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MOVIMODA S.P.A.

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

ORGANISATION, MANAGEMENT AND CONTROL MODEL

Attachment 1

Codice Etico

pursuant to Legislative Decree No. 231 of 8 June 2001
on the "Administrative Liability of Companies"

This "Organisation, Management and Control Model" (hereinafter the "Model") of Movimoda S.p.A. (hereinafter the "Company" or "Movimoda") has been drafted in implementation of 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 implementation (including any adjustments that may become necessary as a result of legislative amendments and updates) by the Board of Directors itself and by the Supervisory Body.

The "Model" represents the direct management reference framework and constitutes the instrument designed for the purpose of 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 all those with whom it interacts in the conduct of its business.

In full alignment with the principles expressed and upheld by the accreditation system to which it adheres, the organization is aware that, through its activities 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 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 to the reasonable prevention of the offences referred to 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 deemed an integral part of existing and future employment contracts pursuant to Article 2104 of the Italian Civil Code (Employee's Duty of Diligence).

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

With regard to collaborators, consultants and self-employed workers (specified below among the addressees) who provide services to the Company, as well as other third parties, signing this Code of Ethics or an extract thereof, or in any case adhering to its provisions and principles, shall constitute a "conditio sine qua non" for the execution of contracts of any nature between the Company and such parties. The provisions thus signed or, in any case, approved, even by conduct, shall form an integral part of the contracts themselves.

In light of the above, any violations by the parties referred to in the preceding paragraph of specific provisions of the Code of Ethics, depending on their seriousness, may 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 person who may act in the name and on behalf of the Company, whether directly or indirectly, permanently or temporarily, or who establishes relationships with the Company and operates in pursuit of its objectives.

The addressees 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 delegated person, 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 relationships and to relationships with external parties and, in particular, with Public Administrations and other public authorities.

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

To this end, upon entering into contracts or agreements with other addressees, the Company provides them with a copy of this document.

PRINCIPLES OF CONDUCT FOR THE ORGANIZATION

The principles listed below are considered fundamental, and our organization undertakes to comply with them in relation to anyone.

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 addressees are required to apply them properly in their work environment in both internal and external operations and relationships.

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The core values on which the Company's activities are based are:

- 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 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, with citizens and with third-party companies.

Everyone is required to operate, 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 places in which they operate.

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

The Company shall neither initiate nor continue any relationship with anyone who does not intend to align with this principle.

Rejection of All Forms of Discrimination

In decisions affecting relationships with stakeholders (personnel management and work organization, selection and management of suppliers, relationships with the local community and the institutions representing it), our 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 importance of human resources and considers the professional contribution of its people to be an essential factor of 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 aimed at recognizing each person's work as a fundamental element of both corporate and personal growth.

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

This value translates into:

- creating a work environment capable of enhancing individual contributions and potential through the gradual empowerment of personnel;
- establishing a system of relationships that prioritizes teamwork over hierarchical relationships;
- daily efforts aimed at sharing skills and knowledge, including through the use of innovative systems.

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

In managing contractual relationships involving hierarchical structures, the Company undertakes to ensure that authority is exercised with fairness and correctness and that any form of abuse is avoided; in particular, the Company guarantees that authority does not become the exercise of power detrimental to the dignity and autonomy of the individual.

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

Local Rootedness

The Company aims to implement projects designed to directly involve citizens, public and private institutions, entrepreneurs and associations in matters relating to health education, prevention and personal well-being.

The Company acts and will continue to act to ensure that entities collaborating with it comply with the same standards of conduct and align their activities with the same principles and values.

Furthermore, the Company promotes local development through strong connections with the various stakeholders of the local community. It operates within the local community to foster 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 their recognition both by service users and by those who materially provide the service.

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Transparency and Business Ethics

The history, identity and values of the organization are reflected in a business ethics based on:

- reliability: understood as a guarantee of absolute seriousness in projects undertaken, transactions and commitments entered into;
- solidity: referring to an entity founded on defined assets, as evidenced by its long-standing operations;
- transparency: arising from its understanding of its social role, which requires not only compliance with ethical principles and standards but also the adoption of practices that enable reference communities and social stakeholders to access information necessary to reconstruct its activities;
- fairness in contractual matters: avoiding situations in which anyone acting in the name and on behalf of the Company seeks to take advantage of contractual loopholes or unforeseen events in order to renegotiate a contract solely to exploit a position of dependency or weakness in which the counterparty may find itself;
- protection of competition: refraining from collusive, predatory conduct or abuse of a dominant position.

Quality

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

Activities are carried out through a set of processes managed by rules and procedures tailored to each warehouse according to different customer requirements and specific logistical needs.

Diversity

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

- ensures the strictest compliance with regulations protecting child and minor labor, as well as workers' freedoms and rights;
- guarantees conditions of 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 any form 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 that may pursue terrorist purposes or aim to undermine the democratic order.

The organization also condemns any activity involving:

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- counterfeiting, forgery, alteration and/or circulation of currency, public credit cards or revenue stamps;
- receipt and handling of proceeds from criminal activities (money laundering);
- unauthorized access to external IT systems;
- unlawful possession of access codes;
- damage to equipment or data;
- fraud in the management of electronic signature certification;
- interception, obstruction or interruption of IT communications;
- dissemination of ideas promoting tolerance or silence regarding drug use or creating any form of dependency;
- incitement to commit unlawful acts or acts contrary to moral standards;
- negligence in combating violence, damage to public property and compliance with internal regulations.

SOCIAL STAKEHOLDERS

Customers

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

Within this framework, the organization ensures the best possible execution of assigned tasks 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 so as to enable customers to make rational and informed decisions. It safeguards customers' privacy in compliance with applicable regulations, undertaking not to disclose or disseminate their personal data except where 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 a view to creating value for the Company itself.

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

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Suppliers

Suppliers of Goods and Services

The Company establishes collaborative relationships with its 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 on the basis of professionalism, reputation and 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 common objectives, in compliance with regulations and the principles of this Code of Ethics.

Public Administration

“Public Administration” means 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 Administrations, Supervisory Authorities, Independent Authorities, European Institutions, as well as private partners entrusted with a Public Service.

In its relations with the Public Administration, the Company conducts itself in accordance with principles of fairness and honesty. On this basis, individuals appointed by the Company to handle any negotiation, request or institutional relationship with the Italian or foreign Public Administration must under no circumstances seek to improperly influence its decisions or engage in unlawful conduct, such as offering money or other benefits that could compromise the impartial judgment of the Public Administration representative.

Persons entrusted with managing relations with any Public Administration authority must ensure that any information provided, in any form and for any purpose, is truthful, accurate and correct. Only individuals expressly authorized by the Company may have direct contact with the Public Administration on its behalf.

No other collaborator may maintain any form of relationship with the Public Administration concerning activities related to the Company’s corporate purpose.

In public tender procedures, Company representatives 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, had relations with the Company, or of their relatives and/or in-laws, takes place in strict compliance with the standard personnel selection procedures defined by the organization.

The establishment of other employment or consultancy relationships with former Public Administration employees or their relatives and/or in-laws also takes place in strict compliance with standard procedures.

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Grants and Funding

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

The Company prohibits the addressees 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 allocated.

Similarly, in the event of participation in public procedures, the addressees of this Code of Ethics must operate in compliance with the law and sound commercial practice, in particular avoiding inducing Public Administrations to act improperly in favor of the Company.

The organization undertakes to prevent acts that may lead the addressees of this Code of Ethics to obtain unlawful advantages.

It is also unlawful to use altered or falsified statements or documents, omit information, or engage in deceptive practices aimed at obtaining grants, authorizations, funding or contributions from the European Union, the State or other Public Bodies.

Public Supervisory Authorities

The addressees of this Code of Ethics undertake:

- to strictly comply with provisions issued by competent institutions or Public Supervisory Authorities to ensure compliance with applicable regulations in their respective areas of activity;
- not to submit, in the context of proceedings with Institutions and/or Public Supervisory Authorities, applications or requests containing untruthful statements in order to obtain public funds, contributions, subsidized financing, concessions, authorizations, licenses or other administrative acts;
- to comply with any request from the above-mentioned institutions or authorities in the performance of their supervisory functions, providing full cooperation where required and avoiding obstructive conduct.

Political Parties, Associations and Interest Groups

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

PRINCIPLES OF CONDUCT TO BE OBSERVED BY PERSONNEL

Professionalism

Each individual performs their work diligently, efficiently and fairly, making the best use of the tools and time available and assuming responsibility for assigned duties.

Loyalty

Individuals are required to be loyal to the Company.

Honesty

In carrying out their work activities, Company personnel are required to be familiar with and diligently comply with the Model 231 and applicable laws. Honesty is the fundamental principle underlying all Company activities and initiatives and constitutes an essential organizational value.

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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 national and international laws, directives, regulations and generally recognized practices. It also bases its decisions and conduct on the protection of the public interest entrusted to it.

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 reports that could harm the Company or provide undue advantage to themselves, the Company or third parties.

Each individual must refuse and not make promises of undue payments or other benefits. The Company undertakes to operate clearly and transparently, without favoring any interest group or individual.

Confidentiality

Individuals ensure the utmost confidentiality regarding information and data constituting Company assets or relating to Company activities, in compliance with legal provisions, applicable regulations and internal procedures.

Company personnel must not use confidential information for purposes unrelated to their duties.

Responsibility Toward the Community

Aware of its social role within its reference territory, 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 to enhance its reputation and legitimacy to operate.

Resolution of Conflicts of Interest

In performing their work activities, individuals pursue the general objectives and interests of the Company.

They must promptly inform their superiors or contact persons of any situation or activity 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 convenience arise.

Individuals must comply with the decisions adopted by the Company in this regard.

Sense of Belonging

In carrying out their work activities, individuals must avoid any conduct that may hinder or prejudice the development of a sense of belonging within the organization, work group or towards third parties.

Mutual Respect

All persons collaborating with the Company, in any capacity, must require and actively demonstrate respect for roles, skills and methods of performing duties, including by refraining from making personal comments to third parties.

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Specific Obligations

Company employees must follow the guidelines set out below:

Transparency

As a general rule, all information regarding activities carried out within the company should be accessible to everyone. Each employee is responsible for reporting to their supervisor and colleagues regarding the work they perform. In the event of misunderstandings or problems, it is everyone's duty to first consult their supervisor or designated contact person. Employees must act with strict loyalty and independence, free from any form of influence that could affect their work, both towards their Client and towards external Organizations connected with them. Improper financial relationships must not be established, nor may gifts of significant value or favors of any kind be accepted from Organizations or suppliers of the Client. Upon accepting a professional assignment, or during its execution, any relationship or shared interest with external Organizations that have dealings with the Client and that could give rise to a conflict of interest must be disclosed.

Consistency

Once a commitment is made, it must be fulfilled. Never leave a task unfinished and never undertake commitments that you already know you cannot meet.

Courtesy and Kindness

Courtesy and kindness must form the basis of all daily activities and must always characterize interpersonal relationships, both within and outside the company.

Punctuality

If you are going to be late for an appointment, it is good practice to inform the other party before the agreed time; doing so afterward is discourteous. Punctuality is a sign of respect towards those who are waiting for us.

Confidentiality

All information and data handled in the workplace are company property and confidential, and must be treated as such. In particular, work-related problems or situations should never be discussed in public places where conversations may be overheard, or in the presence of individuals who are not entitled to receive such information.

Professionalism

Being professional means knowing and adopting all appropriate behaviors and doing everything necessary to perform one's job in the best possible way, taking into account the needs of both clients and the company. Professionalism is required in all activities.

Work Environment

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

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Loyalty and Respect for the Company

It is everyone's duty to support company policies and ensure they are respected. In daily activities, each employee should safeguard the company's interests and image and show the utmost respect for company property. When carrying out work activities, employees should always consider the economic implications of their decisions and avoid waste.

Respect for the Client

The company, like all businesses operating in a free market, depends on its clients. Respect, kindness, and courtesy must always characterize interactions with anyone contacting the organization.

Workstation

Each employee is responsible for their workstation. Everyone is expected to take care of and keep clean the equipment assigned to them.

Personal computers

Company-issued personal computers must be kept in the best possible condition, and no additional software may be installed other than that provided in the company configuration. Hardware equipment provided by the company constitutes work tools and may not be used for personal purposes.

In particular, the files stored on them are company assets and may not be arbitrarily damaged and/or destroyed.

It is strictly forbidden to use hardware devices for copying and/or storing files and data—such as USB mass storage devices, laptops, optical disks, burners, or any other electronic storage media—without prior explicit authorization from the company.

Internet

The Internet connection is a work tool and must be used as such. Use of the Internet for personal purposes is permitted only outside working hours. Internet browsing:

- is not permitted for websites unrelated to assigned duties, especially those that may reveal the employee's political, religious, or trade union views
- financial transactions of any kind, including remote banking operations, online purchases, and similar activities, are not permitted unless directly authorized by the company and carried out in compliance with standard purchasing procedures
- downloading and installing freeware, shareware, P2P and/or FTP software from websites is not permitted without prior explicit authorization from the company
- registration on websites whose content is unrelated to work activities is prohibited
- participation in forums for non-professional reasons or the use of chat rooms is not permitted; storing electronic documents containing offensive and/or discriminatory content based on gender, language, religion, race, ethnic origin, opinion, trade union membership, and/or political affiliation, etc., is prohibited

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Email

Email is a company tool and is not to be considered private correspondence; therefore:

- any email message (as it relates to work activities) may be copied and/or made public at any time
- use of email (internal or external) for purposes unrelated to assigned duties is not permitted
- sending or storing messages (internal or external) that are offensive or discriminatory based on gender, language, religion, race, ethnic origin, opinion, trade union membership, and/or political affiliation, etc., is not permitted
- configuring and using email accounts external to the company is not permitted

Mobile Phones

The use of mobile phones is subject to rules of proper conduct that must always be respected. As a work tool, mobile phones should always be kept on silent during meetings and client appointments, especially when at the client's premises. Personal use of mobile phones must be kept to a minimum and limited to emergency situations.

Company Cars

The company car is under the full responsibility of the person to whom it is assigned and, like all company assets, must be used and maintained with the utmost care. It must be driven in full compliance with traffic laws. The assigned driver is responsible for ensuring cleanliness, maintenance, and that the vehicle is always kept in the best possible condition. Any fines resulting from traffic violations remain the responsibility of the driver.

Private Cars

The use of private vehicles for work purposes is permitted and, as in the case of company cars, the driver must comply fully with traffic laws. Any fines resulting from traffic violations remain the responsibility of the driver.

CODE OF CONDUCT

Introduction

The rules contained in this section are intended to indicate to the recipients of this Code of Ethics the attitudes and behaviors to be observed in carrying out company activities, in accordance with the values that inspire this document.

All recipients of this Code of Ethics must act with integrity and transparency in performing their duties, thereby contributing to the effectiveness of the internal control system and safeguarding company value.

In compliance with the law, all recipients must maintain a cooperative attitude toward corporate bodies and supervisory authorities.

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Relations with Personnel

Recruitment

The evaluation of personnel to be hired or engaged as collaborators is carried out by matching candidates' profiles with expected profiles and internal needs, ensuring equal opportunities for all applicants.

The information requested is strictly related to verifying aspects provided for in the professional and aptitude profile, respecting the candidate's privacy and personal opinions.

The General Management adopts appropriate measures during the selection process to avoid favoritism or undue advantages of any kind and conducts careful selection based not only on mandatory requirements but also on preferential criteria established by the Board of Directors.

Establishment of the Employment Relationship

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

Integrity and Protection of Individuals

In the context of personnel management and development processes, as well as during recruitment, decisions are based on the alignment between the expected profiles and the actual profiles of individuals and/or on merit-based considerations. Access to roles and positions is determined by skills and capabilities. Furthermore, within the limits of overall work efficiency, forms of flexibility in work organization are encouraged to support employees who are on maternity leave or those who need to care for their children.

Safety and Health

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

The company also works to preserve, especially through preventive measures, the health and safety of workers.

One of the main objectives is to protect human resources by constantly seeking the necessary 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, health, and safety, and to promptly report any deficiencies or non-compliance with applicable regulations.

The company adopts general measures to protect health and safety at work as prescribed by law, with particular reference to Legislative Decree 81/08 and subsequent amendments. The organization is committed to the strictest compliance with all regulations concerning employee, collaborator, and user health and safety. In particular, it:

- Defines operational procedures to follow and coordinates activities related to health and safety at work.

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- Ensures the application of current regulations, including the preparation of risk assessment documents and the definition of work procedures aligned with safety standards.
- Constantly monitors legislative updates and works to implement them.

Additionally, the company commits to ensuring:

- Assessment of all health and safety risks.
- Planning of prevention measures that integrate operational conditions, environmental factors, and work organization coherently.
- Elimination of risks or, where not possible, their reduction to a minimum according to technical progress.
- Compliance with ergonomic principles in work organization, workstation design, equipment selection, and service delivery methods, particularly to reduce the health impact of monotonous or repetitive work.
- Reduction of risks at the source.
- Substitution of hazardous materials or practices with safer alternatives.
- Minimization of the number of workers exposed to risks.
- 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 health reasons and, if possible, reassignment to another role.
- Adequate information and training for workers, managers, supervisors, RLS (workers' safety representatives), and all personnel.
- Appropriate instructions for workers.
- Worker participation and consultation.
- Planning of measures to ensure continuous improvement in safety levels, including codes of conduct and best practices.
- Emergency procedures for first aid, fire fighting, evacuation, and immediate serious danger.
- Use of warning and safety signs.
- Regular maintenance of environments, equipment, and systems, particularly safety devices, in accordance with manufacturer instructions.
- Proper instructions and training for employees, collaborators, and users, as required by law and the applicable national collective labor agreement (CCNL).

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Privacy Protection

In handling personnel data, the company complies with the provisions of European Regulation 679/2016 (GDPR). Employees are provided with a privacy notice that identifies:

- Purposes and methods of data processing.
- Any recipients of the data.
- Information necessary to exercise the right of access under Article 15 of the GDPR.

Where required by law, individuals are asked for specific consent to the processing of their personal data. Any inquiries into employees' private opinions, preferences, tastes, or personal life are strictly prohibited.

The same procedure applies 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. It strives to prevent pollution and raise employee and collaborator awareness of environmental issues.

Employee Duties

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

Delegation and Responsibilities

Through specific resolutions and/or procedures, the tasks, responsibilities, and powers of administrators, employees, and collaborators are defined. These must be known, accepted, and respected.

Obligations of Function Managers Regarding the Code of Ethics

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

- Ensure compliance with the Code of Ethics by those directly or indirectly under their responsibility.
- Serve as a behavioral example for their employees/collaborators.
- Ensure employees understand that the provisions of the Code of Ethics are an integral part of their work performance.
- Promptly report to General Management or delegated personnel, or to the Supervisory Body (O.d.V.), any reports or special needs from their subordinates.

Non-compliance by function managers 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

Each employee is required to be familiar with the provisions of the Code of Ethics and relevant legal regulations governing their role, as these constitute 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., or General Management, following internal procedures.

General Management monitors employees' understanding of mandatory documents through anonymous tests and takes actions to continuously improve knowledge and comprehension of their contents.

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Employees must also:

- Refrain from behavior contrary to these provisions and regulations.
- Contact their superiors or the O.d.V. for clarifications on the application of the Code of Ethics or relevant laws.
- Promptly report potential violations of the Code of Ethics to at least one of the above parties.
- Cooperate with the organization in any investigations into possible violations.

These behavioral requirements also apply to external consultants and collaborators.

Protection of Company Assets

All recipients must act diligently to safeguard company assets from improper use.

Employees must know and implement internal policies regarding information security to ensure integrity, confidentiality, and availability.

Information and know-how must be protected with maximum confidentiality. Significant data acquired or created by the company during its activities, including data regarding third parties (clients, contacts, partners, employees, etc.), must be treated as confidential.

Employees who, in performing their duties, gain access to confidential information, materials, or documents must inform their superiors.

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

Confidential Information Regarding Third Parties

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

Employees who, as part of a contractual relationship, gain access to confidential information about third parties may use it only as provided in the contract.

Without proper authorization, employees may not request, receive, or use confidential information about third parties. If they become aware of confidential information not covered by a non-disclosure agreement or other protections, they must consult their manager for guidance.

Use of Company Assets

Everyone must act diligently to protect company assets through responsible behavior in line with operational procedures, accurately documenting their use.

Specifically, personnel must:

- Use assigned assets carefully and sparingly.
- Avoid misuse of company assets that could cause damage, inefficiency, or conflict with company interests.

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- Properly safeguard assigned resources and promptly report threats or harmful events to the responsible units.

Regarding IT applications, employees must:

- Strictly follow company security policies to protect system functionality.
- Avoid sending threatening or offensive emails, using inappropriate language, or making comments that could harm individuals or the company's reputation.
- Refrain from visiting indecent or offensive websites unrelated to professional activities.

Relations with Clients

For further details, see the operational procedures of the management system.

Impartiality

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

Contracts and Communications with Clients

Company contracts and communications with clients must always be:

- Clear and simple, using language as close as possible to that commonly used by the recipients.
- Compliant with current regulations and not constitute evasive or improper practices.
- Complete, including all relevant elements necessary for client decisions.

Behavioral Conduct of Personnel Toward Clients

Company personnel must act with availability, respect, and courtesy toward clients, promoting a collaborative and professional relationship.

Data Processing

In handling clients' personal data, the organization complies with European Regulation 679/2016 (GDPR).

A privacy notice is provided that identifies:

- Purposes and methods of data processing.
- Any recipients of the data.
- Information necessary to exercise the right of access under Article 15 of the GDPR.

Where required by law, specific consent for personal data processing is requested; any inquiries into clients' personal opinions, preferences, tastes, or private life are strictly prohibited.

Employees are obliged to handle data with the utmost discretion and confidentiality, especially internally. The same procedure applies to electronic management of personal information and data.

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Relations with Suppliers

Supplier Selection

Purchasing processes are important for:

- Seeking the maximum competitive advantage for the company.
- Granting equal opportunities to suppliers.
- Loyalty.
- Impartiality.

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

An additional selection criterion is the exclusion of suppliers involved in criminal proceedings related to public contracts or organized crime.

Integrity and Independence in Relations

Relations with suppliers, including those concerning financial and consulting contracts, are constantly monitored by the company.

Entering into a contract with a supplier must always be based on the utmost clarity, avoiding dependence wherever possible.

Documents exchanged with suppliers must be appropriately archived; in particular, accounting documents must be retained for the periods established by applicable law.

Relations with Public Administration

This section addresses the company's interactions with public authorities.

Correctness and Loyalty

The company aims to conduct its relations with public authorities with maximum transparency and ethical conduct. These relations, which must comply with applicable law, are guided by principles of fairness and loyalty so as not to compromise the integrity of either party.

Gifts, Courtesies, and Benefits

Nessuna persona dell'azienda può elargire denaro oppure offrire vantaggi economici o altre tipologie di benefici a soggetti della Pubblica Amministrazione a scopo di ottenere incarichi o altri vantaggi personali o per l'azienda stessa.

Relazioni esterne

No company employee may give money or offer economic advantages or other benefits to public officials to obtain assignments or other personal or company advantages.

No form of gift is allowed that could be interpreted as exceeding normal commercial or courtesy practices, or aimed at gaining preferential treatment in any company-related activity.

For this purpose, a "normal commercial or courtesy practice" is considered a gift of less than €100.

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

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

These rules cannot be circumvented through third parties: acts of corruption include not only illicit payments made directly to authorities or their employees but also payments made to individuals acting on behalf of such authorities.

On occasions such as anniversaries or holidays, the donation of modest goods is permitted, provided it is within limits approved by the Board of Directors or General Management, after documented notification to the Supervisory Body (O.d.V.) to allow appropriate verification.

If a company employee receives, from a public official, explicit or implicit requests for benefits, they must immediately inform the Board of Directors or the designated reporting authority for proper verification and action.

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 for commercial, institutional, social, political, or other types of interactions must:

- Inform such parties of the commitments and obligations imposed by the Code of Ethics.
- Require compliance with the Code of Ethics in carrying out their activities.
- Take necessary actions if third parties refuse to comply with the Code of Ethics or fail to fully implement the commitments, informing General Management, its delegates, and the Supervisory Body (O.d.V.).

Conflict of Interest

All recipients must ensure that decisions taken in their activities are made in the company's interest.

All recipients must avoid any personal activity or situation that constitutes, or could potentially constitute, a conflict between their personal interests and those of the organization. They must, in all cases, comply with the company's specific procedures.

All Code of Ethics recipients must refrain from exploiting their relationship with the company to favor themselves or third parties to the detriment of the organization.

Employees are prohibited from directly or indirectly participating in any commercial initiatives that compete with the company unless such participation has been previously communicated to the competent Board of Directors and approved, after consulting the O.d.V.

In cases of identified actual or potential conflicts of interest, whether internal or external, all involved parties must refrain from acting on the conflict and promptly notify the O.d.V., which will assess the existence of any incompatibility or risk.

Competitive Practices

It is of primary importance to the company that the market operates based on fair and honest competition.

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The company is committed to strictly complying with competition laws and collaborating with market regulatory authorities. In particular, it:

- Conducts activities in accordance with the intent of the law for public procurement of goods and services, including economic entities and publicly-owned corporations.
- Competes fairly in the market, respecting competition rules.
- Provides accurate information about its activities both internally and externally in response to legitimate requests.
- Ensures the truthfulness and accuracy of corporate data related to financial statements, reports, and other official documents.

Gifts and Benefits

See the previous section, “Gifts, Courtesies, and Benefits.”

MECHANISMS FOR APPLYING THE CODE OF ETHICS

Organizational Principles

The company ensures that the organizational system is based on the principle of separation among decision-makers, executors, and controllers. All operations are made verifiable because they are documented.

Those performing auditing functions are bound to ensure the truthfulness and accuracy of data and information.

Every operation or activity must be lawful, authorized, coherent, documented, verifiable, in compliance with the principle of traceability and company procedures, according to prudence and protection of company interests.

Company procedures must allow for verification of operations, authorization processes, and execution of activities.

Every employee handling operations involving money, assets, or other economically quantifiable benefits belonging to the company must provide reasonable evidence to allow verification of such operations.

Controls and Verifications

The company ensures that, through competent personnel, all information and document access requests necessary for auditing and control bodies are provided. 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 functions, all the 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 attesting to untrue situations, including through IT systems, with the purpose of improperly receiving public funds and/or obtaining and 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:

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

The O.d.V. has the following responsibilities:

- Communicate to General Management, for appropriate action, any reports received regarding violations of the Code of Ethics.
- Express binding opinions regarding the review of major policies and procedures to ensure consistency with the Code of Ethics.
- Contribute to the periodic review of the Code of Ethics; for this purpose, the O.d.V. makes proposals to the Board of Directors, which evaluates and, if appropriate, approves and formalizes them.

The O.d.V. maintains autonomy and independence, and assumes investigative and control powers, as well as initiative powers for the execution of its assigned functions.

Reporting Problems or Suspected Violations

Violations of the Code of Ethics by recipients are subject to the disciplinary system established by the company's 231 Model. In fact, in the event of violations of the Code of Ethics, the company may take disciplinary measures against those responsible, when deemed necessary to protect the organization's interests, up to and including dismissal, in addition to any compensation for damages resulting from the violations. Non-compliance with the Code of Ethics by members of corporate bodies may result in the adoption, by the competent corporate bodies, of the most appropriate measures permitted by law. Violations of the Code of Ethics by employees constitute a breach of the obligations arising from the employment relationship, with all contractual and legal consequences, including as regards their relevance as a disciplinary offense. Violations committed by suppliers and external collaborators will be punishable in accordance with the relevant contractual agreements, except in cases of more serious legal violations. Particular attention is given to the handling of data through internal IT systems: any problems or suspected violations must be immediately reported to the IT manager and/or General Management for appropriate action.

Disciplinary Measures Resulting from Violations

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by personnel and by parties having business relationships with the company. Violation of the principles and behaviors indicated in the Code of Ethics undermines the trust relationship between the company and the violators, whether they are administrators, employees, consultants, collaborators, clients, or suppliers. For details on the disciplinary system and sanctioning mechanisms, refer to the company's adopted 231 Model.

In general, violations will be addressed as follows:

- For employees (including members of corporate bodies and the O.d.V.), through appropriate disciplinary measures, regardless of the potential criminal relevance of the behavior and the initiation of criminal proceedings in cases where conduct constitutes a crime. Sanctions may

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include warnings, suspension without pay, demotion, and, in more serious cases, dismissal. The individual concerned will be given the opportunity to explain their behavior before any disciplinary action is taken.

- For consultants, collaborators, clients, suppliers, and other parties with contractual relationships with the company, specific procedures for contract termination will be activated.

Furthermore, the company reserves the right to seek compensation for any damages suffered as a result of violations of the Code of Ethics by the above parties.

Public Service Assignments

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

- Respect for principles of impartiality, typical of Public Administration
- Non-acceptance of benefits, money, or utilities
- Non-acceptance of illegitimate influences by third parties
- Avoiding conflicts of interest of its appointees

Confidentiality

Recipients are required to observe the highest confidentiality regarding information, documents, studies, initiatives, projects, and contracts they learn about in the performance of their duties. The company implements measures to protect information and prevent access by unauthorized personnel.

Dissemination, Communication, and Training

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

Operational Procedures and Decision-Making Protocols

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

Delegation System

Besides already qualified individuals, the company uses a delegation system whereby certain activities may only be carried out by expressly authorized persons with powers granted through official delegation and/or notarized proxy. It is necessary that individual operations in various phases are performed by different subjects whose responsibilities are clearly defined and known within the organization to avoid granting unlimited or excessive powers to single individuals.

FINAL PROVISIONS

Conflicts with the Code of Ethics

If even one provision of this Code of Ethics conflicts with provisions in internal regulations or procedures, the Code of Ethics shall prevail.

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Approval and Amendments

This Code of Ethics was originally approved by the company's Board of Directors. Any changes or additions to this Code of Ethics will be approved by the Board of Directors after consultation with the O.d.V. and promptly communicated to all recipients, in particular:

- The O.d.V. periodically reviews the Code of Ethics for legislative or corporate changes and proposes any modifications or additions.
- Any modifications or additions will be developed, under mandate from the Board of Directors, either by a third party with formal assignment or by the O.d.V. through extension of its existing mandate.
- The Board of Directors examines the proposals and deliberates accordingly, immediately implementing the approved changes.