

Organization

OLIDATA S.P.A.

Via Giulio Vincenzo Bona, no. 120 - 00156 - Rome (RM)

Tel. 0694320183 - P.Iva 01785490408

Web : www.olidata.com

E-Mail : olidata@legalmail.it

Code of Ethics

Pursuant to Legislative Decree No. **231** of June 8, 2001,
amended.

Master

✓

Controlled copy

✓

Uncontrolled copy

×

Copy number

02

DG issue

Date

Signature

DG approval

Date

Signature

SB approval

Date

Signature

Status of revisions

Version

Date

Description

Author

00	20/06/24	First issue Changes to	Fabrizio Ceccarelli
01	-	section __ Changes to	- - -
03	-	section __ New	
04	-	version	

General section index

Section 0 - General Introduction

0.1	Foreword
0.2	Recipients of the company's Code of Ethics

Section 1 - Principles of conduct for the organization.

1.0	Foreword
1.1	Integrity of behavior and compliance with Laws and Regulations
1.2	Repudiation of all discrimination
1.3	Centrality, development and enhancement of human resources and equity of authority
1.4	Territorial rootedness
1.5	Transparency and business ethics
1.6	Quality
1.7	Diversity
1.8	Legality and countering terrorism and crime

Section 2 - Social actors

2.1	Customers
2.2	Financial institutions
2.3	Suppliers
2.4	Public Administration
2.5	Public supervisory authorities
2.6	Political forces, associations and interest-bearing institutions

Section 3 - Principles of conduct to be followed by staff.

3.1	Professionalism
3.2	Loyalty
3.3	Honesty
3.4	Legality
3.5	Fairness and transparency
3.6	Confidentiality
3.7	Responsibility to the community
3.8	Resolution of conflicts of interest
3.9	Sense of belonging
3.10	Mutual respect

3.11	Specific obligations
Section 4 - Conduct Criteria	
4.0	Introduction
4.1	Staff relations 4.1.1 Safety and health. 4.1.2 Privacy protection 4.1.3 Protection of the environment
4.2	Duties of personnel 4.2.1 Delegations and responsibilities. 4.2.2 Obligations for department heads to the Code of Ethics. 4.2.3 Obligations for all employees to the Code of Ethics and the documents produced by the company 4.2.4 Protection of corporate assets 4.2.5 Confidential information about third parties 4.2.6 Use of corporate assets 4.2.7 When leaving Olidata
4.3	Customer relations 4.3.1 Impartiality. 4.3.2 Contracts and customer communications 4.3.3 Staff behavior style toward customers 4.3.4 Data Treatments
4.4	Supplier relationships 4.4.1 Selecting a supplier. 4.4.2 Integrity and independence in relationships 4.4.3 Relations with suppliers
4.5	Relations with Public Administrations 4.5.1 Correctness and fairness 4.5.2 Gifts, giveaways and benefits 4.5.3 Lobbying
4.6	External Relations 4.6.1 External effectiveness of the Code of Ethics 4.6.2 Conflict of Interest. 4.6.3 Competitive practices 4.6.4 Gifts and benefits 4.6.5 Insider Trading 4.6.6 Public offices and participation in political activity
Section 5 - Enforcement Mechanisms of the Code of Ethics.	
5.1	Organizational principles
5.2	Accounting transparency
5.3	Controls and audits 5.3.1 Supervision of the implementation of the Code of Ethics 5.3.2 Reporting problems or suspected violations. 5.3.3 Disciplinary measures resulting from violations
5.4	Public service assignment
5.5	Confidentiality
5.6	Dissemination, communication and training
5.7	Operational procedures and decision-making protocols
5.8	Delegation system

Section 6 - Final Provisions

6.1	Conflicts with the Code of Ethics
6.2	Approval process and amendments

Section 0 - General Introduction

0.1 Foreword

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

In full agreement with the positions expressed and protected by the accreditation system to which it adheres, the organization is aware that it contributes through its actions, with a sense of responsibility and moral integrity, to the process of development of the Italian economy and the civil growth of the country

The company believes in the value of work and considers legality, fairness and transparency of action to be indispensable prerequisites for the achievement of its economic, productive and social objectives

The company affirms the appropriateness of its Code of Ethics in pursuit of its social mission

The Code of Ethics is, moreover, intended to introduce and make binding for the company the principles and rules of conduct relevant to the reasonable prevention of the crimes indicated in Legislative Decree no. 231/2001

Il Code of Ethics, considered as a whole and together with all specific implementation procedures approved by the company, is considered to be an integral part of existing and to be entered into employment contracts, pursuant to Article 2104 of the Civil Code (Diligence of the employee)

Violation of its provisions will, therefore, constitute an offence of a disciplinary nature and, as such, will be prosecuted and sanctioned by the company pursuant to and for the purposes of Art. 7 (Disciplinary Sanctions) of Law No. 300/1970 (Workers' Statute - Regulations on the Protection of Workers' Freedom and Dignity, Trade Union Freedom and Trade Union Activity in the Workplace and Employment Regulations) and may result in compensation for damages caused to the organization

As for the collaborators, consultants and self-employed workers (specified below among the recipients) who perform their activities in favor of the company and other third parties, the signing of this Code of Ethics or of an excerpt from it or, in

any case, the adherence to the provisions and principles set forth therein represent a *conditio sine qua non* of the stipulation of contracts of any nature between the company and such parties. The provisions thus signed or, in any case, approved, even by concluding facts, constitute an integral part of the contracts themselves

By reason of what has been described so far, any violations by the persons referred to in the preceding paragraph of specific provisions of the Code of Ethics, depending on their seriousness, may legitimize the company's termination of existing contractual relations with said persons and may also be identified *ex ante* as causes for automatic termination of the contract pursuant to Art. 1456 of the Civil Code (express termination clause)

0.2 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 be followed

The Code of Ethics is directed to:

- **Members members of collegiate bodies**
- **Employees (both fixed-term and permanent)**
- **Project workers**
- **External and internal consultants**
- **Suppliers of goods and services**
- **Any other person who may act for 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 pursue its objectives**
-
-

The recipients of this Code of Ethics are required to learn its contents and abide by its precepts

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

Management, or a delegate, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination within and outside the organization

Company employees, in addition to the compliance *per se* due to current regulations and the provisions of collective bargaining - where applicable -, undertake to adapt the manner in which they perform their work activities to the purposes and provisions of this Code of Ethics

This is as much in intra-company relations as it is in relations with parties outside the company and, especially, with government and other public authorities

An inescapable requirement of any profitable relationship with the company is compliance by other recipients with the principles and provisions contained in this Code of Ethics

To this end, when entering into contracts or agreements with other recipients, the company equips its stakeholders with a copy of this document.

Section 1 - Principles of conduct for the organization.

1.0 Foreword

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

It is, however, imperative that these values do not remain mere utterances but are translated into conduct and behavior that is immanent to the company.

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

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

- 1.1 Integrity in compliance with Laws and Regulations
- 1.2 Repudiation of all discrimination
- 1.3 Centrality, development and enhancement of human resources and equity of authority
- 1.4 Territorial rootedness
- 1.5 Transparency and business ethics
- 1.6 Quality
- 1.7 Diversity
- 1.8 Legality and countering terrorism and crime.

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

1.1 Integrity of behavior and compliance with Laws and Regulations

The company is committed to realizing and providing quality services and competing in the marketplace according to principles of fair and free competition and transparency, maintaining fair relations with all public, governmental and administrative institutions, the public and third-party businesses.

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

The company operates in strict compliance with the Law and strives to ensure that all personnel act accordingly: people must behave in accordance with the Law, whatever the context and activities carried out and the places where they work.

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

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

1.2 Repudiation of all discrimination

In decisions affecting relations with stakeholders (personnel management and work organization, selection and management of suppliers, relations with the surrounding community and its representative institutions), our organization avoids any discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs of its stakeholders.

1.3 Centrality, development and enhancement of human resources and equity of authority

The company recognizes the centrality of human resources and believes that an essential factor of success and development is the professional contribution of its people.

The company has always placed the professionalism and individual contribution of people at the center of its operations, giving continuity to a relationship style that aims to recognize everyone's work as a fundamental element of corporate and personal development.

Contextually, the company places dialogue, the exchange of information-at any level-, the enhancement and professional development of its employees, and the establishment of a corporate identity and related sense of belonging at the center of its daily operations.

This value translates:

- **In creating a work environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of staff**
- **In the implementation of a relationship system that privileges teamwork over hierarchical relationship**
- **In the daily effort aimed at sharing skills and knowledge including through the use of innovative systems**

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

Without prejudice to the legal and contractual provisions regarding the duties of employees, professionalism, dedication to work, loyalty, spirit of cooperation, mutual respect, sense of belonging and morality are required of employees

In the management of contractual relationships involving the establishment of hierarchical relations, our company is committed to ensuring that authority is exercised with fairness and propriety and that all forms of abuse are avoided: in particular, the company ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the person

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

1.4 Territorial rootedness

The company aims to carry out projects tending to a direct involvement of citizenship, public and private institutions, business and associations on everything related to health education, prevention and taking charge of one's well-being. The company is active and will continue to take steps to ensure that the entities collaborating with it comply with the same behavioral regulations and orient their activities to the same principles and values

The company, moreover, promotes local development through a strong connection with the various actors in the relevant territorial community. It acts, therefore, in the local community for the development of a rich and generative society, capable of recognizing and enhancing the resources that make it up, 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 the users and those who materially offer the service.

1.5 Transparency and business ethics

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

- **Reliability**
understood as a guarantee of absolute seriousness in the projects launched, transactions and commitments made
- **Soundness**
relating to an entity that rests its defined asset bases, as evidenced by its prolonged activity
- **Transparency**
consequent to the conception of the social role that requires not only compliance with ethical principles and work but also the implementation of ways in which the communities of reference and social actors can have the information to be able to reconstruct their work

- **Fairness in contractual matters**

avoiding that, in existing relationships, anyone acting 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 in which the interlocutor has found itself

- **Protection of competition**

Refraining from collusive, predatory and position-abusing behavior.

1.6 Quality

Quality is a hallmark of our company. The organization is committed to and responsible for ensuring quality in every activity, consistent with its long-term strategy

Activities are put in place by the company through a set of processes managed through a quality management system that offers uniformity, transparency and service improvement to the outside world.

1.7 Diversity

The company demands from its directors, employees and collaborators, behaviors that ensure absolute respect for the dignity of people, therefore the organization:

- Ensures the most scrupulous compliance with regulations protecting child and child labor, freedoms and workers' rights
- Ensures conditions for free membership in labor organizations
- Does not tolerate human rights violations
- Promotes, in the complex social fabric, integration as a form of collective enrichment
-

In particular, the company condemns any form of discrimination on the basis of gender, ethnic, political and religious affiliation.

1.8 Legality and countering terrorism and crime

The company believes deeply in democratic values 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

- Forgery, counterfeiting, alternation and/or spending of coins, public credit cards and stamps
- Acceptance and processing from income from criminal activities (money laundering)
- Unauthorized access to external computer systems
- Unauthorized possession of access codes
- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Wiretapping, obstruction and interruption of computer communications
- Spreading ideas of tolerance and omertà related to drug use or creating any addiction
- Incitement to commit unlawful acts or even acts contrary to the moral sense
- Negligence in countering violence, damage to public property and compliance with internal regulations.

Section 2 - Social actors

2. 1Clients

It is a primary goal of the company to fully meet the needs of its customers

Within this framework, the organization ensures the best execution of the entrusted assignments to the client and is constantly oriented to propose increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness

The company provides accurate, complete and truthful information so that the customer can make a rational and informed decision. It protects the privacy of its customers in accordance with relevant regulations, undertaking not to disclose or disseminate the relevant personal data subject to legal obligations

The company also adopts a communication style based on efficiency, cooperation and courtesy.

2. 2Financial institutions

The organization maintains relationships with financial institutions based on fairness and transparency, with a view to creating value for the company itself

Therefore, financial institutions are chosen in relation to their reputation, including adherence to values comparable to those expressed in this Code of Ethics.

2. 3Suppliers

Suppliers of goods and services

The company establishes collaborative relationships with its suppliers, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment

Internal and external consultants

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

Relations with consultants are based on transparent agreements and constructive dialogue aimed at achieving common goals, consistent with the regulations and principles of this Code of Ethics.

2.4 Public administration

The term Public Administration means any person, subject, interlocutor that can be qualified as a Public Official or Person in Charge of a Public Service acting on behalf of central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners who are concessionaires of a Public Service

The company inspires and adapts its conduct, in its relations with the Public Administration, to the principles of fairness and honesty. On this basis, the persons entrusted by the company to follow any negotiation, request or institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason seek to improperly influence its decisions or engage in unlawful behavior, such as offering money or other benefits, that may alter the impartiality of judgment of the representative of the Public Administration

Persons entrusted by the company organization with the management of relations with any authority of the Public Administration must verify that the information rendered in any manner and for any reason is true, accurate and correct. The persons permitted to have direct contact with the Public Administration on behalf of the company are only those persons expressly designated by the company for this purpose

No other employee may have any relationship whatsoever with the public administration for activities related to the corporate purpose of the company

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

Labor relations with former civil servants

Recruitment of former employees of the Public Administration who in the performance of their duties have had relations with the company or their relatives and/or relatives-in-law, shall be carried out in strict compliance with the standard procedures defined by the organization for the selection of personnel

The establishment of other working and/or consulting relationships with former Public Administration employees or their relatives and/or relatives-in-law also takes place in strict compliance with standard procedures

Grants and funding

Grants, subsidies or financing obtained from the European Union, the State or other Public Entity, even if of small value and/or amount, must be used for the purposes for which they were requested and granted

The company prohibits the recipients of this Code of Ethics from using funds received from public administrations and/or interprofessional funds for purposes other than those for which they were disbursed

Similarly, in the event of participation in public procedures, the addressees of this Code of Ethics are required to operate in compliance with the law and fair business practice, avoiding in particular to induce public authorities to operate unduly in favor of the company

The organization is committed to preventing acts that indicate the recipients of this Code of Ethics from engaging in actions likely to procure unlawful advantage

The use of altered or falsified statements or documents or the omission of information or, in general, the performance of artifice or deception, aimed at obtaining concessions, authorizations, financing, contributions from the European Union, the State or other Public Entity, also constitutes illegal conduct.

2.5 Public supervisory authorities

The company consults transparently with all political forces, associations in the area and public institutions (territorial and national) in order to duly represent its positions on topics and issues of interest.

2.6 Political forces , associations and interest-bearing institutions

The recipients of this Code of Ethics undertake:

- To scrupulously observe the provisions issued by the relevant institutions or Public Supervisory Authorities for compliance with current regulations in areas related to their respective areas of activity
- Are not submitted, within the framework of investigations incurring with Institutions and/or Public Supervisory Authorities, applications or requests containing untrue statements in order to obtain public disbursements, contributions or subsidized financing or to unduly obtain concessions, authorizations, licenses or other administrative acts

To comply with any request from the above-mentioned institutions or authorities within the scope of their respective supervisory functions, providing-when requested-full cooperation and avoiding obstructive behavior.

Section 3 - Principles of conduct to be followed by staff.

3. 1Professionalism

Each person performs his or her work and services with diligence, efficiency, and fairness, making the best use of the tools and time at his or her disposal and assuming the responsibilities associated with performance.

3. 2Loyalty

People are expected to be loyal to the company.

3.3 Honesty

As part of their work activities, people in the company are required to know and diligently comply with Model 231 and applicable laws. Honesty is the fundamental principle for all the company's activities, its initiatives and constitutes an essential value of organizational management. Relations with stakeholders, at all levels, must be based on criteria and behavior of fairness, cooperation, loyalty and mutual respect. Under no circumstances can the pursuit of the corporate interest justify dishonest conduct.

3. 4Legality

The organization is committed to complying with all national and international standards, laws, directives and regulations and all generally accepted practices. It also inspires its decisions and conduct with the care of the public interest entrusted to it.

3.5Correctness and transparency

Individuals shall not use for personal purposes any information, property, or equipment available to them in the performance of their assigned function or assignment. Each person shall not accept or make for himself or herself or for others any pressure, recommendation, or report that would be detrimental to the company or any undue benefit to himself or herself, the company, or any third party. Each person rejects and does not make promises of undue offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favoring any interest group or individual.

3. 6Responsibility

Persons shall ensure the utmost confidentiality regarding news and information constituting the company's assets or pertaining to the company's business, in compliance with the provisions of the law, applicable regulations and internet procedures. In addition, persons of the company are required not to use confidential information for purposes unrelated to the conduct of their business.

3.7 Responsibility to the community

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

3.8 Resolution of conflicts of interest.

Persons shall, in the performance of their work activities, pursue the general objectives and interests of the company. They shall inform their superiors or contact persons without delay of situations or activities in which there may be an interest in conflict with that of the company, on the part of the persons themselves or their close relatives, and in any other case in which relevant reasons of convenience apply. Persons shall respect the decisions that have been made by the company in this regard.

3.9 Sense of belonging

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

3. 10 Mutual Respect

Persons engaged in any capacity in cooperation with the company shall demand and actively manifest respect for the tasks, skills, manner of performing duties even through the omission of their own personal considerations to third parties.

3. 11 Specific obligations

Company employees should follow the directions given:

Transparency

It is a good rule that any information pertaining to the activities carried out within the company should be within the reach of everyone

Each staff member is responsible for relating to his or her supervisor and colleague regarding the work he or she does

In case of misunderstandings or problems, it is everyone's duty to first relate to their supervisor or contact person

Behave in a scrupulously loyal manner and independent of influences of any kind that might affect their actions both towards their Principal and towards external Organizations in relationship with them

Do not engage in improper economic dealings or accept gifts of value or favors of any kind from Organizations, suppliers of their Principal

Report, at the time of acceptance of the professional assignment or during its performance, any relationship or interest in common with outside Organizations that have a relationship with their Principal, likely to result in conflicts of Interest.

Consistency

Having made a commitment, one completes it. Never leave a job unfinished and never make commitments that you already know you cannot meet.

Courtesy and kindness

Courtesy and kindness are and must be the basis of every day-to-day 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 give notice before the agreed-upon time expires; to do so later is rude

Punctuality is a form of respect for those who are waiting for us.

Confidentiality

All information and data handled in the workplace is company property and confidential, and should be treated as such. In particular, one should never talk about work problems or situations in public places where one may be overheard, or in the presence of people who do not have a right to be affected by 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 the needs of customers and the company

Whatever activity you do you must always be professional.

Work environment

Everyone should have the ability to understand the phenomena underlying interpersonal relationships and adopt behavior consistent with the relevant context, always striving to maintain a courteous, cordial and cooperative atmosphere with their colleagues.

Loyalty and corporate respect

It is everyone's duty to share company policies and work to ensure that they are followed

During daily activities, each employee should always preserve the interests and image of the company, as well as have the utmost respect for company property

While conducting one's business, one should always consider the economic implications of one's choices while avoiding waste.

Respect for the customer

The company, like all free-market companies, lives off its customers

Respect, kindness and courtesy should be a constant in the relationships of those who make contact with the organization

Workstation

Each employee is responsible for his or her own workplace. Each person is responsible for the care and cleanliness of the tools at his or her disposal.

Personal computer

The personal computers provided must be kept in the best possible condition and no programs other than those provided by the company configuration may be installed

Hardware equipment provided by the company constitutes for all intents and purposes working tools and may not be used for personal purposes

In particular, the files they contain, constitute corporate assets and may not be arbitrarily damaged and/or destroyed

It is strictly prohibited to use hardware equipment suitable for copying and/or storing files and data, such as USB mass storage devices, laptops, optical disks, burners and any other electronic storage media, unless expressly authorized by the company.

Internet

The Internet connection is a business tool and should be used as such

Internet use for private purposes is allowed only outside working hours

Internet browsing:

- It is not permitted for those sites that do not directly pertain to the performance of assigned duties, especially in those that may disclose the employee's political, religious, or union views No financial transactions of any kind are permitted including remote banking, online purchases and the like except in cases directly authorized by the company and with compliance with normal purchasing procedures The downloading and installation of free (freeware), shareware, P2P and/or FTP software taken from Internet sites is not allowed unless expressly authorized by the company Any form of registration to sites whose content is not related to work is prohibited Participation, for nonprofessional reasons, in forums, or the use of chat lines is not permitted, nor is the storage of computer documents of an outrageous and/or discriminatory nature due to sex, language, religion, race, ethnic origin, opinion and union and/or political affiliation etc.

Electronic mail

E-mail is a business tool and is not to be considered private correspondence and therefore:

- Any e-mail message (as it pertains to work activity) may be copied and/or made public at any time
- Use of electronic mail (internal and external) for reasons not related to the performance of assigned duties is not permitted. It is not permitted to send or store messages (internal or external) of an outrageous nature, discriminatory on the basis of sex, language, religion, race, ethnic origin, opinion or union and/or political affiliation etc.
- It is not allowed to set up and use e-mail accounts outside the company.
-

Cell phones

Cell phone use has rules of good behavior that should always be followed

WHEREAS, it is a business tool, the cell phone should always be kept silent during meetings and meetings with clients, especially when you are at their premises

Cell phone use for personal purposes should be kept to a minimum and only for emergency cases.

Company cars

The company car is the total responsibility of the person to whom it has been assigned like all company assets it should be used and maintained with the utmost care

It should be conducted in full compliance with the requirements of the Highway Code

It is the responsibility of the assigned driver of the vehicle to worry about cleanliness, maintenance and ensure that the car is always in the best condition

Any fines resulting from traffic violations remain the responsibility of the driver.

Private cars

The use of the private car for business purposes is expected, 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 traffic violations remain the responsibility of the driver .

Section 4 - Conduct Criteria

4.0 Introduction

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

All recipients of this Code of Ethics (identified in Chapter 0 of this document) must observe proper and transparent conduct in the performance of their duties, thereby contributing to the effectiveness of the internal control system to protect corporate value

In compliance with legal regulations, all recipients must maintain an attitude of helpfulness to corporate bodies and supervisory authorities.

4.1 Relationships with staff

For further details, please also refer to the relevant Procedures of the 231 Management System. In general:

- **Personnel selection**
The evaluation of personnel to be hired, or in collaboration, is carried out on the basis of the correspondence of the candidates' profiles, compared with those expected and internal needs, while respecting equal opportunities for all stakeholders. The information requested is strictly related to the verification of the aspects provided by the professional and psycho-aptitude profile, respecting the privacy and opinions of the candidate. The General Management adopts, in the selection activity, appropriate measures in order to avoid favoritism and facilitation of any kind and makes a careful selection based not only on the mandatory aspects, but also on preferential aspects deliberated by the BoD
- **Establishment of the employment relationship**

Staff are hired under regular employment, professional service or internship contracts: no form of illegal employment is tolerated

▪ **Integrity and protection of the person**

As part of personnel management and development processes, as well as during selection, decisions made are based on the match between expected profiles and profiles possessed by people and/or on merit considerations. Access to roles and positions is made on the basis of skills and abilities. In addition, consistent with general work efficiency, flexible forms of work organization are favored that facilitate people on maternity leave as well as those who must care for children

▪ **Resource enhancement and training**

The company provides people with information and training tools with the aim of enhancing specific skills and preserving the professional value of staff. There is institutional training, delivered at certain times in professional life, internal to the person (example: an introduction to the business is provided for new hires) and recurring training aimed at operational staff (example: training on safety in the workplace, on 231 management and code of ethics).

4.1.1 Safety and Health

The company is committed to providing a work environment that protects the health and safety of its staff by spreading and consolidating a safety culture, developing risk awareness and promoting responsible behavior by all staff

The company also works to preserve, especially with preventive actions, the health and safety of workers

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 company's own activities

All employees are required to comply with internal rules and procedures on risk prevention and health and safety protection and to promptly report any deficiencies or non-compliance with applicable regulations

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 No. 81/08 as amended. The organization is committed to the most scrupulous compliance with all regulations concerning occupational health and safety for employees, collaborators and users. In particular:

- **Establishes operating procedures to be followed and coordinates occupational health and safety activities**
- **Ensures enforcement of current regulations including through the creation of risk assessment documents and the establishment of work procedures in line with current safety standards**
- **Constantly monitors legislative innovations and works to implement them**

The company also undertakes to ensure:

- **The assessment of all health and safety risks**
- **Prevention planning, aimed at a complex that consistently integrates in prevention the operating conditions, as well as the influence of factors of the environment and work organization**
- **The elimination of risks and, where this is not possible, their minimization in relation to the knowledge gained from technical progress**
- **Observance of ergonomic principles of work organization, in the design of workplaces, in the choice of equipment, and in the definition of working and service delivery methods, particularly with a view to reducing the health effects 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.**
- **Limiting to a minimum the number of workers who are or may be exposed to the risk**
- **The limited use of chemical, physical and biological agents in the workplace**
- **The priority of collective protective measures over individual protective measures**
- **The health monitoring of workers**
- **The removal of the worker from exposure to the hazard for health reasons pertaining to his or her person and displacement where possible to another task**
- **Adequate information and training for workers, managers, proposed, RLS and all personnel**
- **The appropriate instructions to workers**
- **The participation and consultation of workers and the RLS**
- **The planning of measures deemed appropriate to ensure the improvement of safety levels over time, including through the adoption of codes of conduct and best practices**
- **The emergency measures to be implemented in case of first aid, fire fighting, evacuation of workers, and serious and immediate danger**
- **The use of warning and safety signs.**
- **The regular maintenance of rooms, equipment, facilities with special regard to any safety devices in accordance with the indication of the respective manufacturers**
- **The appropriate instructions to employees, contractors and users and training to them in accordance with the law and the collective bargaining agreement applied to personnel.**
-
-
-
-

4.1. 2Privacy protection

In processing the data of its staff, the company complies with the provisions contained in the European Regulation 679/2016. People are given a privacy policy that identifies:

- **Purpose and manner of processing**
- **Any parties to whom the data are disclosed**
- **Information necessary for the exercise of the right of access under Article 15 of the GDPR**
-

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

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

4.1.3 Protection of the environment

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

It is committed to implementing pollution prevention and spreading awareness of environmental issues among employees and collaborators.

4.2 Duties of personnel

Please also refer to the 231 management system procedures for any further details.

People must act loyally in order to comply with the obligations signed in the employment contract and the provisions of the Code of Ethics by ensuring the required performance.

4.2.1 Delegations and responsibilities.

The duties, responsibilities, and powers of directors, employees, and contractors are defined through specific resolutions and/or appropriate procedures

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

4.2.2 Obligations for department heads to the Code of Ethics.

Each department head, identified as such in the organizational chart, job description and/or delegation system, has the obligation to:

- **To ensure compliance with the Code of Ethics by those directly or indirectly subject to its responsibility**
- **To represent by their behavior an example to their employees/collaborators**
- **Ensure that employees understand that the provisions contained in this Code of Ethics form an integral part of their work performance**
- **Promptly report to the General Management or any delegate or the SB any reports or special needs from their subordinates**

Failure on the part of department heads to comply with the obligations set forth in this chapter may result in disciplinary sanctions, as provided for in the sanctions system.

4.2.3 Obligations for all employees to the Code of Ethics and the documents produced by the company

Every employee is required to be familiar with the provisions contained in or referred to in the Code of Ethics as well as with the relevant legal regulations governing the activities carried out within the scope of his or her function, which form an integral part of the work performance of each

Any employee who becomes aware of alleged misconduct is required to report the information he or she has about such conduct only to his or her superiors or to the Supervisory Board and/or General Management in the manner prescribed by the internal system

The General Management adopts monitoring systems on the effective reading and comprehension of legally required documents by employees, collaborators, etc., by means of anonymous tests, activating the most appropriate actions to constantly increase the level of dissemination and comprehension of their contents

Employees are also required to

- **Refrain from conduct contrary to these provisions and standards**
- **Contact their superiors or the SB and/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 reference regulations**
- **Promptly report to at least one of the above individuals any news about possible violations of the Code of Ethics**
- **Cooperate with the organization in the event of any investigations aimed at verifying and possibly sanctioning possible violations**

These behavior requirements are also required of outside consultants and collaborators of all kinds.

4.2.4 Protection of corporate assets

Each recipient is expected to work diligently to protect corporate assets from improper or incorrect use

Individuals must know and implement the provisions of internal information security policies 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 given appropriate attention: this also includes information acquired from and concerning third parties (customers, contacts, partners, employees, etc.,)

Persons who in the performance of their duties come into possession of confidential information, materials or documents shall inform their superiors

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

4.2. 5 Confidential information about third parties

Company personnel shall refrain from using unlawful means in order to acquire confidential information about other organizations and third-party entities

Those who, within the framework of a contractual relationship, become aware of confidential information about others will be required to make only the use of such information as provided for in the contract in question

Without proper authorization, individuals may not 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 supervisor for assistance in handling such information.

4.2.6 Use of corporate assets

Each person is required to work diligently in order to protect the company's assets through responsible behavior and in line with the operating procedures prepared to regulate their use by accurately documenting their use.

In particular, staff must:

- **Use the assets entrusted to them scrupulously and sparingly**
- **Avoid misuse of corporate assets that may cause harm or reduce efficiency or are otherwise contrary to corporate interest**
- **Properly guard the resources entrusted to him/her and promptly inform the appropriate units of any threats or harmful events to the company**

Instead, with regard to computer applications, each person is expressly required to:

- **Strictly adopt the provisions of corporate security policies in order not to compromise the functionality and protection of information systems**
- **Refrain from sending threatening or insulting e-mail messages or resorting to low-level language or making inappropriate comments that may cause offense to persons and/or damage to the company's own image**
- **Refrain from browsing websites with indecent and offensive content and otherwise not related to professional activities.**

The principals that Olidata provides to staff - such as tablets, computers, etc. - may be legitimately used by Olidata itself as a means of evidence in order to acquire useful elements to prove the disciplinary or criminal liability of personnel who have made unlawful use of such Olidata-owned principals. By way of example and not limitation, Olidata may use as a means of evidence the computer through which the employee has made online bets.

4.2.7 When leaving Olidata

Olidata materials and assets belong to Olidata and may not be used for personal purposes or in any other future employment relationship. Materials and assets include software, hardware, data, and any other information or materials (such as employee data, financial information, marketing data, code, project files, and program or product designs) that are made or worked with during the employment relationship.

If the employee decides to leave Olidata for any reason-including retirement-the employee must return to Olidata all Olidata assets and materials including those on BYO devices. Upon leaving, no Olidata assets or materials may be removed from Olidata, either physically or by digital means.

The disclosure or use of Olidata's assets and materials for any purpose and for the benefit of any future employer is prohibited. Olidata continues to own the intellectual property created by the employee n.q. of Olidata employee even after he or she has left the company.

4.3 Customer Relations

Please also refer to the management system operating procedures for further details.

4.3. 1 Impartiality.

The company is committed to offering its products and services without any discrimination among private or potentially endowed customers with special attention to the latter.

4.3. 2 Contracts and customer communications

Contracts and communications to customers by the company should always be:

- Clear and simple, couched in language as close as possible to that normally used by interlocutors
- Compliant with applicable regulations and such as not to constitute circumvention or otherwise unfair practices
- Complete so as not to overlook any relevant element, for the client's decision.
-

4.3. 3 Staff behavior style toward customers

The behavior style of the company's people toward customers is marked by helpfulness, respect and courtesy, with a view to a cooperative and highly professional relationship.

4.3. 4Data processing.

When processing customers' personal data, the organization complies with the provisions contained in European Regulation 679/2016.

A privacy policy is achieved that identifies.

- ~~Purpose and manner of processing~~
- ~~Any parties to whom the data are disclosed~~
- Information necessary for the exercise of the right of access under Article 15 of the GDPR
-

In cases where legislation requires it, individuals are asked for specific consent to the processing of their personal data; any investigation of clients' ideas, preferences, personal tastes, and in general private life is excluded

It is incumbent on staff to treat data with the utmost discretion and confidentiality, especially in relation to internal; the same procedure is also applied to the telematic management of information and personal data.

4.4 Relationships with suppliers

Please also refer to the management system procedures for further details.

4.4.1 Choosing a supplier.

Purchasing processes are important:

- ~~In pursuit of maximum competitive advantage for the company~~
- ~~To the granting of equal opportunities to providers~~
- ~~To loyalty~~
- ~~To impartiality~~
-

Selection of suppliers and determination of purchasing conditions are based on an objective assessment of the quality, price of the good or service of its actual availability as well as guarantees of service and timeliness

As an additional selection criterion is the exclusion of suppliers who have ongoing criminal proceedings for procurement or other mafia-related matters.

4.4.2 Integrity and independence in relationships

Supplier relationships, including those involving financial and consulting contracts, are constantly monitored by the company

Entering into a contract with a supplier should always be based on relationships of extreme clarity, avoiding forms of dependence wherever possible

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

4.4.3 Relationships with suppliers.

Olidata works with many suppliers around the world from whom it makes purchases both for internal use and to meet customer commitments. In general, all purchases made from suppliers must be negotiated, signed and managed by the Purchasing Department, unless delegated specifically.

In decisions involving the choice between competing suppliers-whether the employee is a purchasing officer or a corporate officer involved in a purchasing decision-it is necessary to evaluate the facts impartially to determine the most suitable supplier, regardless of the volume of the purchase.

No pressure, real or apparent, should be exerted in order to obtain "favorable treatment" for a particular supplier. The mere appearance of such behavior is sufficient to compromise the integrity of existing procedures. Similarly, to avoid conflicts of interest in a procurement transaction, the principles outlined in Section 4.6.2 must be followed.

As a general principle, Olidata does not buy or sell on a reciprocal basis. To maintain high standards of the products, purchasing decisions are based on the quality, price, and reliability of the supplier. Moreover, in some situations, reciprocity may be illegal.

Of course, Olidata's customers may also be Olidata's suppliers; therefore, it may be appropriate in some cases for Olidata to consider its other relationships with a supplier. For example, when Olidata divests part of its business, it often purchases products from the divested business area from the company that purchased it.

4.5 Relationships with Public Administrations.

This section deals with relations between the company and the government.

4.5.1 Correctness 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 regulations, are informed by the general principles of fairness and loyalty so as not to compromise the integrity of both parties.

4.5.2 Gifts, giveaways and benefits

No person in the company may give money or offer financial or other kinds of benefits to any person in the public administration for the purpose of obtaining appointments or other benefits personally or for the company itself

No form of gift that could be construed as exceeding normal business or courtesy practices or otherwise aimed at acquiring favorable treatment in the conduct of any activity related to the company is allowed

In this sense, a "normal business practice or courtesy" worth less than €100.00 is considered as a gift

In particular, any form of gifts to Italian and foreign public officials or their family members that may influence their independent judgment for the purpose of obtaining more favorable treatment or undue benefits or advantages of various kinds is prohibited

Gift means any kind of benefit: not only material goods but also, for example, free attendance at conferences, training courses, promise of a job offer etc.

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

On the occasion of anniversaries, anniversaries and/or holidays, the donation of goods is allowed as long as it is of a modest amount and in any case within the limits deliberated by the Board of Directors or the General Management subject to prior notification to the SB adequately documented in order to allow the appropriate verifications

If any person in the company, on the other hand, receives, from a member of the Public Administration, explicit or implicit requests for benefits, he or she shall immediately inform the Board of Directors or the person to whom he or she is reporting for the adoption of appropriate checks and initiatives.

4.5. 3Lobbying

Any contact with government personnel intended to influence legislation, policies, or government actions may be considered lobbying, including sending responses to government requests for public policy comments. In some legislation, lobbying also includes normal marketing, purchasing, and sales activities directed at government customers. You are required to know and comply with all laws regarding lobbying and gift-giving activities, including reporting requirements. To engage in lobbying on behalf of Olidata, or to authorize someone (such as a consultant, agent, trade association, or Olidata Business Partner) to engage in such lobbying, you must first obtain approval from the Legal Representative or the Directors delegated to do so.

4. 6External Relations

This section discusses details regarding the company's external relations.

4.6. 1External 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 engage in business relations or is required to have institutional, social, political or any kind of relationship with them is obligated to:

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

4.6.2 Conflict of Interest.

A conflict of interest occurs when personal interests are placed before those of Olidata. A personal interest may be a direct benefit to the employee or to a family member or friend. The employee is required to avoid any activity that creates, or gives the appearance of creating, a conflict between his or her personal interests and the interests of Olidata. Conflicts of interest - actual or potential - should be reported to the manager so that ways in which the conflict can be reduced or eliminated can be discussed. The employee's primary responsibility is to Olidata and any conflict must be resolved in Olidata's favor.

Olidata Suppliers

An employee may not be an Olidata supplier or work for an Olidata supplier in any capacity (as an employee, representative, consultant, or member of the CDA, board, or advisory committee) unless he or she obtains prior approval from the C.D.A. and C.E.O. following the evaluation of the Related Parties Committee.

You may not accept money or other benefits for advice or services rendered to a supplier in connection with your business relationship with Olidata. However, you may accept promotional discounts generally offered to the public by transportation companies, hotels, car rental agencies, and restaurants.

Assisting a competitor

Providing assistance to a competitor is a clear conflict of interest, and you may not work for a competitor of Olidata in any capacity (as an employee, representative, consultant, or member of a board of directors or advisory board or committee).

Carrying out external activities

Outside the office, the employee may wish to engage in activities related to the technologies, business support, or products and services that Olidata offers to its customers. However, any outside activity, including working for another company or starting your own business, could cause a conflict of interest if, for example, the outside activity competes with Olidata's business interests or advances another company's interests at Olidata's expense. As Olidata rapidly expands into new business sectors and areas of interest, the boundaries of acceptable activities are continually being redefined. It is the employee's responsibility to obtain the manager's approval before engaging in outside activities that may conflict or compete with any actual or potential activities of Olidata.

Personal financial interests

It is not permissible to hold financial interests in any organization or company (public or private, widely or narrowly held) with which Olidata does business, such as suppliers, customers, competitors, or Olidata Business Partners, where such an interest might create or give the appearance of a conflict of interest with Olidata.

The employee is required to consult the manager if he/she thinks that any of his/her investments may generate a conflict of interest issue. It is forbidden to circumvent these restrictions on investments by acting indirectly through third parties.

Family members and close friends employed in the industry

The existence of close personal relationships with other people working in the industry (spouse, domestic partner, family members, close friends, and the like) poses special problems related to security, regulation, and confidentiality. Such personal relationship could lead to unintentionally compromising Olidata's business interests.

The employee is required to notify his or her manager of any such relationship. Frequent reminders and a focus on avoiding accidental disclosure of Olidata's or other parties' assets or confidential information will help minimize risks to Olidata's interests. At times, however, it may be necessary to modify the employee's job responsibilities or those of one of the other persons involved.

4.6. 3Competitive practices.

It is of primary importance to the company that the market is based on fair and equitable competition

The company is committed to strict compliance with relevant laws and cooperation with market regulators. In particular:

- **Undertakes to carry out activities in compliance with the rationale of the law for assignments for the provision of goods and services that are entrusted through express agreements with public entities, including economic entities and joint-stock companies with public participation**
- **Commits to providing correct information about its business both internally and externally or in the face of legitimate requests**
- **Ensures the truthfulness and accuracy of social data related to financial statements, reports and other official documents.**

Interacting with competitors

Competition laws-also known as monopoly, antitrust, fair competition or cartel laws-are designed to prevent interference with the operation of a market system based on competition.

Prohibited behaviors may include: colluding with others to fix prices or divide territories, illegal monopolization of an industry, and illegal abuse of a dominant position.

Interactions with competitors require additional caution. Discussions or collaborations based on proprietary or confidential information, including prices, contract terms, costs, inventories, marketing and plans for new products, market surveys and studies, production plans and capacities, and allocation of customers or territories should be avoided. Such discussions may

be illegal. If a competitor starts to engage in a conversation related to a prohibited topic, you should stop the dialogue immediately and inform the competitor that you do not intend to talk about such matters. If the competitor insists on the prohibited topic, you should leave the meeting and immediately report the incident to the Olidata Legal Department. Working with competitors involves risks. You have a responsibility to understand the rules that apply to these activities and to avoid prohibited topics. Before collaborating with competitors, including Olidata Business Partners who may be in competition, you must obtain prior manager approval and seek advice from Olidata Legal.

4.6.4 Gifts and benefits

See chapter 4.5.2 above

4.6.5 Insider Trading

During your employment with the Company you may become aware of information, which has not been made public, about Olidata or other Companies. The use or disclosure of this insider information for financial or other personal gain is unethical and against the law. Inside information is significant information that is not available to the public because it could cause a shrewd investor to buy, sell, or hold a company's stock or bonds. Such information can be significant even if it produces only a limited impact on the stock price.

Violation of these laws may result in civil and panic penalties, and Olidata will not tolerate the misuse of inside information. This prohibition applies in all countries around the world where the company operates.

The use or disclosure of privileged information is prohibited; any conduct aimed at circumventing these guidelines by acting through third parties or providing others with inside information for their personal use is also prohibited, even if the employee derives no economic benefit.

4.6.6 Public offices and participation in political activity

As a good corporate citizen, Olidata encourages employees to contribute to their communities. Employees are expected to speak with their manager to determine the proper approach if they feel personal activities may create a conflict of interest.

Public appointments

An Olidata employee's participation in a public office may create a conflict of interest for Olidata. As a member of a board of directors or civic organization, for example, one might find oneself having to make a decision involving Olidata, such as a decision to purchase Olidata products or services. In such a case, one's interest in favor of Olidata and one's obligation to the civic organization might push the Olidata employee in opposite directions. The latter is required to make it clear that he or she is an Olidata employee to avoid the impression that he or she has concealed his or her relationship with Olidata and to consider whether to refrain from participating in any decision-making on matters involving Olidata. If necessary, advice can be sought from Olidata Legal Management.

Political contributions and endorsements

Olidata does not endorse, support, make contributions or make payments to any political party or candidate, including through political endorsement committees, campaign funds, trade or industry associations and similar organizations. For example, Olidata will not purchase tickets or pay registration fees or expense reimbursements for participation in events where the funds raised will be even partially used for election campaigns.

It is not permissible to make any political contribution as a representative of Olidata and to employ Olidata's working time or assets to support political parties or candidates: using Olidata's working time or assets would be tantamount to making a contribution. Olidata will not reimburse any contribution offered in a personal capacity.

Public offices

Olidata will not pay for time spent performing activities as a candidate for public office if you hold them or if you participate in an election campaign, unless expressly provided for under the law. You must consult before accepting an appointment or running for public office at any level.

Section 5 - Enforcement Mechanisms of the Code of Ethics.

5.1 Organizational principles

The company ensures that the organizational system is based on the criterion of separation between the decision-maker, the executor and the controller. In particular, the organization makes all operations verifiable because they are recorded

The company binds those performing the audit function to the truthfulness and accuracy of the data and information

Every operation and/or activity must be lawful, authorized, consistent, documented, verifiable, in accordance with the principle of traceability and company procedures in accordance with the criteria of prudence and to protect company interests

Company procedures must allow for controls to be carried out on operations, authorization processes and the execution of those operations

Any employee who engages in transactions involving sums of money, goods or other utilities that can be economically valued as belonging to the company shall reasonably provide appropriate evidence in order to enable the verification of such transactions.

5.2 Accounting transparency

The company's accounting meets the generally accepted principles of truth, accuracy, completeness and transparency of the recorded data

The addressees of this Code of Ethics undertake to refrain from any behavior, active or omissive, that directly or indirectly violates the regulatory principles and/or internal procedures pertaining to the formation of accounting documents and their external representation

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 enable them:

- **The accurate accounting record**
- **The immediate identification of the underlying characteristics and motivations**
- **The easy, formal and chronological reconstruction**
- **The verification of the decision-making, authorization and implementation process in terms of legitimacy, consistency and appropriateness as well as the identification of the various levels of responsibility**
-

Recipients of this Code of Ethics who become aware of instances of omission, falsification, or neglect in accounting records or supporting documentation are required to promptly report them to their supervisor or to the SB and/or General Management. The company promotes training and updating in order to make the recipients of this Code of Ethics

aware of the rules

(laws or regulations, internal prescriptions, provisions of trade associations) that govern the formation and management of accounting records.

5.3 Checks and verifications

The company ensures the readiness, through the competent persons, to provide all necessary information and viewing of documents, and requests to the audit and control bodies

The company ensures the accessibility of all information and documents to those entitled to them and provides, through the availability of its directors and employees, who are responsible for their function, all information that facilitates the exercise of supervisory functions

The organization prohibits its directors and employees and/or collaborators from making false statements rather than the submission of false documents or attesting to untrue situations, including through computer systems, for the purpose of unduly receiving public funds and/or obtaining and retaining any benefits.

5.3.1 Supervision of the implementation of the Code of Ethics

The task of monitoring the implementation and enforcement of the Code of Ethics falls to:

- **Board of Directors**
- **Chief Executive Officer**
- **Supervisory Board: this body, in particular, in addition to monitoring compliance with the Code of Ethics, having for this purpose access to all sources of information in the company, suggests appropriate updates to the Code itself, including on the basis of reports received from staff**
-

The following tasks are the responsibility of the SB:

- **Communicate reports received regarding violations of the Code of Ethics to the Executive Board for appropriate action to be taken**
- **Express binding opinions on the revision of the most relevant policies and procedures in order to ensure consistency with the Code of Ethics**
- **Contribute to the periodic review of the Code of Ethics: to this end, the SB makes appropriate proposals to the Board of Directors, which assesses them and, if necessary, approves and formalizes them**

The SB maintains the requirements of autonomy and independence, assumes powers of investigation and control as well as powers of initiative to carry out its assigned functions.

5.3.2 Reporting problems or suspected violations

Violations of the Code of Ethics, if any, by the recipients are subject to the disciplinary system provided by the corporate Model 231

It should be noted, in fact, that in the event of violations of the Code of Ethics, the company shall take disciplinary measures against those responsible for the violations themselves, where deemed necessary for the protection of the interests of the organization, which may go as far as the removal from the company of those responsible in addition to compensation for any damages derived from the violations

Failure to comply with the rules of the Code of Ethics by members of corporate bodies may result in the adoption by the relevant corporate bodies of the most appropriate measures provided for and permitted by law

Violations of the rules of the Code of Ethics by employees constitute a breach of the obligations arising from the employment relationship, with all contractual and legal consequences, also with reference to the relevance of the same as a disciplinary offence

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

Special attention is given to the handling of computer data through internal systems: any problems and suspected breaches must be reported immediately to the head of IT services and/or the General Management for appropriate action.

5.3.3 Disciplinary measures resulting from violations

The provisions of this Code of Ethics are an integral part of the contractual obligations undertaken by personnel as well as by persons having business relations with the company

Violation of the principles and behaviors set forth in the Code of Ethics compromises the relationship of trust between the company and the violators, whether they are directors, employees, consultants, collaborators, customers or suppliers

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

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

- **With regard to employees (including members of corporate bodies and the SB itself) through appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the institution of criminal proceedings in cases where the conduct constitutes a crime. In particular, sanctions will be in accordance with the rules and logic of the labor contract applied. Disciplinary measures range from reprimand or warning to suspension without pay, demotion and, in the most serious cases, dismissal. Before disciplinary action is taken, the person concerned is given an opportunity to explain his or her behavior**
- **With regard to consultants, collaborators, customers, suppliers and others having contractual relations with the company, specific ways of termination of the contractual relationship will be activated**

It is also without prejudice to any compensation for damages that the company may suffer as a result of the violation by the above-mentioned individuals of the requirements contained in the Code of Ethics.

5.4 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 public administration**
- **Non-acceptance of benefits, money and utilities**
- **Non-acceptance of illegitimate influences from third parties**
- **Avoid conflicts of interest of their appointees.**
-
-

5.5 Confidentiality

Recipients are required to observe strict confidentiality of information, documents, studies, initiatives, projects, contracts, known for services performed

The company puts measures in place to protect the information it handles and prevent it from being accessed by unauthorized personnel.

5.6 Dissemination, communication and training

This Code of Ethics forms an integral part of and is an implementation of the 231 Model adopted by the company in order to prevent crimes committed in the interest or to the advantage of the organization itself by the persons specified by Legislative Decree no.231/01

In order to prevent violations of the regulations in force, as well as of 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 persons responsible for the processes of decision-making, authorization and performance of the operations themselves This Code of Ethics is brought to the attention of all internal and external parties concerned with or otherwise involved in the company's mission through appropriate communication and training activities.

5.7 Operational procedures and decision-making protocols

This Code of Ethics forms an integral part of and is an implementation of the 231 Model adopted by the company in order to prevent crimes committed in the interest or to the advantage of the organization itself by the persons specified by Legislative Decree no.231/01

In order to prevent violations of the regulations in force, as well as of 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 persons responsible for the processes of decision-making, authorization and performance of the operations themselves.

5.8 Delegation system

Apart from the already qualified individuals (Managing Director), the company uses a system of proxies on the basis of which certain activities can only be carried out by individuals who are expressly authorized to do so because they have the power conferred by means of an appropriate official proxy and/or notarized power of attorney

Indeed, it is necessary for individual operations to be carried out at the various stages by different individuals, whose responsibilities are clearly defined and known within the organization so as to avoid unlimited or excessive powers being given to individual individuals.

Section 6 - Final Provisions

6.1 Conflicts with the Code of Ethics

In cases where even one of the provisions of this Code of Ethics conflicts with the provisions set forth in internal regulations or procedures, the Code of Ethics will prevail over any of these provisions.

6.2 Iter of approval and amendments

This Code of Ethics was originally approved by the corporate board on the following date.

Date of approval Code of Ethics _____

Any changes and/or additions to this Code of Ethics will be approved by the Board of Directors after consultation with the SB and promptly disseminated to all recipients of the same, in particular:

- **The SB periodically reviews the Code of Ethics for intervening legislative or corporate changes and proposes amendments and/or additions**
- **The BOD reviews the SB's proposals and deliberates accordingly, making the approved changes immediately operational.**