





**CODE OF ETHICS**

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## CODE OF ETHICS

### 1 General introduction

This document, called Code of Ethics, regulates the set of rights and responsibilities that the Company assumes towards those with whom it interacts in carrying out its business.

In accordance with the positions expressed and protected by the accreditation system to which it adheres, the organization is aware of contributing with its own work, with a sense of responsibility and integrity.

Same principles are reported in the Code of Ethics of Innovery Spa and the relative regulations in force relating to the own country of origin and are adopted all principles and Policies and Procedures of Innovery S.p.A.

Innovery Group (hereinafter referred to as “Company”) believes in the value of work and considers the legality, correctness and transparency of acting as essential prerequisites for achieving its economic, production and social objectives.

Innovery Group affirms the congruity of its own Code of Ethics in the pursuit of its social mission.

The Code of Ethics also need to introduce and make binding for the Company the principles and rules of conduct relevant to the reasonable prevention of the crime according to the laws in force of the country of origin

The Code of Ethics, as a whole, and in conjunction with all approval specific implementation procedures is considered integral part of the contract work subordinated in place and to be concluded, to sens the art. 2104 cc (Diligence of the Employee).

The violation of its provisions will therefore constitute an offense of a disciplinary nature and, as such, will be prosecuted and punished by the Company pursuant to and for the purposes of art. 7 ( Disciplinary sanctions ) of Law no. 300/1970 (the Workers' Statute - Rules on the protection of the freedom and dignity of workers, freedom of association and trade union activity in the place of work and rules on employment) and it may involve a compensation of damages procured to the Company

As for collaborators, consultants and self-employed workers (more specifically below among the recipients) who lend their activities in favor of the Company and other third parties, the signing of this Code of Ethics or an extract of it or, however, the adherence to the rules and principles laid down a “Conditio sine qua non” of stipulation and contracts of any nature between the Company and such subjects. The provisions thus signed or, in any case, approved, even for conclusive facts, are an integral part of the contracts themselves.

Because of what has been described, event violations by the parties referred to in this paragraph and described above, according to their severity, can justify withdrawal and ending by the Company of Contractual relationship with these subjects and may be identified “ex ante” as an automatic resolution causes of the contract pursuant to art. 1456 cc (express termination clause).



## CODE OF ETHICS

### 1.1 Recipients of the Company's Code of Ethics

Through the adoption of the Code of Ethics , the Company intended to define moral values, clear rules and procedures to comply with:

The Code of Ethics is directed to:

- **Members of the collegial bodies**
- **Employees (Fixed Term Contract and Permanent Contract)**
- **Project Collaborator**
- **External and Internal consultant**
- **Supplier of Products and Services**
- **Any other person who can act in the name and on behalf of the Company either directly or indirectly, permanently or temporarily or those who establish relationships or relations with the Company and work to achieve its goals**

The recipients of this Code of Ethics are required to learn its contents and respect its 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 for the merger of the same inside and outside the organization .

In addition to compliance per se due to the regulations in force and the provisions of collective bargaining - where applicable, Company Employees undertake to adapt the methods of performance of the work activity to the purposes and provisions set out in the Code of Ethics .

This is true both in intra-Company relations and in relations with Third Part to the Company and, in particular, with the public administrations and with other public authorities .

Essential requirement of every fruitful cooperation with Innovery Group is represented by respect from other recipients, purposes and other provisions set out in Code of Ethics

In this sense, at the time of signing contracts or agreements with other recipients, Innovery Group provides its interlocutors a copy of this Code of Ethics.

## 2 Principles of conduct for the organization

The principles listed below are considered fundamental, so our organization is committed to to respect them towards everyone .

Furthermore, it is essential that these values do not remain only statements but are translated into behavior inherent in the Company .



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

The fundamental values on which the Company's activity is based are :

### **1.1 Integrity in compliance with Laws and Regulations**

### **1.2 Rejection of any discrimination**

### **1.3 Centrality, development and enhancement of human resources and equity of the authority**

### **1.4 Territorial roots**

### **1.5 Transparency and business ethics**

### **1.6 Quality**

### **1.7 Diversity**

### **1.8 Legality and the fight against terrorism and crime**

The Company expects these values to define its identity, unite Employees and collaborators in the global organization.

## **2.1 Integrity behaviour and compliance with Laws and Regulations**

Innovery Group is committed to realize and provide quality services and to compete on the market in accordance with principles of fair and free competition and transparency, keeping correct relationships with all public institutions, governmental and administrative, with citizens and with third Company.

Everyone is obliged to act 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 makes every effort to ensure that all personnel act in this sense: people must behave in accordance with the law, whatever the context and the activities carried out and the places in which they operate.

This commitment must also apply to consultants, Suppliers, Customers and anyone who has relations with our organization .

The Company will not initiate or continue any relationship with anyone who does not intend to align with this principle .

## **2.2 Ripudiation of any discrimination**

In decisions affecting relations with interested parties ( personnel management and work organization, Suppliers selection and management, relations with the surrounding community and with the institutions they represent ), our organization avoids any discrimination based on the age, sex, sexuality, state of health, race, nationality, disabilities, political opinions and religious belief of their interlocutors .



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### **2.3 Centrality, development and enhancement of human resources and equity of authority**

Innovery Group recognizes the centrality of human resources and believes that an essential factor for success and development is the professional contribution of the people who work there .

Innovery Group has always placed the professionalism and individual contribution of people at the center of its work , giving continuity to a style of relationship that aims to recognize the work of each one as a fundamental element of corporate and personal development .

Contextually Innovery Group put in the center of its daily work:dialog, the exchange of information at any level, enhancement and professional development of its Employees and the establishment of a corporate identity and relative status of belonging.

This value translates into:

- **Creating a work environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of staff**
- **The embodiment of a system relation that privileges team work with respect to the hierarchical relationship**
- **The daily effort aimed at sharing skills and knowledge also through the use of innovative systems**

Innovery Group assigns great importance to those who work inside the Company contributing to the developing of the Innovery Group as it is through human resources , that Innovery Group is able to deliver, develop and improve andensure optimal management of own services

Without prejudice to the legal and contractual provisions regarding the duties of workers, Employees are required professionalism, dedication to work, loyalty, a spirit of collaboration, mutual respect, a sense of belonging and morality.

In the management of contractual relationships that involve the establishment of hierarchical relationships, our 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 the authority is not transformed into the exercise of power which damages the dignity and autonomy of the person.

These values must in any case be safeguarded in making choices regarding the organization of work .

### **2.4 Territorial roots**

The Company carries out projects aimed at a direct involvement of citizens, public and private institutions, entrepreneurship and associations on everything related to health





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education, prevention and taking charge of one's own welfare. The Company takes action and will continue to take action to ensure that the companies collaborating with it, comply with the same behavioral regulations and orient their business to the same principles and values.

The Company also promotes local development through a strong connection with the various actors of the local community of reference. It therefore acts in the local community for the development of a rich and generative society, capable of recognizing and enhancing the resources that compose it, the skills and potential present, gender, cultural and ethnic differences, promoting well-being, integration and social development and enhancing the recognition of the same by users and those who materially offer the service.

### 2.5 Transparency and business ethics

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

- **Reliability**  
intended as a guarantee of absolute seriousness in the projects launched, in the transactions and in the commitments comprised.
- **Solidity**  
related to an entity that rests the defined capital bases, as evidenced by its prolonged activity
- **Transparency**  
consequent to the conception of the social role which requires not only respect for ethical principles and work but also the implementation of methods that allow the reference communities and social actors to have access to information to be able to reconstruct their work
- **Fairness in the contractual context**  
avoiding that, in existing relationships, anyone who works in the name and on behalf of the Company, tries to take advantage of contractual gaps or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness the interlocutor holds.
- **Protection of competition**  
refraining from collusive, predatory and behaviors of abuse of dominant positions.

### 2.6 Quality

Quality is a distinctive element of Innovery Group. The organization is committed and re ensuring quality in any activity, in line with its long-term strategy.

The activities are carried out by Innovery Group through a set of managed processes through a quality management system that offers external uniformity, transparency and improvement of the service

### 2.7 Diversity

The Company understands that diversity is the key to attracting the best talent in a globalized and constantly changing society. Furthermore, as a Company we reaffirm our commitment to the protection and promotion of human rights. Therefore, our talent management processes



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promote respect for diversity through equal opportunities and non-discriminatory treatment for its Employees, regardless of religion, gender, nationality, ethnic origin, sexual orientation, age, skills, disabilities, including others.

Innovery Group requires of its directors, Employees and consultants, behaviors that ensure the most absolute respect for the dignity of people, therefore the organization :

- Guarantees the most scrupulous observance of the rules for the protection of underage and child labor , freedoms and rights of workers
- Guarantees the conditions of free membership in trade union organizations
- Does not tolerate human rights violations
- Promotes, in the complex social fabric, integration as a form of collective enrichment

Innovery Group also prohibits the use of forced labor , slavery and human trafficking. Suppliers are required to respect and to adhere to this Code of Ethics and to respect it.

### **2. 8 The law and fight against terrorism and crime**

The Company deeply believes in the values of democracy and condemns any activity that may have the purpose of terrorism or subversion of the democratic order

The organization also condemns any activity that involves

- Falsification, counterfeiting, alternation and / or spending money , public credit card and tax stamps
- Acceptance and treatment of proceeds from criminal activities (money laundering)
- Unauthorized access to computer systems and outside
- Unlawful possession of access code
- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Interceptions, impediments and interruptions of computer communications
- Dissemination of ideas of tolerance and silence relating to the use of drugs or substances that create any addiction
- Incitement to carry out illegal acts or even contrary to the moral sense
- Negligence in combating violence, damage to public things and compliance with internal regulations

## **3 Social Actors**

### **3.1 Customers**

The primary objective of the Company is the full satisfaction of the needs of its Customers

In this context, the organization ensures Customers the best execution of the tasks entrusted and is constantly oriented to propose more advanced and innovative solutions with a view to integration, effectiveness efficiency and economy



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The Company provides accurate, complete and truthful information in order to allow the Customer to make a rational and informed decision. It protects the privacy of its Customers in accordance with the regulation in force on the subject, undertaking to not communicate or disseminate its policy without prejudice to the legal obligations.

The Company also 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 a view to creating value for the Company itself

For this reason, financial institutions are chosen in relation to their reputation, also for adherence to values comparable to those expressed in this Code of Ethics.

### **3.3 Suppliers**

#### **Suppliers of goods and services**

The Company defines collaboration relationship with its Suppliers, in compliance with current regulations and principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, protection of health and the safety and respect for the environment

#### **Internal and external Consultant**

The consultants are chosen in relation to professionalism and reputation as well as reliability and adherence to values comparable to those expressed in this document.

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

### **3.4 Public Administration**

The term “Public Administration” means any person, subject, interlocutor qualifiable as Public Official or Public Service Officer who operates on behalf of the central or Peripheral or Central Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private concessionary partner of a Public Service

**Innovery Group** inspires and adapts its conduct, in relations with the Public Administration, to the principles of correctness and honesty. On this basis, people appointed by the Company to follow any negotiation, request or institutional relationship with the Public Administration, Italian or foreign, must not, for any reason, try to improperly influence their decisions or engage in illegal behaviour, such as the offer of money or other utility, which may alter the impartiality of judgment of the representative of the Public Administration

All persons appointed by the Company Organization to manage relations with any authority of the Public Administration must verify that the information provided in any way and any capacity is true, accurate and correct. The people who are allowed to have direct contact with



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the Public Administration on behalf of the Company are the only people expressly indicated by the Company itself for this propose.

No other collaborator may have relations of any kind with the Public Administration for the activities related to the corporate purpose of the Company

In carrying out tenders, the subjects appointed by the Company must respect the law and related regulations.

### **Employment relationships with former Employees of the Public Administration**

The hiring of former Employees of the Public Administration who, in the exercise of their functions, have had relations with the Company or their relatives and/or similar, takes place in strict compliance with standard procedures established by Company Organization for the selection of personnel .

Even the definition of other employment and / or consultancy relationships with former Employees of the Public Administration or with their relatives and / or similar, takes place in strict compliance with standard procedures

### **Grants and funding**

Contributions, grants or funding obtained from the European Union, by the State or by other public body, including 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 by Public Administration and/or inter-professional funds for purposes other than those for which they were provided

Similarly, in case of participation in public tender procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practice, in particular avoiding inducing Public Administration to improperly operate in favor of the Company .

The organization undertakes to prevent acts that indicate the recipients of this Code of Ethics will take actions aimed at obtaining illegal advantages .

The use of altered or falsified declaration/statements or documents or the omission of information or, in general, the carrying out of tricks or deceptions, aimed at obtaining concessions, authorizations, loans, contributions from the European permits, funding, contributions from the European Union, or the State or other Public Company also constitute unlawful conduct.

### **3.5 Public Supervisory authorities**

The recipients of this Code of Ethics undertake:



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- To scrupulously observe the provisions issued by the competent institutions or Public Supervisory Authorities for compliance with the current legislation in the sectors connected to the respective areas of activity.
- In the context of ongoing investigations with Institutions and/or Public Supervisory Authorities, instances or requests containing untrue statements are not presented in order to obtain public grants, contributions or subsidized loans or to obtain undue concessions, authorizations, licenses or other administrative act.
- To comply with any request from the aforementioned institutions or authorities within their respective supervisory functions, providing - where required - full cooperation and avoiding obstructive behaviors

### **3.6 Political forces, associations and institutions with interest**

The Company deals transparently with all political force, associations present in the area and public institutions (local and national) in order to duly represent their positions on topics and issues of interest.

## **4 Principles of conduct to which personnel must comply**

### **4.1 Professionalism**

Each person carries out their work and their performance with diligence, efficiency and fairness using the best tools and time at their disposal and assuming the responsibilities related to their obligations.

### **4.2 Loyalty**

People are expected to be loyal to the Company.

### **4.3 Honesty**

As part of their work, all the Personnel of Innovery Group are required to know and diligently respect the same principles adopted by Innovery S.p.A and present in the laws in force. Honesty is the fundamental principle for all Company activities and for its initiatives, and constitutes an essential value of organizational management

Relations with stakeholders, at all levels, must be based on criteria and behaviors of correctness, collaboration, loyalty and mutual respect. In no case, can the pursuit of corporate interest justify dishonest conduct.

### **4.4 Legality**

The organization undertakes to comply with all national and international rules, laws, guidelines and regulations and all generally recognized practices. The Company also inspires its own decisions and behaviors on the care of the public interest entrusted to him.



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### **4.5 Fairness and transparency**

People do not use information, goods and equipment they have at their disposal for personal purposes in carrying out their assigned function or assignment.

Each person doesn't accept or puts for himself or for others pressures, recommendations or reports that may harm the Company or undue advantages for themselves, for the Company or for third parties. Each person rejects and makes no promises of undue offers of money or other benefits.

The Company undertakes to operate in a clear and transparent manner, without favoring any interest group or individual.

### **4.6 Confidentiality**

People ensure absolute confidentiality in relation to news and information constituting the corporate assets or related to the business, in compliance with law in force, regulations and Internet procedures. In addition, the Company's people are required not to use confidential information for purposes not connected with the exercise of their business

### **4.7 Responsibility towards the community**

The Company, aware of its social role in the reference area, on economic and social development and on the general well-being of the community, intends to operate in respect of national and local communities, supporting cultural and social initiatives in order to improve one's reputation and legitimacy to operate.

### **4.8 Conflicts of interest resolution**

People pursue, in carrying out their work, the objectives and general interests of the Company.

They inform their superior, without delay, of any contact or situations or activities in which there could be a conflict of interest for the Company, the person themselves or their close relatives and in any other case in which relevant reasons of convenience occur. People respect the decision that has been made by the Company in this regard.

### **4.9 Sense of belonging**

People pursue, in carrying out their work activities, everything that does not hinder or in any way prejudice the creation of a sense of belonging of the people to their organization, work group or third parties.

### **4.10 Mutual Respect**

People engaged in any capacity in cooperating with the Company require and actively demonstrate respect for the task, skill, methods or carrying out tasks, including the omission of their personal considerations to third parties.



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### **4.11 Specific Obligations**

Company Employees must follow the instructions given:

#### **Transparency**

It is a good rule that any information concerning the activities carried out within the Company is within everyone's reach

Each collaborator has the task of interacting with their manager and colleagues in relation to the work carried out by them. In case of misunderstandings or problems, it is everyone's duty to first resort to their manager or contact person.

Behave in a scrupulously loyal and independent manner from any kind of conditioning that may affect the work both towards your Client and towards external organizations associated with them.

Not to entertain improper economic relationships or accept gifts of value or favors of any kind from Organizations or Suppliers of their Client.

Report, upon acceptance of the professional assignment or during its performance, any relationship or interest in common with external organizations that have relations with their client, which could lead to conflicts of interest

#### **Consistency**

Once a commitment is made, it is carried out. Never leave a job unfinished and never take on commitments that you already know you can't cope with

#### **Courtesy and kindness**

Courtesy and kindness are and must be the basis of every daily activity, they must also be a constant in interpersonal relationships both inside and outside the Company

#### **Punctuality**

If you are late for an appointment, it is good practice to notify before the agreed time expires, doing it later is a rude gesture. Punctuality is a form of respect towards those who are waiting for us.

#### **Confidentiality**

All information and data managed in the workplace are Company property and confidential and should be treated as such. In particular, you should never talk about work problems or specific situations in public places where you can be heard, or in the presence of people who have no right to be involved in the information in question.

#### **Professionalism**

Being professional means knowing all the appropriate behaviors, everything you need to do your job in the best possible way, taking into account Customer and Company needs.

Whatever activity takes place, you must always be professional

#### **At work environment**

Everyone should have the ability to understand the phenomena that underlies interpersonal relationships and adopt a behavior consistent with the reference context, always trying to maintain a courteous, cordial and collaborative atmosphere with their colleagues.

#### **Company Loyalty and respect**



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It is everyone's duty to share Company policies and make every effort to ensure that they are respected. During daily activities, each Employee should always preserve the interests and image of the Company, as well as having the utmost respect for Company properties. While carrying out your business you should always evaluate the economic implications of your choices, avoiding waste.

### Customer respect

The Company, like all free market companies, lives thanks to its Customers. Respect, kindness and courtesy should be a constant in the relationships of those who make contact with the organization.

### Work Place

Each Employee is responsible for their own workplace. Everyone is responsible for the care and cleaning of the tools at their disposal.

### Personnel computer

The use of computer owned by the Company assigned to the collaborator is aimed at satisfying the needs of work arising from the relationship between the Company and the collaborators themselves. It is the collaborator's responsibility to adopt the utmost diligence in the use of Company equipment while preserving its physical, logical integrity and operating status, exclusively for lawful purposes and in compliance with applicable laws and Company regulations. It is also the responsibility of the collaborator to take maximum care and attention during the processing, using the aforementioned instruments, of any information to which the Employee has access to or becomes aware as a result of the working relationship with the Company. The use of the Personnel Computer is allowed only to the Employee who is the assignee, it is absolutely forbidden to lend it or allow its use to third parties. The Company adopts mechanisms for the identification and authentication of users who access networks, systems, services and applications. Where passwords are used for authentication, they must comply with the Policies defined by the Company.

### Internet

The Company allows the Employee the mixed use of any equipment, in particular: Personal Computer and Company telephone, internet access from Company offices, any mobile phone when required. The Employee can connect to the Internet where authorized, provided that always in full compliance with applicable laws, regulations and adopting the same precautions used during use for business purposes. The use of Social Media for business purposes is limited to cases identified and permitted by the Company. The use of Social Media for personal purposes using Company tools is not allowed during working hours. During working hours and / or when corporate connections are used, the use of the equipment for personal purposes is still permitted under conditions of obvious necessity, is temporary and in any case not for play purposes.

### Email





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Electronic mail is a corporate tool and should not consider private correspondence. In addition to the mandatory consultation of the Company e-mail box, which is always allowed, the consultation of personal e-mail boxes is allowed, paying the utmost attention to a correct and respectful use of the Company resources used and to the adoption of all the precautions for the defense from the threats potentially present in e-mail messages or in their attachments. This, considering the fact that, it is not possible for the Company to impose security policies on e-mail systems beyond its control, in particular:

- Avoid downloading messages with large attachments when using corporate connections.
- Do not open suspicious messages and their attachments.
- Do not open spam, phishing or generally suspicious messages.
- It is not allowed to use the Company e-mail address for reasons not related to the performance of the assigned duties.
- It is not allowed to send or store messages (internal or external) of an outrageous nature, discriminatory by sex, language, religion, race, ethnic origin, opinion or trade union and / or political affiliation etc.

### Cell phones

The use of mobile phones has rules of good behavior.

Given that it is a work tool, the mobile phone should always be kept silent during meetings and meetings with Customers, especially when you are at their office.

The use of mobile phones for personal purposes must be severely limited.

### Company cars

Company cars are under the total responsibility of the person to whom it was assigned to. All Company assets must be used and maintained with maximum attention.

It must be conducted in full compliance with the requirements of the highway code.

It is up to the driver assignee of the vehicle to take care of cleaning, maintenance and to ensure that the car is always in the best conditions.

Any fines resulting from infringements of the highway code remain responsibility of the driver assigned.

### Private Car

The use of the private car for business purposes is allowed and as in the case of the Company car, the driver must operate in full compliance with the requirements of the highway code.

Any fines resulting from infringements of the highway code remain the responsibility of the driver.

## 5 Rules of conduct

The rules contained in this section are intended to indicate to the recipients of this Code of Ethics the attitudes and behaviors that should be observed during the performance of the various Company activities in accordance with the values that inspire this document.

All recipients of this Code of Ethics (identified in Chapter 1 of this document) must demonstrate correct and transparent conduct in the performance of their function, thus contributing to the effectiveness of the internal control system to protect corporate value.

In compliance with the law, all recipients must sustain an attitude based on the availability of corporate bodies and supervisory authorities.



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### 5.1 Relations with staff

For any further information, please also refer to the related 231 Management System Procedures. In general:

#### ▪ **Personnel selection**

The evaluation of the personnel to be hired, or in collaboration, is carried out on the basis of the correspondence between the candidates' profile and the one expected for the role as well as internal needs. This assessment is done in compliance with equal opportunities for all interested parties. The information requested is strictly connected to the verification of the aspects foreseen by the professional and psycho-attitudinal profile, respecting the private sphere and the opinions of the candidate. The Management adopts, in the selection activity, appropriate measures in order 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 approved by the Board of Directors.

#### ▪ **Establishment of the employment relationship**

The staff is hired with a regular employment contract, professional service or internship: no form of irregular work is tolerated.

#### ▪ **Integrity and protection of the person**

In the context of personnel management and development processes, as well as in the selection phase, the decisions made are based on the correspondence between expected profiles and profiles possessed by people and / or on merit considerations. Access to roles and positions takes place on the basis of skills and abilities. Furthermore, compatible with the general efficiency of work, forms of flexibility in the organization of work are favored, benefitting facilitating people in a state of maternity as well as those who have to take care of their children.

#### ▪ **Enhancement and training of resources**

The Company makes information and training tools available to people with the aim of enhancing specific skills and preserving the professional value of the staff. Institutional training is provided, delivered at certain moments of professional life, internal to the person (example: an introduction to the activity is provided for new hires) and recurring training aimed at operational personnel (example: training on safety in environments of work, Code of ethics, etc).

#### *5.1.1 Safety and health*

The Company is committed to offering a work environment that can protect the health and safety of its staff, spreading and consolidating a culture of safety, developing risk awareness and promoting responsible behavior by all staff.

The Company also operates in order to preserve, especially with preventive actions, the health and safety of workers.



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Among the main objectives is to protect human resources by constantly seeking the necessary synergies not only internally but also with Suppliers, external consultants and Customers involved in the business activities themselves.

All Employees are required to comply with the rules and internal procedures regarding risk prevention and the protection of health and safety and to promptly report any shortcomings or non-compliance with applicable rules

The Company adopts the general measures for the protection of health and safety at work prescribed by legislation with particular reference to the provisions of Legislative Decree 81/08 and subsequent amendments. The organization is committed to the most scrupulous compliance with all regulations regarding health and safety at work for Employees, collaborators and users. In particular:

- **Defines the operational procedures to be followed and coordinates activities in the field of health and safety at work.**
- **Ensures the application of current regulations also through the creation of risk assessment documents and the definition of processing procedures in line with current safety standards.**
- **Constantly monitors legislative innovations and strives for their implementation.**

The Company also undertakes to guarantee:

- Assessment of all health and safety risks.
- Prevention planning, aimed at a complex that coherently integrates operating conditions in prevention, as well as the influence of environmental factors and work organization.
- The elimination of risks and, where this is not possible, their reduction to a minimum in relation to the knowledge acquired on the basis of technical progress.
- Respect for the ergonomic principles of work organization, in the conception of workplaces, in the choice of equipment and in the definition of working methods and service delivery, in particular in order to reduce the effects on health of monotonous and repetitive work.
- The reduction of risks at the source.
- The replacement of what is dangerous with what is not or is less dangerous.
- The minimum limitation of the number of workers who are or may be exposed to risks.
- The limited use of chemical, physical and biological agents in the workplace.
- The priority of collective protection measures over individual protection measures.
- The health control of workers.
- The removal of the worker from exposure to risk for health reasons inherent to the Employee and relocating where possible to another job.
- Adequate information and training for workers, managers, proposals, RLS and all staff.
- Adequate instructions for workers.
- Participation and consultation of workers and the RLS.



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- The planning of measures deemed appropriate in order to ensure the improvement of safety levels over time, also through the adoption of codes of conduct and good practices.
- The emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and serious and immediate danger.
- The use of warning and safety signs.
- Regular maintenance of environments, equipment, systems with particular regard to any safety devices in accordance with the indications of the respective manufacturers.
- Adequate instructions to Employees, collaborators and users as well as adequate training in accordance with the provisions of the law and the CCNL applied to personnel.

### 5.1.2 Privacy protection

In the processing of its staff data, the Company complies with the provisions contained in Legislative Decree 196/2003 containing the code for the protection of personal data. People are given a privacy policy that identifies:

- ✓ **Purposes and methods of processing.**
- ✓ **Any subjects to whom the data is communicated.**
- ✓ **Information necessary for exercising the right of access (EU Regulation 679/2016 and Legislative Decree 101/2018).**

In cases where the law requires it, individuals are asked for specific consent to the processing of their personal data. Any investigation into the ideas, preferences, personal tastes and in general the private life of Employees and collaborators is excluded.

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

### 5.1.3 Environmental Protection

The organization is committed to pursuing environmental protection through compliance with national and EU legislation and regulations.

It undertakes to carry out the prevention of pollution and to spread the awareness of Employees and collaborators on environmental issues.

## 5.2 Duties of the Personnel

For any further information, please also refer to the Internal procedures adopted by Innovery S.p.A. and valid for all Group Companies. People must act loyally in order to comply with the obligations underwritten in the employment contract and the provisions of the Code of Ethics, ensuring the required services.



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### 5.2.1 Delegations and Responsibilities

The duties, responsibilities and powers of directors, Employees and collaborators are defined through specific resolutions and / or specific procedures.

These duties, responsibilities and powers must be known, accepted and respected.

### 5.2.2 Obligations for department heads towards the Code of Ethics

Each Department Manager, identified as such in the organization chart, in the job description and / or in the system of proxies, has the obligation to:

- **Ensure compliance with the Code of Ethics by subjects directly or indirectly subject to its responsibility.**
- **Representing an example for one's Employees / collaborators with one's own behavior.**
- **Make every effort to ensure that Employees understand that the provisions contained in this Code of Ethics are an integral part of their work performance.**
- **Promptly report to the Management or to any delegate any reports or special needs from their subordinates.**

Failure by department heads to comply with the obligations referred to in this chapter may result in the application of disciplinary sanctions, as provided by the sanction system.

### 5.2.3 Obligations for all Employees towards the Code of Ethics and the documentation produced by the Company

Each Employee is required to know the provisions contained in the Code of Ethics or the ones it refers to, as well as the relevant legal regulations governing the activity carried out in the context of his / her function, which are an integral part of each person's work performance.

Employees who have news of alleged unlawful conduct are required to communicate the information in their possession regarding such conduct only to their superiors or to the Management in the manner prescribed by the internal system

The Management adopts monitoring systems on the effective reading and understanding of the mandatory legal documents by Employees, collaborators, etc., by means of anonymous tests, activating the most appropriate actions to constantly increase the level of dissemination and understanding of the related contents.

Employees also have the obligation to:

- **Refrain from conduct contrary to these provisions and rules.**
- **Contact superiors or delegate as responsible for the management of the prevention model for the necessary clarifications on the application methods of the Code of Ethics or other relevant regulations.**
- **Promptly report to at least one of the subjects indicated above, any news regarding possible violations of the Code of Ethics.**



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- **Collaborate with the organization in the event of any investigations aimed at verifying and possibly punishing possible violations.**

These behavioral requirements are also required of external consultants and collaborators of all kinds.

### 5.2.4 *Protection of Company assets*

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

People must know and implement provisions of internal information regarding security policies in order to ensure the integrity, confidentiality and availability.

Information and know-how must be protected with the utmost confidentiality. The most significant data that the Company acquires or creates in the course of its business must be considered confidential information and subject to adequate attention: this also includes information acquired from and regarding third parties (Customers, contacts, partners, Employees, etc.)

People, 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 the employment relationship with the Company, people will be able to use confidential data exclusively in the interest of the Company and never for their own benefit and / or benefits of third parties. Each recipient is required to work diligently to protect corporate assets from improper or incorrect use.

### 5.2.5 *Confidential information on third parties*

Company personnel must refrain from using illegal means in order to acquire confidential information on other organizations and third parties.

Those who, within the framework of a contractual relationship, become aware of confidential information on other subjects, will be required to exclusively use the information in line with guidelines provided in the contract in question.

Without proper authorization, individuals cannot request, receive or use confidential information about third parties. If you learn confidential information about another person's account that is not already subject to a non-disclosure agreement or other form of protection, you will need to contact your manager for assistance in handling such information.



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### 5.2.6 *Use of Company assets*

Each person is required to work diligently in order to protect Company assets through responsible behavior and in line with the operating procedures set up to regulate their use, accurately documenting that use.

In particular, each person must:

- **Use the goods entrusted to them with care and parsimony.**
- **Avoid improper use of Company assets that may cause damage or reduction in efficiency or are in any case in conflict with the corporate interest.**
- **Adequately guard the resources entrusted to them and promptly inform the units in charge of any threats or events harmful to the Company.**

With regard to IT applications, each is expressly required to:

- **Scrupulously adopt the provisions of corporate security policies in order not to compromise the functionality and protection of IT systems.**
- **Refrain from sending threatening or insulting e-mails or from using low-level language or from making inappropriate comments that may offend people and / or damage the image of the Company.**
- **Refrain from browsing websites with indecent and offensive content and in any case not inherent to professional activities.**

### 5.3 Relations with Customers

For any further information, please also refer to the operating procedures of the management system

#### 5.3.1 *Impartiality*

The Company undertakes to offer its products and services without any discrimination between private Customers or potentially holders of dowry, with particular attention to the latter.

#### 5.3.2 *Contracts and communications to Customers*

Contracts and communications to Customers by the Company must always be:

- **Clear and simple, formulated with the language as close as possible to that normally used by the interlocutors.**
- **Compliant with current regulations and such as not to configure elusive or otherwise incorrect practices.**
- **Complete so as not to overlook any relevant element for the Customer's decision.**

#### 5.3.3 *Style of behavior of staff towards Customers*

The style of behavior of the Company's personnel towards Customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship.



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### 5.3.4 Data Processing

In the processing of Customer personal data, the organization complies with the provisions contained in EU Regulation 679/2016 and Legislative Decree 101/2018 containing the Code regarding the protection of personal data

A privacy policy is obtained which identifies

- **Purposes and methods of processing.**
- **Any subjects to whom the data is communicated.**
- **Information necessary for exercising the right of access (EU Regulation 679/2016 and Legislative Decree 101/2018).**

In cases where the law requires it, individuals are asked for specific consent to the processing of their personal data; any investigation into the ideas, preferences, personal tastes and in general the private life of Customers is excluded. Staff are required to process data with the utmost discretion and confidentiality, especially with regard to the inside; the same procedure is also applied for the telematic management of information and personal data.

### 5.4 Relations with Suppliers

For any further information, please also refer to the management system procedures

#### 5.4.1. Choice of Supplier

Purchasing processes are important:

- **To research of the maximum competitive advantage for the Company.**
- **To grant equal opportunities to Suppliers.**
- **To grant loyalty.**
- **To grant impartiality.**

The selection of Suppliers and the determination of the purchase conditions are based on an objective assessment of the quality, the price of the good or service, its actual availability as well as the guarantees of assistance and timeliness.

As a further selection criterion is the exclusion of Suppliers who have criminal proceedings underway for tenders or other mafia features.

#### 5.4.2. Integrity and independence in relationships

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





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The stipulation of a contract with a Supplier must always be based on extremely clear relationships avoiding, where possible, forms of dependence.

Documents exchanged with Suppliers must be suitably filed: in particular, those of an accounting nature must be kept for the periods established by current legislation.

### **5.5 Relations with Public Administrations**

This section deals with the relationships between the Company and Public Administrations.

#### *5.5.1. Fairness and loyalty*

The Company intends to conduct relations with the Public Administration with the utmost transparency and ethical behavior. These relationships, which must take place in compliance with current legislation, are based on the general principles of correctness and loyalty so as not to compromise the integrity of both parties.

#### *5.5.2. Gifts, giveaways and benefits*

No person in the Company can give money or offer economic advantages or other types of benefits to subjects of the Public Administration for the purpose of obtaining assignments or other personal advantages or for the Company itself.

No form of gift is allowed that can be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring preferential treatment in the conduct of any business related to the Company.

In this sense, a “normal commercial or courtesy practice” worth less than € 100.00 is considered as a gift.

In particular, any form of gift to Italian and external public officials or their families that could affect their independence of judgment in order to obtain more favorable treatment or undue benefits or advantages of various kinds is prohibited.

By gift we mean any kind of benefit: not only material goods but also, for example, free participation in conferences, training courses, the promise of a job offer, etc.

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

On the occasion of events, anniversaries and / or holidays, the donation of goods is allowed as long as they are of modest amount and in any case within the limits approved by the Board of Directors or by the Management is documented adequately in order to allow the appropriate checks.



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If a person in the Company, on the other hand, receives explicit or implicit requests for benefits from a member of the Public Administration, they have to immediately inform the Board of Directors or the person to whom they are required to report for the adoption of appropriate checks and initiatives.

### 5.6 External Relation

This section deals with the details regarding the Company's external relations

#### *5.6.1. External effectiveness of the Code of Ethics*

Anyone acting in the name and on behalf of the Company who comes into contact with third parties with whom the organization intends to undertake commercial relations or is required to have relations with them of an institutional, social, political or any nature, has the obligation to:

- **Inform subjects of the commitments and obligations imposed by the Code of Ethics.**
- **Require compliance with the obligations of the Code of Ethics in carrying out their activities.**
- **Take the necessary steps in case of refusal by third parties to comply with the Code of Ethics or in failure or partial execution of the commitment to comply with the provisions contained in the Code of Ethics itself, informing the Management**

#### *5.6.2. Conflict of interest*

All recipients must ensure that every decision taken in the context of their activities is made in the interest of the Company

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

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

Each Employee is prohibited from taking part, directly or indirectly, for any reason whatsoever, in commercial initiatives that are in direct competition with the Company unless, such participation has been previously communicated to the competent Board of Directors (BoD) and approved by the same.

In the event that situations of conflict of interest, even potential, both internal and external to the Company's activity, are identified, each person involved is required to refrain from



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engaging in conflict conduct, promptly notifying it to the Board of Directors, responsible for assessing the existence, case by case, of any incompatibility or situations of prejudice.

### 5.6.3. *Competitive practices*

It is of primary importance for the Company that the market is based on honest and fair competition.

The Company is committed to scrupulously observe the relevant laws and to collaborate with the regulatory authorities of the market. In particular:

- **It undertakes to carry out the activities in compliance with the rationale of the law for assignments for the supply of goods and services that are entrusted through express agreements with public bodies, including economic ones and publicly-held corporations.**
- **Compete fairly on the market while respecting competition rules.**
- **It undertakes to provide correct information about its business both internally and externally or in the face of legitimate requests.**
- **Ensures the truthfulness and correctness of corporate data relating to financial statements, reports and other official documents.**

### 5.6.4. *Gifts and benefits*

No form of donation is allowed (including: money, economic advantages, gifts, free gifts, other types of benefits, etc.) contrary to the law and to what is adopted and defined in the Code of Ethics of Innovery S.p.A. valid for all Companies of Innovery Group, which can be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring benefits in carrying out any activity that can be connected to the Company - especially towards subjects of the Public Administration for the purpose of obtaining assignments or other personal advantages or for the Company itself. In any case, any form of donation to Italian and external public officials or their families that could affect their independence of judgment, in order to obtain more favorable treatments or undue benefits or advantages of various kinds, is not allowed. It is also not allowed by resorting to the activities of third parties. Donations must be inspired by criteria of probity and proportionality and must take into account the economic activity of the Company and the economic condition of the beneficiary. By donation we mean any type of benefit: including but not limited to material goods, free participation in conferences, training courses, the promise of a job offer, etc. On the occasion of events, anniversaries and/or holidays, the donation of modest value is allowed and in any case within the limits approved by the Management upon communication to the Board of Statutory Auditors documented in an adequate manner in order to allow the appropriate checks. If a Company collaborator, on the other hand, receives explicit or implicit requests for benefits from a member of the Public Administration, they immediately need to report it to Management or the person to whom they are required to inform the adoption of appropriate checks and initiatives.



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### 6 Application mechanisms of the Code of Ethics

#### 6.1 Organizational principles

The Company ensures that the organizational system is based on the criterion of separation between who decides, who executes and who controls. In particular, the organization makes all operations verifiable because they are registered.

The Company binds those who carry out the auditing function to the truthfulness and correctness of the data and information.

Each operation and/or activity must be lawful, authorized, consistent, documented, verifiable, in compliance with the principle of traceability and Company procedures according to the criteria of prudence and to protect the Company's interests.

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

Each collaborator who carries out transactions involving sums of money, goods or other economically assessable benefits as belonging to the Company must reasonably provide the appropriate evidence in order to allow the verification of the aforementioned transactions.

#### 6.2 Transparency of accounting

The Company's accounting responds to the generally accepted principles of truth, accuracy, completeness and transparency of the recorded data.

The recipients of this Code of Ethics undertake to refrain from any conduct, active or omissive, that directly or indirectly violates the regulatory principles and / or internal procedures concerning the formation of accounting documents and their representation externally.

The recipients of this Code of Ethics are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to allow:

- **Accurate accounting registration.**
- **The immediate identification of the characteristics and underlying reasons.**
- **The easy formal and chronological reconstruction.**
- **Verification of the decision-making, authorization and implementation process, in terms of legitimacy, consistency and congruity as well as the identification of the various levels of responsibility.**

The recipients of this Code of Ethics who become aware of cases of omission, falsification or neglect in accounting records or supporting documentation are required to promptly report it to their Manager or to Board of Management.



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The Company promotes training and updating in order to make the recipients of this Code of Ethics aware of the rules (legal or regulatory provisions, internal prescriptions, disposition of trade associations) that preside over the training and management of accounting documentation.

### 6. 3 Checks and verifications

The Company guarantees the availability, through the competent people, to provide all the information and the vision of the documents, and necessary requests to the auditing and Supervisory Board

The Company guarantees access to all information and documents to those entitled to it and provides, through the availability of its directors and Employees, responsible for their function, all the information that favors the exercise of supervisory functions.

The organization prohibits its directors and Employees and / or collaborators from making false declarations, presenting false documents or certifying untrue situations, even through IT systems, with the aim of unduly receiving public funds and / or obtaining and maintaining any concessions.

#### *6.3.1. Supervision of the implementation of the Code of Ethics*

The task of verifying the implementation and application of the Code of Ethics is the responsibility of:

- **Board of Directors**
- **Direction**
- **Coordinators**
- **HR - Compliance**

#### *6.3.2. Reporting problems or suspected violations*

Violations of the Code of Ethics, possibly carried out by the recipients, are subject to the disciplinary system adopted in Innoverly S.p.A. and valid for all Companies of Innoverly Group

In fact, it should be noted 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 organisation's interests, which can even extended to the removal from the Company. of those responsible as well as compensation for any damage resulting from violations.

Non-compliance with the rules of the Code of Ethics by members of Collegial Bodies may result in the adoption, by the competent corporate bodies, of the most appropriate measures provided for and permitted by law.



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Violations of the rules of the Code of Ethics by Employees constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to their relevance as a disciplinary offense.

Violations committed by Suppliers and external collaborators will be punishable in accordance with the provisions of the related contractual assignments, except for more significant violations of the law.

Particular attention is given to the processing of IT data through the internal systems: any problem and suspected violation must be immediately communicated to the IT services manager and / or to the Management for appropriate actions.

### *6.3.3. Disciplinary measures resulting from violations*

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by the staff as well as by persons having business relations with the Company.

Violation of the principles and behaviors indicated in the Code of Ethics compromises the relationship of trust between the Company and the perpetrators, whether they are directors, Employees, consultants, collaborators, Customers or Suppliers.

For details, do it reference to what is reported in Disciplinary System of Innovery S.p.A. adopted by all Companies of the Group

In general, violations will be prosecuted under the following terms:

- **With regard to Employees (including Managers) through appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the establishment of criminal proceedings in cases where the conduct constitutes a crime. In particular, the sanctions will comply with the rules and logic of the applied employment contract. Disciplinary measures range from recall or reprimand to suspension without pay, to relegation and, in the most serious cases, to dismissal. Before taking a disciplinary measure, the interested party is given the opportunity to explain their behavior.**
- **With regard to consultants, collaborators, Customers, Suppliers and other parties having contractual relationships with the Company, specific methods for terminating the contractual relationship will be activated.**

Furthermore, any compensation for damages suffered by the Company as a result of the violation by the aforementioned subjects, of the provisions contained in the Code of Ethics, is reserved.

### *6.3.4. Whistleblowing*

The Company has set up a specific communication channel ([whistleblowing@innovery.net](mailto:whistleblowing@innovery.net)) to allow its collaborators to promptly report any action or omission deemed non-compliant



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with the Code of Ethics or any circumstance that suggests the existence of a crime or a danger of a crime, or in any case the presence of "incorrect" behavior deemed inappropriate or non-compliant with current policies.

This channel guarantees the confidentiality and protection of the reporting party from unfair and retaliatory actions

### 6.3.5. *Public service assignment*

The Company, in the case of carrying out public service activities, applies the following behaviors:

- **Respect for the principles of impartiality, typical of the Public Administration.**
- **Non-acceptance of benefits, money and utilities.**
- **Non-acceptance of illegitimate influences from third parties.**
- **Avoid conflicts of interest of your representatives.**

### 6.3.6. *Confidentiality*

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

The Company implements measures to protect the information managed and prevents it from being accessible to unauthorized personnel.

### 6.3.7. *Dissemination, communication and training*

This Code of Ethics is brought to the attention of all internal and external subjects interested or otherwise involved in the Company's mission through specific communication and training activities.

### 6.3.8. *Operating procedures and decision-making protocols*

In order to prevent violations of the regulations in force, as well as the Code of Ethics itself, the Company provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the subjects responsible for the decision, authorization and carrying out the operations themselves.

### 6.3.9. *System of proxies*

Apart from the subjects already qualified (BoD and Managers), the Company makes use of a system of delegations on the basis of which certain activities can be carried out only by subjects expressly authorized to do so because they have power attributed through a specific official delegation notarial power of attorney.



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

## 7 Final provisions

### 7.1 Conflicts with the Code of Ethics

In cases in which even one of the provisions of this Code of Ethics should conflict with the provisions set out in the internal regulations or procedures, the Code of Ethics will prevail over any of these provisions.