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MANAGEMENT AND CONTROL ORGANISATIONAL MODELWithin the meaning of D. Lgs. 231/01 of June 8th 2001 and s.m.i.**ETHICAL CODE**

Version	Date	Description	Author
Rev.00	03/01/2022	First Emission	HM

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1. GENERAL INTRODUCTION

1.1 PREMISE

This document, called the Ethical Code, regulates the set of rights and responsibilities that the company expressly assumes towards those with whom it interacts in carrying out its activities.

In full harmony with the positions expressed and safeguarded by the accreditation system to which it adheres, the organization is aware of contributing through its actions, with a sense of responsibility and moral integrity, to the process of development of the Italian economy and the country's civil growth.

The company believes in the value of work and considers legality, correctness, and transparency of action as indispensable prerequisites for achieving its economic, productive, and social objectives.

The company affirms the congruity of its own Ethical Code in pursuing its social mission.

The Ethical Code also aims to introduce and make binding for the company the principles and rules of conduct relevant to the reasonable prevention of crimes indicated in Legislative Decree no. 231/2001.

The Ethical Code, considered as a whole and together with all the specific implementing procedures approved by the company, is considered an integral part of contracts of subordinate employment which have been already signed or to be signed, pursuant to Article 2104 of the Italian Civil Code (Diligence of the employee).

The violation of its provisions will therefore constitute a disciplinary offense and, as such, will be pursued and sanctioned by the company in accordance with and for the purposes of Article 7 (Disciplinary Sanctions) of Law no. 300/1970 (Workers' Statute - Rules on the protection of freedom and dignity of workers, freedom of trade union activity and trade union activity in the workplace, and rules on placement) and may entail compensation for damages caused to the organization.

As for collaborators, consultants, and self-employed workers (further specified among the addressees) who provide their services in favor of the company, as well as other third parties, the subscription to this Code of Ethics or an extract thereof, or, in any case, adherence to the provisions and principles contained therein, represent a "conditio sine qua non" for the stipulation of contracts of any nature between the company and such parties. The provisions thus subscribed or, in any case, approved, also by conclusive acts, constitute an integral part of the contracts themselves.

In light of the foregoing, any violations by the parties referred to in the preceding paragraph of specific provisions of the Code of Ethics, based on their seriousness, may justify the termination by the company of the contractual relationships with said parties and may also be identified ex ante as causes of automatic termination of the contract pursuant to Art. 1456 of the c.c. (express termination clause).

1.2 RECIPIENTS OF THE COMPANY'S CODE OF ETHICS

By adopting the Code of Ethics, the company wanted to define moral values, clear rules and procedures to conform.

The Code of Ethics is directed to:

- Members of the collegiate bodies
- Employees (both temporary and permanent)

- Project collaborators
- External and internal consultants
- Suppliers of goods and services
- Any other person who can act in the name and on behalf of the company both directly and indirectly, permanently or temporarily or those who establish relationships with the company and work to reach its goals.

The addressees of this Code of Ethics are required to learn the contents and to respect the precepts.

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

The Management, or a delegate, of the company is responsible for the effective implementation of the Code of Ethics and the dissemination of the same inside and outside the organization.

Company employees, in addition to complying with the regulations in force and the provisions provided for by collective agreements - where applicable - undertake to adapt the methods of carrying out work activities to the purposes and provisions outlined in this Code of Ethics.

This applies to both intra-company relationships and relationships with external parties to the company, particularly with Public Administrations and other public authorities.

An essential requirement for every relationship of fruitful collaboration with the company is the adherence, by other recipients, to the principles and provisions contained in this Code of Ethics.

In this regard, upon the signing of contracts or agreements with other recipients, the company provides its counterparts with a copy of this document.

2. BEHAVIOR PRINCIPLES FOR THE ORGANIZATION

2.1 INTRODUCTION

The principles listed below are considered fundamental, and our organization commits to respecting them towards everyone.

It is essential that these values are not merely stated but become behaviors and actions inherent to the company.

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

The fundamental values on which the activity of the company is based are:

- 2.1 Integrity in compliance with Laws and Regulations,
- 2.2 Rejection of all discrimination,
- 2.3 Centrality, development and enhancement of human resources and equity of authority,
- 2.4 Territorial rooting,
- 2.5 Transparency and business ethics,
- 2.6 Quality,

2.7 Diversity,

2.8 Legality and combating terrorism and crime.

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

2.2 INTEGRITY OF BEHAVIOR AND RESPECT FOR LAWS AND REGULATIONS

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

Each individual is required to operate, in any situation, with integrity, transparency, consistency, and fairness, conducting every business relationship with honesty.

The company operates in strict compliance with the law and endeavors to ensure that all staff act accordingly: individuals must maintain behavior in accordance with the law, regardless of the context, activities, or locations in which they operate.

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

The company will not initiate or continue any relationship with those who do not intend to align themselves with this principle.

2.3 REJECTION OF ALL FORMS OF DISCRIMINATION

In decisions affecting relationships with stakeholders (staff management and organization of work, selection and management of suppliers, relationship with the surrounding community and the institutions representing it), our organization avoids all forms of discrimination based on age, gender, sexuality, health status, race, nationality, political opinions, and religious beliefs of its counterparts.

2.4 CENTRALITY, DEVELOPMENT, AND VALUATION OF HUMAN RESOURCES AND FAIRNESS OF AUTHORITY

The company recognizes the centrality of human resources and believes that an essential factor for success and development lies in the professional contribution of the individuals operating within it.

The company has always placed professionalism and the individual contribution of people at the core of its operations, maintaining a relationship style that aims to recognize each person's work as a fundamental element of both company and personal development.

Additionally, the company places dialogue, the exchange of information - at any level -, the valorization and professional development of its collaborators, and the establishment of a corporate identity and a sense of belonging at the heart of its daily operations.

This value translates into:

- Creating a working environment capable of enhancing the contribution and potential of individuals through the gradual empowerment of staff.
- Establishing a relationship system that privileges teamwork over hierarchical relationship.
- Daily efforts aimed at sharing skills and knowledge also through the use of innovative systems.

The company attaches the utmost importance to those who work within its organization, contributing to its development. It is precisely through human resources that the company is able to provide, develop, improve and ensure optimal management of its services.

While complying with legal and contractual provisions regarding the duties of workers, employees are required to demonstrate professionalism, dedication to work, loyalty, teamwork, mutual respect, a sense of belonging, and morality.

In managing contractual relationships that involve hierarchical structures, our company commits to ensuring that authority is exercised fairly and justly, and that any form of abuse is avoided. Specifically, the company guarantees that authority does not turn into the exercise of power that undermines the dignity and autonomy of individuals.

These values must be upheld in making decisions regarding work organization in all circumstances.

2.5 TERRITORIAL ROOTING

The company aims to create projects aimed at a direct involvement of the community, public and private institutions, entrepreneurship, and associations in everything related to health education, prevention, and taking charge of one's well-being. The company is committed and will continue to ensure that the entities collaborating with it adhere to the same behavioral norms and align their activities with the same principles and values.

Furthermore, the company promotes local development through strong connections with various actors in the local community. It therefore acts within the local community to develop a rich and generative society, capable of recognizing and enhancing its resources, existing skills and potentials, gender, cultural, and ethnic differences, promoting well-being, integration, and social development, and emphasizing the acknowledgment of these by users and those who physically provide the service.

2.6 TRANSPARENCY AND BUSINESS ETHICS

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

- Reliability: understood as a guarantee of absolute seriousness in the projects launched, transactions, and commitments made.

- **Solidity:** related to an entity that relies on defined asset bases, as evidenced by its prolonged activity.
- **Transparency:** resulting from the conception of the social role that not only requires respect for ethical principles and work but also the implementation of methods that allow reference communities and social actors to have access to information to reconstruct the actions.
- **Fairness in contractual matters:** avoiding that, in existing relationships, anyone operating on behalf of the company seeks to take advantage of contractual gaps or unforeseen events to renegotiate the contract solely for the purpose of exploiting the dependent or weakened position in which the interlocutor finds themselves.
- **Competition protection:** refraining from collusive, predatory, and abuse of position behaviors.

2.7 QUALITY

Quality is a distinctive 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 by the company through a set of processes managed through a quality management system that provides external parties with uniformity, transparency, and service improvement.

2.8 DIVERSITY

The company demands behaviors that guarantee the utmost respect for the dignity of individuals from its administrators, employees, and collaborators. Therefore, the organization:

- Ensures the scrupulous observance of laws protecting child and infant labor, freedoms, and workers' rights.
- Ensures conditions for free association with trade unions.
- Does not tolerate violations of human rights.
- Promotes integration as a form of collective enrichment in the overall social fabric.

In particular, the company condemns any form of discrimination based on gender, ethnicity, political affiliation, or religion.

2.9 LEGALITY AND COUNTERING TERRORISM AND CRIME

The company strongly believes in democratic values and condemns any activity that may have purposes of terrorism or subversion of democratic order.

Furthermore, the organization condemns any activity involving:

- Forgery, counterfeiting, alteration, and/or use of coins, public credit cards, and stamp values
- Acceptance and processing of proceeds from criminal activities (money laundering)
- Unauthorized access to external computer systems
- Abusive possession of access codes

- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Interceptions, hindrances, and interruptions of computer communications
- Propagation of ideas of tolerance and omertà concerning the use of drugs or substances creating any form of addiction
- Incitement to commit illegal acts or acts contrary to moral sense.

Negligence in countering violence, damage to public property, and adherence to internal regulations.

3. SOCIAL STAKEHOLDERS

3.1 CUSTOMERS

The primary objective of the company is to fully satisfy the needs of its customers.

In this context, the organization ensures the best execution of entrusted tasks to the customer and is constantly oriented towards proposing increasingly advanced and innovative solutions with a view to 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 the privacy of its customers in accordance with applicable laws, undertaking not to disclose or disseminate their personal data except as required by law.

Furthermore, the company adopts a communication style based on efficiency, collaboration, and courtesy.

3.2 FINANCIAL INSTITUTIONS

The organization maintains relationships with financial institutions based on fairness and transparency, with the aim of creating value for the company itself.

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

3.3 SUPPLIERS

Suppliers of goods and services

The company establishes collaborative relationships with its suppliers, respecting current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, ethical practices, health and safety protection, and environmental respect.

Internal and external consultants

Consultants are chosen based on their professionalism, reputation, reliability, and 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 accordance with the regulations and principles of this Code of Ethics.

3.4 PUBLIC ADMINISTRATION

The term "Public Administration" refers to any individual, entity, or interlocutor who can be qualified as a Public Official or Agent of Public Service operating on behalf of the central or peripheral Public Administration, or Public Supervisory Authorities, Independent Authorities, Community Institutions, as well as private partners who are concessionaires of a Public Service.

The company is guided by and adapts its conduct, in its relations with the Public Administration, to the principles of fairness and honesty. Based on this, individuals appointed by the company to handle any negotiation, request, or institutional relationship with the Public Administration, whether Italian or foreign, must not under any circumstances seek to improperly influence decisions or engage in illicit behavior, such as offering money or other benefits, which may compromise the impartiality of the representative of the Public Administration.

Individuals appointed by the organization to manage relationships with any authority of the Public Administration must ensure that the information provided by any means and for any purpose is true, accurate, and correct. Only individuals expressly designated by the company for this purpose are permitted to have direct contact with the Public Administration on behalf of the company.

No other employee may engage in any kind of relationship with the Public Administration for activities related to the company's corporate purpose.

In carrying out tenders, individuals appointed by the company must comply with the law and its related regulations.

Employment Relationships with Former Public Administration Employees

The hiring of former employees of the Public Administration who, in the performance of their duties, have had relationships with the company or their relatives and/or affiliates, occurs in strict compliance with the standard procedures defined by the organization for personnel selection.

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

Grants and Financing

Contributions, grants, or financing obtained from the European Union, the State, or any other Public Entity, 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 recipients of this Code of Ethics from using funds received from Public Administrations and/or inter-professional funds for purposes other than those for which they were granted.

Similarly, in the case of participation in public procurement procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and proper business practice, particularly avoiding inducing Public Administrations to act improperly in favor of the company.

The organization is committed to preventing actions by the recipients of this Code of Ethics that may lead to illicit advantages.

It is also considered illicit behavior to resort to altered or falsified statements or documents, or the omission of information, or, in general, the use of tricks or deception aimed at obtaining concessions, authorizations, financing, or contributions from the European Union, the State, or any other Public Entity.

3.5 SUPERVISORY PUBLIC AUTHORITIES

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

3.6 PUBLIC AUTHORITIES, ASSOCIATIONS, AND INSTITUTIONS REPRESENTING INTERESTS

The recipients of this Code of Ethics commit to:

- Scrupulously observe the provisions issued by the competent institutions or Public Supervisory Authorities for compliance with the current regulations in the sectors related to their respective areas of activity.
- In the context of incorrect investigations with Institutions and/or Public Supervisory Authorities, instances or requests containing untrue statements are not to be presented in order to obtain public disbursements, contributions, or facilitated financing, or to unduly obtain concessions, authorizations, licenses, or other administrative acts.
- Comply with any request from the aforementioned institutions or Authorities within the scope of their supervisory functions, providing – where required – full cooperation and avoiding obstructive behavior.

4. PRINCIPLES OF CONDUCT TO BE ADHERED TO BY THE STAFF

4.1 PROFESSIONALISM

Each individual carries out their work activities and tasks with diligence, efficiency, and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities associated with their duties.

4.2 LOYALTY

Individuals are required to be loyal to the company.

4.3 HONESTY

Within the scope of their work activities, individuals within the company are required to diligently understand and comply with Model 231 and current laws. Honesty represents the fundamental principle for all of the company's activities and initiatives and constitutes an essential value of organizational management. Relationships with stakeholders at all levels must be based on principles and behaviors of correctness, collaboration, loyalty, and mutual respect. Under no circumstances can the pursuit of the company's interest justify dishonest conduct.

4.4 LEGALITY

The organization is committed to complying with all national and international norms, laws, directives, and regulations, as well as all generally recognized practices. Furthermore, it guides its decisions and behaviors in the care of the public interest entrusted to it.

4.5 FAIRNESS AND TRANSPARENCY

Individuals do not use information, assets, or equipment available to them in the performance of their function or assignment for personal purposes. Each person neither accepts nor makes, for themselves or others, pressures, recommendations, or reports that may harm the company or provide undue advantages for themselves, the company, or third parties. Each individual rejects and does not make promises of undue offers of money or other benefits. The company commits to operate in a clear and transparent manner, without favoring any interest group or individual.

4.6 CONFIDENTIALITY

Individuals ensure the utmost confidentiality regarding news and information constituting the company's assets or relating to business activities, in compliance with legal provisions, current regulations, and internet procedures. Additionally, individuals within the company are required not to use confidential information for purposes unrelated to the exercise of their activities.

4.7 RESPONSIBILITY TOWARDS THE COMMUNITY

The company, aware of its social role in the reference territory, economic and social development, and the general welfare of the community, intends to operate in respect of national and local communities, supporting initiatives of cultural and social value to improve its reputation and legitimacy to operate.

4.8 RESOLUTION OF CONFLICTS OF INTEREST

Individuals pursue the objectives and general interests of the company in carrying out work activities. They promptly inform their superiors or designated contacts of situations or activities in which there may be an interest conflicting with that of the company, whether from themselves or their close relatives, and in any other case where there are significant reasons of convenience. Individuals respect the decisions made by the company in this regard.

4.9 SENSE OF BELONGING

Individuals, in carrying out their work activities, pursue everything that does not hinder or prejudice in any way the development of a sense of belonging of individuals to their own organization, work group, or towards third parties.

4.10 MUTUAL RESPECT

Individuals engaged in any capacity in collaboration with the company demand and actively demonstrate respect for tasks, skills, and methods of carrying out tasks, even by refraining from expressing personal considerations to third parties.

4.11 SPECIFIC OBLIGATIONS

Employees of the company must follow the instructions outlined below:

Transparency

It is good practice for every piece of information regarding activities carried out within the company to be accessible to everyone.

Every collaborator is responsible for communicating with their supervisor and colleagues regarding the work they have performed.

In case of misunderstandings or problems, it is the duty of everyone to first report to their supervisor or designated contact.

Behave in a scrupulously loyal and independent manner, free from any influences that may affect their work, both towards their Client and towards external Organizations in relation to them.

Do not engage in inappropriate economic relationships or accept gifts of value or favors of any kind from Organizations, suppliers of their Client.

Report, at the time of accepting a professional assignment or during its execution, any relationship or shared interest with external Organizations that have dealings with their Client, which may result in conflicts of interest.

Consistency

Once a commitment is made, it should be fulfilled. Never leave a task unfinished and never take on commitments that you already know you cannot fulfill.

Politeness and Kindness

Courtesy and kindness are and must be the foundation of every daily activity. They should also be constant in interpersonal relationships, both internally and externally within the company.

Punctuality

If you are running late for an appointment, it is good practice to notify the other party before the agreed-upon time expires; doing so afterward is considered rude. Punctuality is a form of respect for those who are waiting for us.

Privacy

All information and data managed in the workplace are company property and confidential, and as such, they must be treated. In particular, one should never discuss work-related issues or situations in public places where they may be overheard or in the presence of individuals who are not entitled to be involved in the information at hand.

Professionalism

Being professional means knowing all appropriate behaviors, everything necessary to perform one's job to the best of their ability, while considering the needs of clients and the company. Regardless of the task at hand, it is always necessary to maintain professionalism.

Work Environment

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

Loyalty and Company Respect

It is the duty of each individual to share the company policies and strive for their compliance. During daily activities, every employee should always safeguard the interests and image of the company, as well as have the utmost respect for company property. When carrying out their tasks, individuals should always consider the economic implications of their choices, avoiding wastage.

Respect for the Customer

The company, like all companies in a free market, thrives thanks to its customers. Respect, kindness, and courtesy should be constant in the interactions of those who come into contact with the organization.

Workstation

Each employee is responsible for their own workstation. Everyone is responsible for the care and cleanliness of the tools at their disposal.

Personal Computer

The personal computers provided must be maintained in the best possible condition, and no other programs can be installed except those specified by the company's configuration. The hardware equipment provided by the company constitutes work tools and cannot be used for personal purposes. In particular, the files contained therein constitute company assets and cannot be arbitrarily damaged and/or destroyed. It is strictly prohibited to use hardware equipment for copying and/or storing files and data, such as USB mass storage devices, laptops, optical disks, burners, and any other electronic storage media, without prior express authorization from the company.

Internet

Internet connection is a work tool and as such must be used appropriately.

The use of the Internet for personal purposes is allowed only outside working hours.

Internet browsing:

- It is not allowed for sites that are not directly related to the assigned tasks, especially those that may reveal the political, religious, or union opinions of the employee.
- Financial transactions of any kind, including remote banking, online purchases, and similar operations, are not allowed unless directly authorized by the company and in compliance with normal purchasing procedures.
- Downloading and installing free software (freeware), shareware, P2P, and/or FTP from websites is not allowed without prior express authorization from the company.
- Any form of registration on sites whose contents are not related to work activities is prohibited.
- Participation, for non-professional reasons, in forums or the use of chat lines is not allowed, and the storage of computer documents that are offensive and/or discriminatory based on gender, language, religion, race, ethnic origin, opinion, union membership, and/or political affiliation, etc., is not permitted.

Email

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

- Any email message (related to work activities) can be copied and/or made public at any time.
- Using email (internal and external) for reasons unrelated to assigned tasks is not allowed.
- Sending or storing messages (internal or external) that are offensive or discriminatory based on gender, language, religion, race, ethnic origin, opinion, union membership, and/or political affiliation, etc., is not allowed.
- Configuring and using email accounts external to the company is not allowed.

Cell Phones

The use of cell phones has rules of good behavior that should always be followed.

Given that it is a work tool, the cell phone should always be kept silent during meetings and encounters with clients, especially when at their premises.

The use of the cell phone for personal purposes should be kept to a minimum and only for emergency situations.

Company Cars

The company car is under the total responsibility of the assigned person and, like all company assets, should be used and maintained with the utmost care. It must be driven in full compliance with road traffic regulations. It is the responsibility of the assigned driver to ensure the cleanliness, maintenance, and optimal efficiency of the vehicle at all times. Any fines resulting from road traffic violations are the responsibility of the driver.

Private Cars

The use of a private car for work purposes is allowed, and like in the case of the company car, the driver must operate in full compliance with road traffic regulations. Any fines resulting from road traffic violations are the responsibility of the driver.

5. CODE OF CONDUCT

5.1 INTRODUCTION

The rules contained in this section aim to indicate to the recipients of this Code of Ethics the attitudes and behaviors to be observed during the performance of various business activities in accordance with the values inspired by this document.

All recipients of this Code of Ethics must observe correct and transparent conduct in carrying out their function, thus contributing to the effectiveness of the internal control system to protect the company's value.

In compliance with legal regulations, all recipients must maintain an attitude based on cooperation with social bodies and supervisory authorities.

5.2 RELATIONS WITH STAFF

For further details, reference may also be made to the relevant Procedures of the System for Management 231. In general:

Personnel selection

The evaluation of personnel to be hired, or collaborated with, is based on the correspondence of candidates' profiles with those expected and internal needs, in compliance with equal opportunities for all interested parties. The requested information is strictly related to the verification of aspects provided by the professional and psycho-attitudinal profile, respecting the candidate's privacy and opinions. The General Management adopts, in the selection process, appropriate measures to avoid favoritism and facilitations of any kind and carries out a careful selection based not only on mandatory aspects but also on preferential aspects decided by the Management.

Establishment of the employment relationship

Personnel are hired with regular employment contracts, professional service contracts, or internships: no form of irregular work is tolerated.

Integrity and protection of the individual

In the context of personnel management and development processes, as well as in the selection phase, decisions are based on the correspondence between expected profiles and profiles possessed by individuals and/or on merit considerations. Access to roles and positions is based on competencies and abilities.

Furthermore, compatible with the overall efficiency of work, forms of flexibility in work organization are encouraged to facilitate individuals in maternity leave as well as those who need to care for children.

Enhancement and training of resources

The company provides individuals with informational and training tools aimed at enhancing specific skills and preserving the professional value of personnel. Institutional training is provided at certain stages of professional life, tailored to the individual (e.g., new hires receive an introduction to the activity), and ongoing training is provided to operational staff (e.g., training in workplace safety, management of 231 compliance, and ethical code).

5.2.1 HEALTH AND SAFETY

The company is committed to providing a work environment capable of protecting the health and safety of its personnel by disseminating and consolidating a safety culture, developing awareness of risks, and promoting responsible behavior among all staff members.

Additionally, the company operates to preserve, particularly through preventive actions, the health and safety of its workers. Among the main objectives is the protection of human resources by constantly seeking necessary synergies not only internally but also with suppliers, external consultants, and clients involved in the company's activities.

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

The company adopts general measures to protect health and safety in the workplace prescribed by regulations, with particular reference to Legislative Decree no. 81/08 and subsequent amendments. The organization is committed to scrupulously respecting all regulations concerning health and safety in the workplace for employees, collaborators, and users. In particular:

- It defines operational procedures to follow and coordinates activities related to health and safety in the workplace.
- It ensures compliance with current regulations through the development of risk assessment documents and the definition of processing procedures in line with current safety standards.
- It constantly monitors legislative innovations and works towards their implementation.

Additionally, the company commits to ensuring:

- Evaluation of all risks to health and safety
- Prevention planning, aimed at an integrated system that coherently integrates operational conditions into prevention, as well as the influence of environmental and work organization factors.
- Elimination of risks and, where this is not possible, their minimization in relation to knowledge acquired based on technical progress.
- Respect for ergonomic principles in work organization, in the design of workstations, in the choice of equipment, and in the definition of work and service delivery methods, particularly to reduce the health effects of monotonous and repetitive work.
- Risk reduction at the source.
- Substitution of what is dangerous with what is not or is less dangerous.
- Minimization of the number of workers who are or may be exposed to risk.
- Limited use of chemical, physical, and biological agents in the workplace.
- Priority of collective protection measures over individual protection measures.

- Health surveillance of workers.
- Worker removal from exposure to risk for health reasons related to their person and relocation, where possible, to another task.
- Adequate information and training for workers, managers, supervisors, the RLS (Representative for Health and Safety), and all personnel.
- Adequate instructions for workers.
- Participation and consultation of workers and the RLS.
- Planning of measures deemed appropriate to ensure improvement over time in safety levels, also through the adoption of codes of conduct and good practices.
- Emergency measures to be implemented in the event of first aid, firefighting, worker evacuation, and serious and immediate danger.
- Use of warning and safety signs.
- Regular maintenance of environments, equipment, and systems, with particular attention to any safety devices in accordance with the indications of their respective manufacturers.
- Adequate instructions to employees, collaborators, and users, and training for them as required by law and the National Collective Labor Agreement applied to staff.

5.2.2 DATA PRIVACY PROTECTION

In the processing of personal data, the company adheres to the provisions contained in European Regulation 679/2016. Individuals are provided with a privacy notice that identifies:

- Purposes and methods of processing.
- Any recipients to whom data is communicated.
- Information necessary for the exercise of the right of access as per Article 15 of the GDPR.

In cases where regulations require it, individuals are asked for specific consent for the processing of their personal data. Any inquiry into the ideas, preferences, personal tastes, and, in general, the private life of employees and collaborators is excluded.

The same procedure is applied for the electronic management of information and personal data.

5.2.3 ENVIRONMENTAL PROTECTION

The organization is committed to pursuing environmental protection through compliance with national and European legislation and regulations. It aims to prevent pollution and promote awareness among employees and collaborators regarding environmental issues.

5.3 EMPLOYEE RESPONSIBILITIES

For further details, reference may also be made to the procedures of the 231-management system.

Individuals must act loyally to fulfill the obligations stipulated in the employment contract and as provided by the Code of Ethics, ensuring the required performance.

5.3.1 DELEGATIONS AND RESPONSIBILITIES

Missions, responsibilities, and powers of administrators, employees, and collaborators are defined through specific resolutions and/or appropriate procedures. These missions, responsibilities, and powers must be known, accepted, and respected.

5.3.2 RESPONSIBILITIES FOR FUNCTIONAL MANAGERS TOWARDS THE CODE OF ETHICS

Every functional manager, identified as such in the organizational chart, job descriptions, and/or delegation system, is obliged to:

- Ensure compliance with the Code of Ethics by individuals directly or indirectly under their responsibility.
- Set an example for their employees/collaborators through their behavior.
- Work to ensure that employees understand that the provisions of this Code of Ethics are an integral part of their work performance.
- Promptly report to the General Management or any delegated representative or the Ombudsman any reports or special needs from their subordinates.

Failure by functional managers to fulfill the obligations outlined in this chapter may result in the application of disciplinary sanctions, as provided for by the sanctioning system.

5.3.3 RESPONSIBILITIES FOR ALL EMPLOYEES TOWARDS THE CODE OF ETHICS AND COMPANY DOCUMENTATION

Every employee is required to be familiar with the provisions contained in the Code of Ethics or referenced therein, as well as the relevant legal regulations governing the activities within their function, which are integral parts of each individual's work performance.

An employee who becomes aware of alleged illicit conduct is obligated to report the information they possess regarding such conduct only to their superiors or the Ombudsman and/or the General Management in accordance with the internal system.

Employees also have the obligation to:

- Refrain from behaviors contrary to these provisions and regulations.
- Seek clarification from their superiors or the Ombudsman and/or delegated representative as responsible for managing the prevention model for the necessary clarification on the application of the Code of Ethics or relevant regulations.
- Promptly report to at least one of the aforementioned parties any information regarding possible violations of the Code of Ethics.
- Collaborate with the organization in the event of any investigations aimed at verifying and potentially sanctioning possible violations.

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

5.3.4 PROTECTION OF COMPANY ASSETS

Each recipient is required to operate diligently to protect company assets from improper or incorrect use. Individuals must be familiar with and implement the internal policies on information security to ensure integrity, confidentiality, and availability.

Information and know-how must be protected with the utmost confidentiality. The most significant data acquired or created by the company during its activities must be considered confidential information and subject to appropriate attention: this also includes information acquired from and concerning third parties (customers, contacts, partners, employees, etc.).

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

Both during and after the termination of their employment relationship with the company, individuals may only use confidential data for the benefit of the company and never for their own benefit and/or that of third parties.

5.3.5 CONFIDENTIAL INFORMATION ABOUT THIRD PARTIES

Company personnel must refrain from using illicit means to acquire confidential information about other organizations and third-party entities.

Those who, within the framework of a contractual relationship, become aware of confidential information about other subjects, will be required to use it exclusively for the purposes specified in the contract in question.

Without proper authorization, individuals may not request, receive, or use confidential information about third parties. If they become aware of confidential information about another party that is not already subject to a nondisclosure agreement or other form of protection, they must contact their supervisor for assistance in handling such information.

5.3.6 USE OF COMPANY ASSETS

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

In particular, every individual must:

- Use the entrusted assets with diligence and thriftiness.
- Avoid improper use of company assets that could cause damage or reduce efficiency or are otherwise contrary to the company's interests.
- Adequately safeguard the resources entrusted to them and promptly inform the relevant units of any threats or harmful events to the company.

Regarding computer applications, each individual is expressly required to:

- Strictly adhere to the company's security policies to avoid compromising the functionality and protection of information systems.

- Refrain from sending threatening or offensive emails or using low-level language or expressing inappropriate comments that could offend individuals and/or damage the company's image.
- Refrain from browsing websites with indecent and offensive content and, in any case, unrelated to professional activities.

5.4 RELATIONSHIPS WITH CUSTOMERS

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

5.4.1 IMPARTIALITY

The company is committed to offering its products and services without discrimination between private customers or those potentially entitled to a dowry, with particular attention to the latter.

5.4.2 CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

Contracts and communications to customers from the company must always be:

- Clear and simple, formulated in language as close as possible to that normally used by the interlocutors.
- Compliant with current regulations and designed to avoid evasive or otherwise improper practices.
- Comprehensive, ensuring that no relevant element is overlooked for the customer's decision-making process.

5.4.3 CUSTOMER INTERACTION STYLE

The behavior of company personnel towards customers is characterized by availability, respect, and courtesy, aiming for a collaborative relationship and high professionalism.

5.4.4 DATA HANDLING

In the processing of customers' personal data, the organization adheres to the provisions contained in European Regulation 679/2016.

A privacy notice is provided, outlining:

- Purposes and methods of processing.
- Any recipients to whom the data is communicated.
- Information necessary for the exercise of the right of access as per Article 15 of the GDPR.

In cases where regulations require it, individuals are asked for specific consent for the processing of their personal data; any inquiry into the ideas, preferences, personal tastes, and, in general, the private life of customers is excluded.

Personnel are obligated to handle data with the utmost discretion and confidentiality, especially internally; the same procedure is applied for the electronic management of information and personal data.

5.5 RELATIONSHIPS WITH SUPPLIERS

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

5.5.1 SUPPLIER SELECTION

The purchasing processes are guided by:

- Pursuit of maximum competitive advantage for the company.
- Equal opportunities for suppliers.
- Loyalty.
- Impartiality.

The selection of suppliers and the determination of purchasing conditions are based on an objective evaluation of the quality, price, availability of the goods or services, as well as assurances of assistance and timeliness. An additional selection criterion is the exclusion of suppliers who are undergoing criminal proceedings for contracts or other activities of a mafia nature.

5.5.2 INTEGRITY AND INDEPENDENCE OF RELATIONSHIPS

Relationships with suppliers, including those concerning financial and consultancy contracts, are subject to constant monitoring by the company.

The signing of a contract with a supplier should always be based on relationships of extreme clarity, avoiding, where possible, forms of dependence.

Documents exchanged with suppliers must be appropriately archived: in particular, those of an accounting nature must be kept for the periods established by current regulations.

5.6 RELATIONSHIPS WITH PUBLIC ADMINISTRATIONS

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

5.6.1 FAIRNESS AND LOYALTY

The company intends to conduct relationships with the Public Administration with the utmost transparency and ethical behavior. These relationships, which must comply with current regulations, are guided by general principles of fairness and loyalty so as not to compromise the integrity of either party.

5.6.2 GIFTS, HOSPITALITIES, AND BENEFITS

No person within the company may give money or offer economic advantages or other types of benefits to Public Administration officials in order to obtain contracts or other personal or corporate benefits.

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

In this regard, a "normal commercial or courtesy practice" of a value less than €100.00 is considered as a gift. Specifically, any form of gift to Italian and foreign public officials or their family members that may influence their independence of judgment in order to obtain more favorable treatment or undue benefits of various kinds is 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 future employment, etc.

The above cannot be circumvented by resorting to third parties: in this regard, acts of corruption include not only illicit payments made directly to the entities or their employees but also illicit payments made to individuals acting on behalf of such entities.

On occasions such as anniversaries and/or holidays, the donation of goods is allowed as long as they are of modest value and within the limits set by the General Management, subject to prior communication to the Compliance Officer documented adequately to allow for appropriate verification.

If a person within the company receives explicit or implicit requests for benefits from a member of the Public Administration, they must immediately inform the Managing Director or the relevant authority for the adoption of appropriate checks and actions.

5.7 EXTERNAL RELATIONSHIPS

This section addresses the details regarding the external relationships of the company.

5.7.1 EXTERNAL EFFECTIVENESS OF THE CODE OF ETHICS

Anyone acting on behalf of and representing the company in dealings with third parties with whom the organization intends to establish commercial relations or with whom it is required to have institutional, social, political, or any other type of relationship, has the obligation to:

- Inform these parties of the commitments and obligations imposed by the Code of Ethics.
- Demand compliance with the obligations of the Code of Ethics in the performance of their activities.
- Take necessary actions in case of refusal by third parties to comply with the Code of Ethics or in case of non-compliance or partial compliance with the commitment to observe the provisions contained in the Code of Ethics itself, by informing the General Management or delegates and the Supervisory Body.

5.7.2 CONFLICT OF INTEREST

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

All recipients are required to avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict between their own interests and those of the organization, and in any case, they must adhere to the specific procedures adopted by the company in this regard.

All recipients of the Code of Ethics must refrain from benefiting from their relationship with the company in order to favor themselves or third parties to the detriment or disadvantage of the organization itself.

It is prohibited for any employee to participate, directly or indirectly, in any capacity, in commercial initiatives that are in direct competition with the company unless such participation has been previously communicated to and approved by the Managing Director, after consulting with the Supervisory Body.

In the event that situations of conflict of interest, even potential, are identified, both internal and external to the company's activities, each involved party is required to refrain from engaging in conflicting conduct and to promptly inform the Supervisory Body, which is responsible for assessing, on a case-by-case basis, the possible existence of incompatibility or prejudicial situations.

5.7.3 COMPETITIVE PRACTICES

It is of paramount importance for the company that the market is based on fair and honest competition.

The company is committed to scrupulously observing the laws in this matter and to collaborating with market regulatory authorities. In particular:

- It undertakes to carry out activities in accordance with the purpose of the law for supply contracts for goods and services that are entrusted through express agreements with public entities, including economic entities and public participation companies.
- It competes fairly in the market respecting competition rules.
- It undertakes to provide accurate information about its activities both internally and externally in response to legitimate requests.
- It ensures the accuracy and correctness of the corporate data relating to financial statements, reports, and other official documents.

5.7.4 GIFTS AND BENEFITS

Please refer to the previous chapter 5.6.2 "Gifts, Tokens of Appreciation, and Benefits".

6. APPLICATIVE MECHANISMS OF THE CODE OF ETHICS

6.1 ORGANIZATIONAL PRINCIPLES

The company ensures that the organizational system is based on the principle of separation between decision-making, execution, and control. In particular, the organization makes all operations verifiable by ensuring they are recorded.

The company binds those performing the auditing function to the truthfulness and correctness of the data and information.

Every operation and/or activity must be lawful, authorized, consistent, documented, verifiable, in accordance with the principle of traceability, and in line with company procedures according to prudent criteria and to protect the company's interests.

Company procedures must allow for checks on operations, authorization processes, and the execution of those operations.

Every collaborator who carries out operations involving sums of money, goods, or other economically assessable benefits belonging to the company must reasonably provide appropriate evidence to enable the verification of these operations.

6.2 TRANSPARENCY OF ACCOUNTING

The company's accounting adheres to generally accepted principles of truth, accuracy, completeness, and transparency of recorded data.

Recipients of this Code of Ethics undertake to refrain from any behavior, active or passive, that directly or indirectly violates regulatory principles and/or internal procedures related to the preparation of accounting documents and their representation externally.

Recipients of this Code of Ethics are also required to retain and make available, for each operation or transaction carried out, adequate supporting documentation in order to enable:

- Accurate accounting registration
- Immediate identification of underlying characteristics and motivations
- Easy formal and chronological reconstruction
- Verification of the decision-making, authorization, and implementation process in terms of legality, consistency, and appropriateness, as well as the identification of various levels of responsibility.

Recipients of this Code of Ethics who become aware of cases of omission, falsification, or negligence in accounting records or supporting documentation are required to promptly report them to their immediate superior or to the Supervisory Body (OdV) and/or the General Management.

The company promotes training and updates to ensure that recipients of this Code of Ethics are informed about the rules (legal or regulatory norms, internal regulations, provisions of industry associations) governing the preparation and management of accounting documentation.

6.3 CONTROLS AND VERIFICATIONS

The company ensures the availability, through competent personnel, to provide all necessary information and access to documents to the audit and control bodies.

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

The organization prohibits its administrators, employees, and/or collaborators from making false statements or presenting false documents or attesting to untrue situations, even through computer systems, with the aim of improperly obtaining public funds and/or obtaining and maintaining any benefits.

6.3.1 OVERSIGHT REGARDING IMPLEMENTATION OF THE CODE OF ETHICS

The responsibility for verifying the implementation and application of the Code of Ethics falls upon:

- Board of Directors
- General Management
- Coordinators
- Oversight Body: In particular, this body, in addition to monitoring compliance with the Code of Ethics, with access to all sources of information within the company for this purpose, suggests appropriate updates to the Code itself, also based on reports received from staff.

The following tasks are assigned to the Oversight Body:

- Communicate to the General Management, for appropriate measures to be taken, reports received regarding violations of the Code of Ethics.
- Provide binding opinions regarding the revision of the most relevant 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 Oversight Body formulates appropriate proposals to the Management, which evaluates and, if necessary, approves and formalizes them.

The Oversight Body maintains the requirements of autonomy and independence, assumes investigative and control powers, as well as powers of initiative for the performance of the assigned functions.

6.3.2 REPORTING OF ISSUES OR SUSPECTED VIOLATIONS

Violations of the Code of Ethics, if committed by recipients, are subject to the disciplinary system provided for in the company's Model 231.

It is specified that in the event of violations of the Code of Ethics, the company adopts disciplinary measures against those responsible for the violations, where deemed necessary for the protection of the organization's interests. These measures may include dismissal from the company and the reimbursement of damages resulting from the violations.

Failure to comply with the Code of Ethics by members of corporate bodies may result in the adoption of the most suitable measures by the competent corporate bodies, as provided and allowed by law.

Violations of the Code of Ethics by employees constitute a breach of obligations arising from the employment relationship, with all contractual and legal consequences, including disciplinary action.

Violations committed by suppliers and external collaborators will be sanctioned in accordance with the provisions of their respective contractual agreements, except for more serious violations of the law.

Particular attention is given to the treatment of computer data through internal systems: any issues or suspected violations must be immediately reported to the IT services manager and/or the General Management for appropriate action.

6.3.3 DISCIPLINARY MEASURES FOLLOWING VIOLATIONS

Violation of the principles and behaviors outlined in the Code of Ethics undermines the trust relationship between the company and the perpetrators of the violation, whether they be administrators, employees, consultants, collaborators, clients, or suppliers.

For details regarding the disciplinary system and sanctioning mechanisms, please refer to the Model 231 adopted by the company.

In general, violations will be pursued as follows:

- Regarding employees (including members of social bodies and the ODV itself), appropriate disciplinary measures will be taken, regardless of the potential criminal relevance of the behaviors and the initiation of criminal proceedings in cases where the conduct constitutes a crime. In particular, sanctions will conform to the rules and logic of the applied employment contract. Disciplinary measures range from warning or admonition to suspension without pay, demotion, and, in the most serious cases, dismissal. Before implementing a disciplinary measure, the individual concerned will be given the opportunity to explain their behavior.
- For consultants, collaborators, clients, suppliers, and other parties with contractual relationships with the company, specific methods of resolving the contractual relationship will be activated.

Furthermore, the company reserves the right to seek compensation for any damages it may suffer as a result of the above-mentioned parties' violation of the provisions contained in the Code of Ethics.

6.4 ASSIGNMENT FOR PUBLIC SERVICE

In the event of the company engaging in public service activities, the following behaviors are applied:

- Adherence to the principles of impartiality, typical of Public Administration.
- Non-acceptance of benefits, money, and favors.
- Non-acceptance of illegitimate influences from third parties.
- Avoidance of conflicts of interest of its appointees.

6.5 CONFIDENTIALITY

Recipients are required to observe maximum confidentiality regarding information, documents, studies, initiatives, projects, contracts, known for the services provided.

The company implements measures to safeguard the information managed and prevent it from being accessible to unauthorized personnel.

6.6 DISSEMINATION, COMMUNICATION, AND TRAINING

This Code of Ethics is an integral part and implementation of the Model 231 adopted by the company for the prevention of crimes committed in the interest or to the advantage of the organization itself by the subjects indicated by Legislative Decree no. 231/01.

In order to prevent violations of current regulations, as well as of the Code of Ethics itself, the company envisages the adoption of specific procedures by all those involved in the operational process, aimed at identifying the individuals responsible for the decision-making, authorization, and execution of operations. This Code of Ethics is made known to all internal and external stakeholders interested or otherwise involved in the company's mission through appropriate communication and training activities.

6.7 OPERATIONAL PROCEDURES AND DECISION-MAKING PROTOCOLS

This Code of Ethics is an integral part and implementation of the Model 231 adopted by the company for the prevention of crimes committed in the interest or to the advantage of the organization itself by the subjects indicated by Legislative Decree no. 231/01.

In order to prevent violations of current regulations, as well as of the Code of Ethics itself, the company envisages the adoption of specific procedures by all those involved in the operational process, aimed at identifying the individuals responsible for the decision-making, authorization, and execution of operations.

6.8 DELEGATION SYSTEM

Apart from the already qualified subjects (General Management), the company employs a system of delegations according to which certain activities can only be carried out by individuals expressly authorized for this purpose because they are empowered by means of a specific official delegation and/or notarial power of attorney.

It is indeed necessary that individual operations be carried out in various phases by different individuals, whose competencies are clearly defined and known within the organization in order to avoid granting unlimited or excessive powers to individual subjects.

7. FINAL PROVISIONS

7.1 CONFLICTS WITH THE CODE OF ETHICS

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

7.2 APPROVAL PROCESS AND MODIFICATIONS

This Code of Ethics was originally approved by the company's Management on the following date.

Approval date of the Code of Ethics

March 1, 2022

Any variation and/or integration of this Code of Ethics will be approved by the Sole Director after consulting the Supervisory Body and promptly disseminated to all its recipients, in particular:

- The Supervisory Body periodically reviews the Code of Ethics for any legislative or corporate changes and proposes modifications and/or integrations.
- The Sole Director examines the proposals from the Supervisory Body and deliberates accordingly, making the approved changes immediately effective.