

**Code of Ethics
adopted by
Bhblasted S.r.l. Società Benefit
and its subsidiaries**

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Glossary of the Code of Ethics

Company / Organization

The organization to which this Code of Ethics applies, including all its operational and production structures, offices, branches, subsidiaries, and affiliated entities.

Algorithm

A set of instructions and logical rules used to process data, generate outputs, or make automated decisions. Corporate ethics requires that the use of algorithms comply with principles of transparency, fairness, and non-discrimination.

Brand Reputation

The perception that customers, users, and stakeholders have of the company's brand. Ethical behavior directly contributes to building and maintaining a positive reputation.

Code of Ethics

This document, which defines the principles, values, and behavioral rules that all recipients must follow when carrying out company activities.

Ethical Conduct

Behavior based on integrity, transparency, legality, and respect in both internal and external company relations.

Ethical Communication

The principle that all disseminated content (advertising, informational, or commercial) must be truthful, non-misleading, and respectful of human dignity and applicable regulations, particularly regarding transparency and consumer protection.

Conflict of Interest

A situation in which a personal, family, or financial interest may interfere — even potentially — with the company's interest or influence the impartiality of decisions and behaviors. This is especially relevant in strategic areas such as selecting technological partners or managing customer data.

Digital Content

Materials distributed through digital channels (websites, social media, online platforms), which must be managed in compliance with principles of intellectual property, informational accuracy, and respect for copyright.

Data Ethics

Principles that guide the correct, transparent, and responsible processing of users' and customers' personal, sensitive, or behavioral data, in accordance with data protection regulations (e.g., GDPR).

Recipients

All individuals required to comply with the Code of Ethics, including: directors, employees, collaborators, consultants, suppliers, business partners, communication agencies, digital service providers, technological partners, and any other third parties acting in the name or on behalf of the company.

Legislative Decree 231/2001

Italian Legislative Decree of 8 June 2001, No. 231, which governs the administrative liability of entities for certain offenses committed in the interest or to the advantage of the entity itself.

Responsible Innovation

The development of technological solutions, services, or products that take into account the social, environmental, and ethical impact of the technologies used (e.g., artificial intelligence, tracking, automation).

Artificial Intelligence (AI)

Technology that enables computer systems to perform tasks that would normally require human intelligence. The use of AI within the company must comply with principles of transparency, non-discrimination, human oversight, and respect for fundamental rights.

Ethical Marketing

Marketing strategies and practices based on truthfulness, respect for user privacy, inclusiveness, and transparency in the use of information collected for advertising or commercial purposes.

Supervisory Body (OdV)

The internal body responsible for verifying the effective implementation of the Code of Ethics and the Organization, Management, and Control Model required by Legislative Decree 231/2001. This also applies to areas related to the use of technology and digital communication.

Privacy

A fundamental right concerning the protection of personal data. All company activities, especially in marketing and tech, must comply with applicable regulations (e.g., GDPR), ensuring the correct and transparent processing of collected information.

Report / Whistleblowing

A confidential communication through which an internal or external party reports, in good faith, alleged violations of the Code of Ethics, laws, or company procedures, with guarantees of confidentiality and protection from retaliation.



Stakeholder

Any individual or entity, internal or external, that has a legitimate interest in the company's activities, including customers, suppliers, employees, institutions, local communities, and partners.

Digital Stakeholders

Individuals or entities that interact with the company through digital platforms and are influenced by its online activities (e.g., users, followers, web customers, IT providers).

Transparency

A principle whereby the company ensures clarity, accessibility, and accuracy in communication and in the management of information and relationships.

Digital Transparency

The commitment to clearly explain how user data is collected, used, and shared, particularly in digital services and marketing campaigns.

Corporate Values

A set of ethical, cultural, and professional principles that guide the decisions and behaviors of the company and its members.

Premise

Introduction

“Bhblasted S.r.l. Società Benefit” (hereinafter, the Company) is a benefit corporation operating in the technological and digital sector. The Company supports and assists client businesses in their corporate growth, particularly in the fields of digital marketing, digital communication, and performance advertising. It also operates in the research and development of advanced e-commerce solutions and in the production of just-in-time and custom-made apparel.

The Code of Ethics

The Code of Ethics (hereinafter, the Code) is the document that encompasses the set of rights, duties, and responsibilities of the Company toward all its stakeholders — not only external stakeholders such as public administrations, suppliers, investors, and local communities, but also internal ones, including collaborators and employees.

The Code expands, on one hand, the provisions of current regulations and, on the other, reinforces and enriches the applicable National Collective Labour Agreement (CCNL).

This Code represents the charter of fundamental principles and values that the Company has chosen to adopt and has incorporated among the essential — though not mandatory — elements of the organizational model required by Legislative Decree 231/2001.

The Code has a transversal value, permeating every area of the Company’s activities and serving as a guide for correct, diligent, and lawful operations.

Finally, with a view to the Company’s global expansion, this Code aims to serve as a true manifesto of the Company’s identity.

In this sense, the primary purposes of this document are to:

- Identify and formalize the values and principles that must inspire the actions of the Company and of all individuals — whether in leadership or subordinate roles — who belong to it, as well as its external relationships with suppliers and stakeholders.
- Formalize the commitment to pursue conduct that is upright and always inspired by honorability, fairness, and transparency, and to ensure that all actions remain within the boundaries of legality and common sense.
- Protect the interests of investors and stakeholders.
- Preserve the Company’s reputational value.

The Company is committed to ensuring the widest dissemination of this Code through its dedicated communication channels. The companies belonging to the network are legally autonomous and independent entities, united by the common objective of offering the highest level of expertise while adhering to principles of quality, ethics, and integrity.

Values and General Principles

Ethical and Social Principles

All recipients of the Code must be aware of the ethical significance of their actions and must pursue corporate objectives and value creation in compliance with laws, ethical and moral principles, and the contents of this Code.

Transparency and Accounting Transparency

Transparency is a core value for the Company. Information communicated externally, as well as internal company information, must be truthful, accurate, and — where specifically required — complete.

This value also applies to accounting practices and to the management of customer complaints. Regarding the latter, the Company must ensure continuous and timely communication, preferably through written documentation, characterized by completeness and clarity, and in compliance with established response times.

With respect to accounting transparency, every economic-financial transaction must be authorized, correctly and transparently recorded, verifiable, and compliant with applicable regulations. It must allow for easy reconstruction of operations, identification of any errors, and traceability of responsibilities. Any anomalies must be promptly reported.

Impartiality and Non-Discrimination

In every area of its activity, the Company is committed to ensuring respect for the principle of impartiality and to promoting a fair, inclusive environment that values diversity.

It rejects all forms of discrimination based on gender or sexual orientation, nationality, skin color, religion, personal or political opinions, trade union affiliation, age, health, disability, or economic conditions of its counterparts, including suppliers.

All decisions related to recruitment, management, training, professional development, and termination of employment are made exclusively on the basis of merit, competence, professionalism, and alignment with corporate objectives, with full respect for human dignity.

Fairness, Fair Competition, and Consumer Rights Protection

The Company considers fairness a fundamental principle. It therefore undertakes not to exploit situations of ignorance or vulnerability and to prevent anyone acting in its name and/or on its behalf from attempting to take advantage of contractual gaps or unforeseen events with the aim of exploiting a position of dependence or weakness of its counterparts — whether consumers, private individuals, or competing companies.

The Company refrains from unfair or comparable conduct, respecting regulations on competition and consumer rights, and avoiding misleading or aggressive advertising, violations of intellectual property, and the use of information classified as confidential.

Correctness, Integrity, and Legality

In carrying out its activities and in all related interactions, the Company observes the principles of fairness, integrity, and legality in its dealings with all stakeholders.

This implies that, in the performance of corporate activities, the rights of all individuals involved — including privacy rights and equal opportunities — must be respected, as well as all laws aimed at protecting the personal dignity of individuals professionally connected to the Company, whether through an employment relationship or an autonomous collaboration.

Use of Company Assets and Resources

Work activities, whether performed individually or in teams, must be carried out with diligence, efficiency, and fairness, making optimal use of the tools and time available and assuming responsibility for assigned tasks.

This same diligence is required in safeguarding the Company's tangible and intangible assets. Corporate assets include both physical goods — such as equipment, devices, tools, and infrastructure — and intangible assets such as know-how, data, patents, reputation, and business relationships.

Assets provided by the Company — including IT tools, vehicles, corporate phones, materials, or digital resources — must be used in accordance with corporate purposes and internal regulations. Their use must comply with safety regulations, IT policies, and operational guidelines.

Use for personal or non-work-related purposes is prohibited unless expressly authorized.

The Company reserves the right to monitor the use of corporate resources, in compliance with applicable privacy and labor regulations, to ensure their proper management.

Quality

The Company's primary objective is to ensure the highest possible level of customer satisfaction and protection.

In this perspective, corporate activities are guided by the principle of quality, understood as the goal of fully meeting user expectations and paying attention to requests that may contribute to improving the quality of services provided.

The Company is committed to ensuring compliance with established quality and safety standards and to periodically monitoring the quality of the services offered.

In accordance with its procedures and guidelines, the Company adopts measures to ensure, in every area of its operations, the maintenance of standards of effectiveness, service quality, and efficiency, in order to guarantee economic sustainability.

Every internal and external member of the organization must demonstrate commitment and professional rigor to provide, within their capabilities, an excellent performance.

Sustainability and Environmental Protection (*continuazione*)

The Company is committed to operating in full respect of the environment, adopting behaviors and policies aimed at environmental sustainability and at reducing the ecological impact of its activities.

All collaborators, employees, and partners are required to:

- comply with applicable environmental regulations at local, national, and international levels
- adopt operational practices that reduce the waste of natural resources such as energy, water, and paper
- promote recycling and proper waste disposal
- report any behaviors or situations that may **pose a risk to the environment or violate environmental regulations**

The Company encourages a culture of environmental responsibility and promotes initiatives aimed at reducing emissions, optimizing resource consumption, and supporting sustainable innovation.

Values in the Digital World

Data Ethics and Digital Transparency

The Company recognizes the strategic value and sensitivity of the personal, behavioral, and corporate data processed in the course of its activities. All data must be collected, used, stored, and shared in full compliance with applicable regulations (with particular reference to EU Regulation 2016/679 – GDPR) and according to principles of fairness, necessity, and minimization.

All processing activities must be transparent to data subjects, who must be clearly and comprehensibly informed about the purposes, methods, and any third parties involved.

The use of data for profiling, automation, or marketing purposes is permitted only when expressly authorized and based on legitimate grounds.

The Company promotes a culture of data ethics, grounded in responsibility, awareness, and attention to the social impacts arising from the intensive use of digital information.

Artificial Intelligence and Algorithms

The adoption of technologies based on algorithms and artificial intelligence (AI) must comply with ethical principles such as transparency, fairness, traceability, and human oversight.

AI solutions used or developed by the Company must not generate discrimination, manipulation, or opaque decision-making.

Every algorithmic system must undergo periodic checks and independent reviews to verify impartiality, accuracy, and compliance with declared purposes.

The Company is committed to not using predictive, automated, or machine-learning technologies for deceptive purposes, for activities harmful to human dignity, or in ways that contradict the organization's core values.

Digital Content and Ethical Communication

All digital content created, published, or promoted by the Company must be accurate, truthful, and respectful of individual rights and of regulations governing communication and intellectual property.

Content that directly or indirectly misleads, spreads stereotypes, incites hatred or discrimination, or violates standards of decency is strictly prohibited.

All forms of communication — internal or external, digital or traditional — must be guided by transparency, inclusiveness, and social responsibility.

The Company is committed to adopting accessible and responsible language, avoiding any form of aggressive, manipulative, or non-consensual advertising.

Ethical Marketing and Digital Stakeholders

In carrying out promotional, commercial, and digital marketing activities, the Company operates according to



principles of fairness, consumer respect, and social responsibility.

Marketing strategies must aim to build long-lasting trust with all digital stakeholders, including users, customers, followers, partners, and technological providers.

Any collection of information for targeting purposes must occur only with free, specific, and informed consent, and with a clear indication of the intended purposes.

The Company condemns cognitive manipulation practices, unauthorized data exploitation, and techniques designed to induce users to take unintentional or undesired actions (dark patterns).

Brand Reputation

Brand reputation represents a fundamental intangible asset of the Company.

Every member of the organization is required to contribute to protecting the Company's image through behaviors consistent with the values expressed in this Code.

Conduct that may compromise — even indirectly — the credibility, authority, or coherence of the brand(s) is prohibited.

Online and offline activities must reflect integrity, reliability, and a commitment to responsible innovation.

The Company continuously monitors the communication and digital environment in which it operates, adopting immediate corrective measures in the event of situations that may harm its own reputation or that of third parties.

Workers and Collaborators

Physical and Moral Integrity of Employees and Collaborators

The Company safeguards the physical and moral integrity of its employees and collaborators, both by ensuring suitable working environments and conditions that respect individual dignity, and by promoting initiatives to prevent and address intimidation or harassment, such as mobbing and stalking.

The Company is committed to organizing awareness sessions, providing informational materials, and maintaining a whistleblowing channel.

Bhblasted S.r.l. Società Benefit does not tolerate behaviors aimed at inducing individuals to act against their will, the law, or this Code.

The Company supports the integration of people with disabilities in the workplace and ensures they can work in an environment suited to their needs.

Children's Rights

The organization is committed to preventing all forms of child labor exploitation, in accordance with Law No. 296 of 27 December 2006, art. 1, paragraphs 622 et seq., and with national and international regulations on the matter.

The hiring and employment of minors below the minimum age required to complete compulsory education — set in Italy at 16 years — is prohibited, except in cases expressly permitted by applicable law.

Exceptions include activities carried out within formally authorized educational programs, such as PCTO (Pathways for Transversal Skills and Orientation), student apprenticeship programs, and other collaboration projects between schools and public or private entities aimed at training, orientation, and the gradual introduction of young people into the workforce, always ensuring the protection, dignity, and psycho-physical well-being of the minors involved.

The Organization promotes and supports such programs in compliance with ethical principles, ensuring that all activities take place in a safe, educational, and non-discriminatory environment.

It also implements control measures to ensure that suppliers, subcontractors, and partners comply with the same standards.

Violation of this clause may result in the immediate termination of the contractual relationship and exclusion from future collaborations.

Freedom of Opinion

Every employee is free to hold personal political views and to engage in political or trade union activities, provided they clearly state that such opinions are strictly personal and not expressed on behalf of the Company.

All forms of political activity or propaganda within the workplace are prohibited.

It is forbidden to use company databases, information, archives, or any other corporate assets to carry out political propaganda, or to request or provide voting indications to suppliers or clients.

Trade Union Rights

Trade union rights, regulated by the Workers' Statute (Law 300/70) and by the National Collective Labour Agreement (CCNL), protect freedom of association and trade union activity.

Bhblasted S.r.l. recognizes and safeguards the fundamental right of all employees to freely join the trade unions of their choice.

The Company undertakes not to hinder trade union activities or the work of union representatives, ensuring the free exercise of trade union rights.

Relations with such organizations will be conducted with the utmost transparency and fairness, in compliance with legal provisions and collective agreements.

The Company will not tolerate any form of discrimination against workers exercising their trade union rights, as already stated in Article 2.1.2 of this Code.

Union representatives are protected from any form of retaliation or discrimination.

Finally, the Company commits to consulting trade unions on matters concerning work organization, worker safety, and health.

Workplace Protection

The Company does not pursue favoritism in recruitment and hiring processes and rejects the use of hiring as a tool for patronage, nepotism, corruption, or coercion.

Candidates must be selected and evaluated objectively based on their professional skills and personal qualities.

Applications submitted by relatives of employees will be considered in the same manner as all other applications.

Workplace safety and the physical well-being of employees are a priority for the Company.

The Company is committed to formalizing a Safety Management System in line with widely recognized international standards.

All Company activities must be carried out in full compliance with regulations on prevention and protection, with the aim of improving health and safety conditions and preventing offenses related to workplace safety.

The Company requires the same level of compliance from all employees and collaborators.

Accordingly, Bhblasted S.r.l. prohibits the possession, consumption, purchase, sale, attempted sale, distribution, and/or production of illegal substances in the workplace, as well as the abuse or unlawful use of alcohol or illegal substances while performing activities on behalf of the Company, whether on Company premises or off-site.

Within the limits permitted by the nature of its activities, Bhblasted S.r.l. promotes the professional growth and development of its employees to enhance their skills and competencies.

Confidentiality

The Company ensures the confidentiality of the information in its possession and compliance with personal

data protection regulations.

Employees and collaborators must not use confidential information for purposes unrelated to their work activities.

Criteria for Implementing the Code

Mandatory Nature

The contents of the Code are binding for all recipients. Compliance is required from anyone who, in any capacity, contributes to the performance of the Company's activities.

Each recipient is required to adhere to the provisions of the Code and to align their conduct and actions with the principles, rules, and requirements expressed herein. Failure to comply constitutes a violation of the organizational model.

Bhblasted S.r.l. undertakes to sanction behaviors that are not consistent with the values and principles of the Code, reserving the right to protect its interests to the fullest extent, depending on the seriousness of the violations committed. Sanctions may be applied in accordance with legal provisions, the Company's disciplinary system, the Code of Conduct, and — with regard to consultants, agents, attorneys, business partners, clients, and suppliers — through measures deemed appropriate, including, by way of example but not limited to, immediate contract termination, claims for damages, and/or indemnification requests.

The Company is committed to promoting awareness and compliance with the Code at every organizational level, verifying adherence through appropriate supervisory structures and, as needed, sanctioning violations in accordance with applicable laws and the National Collective Labour Agreement (CCNL).

Dissemination

The Company is fully committed to sharing, disseminating, and applying the rules and behavioral principles set out in this Code at every level.

No one may presume to ignore the provisions of the Code or believe that acting in violation of it could be justified as being in the Company's interest.

No one within the Company has the authority to issue orders or directives that violate this Code.

The Administrator, or the structure designated by them:

- ensures the widest dissemination of the Code among corporate bodies, managers, employees, and collaborators, providing the necessary interpretative support
- prepares communication and training programs aimed at improving understanding and implementation of the Code
- contributes to defining criteria and procedures intended to reduce the risk of Code violations, in collaboration with the relevant functions
- conducts the necessary checks regarding any reports of violations of the Code, also for the purpose of enabling the competent functions to apply appropriate sanctions
- monitors the state of application of the Code within the Company

Supervision

Each collaborator or employee is required to promptly report to their supervisor — who must in turn inform the Supervisory Body — or, alternatively, directly to the Supervisory Body, any non-compliance with this Code and any request to violate it, regardless of the source.

The reporting process shall follow the procedures set out in the Company's Organization and Management Model pursuant to Legislative Decree 231/01, specifically in the section concerning the Supervisory Body's regulations.

This includes measures designed to guarantee the anonymity of the whistleblower and protect them from any discrimination or retaliation, in accordance with Legislative Decree 24/2023.

Legislative Decree 231/01

The provisions set out herein derive from the nature of the Code of Ethics as an element of the general control environment defined and formally established pursuant to Legislative Decree 231/01.

The Company ensures that the adopted Organization, Management and Control Model (MOGC) is constantly updated to include, among the predicate offenses, those relating to the **Violation of European Union restrictive measures (Art. 25-octies.2)**, and is committed to preventing the commission of such offenses in all its activities.

Delegations and Responsibilities

The proper assignment of delegations and the conscious assumption of responsibilities constitute a fundamental principle for the effective functioning of corporate activities.

Delegations must be formalized and consistent with the professional competencies of the designated individual, ensuring an effective and responsible distribution of tasks.

Each employee is required to perform their duties within the limits of the authority granted and in alignment with corporate objectives, assuming full responsibility for the quality and correctness of their work.

Managers, in particular, must ensure that the organization of activities under their supervision complies with legal requirements and ethical values, promoting a corporate culture based on individual responsibility and cooperation.

Obligations for Function Managers

Function managers play a key role in disseminating the principles contained in the Code of Ethics and ensuring their concrete application within their organizational units.

They are responsible for promoting behaviors consistent with corporate values, acting as role models for collaborators and fostering an environment of mutual respect and integrity.

They must also ensure that the Code is effectively known and understood by personnel, monitor its correct implementation, and intervene promptly in the event of non-compliant behavior.

In the presence of potential violations, they are responsible for initiating appropriate reporting procedures and cooperating with the bodies responsible for verifying the facts.

Obligations for All Employees and Company Documentation

Adherence to the Code of Ethics is mandatory for every employee and collaborator, regardless of their role within the Company.

Each worker is required to:

- know the contents of the Code
- comply with its principles in daily activities
- stay updated on any amendments
- follow internal procedures and regulations
- consult and respect company documentation relevant to their operational area
- participate in training activities promoted by the organization, where applicable

Failure to comply with these obligations may constitute a disciplinary violation, with consequences provided for by the individual employment contract, the National Collective Labour Agreement (CCNL), and applicable laws.

Relations with Public Administration

The assumption of commitments with local, national, EU, and international Public Institutions is reserved exclusively for the designated and authorized functions.

For this reason, documentation summarizing the ways in which the Company has interacted with such Institutions must be collected and retained.

It is strictly forbidden to:

- consider or propose employment and/or commercial opportunities that may personally benefit Public Administration employees
- offer or in any way provide gifts, gratuities, or other forms of benefits
- solicit or obtain confidential information

Conflict of Interest

To ensure maximum transparency, the Company and its employees commit to avoiding situations of conflict of interest with employees of any Authority and their family members.

Any company representative who believes they are in a conflict-of-interest situation with respect to the Company — even on behalf of third parties — must refrain from carrying out the activity and must immediately and formally notify the Company.

In particular, company representatives, and anyone who has the objective ability to influence Company decisions, must avoid using — even implicitly — their position to influence decisions in their own favor or in favor of relatives, friends, or acquaintances for purely personal purposes of any kind.

Gifts

Company representatives must not accept — even during holidays — gifts or other benefits related to their professional activities that are not of modest value.

Any partner or employee who receives, directly or indirectly, requests or offers of gifts or benefits exceeding the reference threshold must obtain authorization from their department head or direct supervisor (if an employee) and must notify the Supervisory Body.

Company representatives must not request or accept gifts or benefits for themselves or others from subordinates or their relatives.

Employees must not offer gifts or benefits to a superior or their relatives or cohabitants, except for customary gifts of modest value.

In all cases, company representatives must refrain from practices not permitted by law, commercial customs, or the ethical codes of companies or entities with which the Company interacts.

Application Mechanisms and Entry into Force

Centrality of the Code

This Code of Ethics is an integral part of the Company's internal regulatory system and is binding — without exception — for all individuals operating on behalf of the Organization, at any level and under any contractual arrangement.

Compliance with the Code is essential for the quality of internal and external relationships and for the credibility of the Company within the social and business context in which it operates.

Effective implementation of the Code requires a structured and continuous control system aimed at verifying compliance and promptly identifying any critical situations.

To this end, the Company undertakes to implement supervisory mechanisms proportionate to and consistent with its organizational structure, while promoting awareness and ethical responsibility among all involved parties.

The Code enters into force on the date of its approval by the competent body and is binding from that moment for all recipients.

Controls and Audits

The Company adopts organizational and procedural measures to ensure that the principles contained in this Code of Ethics are correctly applied and respected in every area of corporate activity.

To this end, periodic controls and inspection activities are carried out by competent internal structures or specifically designated bodies, in full compliance with regulations on privacy, workplace safety, and personal protection.

These audits may include the analysis of behaviors, processes, and relevant documentation, including through sample checks.

All individuals required to comply with the Code — including employees, external collaborators, suppliers, and business partners — must provide full cooperation by supplying any information or documentation requested during the audits.

In the event of confirmed irregularities or violations, the Company may adopt corrective or disciplinary measures consistent with the seriousness of the infraction, in accordance with applicable laws and internal procedures.

Supervision of the Implementation of the Code of Ethics

Responsibility for monitoring the effective implementation of this Code is entrusted to one or more internal bodies, identified based on the Company's organizational structure and, where applicable, designated as the Supervisory Body pursuant to Legislative Decree 231/2001.

These bodies are responsible for monitoring compliance with ethical principles by all recipients of the Code, examining any reports of violations or non-compliant behavior, and proposing updates or improvements to the Code in line with regulatory, organizational, or operational developments.

To ensure effective supervision, the Company promotes an environment based on transparency and collaboration, guaranteeing adequate protection against retaliation or discrimination for anyone who, in good faith, reports irregularities.

The supervisory body periodically reports to the competent corporate bodies on the state of implementation of the Code and on any measures adopted to strengthen its effectiveness.

Final Provisions

These concluding provisions aim to ensure the regulatory consistency of the Code and to govern cases of conflict, updates, or revisions of the document.

The adoption and subsequent management of the Code do not exhaust the Company's ethical commitment; rather, they represent a constant point of reference, to be integrated and strengthened through the evolution of behaviors and organizational practices.

Conflicts with the Code of Ethics

If discrepancies arise between the provisions of the Code and those contained in other internal documents, regulations, or corporate procedures, the most restrictive ethical rule shall prevail, unless otherwise formally specified.

In cases of interpretative doubt or conflict between principles, it is the responsibility of the employee or collaborator to contact the body responsible for supervising the Code, so that an official clarification may be provided and, if necessary, adjustments to the relevant rules may be proposed.

The Company is committed to ensuring that all activities comply with the principles of the Code, establishing a clear process for reporting and resolving any inconsistencies.

Approval and Amendment Process

This Code is adopted through formal approval by the Company's administrative body, which validates its content following an internal analysis and evaluation process.

This process involves various corporate functions — including Human Resources, Legal Department, Compliance, and Internal Control — to ensure that the document accurately reflects the Organization's

values, principles, and operational needs.

Any amendments, additions, or updates are approved by the same governing body, including upon proposal by the Supervisory Body or other entities with control and management functions.

Each revision of the Code must be promptly communicated to all recipients and made available through the Company's official channels.

In the event of significant updates, the Company may organize specific training or informational activities to ensure full understanding and proper application of the new provisions.

Official Language of the Code

The Italian version of the Code is the official version.

All translations are to be considered as courtesy copies.
