

OBJECT

**ORGANISATION, MANAGEMENT AND CONTROL
MODEL**

in accordance with the Legislative Decree 231/01 (*)

DOCUMENT TITLE

CODE OF ETHICS

MOG CE ED. 00

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(*) This document has been developed in accordance with Legislative Decree No. 231 dd. June 8, 2001 "Discipline of Administrative Liability of Legal Persons, Organizations and Associations, including those without legal personality, pursuant to Article 11 of Law No. 300 dd. September 29, 2000".

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1. Introduction

The Company, within its activities and business conduct, adopts the respect for the law and regulations of the territory in which it operates, as well as internal rules, as its guiding principles within a framework of legality, fairness, transparency, confidentiality, and respect for human dignity.

The Company has therefore decided to adopt its own Organizational and Management Model (hereinafter referred to as "MOG") aligned with the requirements established by Legislative Decree 231/2001 and subsequent amendments, with the aim of preventing the risk of crimes that the top management or personnel under the direction of others, including all external parties with whom the Company has relationships, may commit, as expressly addressed by the aforementioned legal framework.

The MOG is designed to serve as a fundamental structure based on the principle of legality, which the Company's overall operations must adhere to in conducting business.

The adoption of this Code of Ethics represents an important step towards defining and implementing the highest standards of legal compliance and ensures a clear definition of the principles upon which the actions of everyone within or acting on behalf of the Company are based. It constitutes the foundation of the corporate culture and sets the standard of behaviour for all recipients of the Code in conducting business activities, complementing the various regulations the Company has adopted and the MOG developed pursuant to Legislative Decree 231/2001, of which this Code is a part.

The principles expressed in this Code serve as a guide the Company has developed to coherently and effectively face future challenges. The Company believes that ethical behaviour in conducting business activities is a fundamental element for its growth and success, especially in the long term.

The Company recognizes that unethical behaviour undermines the trust between the Company and its stakeholders and fosters prejudiced attitudes and the creation of a hostile environment towards the Company, detrimental to its interests.

The reputation and credibility of the Company are fundamental corporate assets, and their preservation is one of the objectives of adopting this Code of Ethics.

In no way can the belief that one is acting to the benefit or in the interest of the Company justify, even in part, behaviours that are contrary to the principles and contents of the Code of Ethics.

2. General Provisions

2.1. Recipients

This Code applies to the members of the Board of Directors, all employees of the Company, and all external collaborators (consultants, professionals, third parties, intermediaries, commercial partners), as well as more generally to all those who have relationships with the Company, including suppliers, contractors,

customers, and all other stakeholders. The recipients of the Code of Ethics are hereinafter referred to as "Recipients."

2.2. Scope of Application

This Code outlines the set of rights, duties, and responsibilities of the Company towards its stakeholders (such as statutory auditors, employees, suppliers, customers, partners, Public Administration, etc.) and vice versa. Specifically:

- *Corporate Bodies* must base all decisions and actions on adherence to the Code, promote awareness of it, encourage its acceptance by personnel and third parties who operate in the interest and advantage of the Company, and serve as a role model for all Collaborators through their behaviour.
- *Employees* are required to act in compliance with the Code and to report any violations to the Company through designated reporting channels (see paragraph 7, "*System for Reporting Violations (whistleblowing)*" in the *General Part of the MOG, MOG_PG*).
- *Suppliers* of goods and services and other stakeholders in general (e.g., consultants, third-party professionals, intermediaries, commercial partners, contractors, customers, etc.) must be appropriately informed of the conduct rules contained in the Code and align their behaviours accordingly throughout the contractual relationship with the Company.

2.3. Legal Effectiveness of the Code of Ethics

The ethical principles outlined in this Code of Ethics are relevant for the prevention of crimes pursuant to Legislative Decree 231/2001 and constitute an essential element of the preventive control system.

The rules of the Code of Ethics are an integral part of the contractual obligations of the Company's employees pursuant to Articles 2104 (Diligence of the Employee), 2105 (Duty of Loyalty), and 2106 (Disciplinary Sanctions) of the Civil Code. Furthermore, this Code of Ethics constitutes a set of disciplinary rules pursuant to Article 7 of Law No. 300 of 20 May 1970 (Workers' Statute). It thus supplements the disciplinary provisions contained in the applicable National Collective Labor Agreements (CCNL).

The Code of Ethics also represents a set of contractual norms that supplement the content of the relationship (mandate) between the Company and the members of the Corporate Bodies, as outlined by current civil laws. It serves as a system of rules to ensure the Company's reliability and transparency in all necessary contexts and circumstances for its operations, such as ensuring business continuity and participating in public procurement tenders.

Compliance with the Code of Ethics by suppliers and intermediaries, in any form, integrates the obligations of diligence and good faith in negotiations and the execution of existing contracts with the Company,

becoming an essential part thereof. A violation of the Code of Ethics rules and the Protocols referenced in the contract constitutes a serious contractual breach and a valid reason for termination or immediate cancellation under Article 1456 of the Civil Code, with all legal consequences, including the right to claim damages.

To this end, the Code of Ethics is specifically delivered by the Company to its commercial partners, suppliers, collaborators, and general recipients of this document. The Company is responsible for informing the Recipients of subsequent updates, regulations, or circulars related to compliance with this Code of Ethics. The Company also believes that this document is a key platform for disseminating and applying to all its Recipients the sustainability, social, and ethical goals of the 2030 Agenda, such as:

- Zero poverty (Goal 1)
- Good health and well-being (Goal 3)
- Quality education (Goal 4)
- Gender equality (Goal 5)
- Decent work and economic growth (Goal 8)
- Industry, innovation, and infrastructure (Goal 9)
- Reduced inequalities (Goal 10)
- Responsible consumption and production (Goal 12)
- Climate action and environmental protection (Goals 13, 14, 15)
- Justice (Goal 16), complemented by the general principles on partnership under Goal 17.

The Protocols for business processes, included in the Special Part of the MOG and involved in the activities promoted by the 2030 Agenda, are specifically integrated with the principles outlined here to achieve sustainability goals.

2.4. Dissemination of the Code of Ethics

The Company promotes the widespread dissemination and awareness of the Code, recognizing it as a fundamental tool for the proper functioning of the Company and ensuring its effectiveness through consistent application at all organizational levels.

The Code is made available to all internal personnel through direct distribution and publication on the company intranet. The contents are communicated via specific training sessions, both at the time of hiring and throughout the employees' tenure.

External stakeholders (such as suppliers, customers, intermediaries, etc.) are informed about the adoption of the Code through publication on the company's website, if available, and through appropriate references in contracts between the parties. The Company ensures the delivery of the Code of Ethics to its suppliers and customers by attaching the document to every contract and requesting a duly signed copy from the

counterpart.

Any modifications to the Code, introduced by an act of the Company's Administrative Body, are subject to the same forms of publicity as outlined above.

2.5. Reporting Violations (Whistleblowing)

The Company encourages Recipients to report any behaviour or action they consider to be in violation, even potentially, of the law, the Code, or other company regulations.

Reports should be made following the procedures established by the Company, which are detailed in paragraph 7, "*System for Reporting Violations (Whistleblowing)*" of the document *General Part of the MOG (MOG_PG)*.

The Company does not tolerate and does not engage in any form of retaliation against those who make a report in good faith. Violations of confidentiality rules, prohibitions against discriminatory acts, and reports made in bad faith or without basis will be sanctioned as specified in paragraph 8, "*Disciplinary System*," of the document *General Part of the MOG (MOG_PG)*.

2.6. Compliance with Ethical Principles and the Disciplinary and Sanctioning System

The non-compliance with the Code of Ethics by the various Recipients is detailed in paragraph 8, "*Disciplinary System*" of the document *General Part of the MOG (MOG_PG)*. Below are brief additional specifics for different parties concerned:

- *Corporate Bodies and Supervisory Body Members:* Compliance with the Code of Ethics by members of the Corporate Bodies and the Supervisory Body (ODV) supplements and clarifies the obligations of diligence in carrying out their assigned duties.
- *Employees:* Compliance with the Code of Ethics by employees supplements and clarifies the obligations of loyalty, fairness, and integrity in the performance of their employment contract in good faith, as required by the Company under Article 2104 of the Civil Code. The rules of the MOG, the Code of Ethics, and the Protocols are essential parts of employees' contractual obligations pursuant to Article 2104 of the Civil Code.
- *Third Parties:* Compliance with the Code of Ethics and the MOG Protocols, to the extent relevant, by third parties (such as suppliers, intermediaries, etc.) supplements the obligations of diligence and good faith in negotiations and the execution of contracts with the Company.

2.7. Revisions and Updates to the Code

The Code of Ethics, being part of the elements constituting the MOG, is subject to the rules for updating as defined by the Company and detailed in paragraph 6.3, "*Responsibility for the Approval, Adoption, Implementation, and Modification of the MOG*" in the document *General Part of the MOG (MOG_PG)*.

The impetus for updating or integrating the Code of Ethics may also come from other stakeholders, who are actively involved in applying the principles and methods outlined in the Code. The Company encourages contributions and reports of any deficiencies from these parties.

3. Ethical Principles

The principles guiding the Company's operations are outlined and articulated below.

3.1. Respect for the Individual

The Company ensures respect for the physical and cultural integrity of individuals and respects the dimension of their relationships with others. The Company does not tolerate requests or threats intended to coerce individuals into acting against the law, the Code of Ethics, or adopting behaviours that are detrimental to their moral and personal convictions and preferences.

3.2. Legality and Honesty

All Recipients are required to comply with the laws and regulations in force in the countries where they operate and, within their respective areas of responsibility, adhere to company regulations, which also include the MOG and its related provisions. The Company, therefore, provides training programs and ongoing awareness activities for its Personnel, also through the Supervisory Body, which offers informational interventions upon request.

3.3. Impartiality and Non-Discrimination

In pursuing its activities and interacting with stakeholders, the Company operates according to criteria of impartiality, objectivity, and transparency, especially concerning employment relations as outlined in Legislative Decree 104/2022 (the so-called "Transparent Work Decree"). The Company does not tolerate any form of discrimination based on age, gender, sexual orientation, health status, race, nationality, religion, political opinions, or any other aspect of personal life. The Company expects this respect to be upheld by all Recipients.

3.4. Transparency, Fairness in Business Conduct, and Completeness of Information

All Recipients are required to adhere to transparency, defined as clarity, completeness, and relevance of information, avoiding misleading situations in activities carried out on behalf of the Company. They are also expected to comply with ethical, professional, and expert standards applicable to their operations on behalf of the Company. Similarly, they must adhere to company regulations, which implement ethical, professional, or expert obligations and formalize the expected conduct as defined by the Company.

Those in positions of responsibility must set an exemplary standard and promote a culture of ethical behaviour and adherence to rules and laws. Observance of these principles, as detailed above, entails a commitment to providing accurate and complete information, both externally and internally. To this end, the Company is committed to ensuring that its representatives and collaborators clearly, correctly, and diligently convey the Company's image in all interactions, both internal and external, through the following actions:

- Provide information, communications, and instructions that are precise, clear, accurate, and correct, covering economic, financial, legal, ethical, and social aspects.
- Ensure the traceability of every operation by providing documented information that allows for verification of the operation's characteristics and rationale at any time. This includes identifying who authorized, executed, recorded, and verified the operation, through the adoption of procedures and/or practices that guarantee the correct registration, recognition, and preservation of related documentation.
- Ensure that all contracts with both internal and external parties include clauses that are always understandable, clear, and fair.

In the performance of their duties for the Parent Company and each Group company, the Recipients of the Code are required to provide clear, complete, transparent, accurate, and timely information regarding their corporate and accounting management, always within the limits prescribed by the confidentiality obligations outlined in this document.

3.5. Confidentiality

Recipients are required to ensure the confidentiality of technical, technological, commercial, financial, asset-related, and banking information that they may become aware of, even incidentally, during the execution of operations conducted on behalf of the Company. Recipients must handle company data and information solely within the scope and for the purposes of their work activities, and must not disclose (communicate, disseminate, or publish in any manner) sensitive information without the explicit consent of the affected parties, or confidential information without the Company's authorization.

In particular, all internal or external collaborators are required to respect confidentiality clauses requested by counterparties. This principle of confidentiality is absolute and does not require that the information be formally classified as confidential. For example, confidential information includes, but is not limited to, all information related to the Company or its clients' businesses or third parties in general regarding their services, products, clients, commercial methods, strategies and practices, internal activities, price lists and billing, financial data, costs, personnel data, client and supplier information, sales documents, technology, software, computer systems, inventions, developments, secrets, and know-how of any kind.

Each recipient is required to take necessary measures, within reasonable limits and as required by the company or interested third parties, to prevent and avoid disclosure and to maintain the security of confidential information and/or materials. The company's confidentiality rules prohibit discussing company aspects or activities with third parties outside the Company, except as necessary to perform their duties, particularly in public areas where conversations could be overheard by others.

3.6. Respect for Safety, the Environment, and Future Generations, Social Responsibility and Sustainability

The Company ensures that its activities and relationships with customers, suppliers, partners, and collaborators are conducted with consideration of environmental and social costs and impacts, aiming to minimize any negative effects on the community and future generations. Furthermore, in work relationships, the Company expects and commits to full compliance with current safety and health regulations and to the continuous improvement of safety levels in all its activities.

This respect for these principles is expected from all individuals operating on behalf of the Company. The Company is aware of the effects of its activities on the surrounding context, economic and social development, and the general well-being of the community, and therefore pays particular attention to considering these interests in its operations. To this end, and within its scope, the Company aligns itself with the objectives and actions of the 2030 Agenda for Sustainable Development.

4. Code of Conduct

4.1. Safety and Protection of Health and Working Conditions, Sustainability

The Company promotes working conditions that protect the physical and psychological integrity of individuals by providing work environments that comply with current health and safety regulations.

Recipients, within the scope of their duties, actively participate in the process of risk prevention, environmental protection, public safety, and the safeguarding of health and safety for themselves, their colleagues, and third parties. The Company has implemented appropriate measures to prevent accidents and health damage that arise from, are connected to, or occur during work, minimizing the causes of risks associated with the work environment as much as reasonably possible.

To make explicit and transparent the principles, criteria, and methods by which Recipients at all levels make decisions regarding health and safety at work, and to take the necessary measures for the protection of workers' safety and health – including risk prevention activities, information, training, and the provision of necessary organization and means – the Company has established certain guidelines to be followed in all work activities, summarized as follows:

- a) Avoid risks;
- b) Assess risks that cannot be avoided;
- c) Address risks at their source;
- d) Adapt work to the individual, particularly concerning the design of workstations and the choice of equipment and work and production methods, to reduce monotonous and repetitive work and mitigate its effects on health;
- e) Consider the state of technical evolution;
- f) Replace hazardous elements with non-hazardous or less hazardous ones;
- g) Plan prevention by aiming for a coherent approach that integrates technical aspects, work organization, working conditions, social relations, and the influence of environmental factors;
- h) Appoint a health and safety officer as part of the Company's management, in compliance with current laws;
- i) Prioritize collective protection measures over individual protection measures.
- j) Provide appropriate instructions to workers, including regular and documented training on workplace health and safety, repeating such training for new hires and when employees change departments.

All Recipients must adhere to these principles during both the decision-making and execution phases. The participation of everyone, at every level and in every aspect related to safety, is crucial to ensuring the success of this endeavour.

In general, each worker must take care of their own health and safety, as well as that of others present in the workplace, who may be affected by their actions or omissions, in accordance with their training, the instructions, and the means provided by the Employer.

4.2. Environmental Protection and Sustainability

The Company guides its decisions to ensure compatibility between pursuing its institutional goals and meeting environmental needs. It commits to operating in full compliance with environmental regulations in all situations and to minimizing the environmental impact of its activities, considering developments in scientific research in the field.

When promoting, designing, or commissioning the design of interventions (e.g., construction projects), the Company undertakes or ensures that all necessary investigations are carried out to verify the possible environmental risks associated with the intervention and to prevent any damage.

The Company is also committed to disseminating and consolidating a culture of environmental protection and pollution prevention among all its employees and suppliers. It aims to raise awareness of the risks and promote responsible behaviour among all collaborators, explicitly referencing the goals and principles of the 2030 Agenda related to sustainability:

- **Goal 3:** Good Health and Well-being - Monitoring workplace well-being.
- **Goal 6:** Clean Water and Sanitation - Monitoring water consumption to detect leaks and waste, improving and developing internal processes to reduce water use.
- **Goals 7, 8, 14:** Affordable and Clean Energy, Climate Action, Life Below Water - Monitoring energy consumption and maintaining high levels of control and maintenance of facilities, implementing plans for the efficient and sustainable use of resources and company assets, and committing to reducing the Company's carbon footprint. It also monitors the main risk factors for worker health and safety.

4.3. Corporate Governance

4.3.1. Appointment and Conduct of Corporate Bodies

The appointment of members of the Corporate Bodies must be carried out through transparent procedures. Corporate Bodies act and deliberate with knowledge and independence, pursuing the objective of creating value for the Company while adhering to principles of legality and fairness. Likewise, the decisions made by the members of the Corporate Bodies must be autonomous, based on their independent judgment, and aimed at the Company's interests, fully complying with laws and company regulations.

The independence of judgment is a requirement for the decisions of the Corporate Bodies. Therefore, members must ensure maximum transparency in managing transactions where they have particular interests, in accordance with legal provisions and company regulations.

Specifically, members of the Administrative Body are individually required to perform their duties with seriousness, professionalism, and presence, thereby allowing the Company to benefit from their expertise.

4.3.2. Business Management

In managing its business, the Company aims to comply with the obligation to set up an organizational, administrative, and accounting structure in accordance with Article 2086, second paragraph, of the Italian Civil Code. This structure should safeguard business continuity and ensure the sustainability of the Company's debt, guiding the conduct of senior managers, subordinates, all collaborators, and partners.

Administrators must act promptly to address pre-crisis signals and work to avoid harming the interests of the company and creditors through unjustified delays and ineffective actions concerning crisis resolution. All company members and professionals are expected to behave transparently and loyally in procedures activated for the negotiated resolution of crises.

4.3.3. Relationships with Shareholders

The Company promotes transparency and regular communication with shareholders, respecting laws and current regulations. Shareholders are adequately and promptly informed of any actions or decisions that may impact their investments. The Company encourages informed and conscious participation in corporate decisions through consistent and targeted actions. It supports the interests of all shareholders, rejecting any particular or partisan interests.

The Company fosters:

- Regular participation of Board Members in meetings.
- The orderly conduct of meetings, respecting each shareholder's right to seek clarifications, express opinions, and make proposals.

The involved Recipients must maintain strict confidentiality regarding information about extraordinary operations and not misuse it.

4.3.4. Transparency in Corporate Accounting

The Company promotes maximum transparency, reliability, and integrity in its accounting information. Every operation and transaction must be verifiable, legitimate, consistent, and appropriate, and also properly recorded and authorized. All actions and operations of the Company must be adequately documented, making it possible to verify the decision-making, authorization, and execution processes.

For every operation, there must be appropriate documentary support to facilitate checks at any time, confirming the characteristics and reasons for the operation, as well as identifying those who authorized, carried out, recorded, and verified the operation.

Recipients who become aware of omissions, falsifications, or negligence are required to report them according to the procedures identified by the Company, as detailed in paragraph 7 of *the General Part of the MOG, MOG_PG (Whistleblowing System)*.

The Company is committed to disseminating and promoting internal control procedures and holding personnel accountable for adhering to them, in relation to their functions and assigned tasks.

In dealings with external consultancy entities, each responsible function refrains from any conduct that could hinder the activity or support the dissemination of false information, ensuring a proper and transparent relationship with these entities. The same level of transparency and fairness is required from those who engage in consultancy relationships with the Company.

The annual financial statements and the accompanying reports are documents prepared according to the principles of clarity, truthfulness, and fairness, in accordance with the provisions of the Civil Code and applicable laws. This is done in full compliance with consultancy contracts and

intercompany agreements, particularly in adherence to the guidelines prescribed by the Business Crisis and Insolvency Code, to ensure the economic and financial sustainability of the Company. This also mandates the appointment of a Supervisory Body (e.g., auditors, auditors, etc.) to guarantee the accuracy of the Company's accounting and financial practices.

In the preparation of financial statements or similar documents, the company's management and all involved recipients must:

- Accurately, clearly, and completely represent the economic, asset, or financial situation.
- Facilitate the performance of control activities in every possible way.
- Present complete and accurate documents and acts to the assembly that correspond to the accounting records.
- Provide oversight bodies with correct and complete information about the economic, asset, or financial situation.

The following details the objectives and principles of the 2030 Agenda related to sustainability:

- **Goal 1: No Poverty:** The Company participates in philanthropic or charitable initiatives and supports local efforts to ensure essential services for people with disabilities and the elderly.
- **Goal 8: Decent Work and Economic Growth:** The Company plans its growth in social, technological, and regulatory fields and improves work processes to create dignified jobs, enhancing human relationships.
- **Goal 9: Industry and Innovation:** The Company promotes synergies with other companies for common strategic and innovative goals in the shared value chain.
- **Goal 10: Reduced Inequalities:** The Company ensures the application of rules that guarantee the circulation of safe and quality products and services, central to healthy economic growth and social development. It also ensures the right to empowerment and social inclusion.
- **Goal 16: Peace, Justice, and Strong Institutions:** The Company promotes effective management to achieve objectives and maintain compliance with regulations, respecting information security and privacy; it prevents corruption risks, including in private transactions, by adopting appropriate self-monitoring systems to maintain transparency and integrity in its operations.
- **Goal 17: Partnerships for the Goals:** In its relationships, including external ones, the Company prioritizes the individual, with particular attention to more balanced and equitable life conditions and timing.

4.4. Relations with Personnel

People are an indispensable element for the Company's existence; the dedication and professionalism of employees are also crucial values and conditions for achieving the Company's objectives. The Company, therefore, commits to:

- **Developing the skills and competencies** of management and employees, so that the energy and creativity of each individual can be fully expressed within the scope of their work performance, enabling them to realize their potential.
- **Protecting working conditions**, safeguarding both the physical and psychological integrity of employees and respecting their dignity.

The related sustainability goals and principles are:

- **Goal 3: Good Health and Well-being:** The Company monitors workplace well-being, respecting both physical and mental health, and collaborates with qualified and accredited medical centers.
- **Goal 4: Quality Education:** The Company ensures its collaborators have access to qualified, fair, and inclusive training and development programs, offering internal growth opportunities.
- **Goal 5: Gender Equality:** The Company respects gender equality and promotes the growth of skills and technical knowledge, offering inclusive compensation and assignments. The Company has established a system for detecting and monitoring discriminatory situations through an internal whistleblowing procedure.
- **Goal 8: Decent Work and Economic Growth:** The Company adopts measures and best practices to promote and ensure a culture of safety and prevention among employees, monitoring key risk factors and health and safety performance. The Company encourages the introduction of young people into the company through school or university engagement projects.
- **Goal 9: Industry, Innovation, and Infrastructure:** The Company ensures all employees have access to information and communication technologies and collaborates with startups and universities for professional growth.
- **Goal 10: Reduced Inequalities:** The Company guarantees equal opportunities.
- **Goal 12: Responsible Consumption and Production:** The Company ensures economic dignity, safety, and health for its employees.
- **Goals 15 and 16: Life on Earth, Peace, and Justice:** The Company invests in training, research, and innovation to develop employees' skills.

4.4.1. Free Choice of Employment

The Company firmly rejects forced labour, labour under coercion, or involuntary labour from prisoners. It does not impose any constraints that bind employees to the Company, such as the

deposit of money or identity documents. After providing adequate notice, each employee is free to terminate their employment with the Company.

4.4.2. Recruitment and Selection

Recipients promote respect for the principles of equality and equal opportunity in recruitment and selection activities, rejecting any form of favouritism, nepotism, or patronage. Employment relationships are formalized with regular contracts, drafted in accordance with Legislative Decree 104/2022 and subsequent amendments, rejecting any form of irregular work. The Company is committed to offering all employees the same job opportunities, ensuring that everyone enjoys fair treatment in terms of regulations and pay, based solely on merit and competence, without any discrimination. Recipients facilitate maximum cooperation and transparency towards new hires, ensuring that they fully understand the tasks assigned to them, as per Legislative Decree 104/2022.

4.4.3. Personnel Management and Evaluation

The Company rejects any form of discrimination against its employees and collaborators, fostering decision-making and evaluation processes based on objectively shared criteria. The Company expects Recipients, at all levels, to commit to maintaining a climate of mutual respect for each person's dignity, honour, and reputation within the company. The Company will intervene to prevent abusive, discriminatory, or defamatory interpersonal behaviour.

4.4.4. Contracts and Salaries

Whenever possible, the work provided by the Company will be performed under recognized employment relationships established within the framework of national laws and customs. The obligations towards employees under labour or social assistance laws, and regulations stemming from regular employment relationships, will not be circumvented through the use of subcontracting, homeworking agreements, or apprenticeship programs where there is no intention to provide skills training or regular employment. Nor will these obligations be evaded through the excessive use of fixed-term contracts.

All employees will be provided with understandable written information regarding their working conditions, including pay, before employment and details of their pay for the relevant period whenever they are paid, as required by Legislative Decree 104/2022. Deductions from pay as a disciplinary measure are not permitted without the express consent of the affected employee. All disciplinary measures will be recorded.

4.4.5. Professional Growth

Every employee has an equal right to professional growth based on the enhancement of their professional skills, personal abilities, and contributions. The Company promotes the professional and cultural growth of Recipients through appropriate tools and training plans and identifies the best paths for growth within the Company.

4.4.6. Privacy Protection

Every employee has the right to privacy regarding information about them that is not strictly necessary for professional activities. If sensitive information is provided to the Company, the employee has the right to know who is responsible for handling such data and how it is treated to ensure confidentiality. Each employee must adhere to the applicable privacy regulations, as provided by law and any specific company regulations, as well as the instructions contained in the documents of appointment for those designated as *Data Controllers or Processors*.

Violations of privacy obligations are subject to civil and criminal penalties as prescribed by law, and the Company will take necessary legal actions and/or disciplinary measures.

For matters not covered in this Code of Ethics regarding privacy, reference should be made to specific Corporate Regulations, if available (e.g., Privacy Regulation, Regulation for the Use of the Information System, etc.).

4.5. Rules of Conduct Toward Third Parties

4.5.1. Final Customers

The Company views direct relationships with customers as the cornerstone for continuously improving the efficiency of its services and finding the most suitable solutions for any type of problem that may arise.

For this reason, it requires its Employees and External Collaborators to adhere to the following provisions:

- Maintaining relationships based on honesty and transparency: Recipients provide customers with transparent and truthful products, services, messages, communications, and contracts, avoiding complex, misleading terms and unlawful or unfair commercial practices.
- Promoting maximum courtesy and availability in handling relationships with final customers: Recipients strive for the continuous improvement of the quality of products and services offered to final customers.

4.5.2. Suppliers

The Company is committed to seeking appropriate professionalism in suppliers and external collaborators who share the principles and contents of the Code and promotes the establishment of long-term relationships for the progressive improvement of performance in the protection and promotion of the principles and contents of the Code. The processes of selection and choice of suppliers are therefore based on the principles of legality, fairness, and transparency.

Recipients are required to include in contracts a confirmation of having read the Code and an explicit obligation to adhere to the principles contained therein, verifying compliance with the contractually stipulated conditions. Supplier selection is based on objective and impartial criteria in terms of quality, innovation level, cost, and additional services relative to the products and services offered. To avoid potential conflicts of interest, Recipients cannot accept gifts or similar items unless they are directly related to normal courtesy relationships and of modest value.

If Recipients receive proposals from a supplier offering benefits to favour their activity, they must immediately suspend the relationship and report the matter according to the Company's established procedures, as detailed in paragraph 7, *Whistleblowing System*, of the *General Part of the MOG (MOG_PG)*.

Violations of the principles of legality, fairness, transparency, confidentiality, and respect for human dignity are grounds for terminating relationships with suppliers.

4.5.3. Public Administration and Public Institutions

In relationships with Public Administration and Public Institutions, Recipients promote lawful and correct relationships characterized by maximum transparency and traceability, rejecting any form of promise or offer of payments or goods to promote or favour any interest or advantage. These relationships are reserved exclusively for the appropriate functions and positions, in accordance with approved programs and company procedures. The Company must not be represented in dealings with Public Administration by a consultant or third party where conflicts of interest could arise.

Recipients or Intermediaries are prohibited from offering money or gifts to managers, officials, or employees of the Public Administration and Public Institutions, or their relatives, except for gifts or utilities of modest value. If Recipients receive requests or proposals for benefits from public officials, they must immediately suspend the relationship and report the incident as outlined in paragraph 7, *Whistleblowing System*, of the *General Part of the MOG (MOG_PG)*.

During any business negotiation, request, or relationship with Public Administration and Public Institutions, Recipients must not attempt to improperly influence the decisions of the counterpart, including those of officials handling or making decisions on behalf of Public Administration and Public

Institutions. Moreover, the following actions must not be undertaken (directly or indirectly):

- Offering or proposing employment and/or business opportunities that may benefit Public Administration employees personally.
- Offering or in any way providing gifts.
- Soliciting or obtaining confidential information that could compromise the integrity or reputation of both parties.

In the specific case of conducting a tender, compliance with current laws and correct commercial practices is required.

4.5.4. Political Parties and Trade Unions

The Company is entirely unaffiliated with any political party or trade union organization and, therefore, does not financially support these organizations or associations in any way. It does not sponsor events, demonstrations, or congresses with political or trade union propaganda purposes.

4.5.5. Contributions and Sponsorships

The Company may participate in requests for contributions limited to proposals from non-profit associations or those of cultural or charitable value. Sponsorship activities may cover themes related to social issues, the environment, amateur sports, entertainment, and art.

4.5.6. Intellectual Property Rights

Recipients whose activities, roles, or functions involve, in any way, the handling of data, information, or documents concerning the Company's intellectual and/or industrial property rights are obligated to protect them with the utmost diligence, accuracy, and confidentiality. Intellectual and/or industrial property rights over products, works, and/or knowledge developed in the work context belong to the Company, which holds the exploitation rights, according to the most suitable methods and timelines, in compliance with applicable laws.

Similarly, the Company respects and protects the intellectual and industrial property rights of others, ensuring that only original products and works are used in business activities, duly licensed by their rightful owners and used in accordance with the received authorizations.

4.6. Rules of Business Conduct

4.6.1. Conflict of Interest

Recipients must carefully avoid becoming involved in transactions or business dealings that could lead to a conflict of interest. Each Collaborator must perform their work activities solely and calmly in the interest of the Company, avoiding any situation where personal economic activities (their own,

those of family members up to the fourth degree, or cohabitants) may conflict with corporate interests, potentially causing harm to the Company's activities or providing illegal advantages to themselves, their family members, or cohabitants.

Anyone who finds themselves operating in a conflict of interest must immediately report this to their hierarchical supervisor, who must promptly inform the company function designated by the Company (e.g., the Supervisory Body - ODV). The individual must also immediately cease all relations or commercial negotiations with the parties involved.

4.6.2. Relationships with Competitors

Relations with competitors must be guided by prudence and confidentiality to best preserve the Company's competitive advantages. Therefore, no Company Employee, except for those expressly and formally authorized, may engage in business relations with representatives of competitors.

All Recipients commit to refraining from any acts of unfair competition as defined by Article 2598 of the Civil Code, including:

- 1) Use of names or distinctive signs capable of causing confusion with the names or distinctive signs lawfully used by others, slavish imitation of a competitor's products, or any other acts that could cause confusion with the products or activities of a competitor;
- 2) Dissemination of news or comments about a competitor's products or activities, likely to discredit them, or appropriation of the qualities of a competitor's products or business;
- 3) Direct or indirect use of any other means that are not in line with the principles of professional fairness and capable of damaging another Company's business.