorities with the utmost transparency and ethical conduct. Such relations, which must comply with applicable laws, are guided by the general principles of fairness and loyalty so as not to compromise the integrity of either party.

Gifts, Favors, and Benefits

No person within the company may give money or offer economic advantages or any other type of benefits to public administration officials for the purpose of obtaining assignments or other personal or corporate advantages.

No form of gift is allowed that could be interpreted as exceeding normal commercial or courtesy practices or as intended to gain preferential treatment in any activity related to the company. For this purpose, a “normal commercial or courtesy practice” is considered a gift with a value of less than €100.

In particular, any form of gift to Italian or foreign public officials, or their family members, that could influence their independent judgment in order to obtain more favorable treatment, undue services, or advantages of any kind is prohibited.

A gift is defined as any type of benefit: not only material goods but also, for example, free participation in conferences, training courses, job offers, etc.

The above cannot be circumvented through third parties: acts of corruption include not only illegal payments made directly to entities or their employees but also those made to individuals acting on behalf of such entities.

On the occasion of holidays, anniversaries, or other special occasions, the donation of goods is permitted provided that they are of modest value and within the limits approved by the Board of Directors or General Management, following prior communication to the Supervisory Body (O.d.V.) with proper documentation to allow appropriate checks.

If a company employee receives explicit or implicit requests for benefits from a public administration official, they must immediately inform the Board of Directors or the appropriate reporting authority for the adoption of proper checks and measures.

External Relations

This section addresses the details regarding the company's external relationships.

External Effectiveness of the Code of Ethics

Anyone acting 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 relationship, is obliged to:

- Inform these parties of the commitments and obligations imposed by the Code of Ethics.
- Require compliance with the Code of Ethics in the performance of their activities.
- Take necessary action in case third parties refuse to comply with the Code of Ethics, or fail to fully observe the commitments undertaken, informing General Management or its delegates and the Supervisory Body (O.d.V.).

Conflict of Interest

All recipients must ensure that every decision made within their activities is in the interest of the company.

All recipients must avoid any activity or personal interest situation that constitutes, or could potentially constitute, a conflict between personal interests and those of the organization and, in any case, must comply with the specific procedures adopted by the company.

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All recipients of the Code of Ethics must refrain from taking advantage of their relationship with the company to favor themselves or third parties to the detriment of the organization. Employees are prohibited from participating, directly or indirectly, in any commercial initiatives that directly compete with the company unless such participation has been previously communicated to and approved by the competent Board of Directors, after consultation with the O.d.V. In the event that potential or actual conflicts of interest, internal or external to the company's activities, are identified, each individual involved must refrain from actions that constitute a conflict and promptly inform the O.d.V., which evaluates, on a case-by-case basis, any potential incompatibility or prejudicial situation.

Competitive Practices

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

The company is committed to strictly observing applicable laws and collaborating with market regulatory authorities. In particular:

- It undertakes activities in compliance with the purpose of the law regarding the supply of goods and services through explicit agreements with public entities, including public economic entities and joint-stock companies with public participation.
- 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.

Gifts and Benefits

See the previous chapter "Gifts, Favors, and Benefits."

APPLICATION MECHANISMS OF THE CODE OF ETHICS

Organizational Principles

The company ensures that the organizational system is based on the separation between decision-makers, implementers, and controllers. In particular, all operations are made verifiable because they are recorded.

The company binds those performing auditing functions to the truthfulness and accuracy of data and information.

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

Company procedures must allow for checks on operations, approval processes, and execution of the operations themselves.

Any collaborator handling money, goods, or other economically quantifiable assets belonging to the company must reasonably provide appropriate evidence to allow verification of such operations.

Controls and Audits

The company ensures, through competent personnel, the provision of all necessary information and access to documents requested by auditing and control bodies.

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The company guarantees access to all information and documents to entitled parties and provides, through the availability of its administrators and employees responsible for their function, all information necessary for oversight functions. The organization prohibits its administrators, employees, and/or collaborators from making false statements or presenting falsified documents, including through IT systems, for the purpose of unlawfully receiving public funds or obtaining and maintaining any benefits.

Monitoring Code of Ethics Implementation

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

- Board of Directors
- General Management
- Coordinators
- Supervisory Body (O.d.V.): This body, in particular, not only monitors compliance with the Code of Ethics, having access to all company information sources, but also suggests appropriate updates to the Code based on reports received from personnel.

The O.d.V. is responsible for:

- Reporting to General Management any notifications of violations of the Code of Ethics for appropriate action.
- Providing binding opinions on the review of significant policies and procedures to ensure consistency with the Code of Ethics.
- Contributing to the periodic review of the Code of Ethics by formulating proposals to the Board of Directors, which evaluates, approves, and formalizes them if appropriate.

The O.d.V. maintains autonomy and independence, assumes investigative and control powers, and has initiative powers to fulfill its assigned functions.

Reporting Problems or Suspected Violations

Violations of the Code of Ethics by recipients are subject to the disciplinary system provided under the company's Model 231.

In the case of violations, the company may adopt disciplinary measures against the responsible parties, including dismissal, and may seek compensation for damages resulting from the violations. Non-compliance with the Code of Ethics by members of corporate bodies may result in the adoption of appropriate measures allowed by law. Violations by employees constitute a breach of obligations arising from the employment relationship, with all contractual and legal consequences, including their relevance as disciplinary offenses. Violations committed by suppliers and external collaborators will be sanctionable according to contractual terms unless they constitute more serious legal violations. Special attention is given to the handling of data through internal IT systems: any issue or suspected violation must be immediately reported to the IT services manager and/or General Management.

Disciplinary Measures Following Violations

The provisions of this Code of Ethics are an integral part of the contractual obligations of personnel and parties with business relations with the company. Violation of the principles and behaviors in the Code of Ethics undermines the trust between the company and the violators, whether they are directors, employees, consultants, collaborators, clients, or suppliers. For details of the disciplinary system and sanction mechanisms, see the company's Model 231. Generally, violations are addressed as follows:

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- For employees (including corporate body members and O.d.V. members) through appropriate disciplinary measures, regardless of any criminal relevance and criminal proceedings. Sanctions include warnings, suspension without pay, demotion, and, in serious cases, dismissal. Employees are given an opportunity to explain their conduct before any measure is taken.
- For consultants, collaborators, clients, suppliers, and other contractual parties, specific measures will be taken to resolve the contractual relationship.

Compensation for damages suffered by the company due to violations of the Code by the above parties may also be pursued.

Public Service Duties

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

- Respect for impartiality principles typical of the Public Administration
- No acceptance of benefits, money, or advantages
- No acceptance of undue influence from third parties
- Avoiding conflicts of interest of its officials

Confidentiality

Recipients must maintain the utmost confidentiality regarding information, documents, studies, initiatives, projects, and contracts accessed during their work. The company implements measures to protect information and prevent unauthorized access.

Dissemination, Communication, and Training

This Code of Ethics is communicated to all internal and external stakeholders involved in the company's mission through dedicated communication and training activities.

Operational Procedures and Decision-Making Protocols

This Code of Ethics is an integral part of and implements the company's Model 231 to prevent crimes committed in the interest or benefit of the organization by parties indicated under Legislative Decree 231 of June 8, 2001. To prevent violations of laws and the Code itself, the company adopts specific procedures for all those involved in operational processes, aimed at identifying parties responsible for decision-making, authorization, and execution of operations.

Delegation System

Besides already qualified personnel, the company uses a delegation system whereby certain activities may only be performed by expressly authorized individuals with official delegated powers or notarial powers of attorney. It is necessary that different phases of operations are carried out by different persons whose responsibilities are clearly defined within the organization to avoid excessive or unlimited powers being given to individuals.

FINAL PROVISIONS

Conflicts with the Code of Ethics

In cases where even a single provision of this Code of Ethics conflicts with internal regulations or procedures, the Code of Ethics prevails.

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Approval and Amendments

This Code of Ethics was originally approved by the company's Board of Directors. Any amendment or addition will be approved by the Board, following consultation with the O.d.V., and promptly communicated to all recipients. In particular:

- The O.d.V. periodically reviews the Code for legislative or corporate changes and proposes amendments or additions.
- Amendments or additions are developed under the Board's mandate by a third party or the O.d.V. with an extended assignment.
- The Board reviews proposals, approves, and implements them immediately.