



## **Group Code of Ethics**

*Approved by resolution of the Board of Directors of the October 31<sup>st</sup> 2018*

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## TERMS AND DEFINITIONS

Alfasigma Group / Group or Alfasigma	The term Alfasigma Group refers to the parent company Alfasigma and its foreign subsidiaries.
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BoD	The Board of Directors (i.e. the equivalent administrative body) of the Group Companies, which is responsible for implementing the standards of conduct set out in the Group Code and adopting them at local level, as well as updating them whenever necessary to reflect changes in the legislative framework, business practices and ethical standards of the communities in which the company operates.
Compliance Committee	The Compliance Committee set up in Alfasigma, composed of the Compliance Function and the Internal Audit Function.
Local Compliance Office	Local Compliance Function committees or contacts established in each Group company other than Alfasigma and excluding Italian subsidiaries.
P.A.	Public Administration
Code of Ethics	This Code of Ethics, adopted by the Board of Directors of the Parent Company and implemented by the administrative bodies of the other foreign companies of the Group, is the following
Disciplinary sanctions	Disciplinary sanctions for violations of this Code in accordance with the laws and/or regulations in force in the countries where the Group Companies operate
Recipients / Relevant Persons (pursuant to the G.L. on Compliance Governance)	All those who act on behalf of, operate and/or collaborate in any capacity with the Companies of the Group (employees, consultants, suppliers, customers, partners and third parties in general).

## BACKGROUND

This Code of Ethics has been prepared to ensure that the fundamental ethical values of the Company are clearly defined and constitute the basic element of the corporate culture, as well as the standard of conduct of the Board of Directors, shareholders, employees and collaborators of the same Company in the conduct of business and their activities.

This Code of Ethics (hereinafter also referred to as the "**Code**") has been defined and approved by the Board of Directors of the Parent Company and implemented by the Directors of the subsidiaries of the Alfasigma Group (hereinafter also referred to as "**Alfasigma**" or "**the Group**") to provide a Guideline to Management, employees and, in general, to any employee working on behalf of the Group or on its behalf. Top Management, Statutory Auditors, Employees, Business Partners and all those who work in the name and on

behalf of one of the Companies of the Group, *regardless of the relationship, even temporary, that binds them to the same (consultants, agents, proxies, also collectively called "Collaborators")*, hereinafter "**Recipients**", are required to comply with the provisions of the Code.

Each recipient shall have a copy of the Code available and shall be obliged to apply it under all circumstances. Recipients will also be required to formally accept the Group's conduct standards by signing the "Declaration of acceptance" attached to the Code. Each Recipient is therefore required, in the exercise of his or her functions, to comply with the rules contained in this Code, including those performed on behalf of the Group Companies with third parties.

## **ASSUMPTIONS, PURPOSE AND VALUE OF THE CODE**

### **What is the code of ethics for?**

The purpose of this Code of Ethics is to provide general ethical and behavioural guidelines to be followed in the performance of one's own activities, as well as to contribute to preventing the carrying out of an unlawful conduct or any conduct contrary to local laws and regulations.

### **Who is the code of ethics addressed to?**

In carrying out their services, all those who act, operate and collaborate in any capacity with Group Companies (employees, consultants, suppliers and third parties in general) are faced with situations that require the adoption of conduct relevant from different points of view, including, the most important, the ethical and legal (so-called "Recipients" of the Code).

The principles and rules contained in the Code apply:

- to all Group employees, regardless of their role or function;
- the members of the various corporate bodies;
- to any third party who may act on behalf of the Group Companies;
- third parties who have relations with Group Companies, such as, for example, suppliers, commercial partners and contractual counterparties with whom the Company conducts negotiations or concludes agreements for any reason.

### **What does Alfasigma expect from its employees, collaborators and partners?**

All Recipients of this Code, as identified above, have the duty to maintain and ensure that their collaborators and interlocutors behave in accordance with the general principles of absolute honesty, loyalty, good faith, balance, correctness and diligence, as well as with the specific obligations that may derive from deontology and, in any case, from those principles considered due by virtue of the context and purpose of their mission.

In the presence or absence of specific provisions, however, it is absolutely necessary that in their actions all are inspired by the highest standards of conduct, to which the Group in turn conforms its conduct, taking into account that the correct conduct to be taken in any situation always originates not only from good faith,

but also from transparency, impartiality and especially from the honesty and loyalty of the thought of those who act.

The Group does not intend to entertain relations with persons who do not undertake to comply with the principles and rules contained in this Code. To this end, each Company shall include clauses in its contracts with such parties in order to comply with this Code.

In no way can the conviction of acting in the interest or to the advantage of the Group justify the adoption of behaviours in contrast with the principles indicated in this Code. The application of and compliance with the principles set out above are also part of the more general obligations of cooperation, correctness, diligence and loyalty required by the nature of the service due and by the interest of the company of which they are part or on behalf of which they operate, to which all are required in the performance of any service in favour of the Company of the Group itself.

These obligations, particularly for Group employees, supplement the provisions of applicable<sup>1</sup> and current laws and regulations.

This Code is an integral part of the Governance Compliance adopted by each Group Company, also in accordance with the specific applicable regulations.

### **How to report any non-compliant conduct?**

Compliance with the Group Code is an essential condition for working in / on behalf of Alfasigma.

Alfasigma does not tolerate any violation of the Group Code and is firmly determined to treat non-compliance cases appropriately. Recipients must be aware that such violations can have serious consequences for Group Companies and for themselves and that they will be held responsible for them.

In daily work, situations may arise that are not explicitly dealt with in this Group Code of Ethics or in the documents to which it refers (e.g. directives, policies, guidelines). If you are in any doubt about the correct behaviour to adopt, you should ask yourself the following questions:

- Is my behavior legitimate?
- Is it in line with Alfasigma's corporate values and principles?
- Does it correspond to the Group Code of Ethics?
- Could it have negative consequences for Alfasigma or for myself?
- Would I be comfortable with it being reported in a newspaper?

Often this can be enough to guide you in your behaviour. However, if there is any doubt or uncertainty about the right behaviour to adopt, asking for help and advice is the right choice.

Your line manager, Human Resources, the local Compliance Office and the Compliance Committee are the functions you should contact to discuss your uncertainties. In any case, any violation of this Code, situations of doubt/uncertainty and/or non-compliance, of which each Recipient may become aware in the

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<sup>1</sup> Articles 2104 and 2105 of the Italian Civil Code and of the National Collective Labour Agreement applicable to Italy.

performance of their activities, must be promptly reported through one of the following alternative channels with guarantees of confidentiality and protection:

- Dedicated email/ Traditional mail with a letter reserved for the attention of the Compliance Committee, or email to the dedicated email address of the Compliance Committee: [compliance@alfasigma.com](mailto:compliance@alfasigma.com).
- traditional mail with a letter reserved for the attention of the local Compliance Office

Any employee who, in good faith, raises a compliance concern is acting in Alfasigma's best interest and deserves protection. Alfasigma does not tolerate any retaliation against an employee who raises a compliance concern in good faith. If an employee believes that this principle is not respected, he or she can and must report the non-compliance using the channels indicated above.

Similarly, Alfasigma does not tolerate any abuse of the reporting channels mentioned above (bad faith reports, etc.).

Therefore, each Recipient is required to:

- Speak openly whenever, in good faith, you believe that someone has done, is doing or intends to do something that violates the Alfasigma Group Code of Ethics;
- Discuss compliance concerns openly with your manager;
- Use other available channels to speak and report non-compliance situations where you are uncomfortable reporting to your manager;
- Speak openly if someone is subject to retaliation for raising compliance concerns in good faith.

### **What is the Responsibility of each Recipient?**

Each Recipient is responsible for:

- **Working with integrity.** Be honest, open and transparent. Follow this Code of Ethics, applicable procedures and laws and never compromise Alfasigma's values.
- **Referring to the Code of Ethics.** Read, understand and keep in mind what is stated in the Code as part of your work activities and when you need to decide what to do to be right.
- **Asking questions.** If uncertain about what to do, all communication and reporting channels provided by Alfasigma to ask for help should be used.
- **Reporting non-compliance.** Any good faith suspicion of unethical or non-compliant conduct must be openly reported through the channels provided by Alfasigma.
- **Cooperate.** Respond transparently to any request for more information about a specific survey, providing complete, accurate and timely information.

## 1. GENERAL PRINCIPLES

### 1.1 *COMPLIANCE WITH LAWS, ETHICAL PROVISIONS, REGULATIONS AND PROCEDURES*

Recipients are required to diligently comply with the laws in force in all countries in which the Group operates, the Code, any other ethical provisions to which each Group Company has adhered and internal regulations. In no case may the pursuit of the Company's interests justify conduct that is not honest and does not comply with current legislation, the relevant ethical provisions and this Code.

Recipients are also required to comply with operating procedures and company protocols.

In the exercise of their respective activities, the Recipients are required to know and respect the rules of the legal system (national, supranational or foreign) in which they operate. Any violations of regulations must be reported to the competent authorities.

Each employee is called upon to contribute with his or her behaviour and work activity to the promotion of integrity, legality and transparency, also providing the subjects/bodies required to control activities (i.e. Local Compliance Office, Internal Audit Function, etc.) with data/information under their own responsibility in compliance with the terms prescribed by current regulations.

The decision-making processes adopted by employees must be traceable through adequate documentary support, which allows replicability at all times.

### 1.2 *CONFLICT OF INTEREST*

Conflict of interest is defined as the case in which an interest different from the corporate mission of each Group Company is pursued or activities are carried out that may, in any case, interfere with the ability to make decisions in the exclusive interest of the Company, or in which personal advantage is taken of business opportunities of the Company itself; or in which the representatives of customers, suppliers or public institutions act in contrast with the fiduciary duties linked to their position.

#### **General principles**

A conflict of interest may arise when, in the course of your business, you, among other things, have a conflict of interest:

- you have interests, including direct or indirect economic and financial interests, which may influence your business;
- you can gain a personal, financial or other advantage by accessing and misusing information;
- work for or on behalf of suppliers of the Company;
- confidential information on the activities carried out by the Company before it has officially communicated it is disseminated, including during informal meetings;
- the position or role is exploited in such a way as to obtain a personal advantage, of whatever nature;
- accept money, favours or benefits not due from persons or companies that have or intend to enter into business relations with the Company.

#### **Operational requirements**

Where the addressees of the Code find themselves or believe that they may find themselves in a position of conflict of interest or where there are serious reasons for the benefit of the Code, they must refrain from making any decision and/or carrying out any activity whose effects fall, directly or indirectly, on the Company.

Both in the event of abstention and where it is not possible to abstain, one has the duty to inform one's own Manager, communicating the reasons for the potential conflict; the Manager will in turn be required to promptly inform the Top Management, who will assess the actual presence of this conflict and authorise any potentially conflicting work activity only after having taken the necessary steps to eliminate the conflict situation.

At the justified request of the Company, the interested party is required to provide further information on the actual or potential situation of conflict of interest in which he believes he is involved.

It is therefore prohibited to:

- carry out actions and behaviours potentially in conflict with the activity of the Company or with the purposes and interests that it pursues, and
- carry out activities or make decisions to which a financial or non-financial interest may be directly or indirectly connected, belonging to the spouse, relatives within the fourth degree and/or cohabitants, associated persons (friends, acquaintances, etc.) or organisations of which the above-mentioned subjects are directors or managers, which may breach the duty of impartiality and conflict with the activity and purposes of the Company, in the name or on behalf of which it operates;
- give in to undue pressure and/or agree to render services in the event of offers or proposals for remuneration, remuneration or benefits of any kind that may prejudice their independence of judgement;
- formulate offers, accept assignments or carry out their activities in any way when it can be reasonably inferred from known elements that the activity contributes to illegal or illegitimate operations and/or in any case incompatible with the principles of lawfulness, morality and transparency;
- promote any form of participation or contiguity in illicit affairs for any reason connected and/or referable to organised crime or in any case to subjects dedicated to malpractice;
- disseminate confidential information acquired in the performance of professional duties.

### ***1.3 HARASSMENT AND DISCRIMINATION***

#### **General principles**

The Group:

- guarantees a work environment that values the diversity of employees, in compliance with the principle of equality, taking care to protect the dignity and freedom of each employee in the workplace;
- does not tolerate any kind of discrimination of a racial, sexual, political, trade-union or religious nature, or on the basis of age or state of health;
- imposes an obligation to refrain from any intimidation, harassment or harassment;

- does not allow sexual harassment, meaning "sexual harassment" any unwanted act or conduct, even verbal, of a sexual connotation that offends the dignity of the person who suffers it;
- does not allow the creation of a climate of intimidation against the person subjected to such harassment.

### **Operational requirements**

or those who believe they are the subject of harassing or discriminatory behaviour or are aware of intimidation, discrimination or harassing and/or discriminatory behaviour in action must inform their Manager and/or the Top Management, or in any case use the reporting channels mentioned above, which will take all the necessary actions with the utmost promptness and confidentiality, in order to allow the situation of hardship to be overcome and restore a serene working environment.

#### ***1.4 QUALITY OF SERVICE***

### **General principles**

The Group focuses its activities on satisfying and protecting its customers, listening to requests that may favour an improvement in the quality of its services; for this reason, the Group directs its development and marketing activities to high quality standards of its services.

### **Operational requirements**

The Group is committed to ensuring that

- Contracts and work assignments are to be executed in accordance with what is knowingly agreed by the parties;
- conditions of ignorance or inability of their counterparts are not exploited;
- no Recipient takes advantage of contractual gaps or unforeseen events to renegotiate the contract for the sole purpose of exploiting the position of dependency or weakness in which the counterparty has found itself;
- the quality standards defined by the Company of the reference Group are always adopted, verified and respected.

## **2. RULES OF CONDUCT TOWARDS STAFF**

### ***2.1 HUMAN RESOURCES - EQUAL OPPORTUNITIES***

### **General principles**

Human resources are an indispensable element of the company's organisation and therefore represent the main source of the Group's success, both from the more general institutional point of view and from the more strictly corporate point of view.

Alfasigma offers all employees the same opportunities, on the basis of merit criteria and in compliance with the principle of equality, and allows everyone to develop their own attitudes, skills and competences, providing, if necessary, training programs and / or training and / or refresher courses.

The Group protects disabled workers by promoting their integration into the working environment.

The Group is committed to fully enhancing all the professional skills present in the company structure, through the activation of the available levers to encourage the development and growth of its collaborators/employees.

## **2.2 STAFF SELECTION**

### **General principles**

The mere promise to hire a person in exchange for favours may constitute an offence.

The process of selecting the personnel to be hired must be aimed at selecting the most suitable and valid person based on the correspondence of the candidates' profiles and their specific skills with the company's needs, as they result from the proposal made by the requesting function and, always, in compliance with equal opportunities for all interested parties.

The information requested is closely linked to the verification of the aspects envisaged by the professional and psycho-aptitude profile, with respect for the private sphere and the opinions of the candidate.

### **Operational requirements**

Favouritism, nepotism or forms of patronage in the selection and recruitment phases are generally prohibited.

Each Group Company must verify compliance with the principles outlined above, within the limits of the information available, as well as to adopt appropriate prevention measures.

The Group is absolutely forbidden to employ foreign workers without a residence permit or with a revoked or expired permit, for which no request for renewal has been submitted, documented by the documentary evidence required by the applicable local regulations.

## **2.3 STAFF APPRAISAL**

### **General principles**

Alfasigma undertakes to ensure that in its corporate organization the annual objectives set, both general and individual, of its personnel, are such as not to induce unlawful conduct and are, instead, aimed at a possible result, specific, concrete, measurable and related to the time required to achieve them.

### **Operational requirements**

Any situations of difficulty or conflict with the above principle must be promptly reported by anyone to their Manager, to the Local Compliance Office or in any case to one of the other channels provided for and indicated above, so that they can implement any corrective actions.

## **2.4 RIGHTS AND OBLIGATIONS OF EMPLOYEES**

### **Operational requirements**

Among other things, Group employees are required to:

- be familiar with and observe current legislation, processes, procedures and company guidelines, as well as the principles contained in this Code;
- comply with the instructions and instructions given by the Group, by the manager or, in any case, by its Managers;
- fulfil all the obligations necessary for the protection of safety and health in the workplace and the protection of the environment;
- avoid abusing or generating false convictions in relation to their position, role or powers within the Group and the role of the Company of the Group of reference, intervening immediately in order to eliminate any misunderstanding;
- not to perform acts contrary to the duties of office, nor to omit or delay an official act for the undue achievement or promise of money or other benefits for oneself or for others;
- in order to maintain the trust of the market and in particular of suppliers towards Alfasigma, to treat everyone in a correct and fair manner, to avoid favours or pressures, real or apparent, in order to obtain particular advantages from certain suppliers;
- keep confidential information relating to Alfasigma's activities, as well as financial and economic information;
- not to use information obtained in the course of the activity carried out for the Group for personal purposes or to obtain financial or non-financial advantages;
- to promote the knowledge of the Code towards all those with whom they have relations, of a formal and informal nature, in the context of the performance of their activities;
- avoid attending associations, clubs or other bodies of any kind, where obligations, constraints or expectations may arise that may interfere with the performance of their activities;
- acquire the professional skills essential for the performance of their activities and maintain, throughout the duration of the employment relationship, an adequate level of knowledge and experience, constantly updating their preparation and attending any refresher or retraining courses proposed and activated by the Group;

## **2.5 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE**

### **General principles**

Within the framework of current legislation, the Group undertakes to adopt all necessary measures to protect the physical and moral integrity of its workers.

In particular, the Group is committed to ensuring that

- compliance with current legislation on the health and safety of workers is considered a priority;
- the risks to workers are, as far as possible and guaranteed by developments in best practice, avoided, inter alia, by selecting the most appropriate and least hazardous materials and equipment and by mitigating the risks at source;
- unavoidable risks are properly assessed and appropriately mitigated through appropriate collective and individual safety measures;
- the information and training of workers is disseminated, updated and specific with reference to the task performed;
- consultation of workers on health and safety at work is ensured;
- any safety needs or non-conformities that arise in the course of work activities or during audits and inspections are dealt with quickly and effectively;
- the organisation of work and its operational aspects are carried out in such a way as to safeguard the health of workers, third parties and the community in which the Group operates.

#### **Operational requirements**

The workers, each to the extent of their competence, are required to ensure full respect:

- the laws in force in the various countries in which Alfasigma operates, and subsequent updates,
- the principles of this Code and the company's procedures and any other internal provisions provided for to guarantee the protection of health and safety in the workplace;
- as well as to report any violations or even simple attitudes or practices in contrast with the provisions of the Code of Ethics and other company provisions for the protection of health and safety in the workplace.

## **2.6 ENVIRONMENTAL PROTECTION**

### **General principles**

Within the framework of current legislation, the Group undertakes to adopt all necessary measures to ensure a safe and protected work environment, as well as respecting the surrounding environment. To this end, the Group undertakes to:

- continuously improve the environmental performance of its processes and to meet all relevant legislative and regulatory requirements;
- minimise environmental impact by optimising the use of resources;
- to seek, in the exercise of the activity commissioned to it, solutions compatible with the exercise of sustainable development, aiming at the exploitation of natural resources, the minimum consumption of the territory and the minimum waste of energy sources;
- to avoid, within the limits of the functions entrusted to it, alterations to the environment in which it operates which may affect the ecological balance and/or the conservation of cultural, artistic, historical and landscape heritage.

### **Operational requirements**

The Group monitors the environmental impacts of its activities and systematically seeks to improve them in a consistent, effective and sustainable manner.

In particular, the Group is committed:

- to capture the stimuli of those Customers who make Sustainability their development strategy;
- Prefer suppliers that demonstrate the best performance in terms of sustainability;
- where, in order to comply with environmental protection requirements, it is necessary to have recourse to the intervention of authorised parties (disposers, transporters, etc.), the latter must be chosen from among those with the highest requirements of reliability, professionalism and ethicality.

It also uses products with a low environmental impact and pays attention at its offices to the separate collection of waste. The Group's environmental commitment is also aimed at raising the awareness of its employees, who are required to:

- to contribute to the fulfilment of the obligations provided for by the legal provisions on the environment;
- immediately report any environmental anomalies to the above parties;
- participate in the training and education programmes organised.
- take all reasonable precautions to maintain a safe and healthy working environment;
- ensure that they do not put themselves or others at risk with their actions;
- promptly report to the competent functions (Local Compliance Office, etc.) all behaviours detected or known that may compromise the safety of the working environment.

It is also absolutely forbidden for all Recipients to:

- serve under the influence of alcohol or drugs;
- ignore the ban on smoking in the workplace, or in any case, even where smoking is not prohibited by law, behave in a way that is insensitive to the needs of those who may feel uncomfortable because of the effects of "passive smoking".

### **3. RULES OF CONDUCT TOWARDS THE PUBLIC ADMINISTRATION**

#### ***3.1 RELATIONS WITH THE PUBLIC ADMINISTRATION***

##### **General principles**

Alfasigma's relations with the Public Administration, public officials or persons in charge of a public service must be inspired by the strictest impartiality and correctness, by the observance of the applicable provisions of law and regulations and may not in any way compromise the integrity or reputation of the same.

##### **Operational requirements**

The assumption of commitments and the management of relations, of whatever nature, with the Public Administration, public officials or persons in charge of a public service, are reserved exclusively to the company functions appointed for this purpose and to the authorised personnel.

In any case, these persons are required to diligently keep all the documentation relating to the relations they have with the Public Administration.

In the context of relations with the Public Administration, public officials or persons in charge of a public service, the Recipients are required to abstain:

- offering, also through a third party, money, job or commercial opportunities or, more generally, other benefits, to the public official, his family members or to persons connected in any way to him;
- illegally seeking or establishing personal relations of favour, influence or interference that could directly or indirectly influence the outcome of the relationship.

### ***3.2 RESPECT OF IMPARTIALITY AND GOOD PERFORMANCE OF THE P.A.***

#### **General principles**

The Group, the corporate bodies and their members, employees, consultants, collaborators and, in general, third parties acting on behalf of the Group Companies in relations with the Public Administration, whether Italian or foreign, inspire and adapt their conduct to respect the impartiality and good performance which the Public Administration is required to maintain.

### ***3.3 RELATIONS WITH PUBLIC INSTITUTIONS AND SUPERVISORY AUTHORITIES***

#### **General principles**

The Group takes care of relations with public institutions on the basis of the principles of integrity, fairness and professionalism.

#### **Operational requirements**

The Recipients are required to scrupulously observe the regulations in force in the sectors connected to their respective areas of activity and the provisions issued by the competent Institutions and/or by the Supervisory Authorities.

The Recipients shall promptly comply with any request from the Inspection and/or Supervisory Authorities competent to carry out checks or controls, providing full cooperation and avoiding obstructive behaviour.

### ***3.4 RELATIONS WITH JUDICIAL AUTHORITIES***

#### **General principles**

The Group operates in a lawful and correct manner, collaborating with the Judicial Authority and the bodies delegated by it.

In the context of any existing disputes, the activity carried out to manage them must be based on the principles of legality, fairness, transparency and all other ethical principles defined in the Code.

#### **Operational requirements**

All Group personnel and those working on behalf of the Group must promptly inform the function with which they collaborate of any information relating to the possible occurrence, or existence, of a criminal trial relating to an offence provided for by applicable laws and regulations, against themselves or any person of the Group and relating to the activity they carry out in the specific Group Company.

In particular, managers, employees and collaborators in any capacity of the Group must refrain from illegal conduct, such as, for example:

- give or promise money or other benefits to Public Officials or to Persons in Charge of a Public Service or to persons indicated by them in order to influence also the impartiality of their judgment;
- send false documents, certify non-existent requirements or provide untrue guarantees/declarations;
- delete documents or destroy archived documents;
- give or promise money or other benefits to the legal advisors of the counterpart companies in a dispute in order to have a favourable outcome in the dispute.

The Group must ensure that the confidentiality of information received on any proceedings in progress is protected, identifying the persons who may have access to it and the methods for filing and storing it.

It is forbidden for everyone to exert any kind of pressure on the subjects involved in a procedure for any reason or role, such as, by way of example:

- promise salary increases or career advancements, or
- threaten dismissals or reductions in remuneration, as well as other forms of demansion or transfer.

Any legal proceedings concerning the relevant offences under the applicable regulations must be promptly communicated to the competent functions indicated above (Local Compliance Office, etc.).

Employees who have been convicted, even with a sentence that has not become final, or for whom the indictment decree has been issued, for crimes against the Public Administration, are required to notify the competent functions (i.e. Head of their structure; Local Compliance Office, etc.).

### ***3.5 OFFERING MONEY, GIFTS OR OTHER BENEFITS***

#### **General principles**

The Group condemns any conduct, on its behalf, by corporate bodies and their members, or by employees of Group companies, as well as by consultants, collaborators and third parties acting on behalf of the Company itself, consisting in promising or offering, directly or indirectly, money, services, performance or other benefits to Italian or foreign Public Officials and/or Persons in Charge of a Public Service, except in the case of gifts or other benefits of modest value and, in any case, falling within the lawful habits, customs or activities, from which an undue or unlawful interest or advantage may result for the Company.

It is also forbidden to accept gifts, fees or other benefits except those of modest value. Gifts and other benefits received in any case must be returned immediately to the sender.

For the purposes of this paragraph, as a criterion for defining the "*modest value*" of gifts or other benefits, reference may be made to the limits and customs considered lawful by the laws and practices in force in the various countries in which the Group operates<sup>2</sup>.

### **Operational requirements**

The Group refrains from practices that are not permitted by law, commercial practices or the ethical codes - if known - of the entities with which it has dealings.

Gifts offered must always be authorized by the function manager and must be adequately documented in order to allow for any checks.

Each function manager periodically and/or upon specific request of the other competent local functions (i.e. Compliance Committee, Local Compliance Office, Internal Audit Function, etc.), shall send specific reports/information on the quantity, extent and beneficiaries of any gifts granted/authorised.

## ***3.6 INFLUENCE ON THE DECISIONS OF THE PUBLIC PROSECUTOR***

### **General principles**

The persons appointed by the Group to follow any business negotiation, request or relationship with the Italian and/or foreign P.A. must not, for any reason, attempt to unlawfully influence the decisions of the Public Officials or Persons in Charge of a Public Service who deal with and make decisions on behalf of the Italian or foreign P.A..

### **Operational requirements**

In the course of business negotiations, requests or commercial relations with Italian or foreign Public Officials and/or Persons in Charge of a Public Service, the following actions may not be taken - directly or indirectly -:

- propose - in any way - employment and/or commercial opportunities that may benefit the Public Officials and/or the Persons in Charge of a Public Service in a personal capacity or through a third party;
- offer money or other benefits in any way, except in the case of gifts, tributes or other benefits of modest value and, in any case, falling within the legitimate customs and traditions;
- perform any other act aimed at inducing Italian or foreign Public Officials to do or omit to do something in violation of the laws of the system to which they belong.

## ***3.7 WORKING RELATIONS WITH THE P.A.***

### **Operational requirements**

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<sup>2</sup> For Italy, reference may be made to the limit quantified in € 150.00, as provided for in Presidential Decree 62/2013, a sum to be understood as the maximum limit in the calendar year for donations made by the same person, unless otherwise evaluated in the specific case by the Chairman of the Board and/or the Managing Director (i.e. gifts on special holidays; mere acts of commercial courtesy).

It is prohibited to establish employment relationships and/or any other form of relationship, including consulting with *former* employees of the Public Administration, local or foreign, who, because of their institutional functions, participate or have participated personally and actively in business negotiations or endorsed requests made by the Company of the Group to the Public Administration, local or foreign, unless such relationships have been preliminarily and adequately evaluated by the Top Management, and communicated to the Local Compliance Office, before proceeding to any recruitment/establishment of the relationship.

### **3.8 TRANSPARENCY IN THE MANAGEMENT OF LOANS AND CONTRIBUTIONS FROM THE PUBLIC ADMINISTRATION**

#### **General principles**

The Group condemns any behaviour aimed at obtaining, by the State, European bodies or other public bodies, any type of contribution, financing, subsidised loan or other disbursement of the same type, by means of altered or falsified declarations and/or documents, or by means of omitted or more general information, by means of tricks or deceptions, including those carried out by means of an IT and/or telematic system, aimed at misleading the disbursing body.

### **3.9 CONFLICTS OF INTEREST WITH THE P.A.**

#### **Operational requirements**

The Group Company may not be represented in relations with the Public Administration, whether Italian or foreign, by persons in a recognised position of conflict of interest, unless such a situation has been adequately declared, on a preliminary basis, to the Top Management, as well as to the competent local Function (i.e. Local Compliance Office, etc.), and by the former evaluated with regard to the possibility of conferring the aforementioned power of representation.

Individuals who work on behalf of the Group Company are obliged to refrain from engaging in relations with the Public Administration, whether national or foreign, in any case where there are situations of conflict of interest.

## **4. RULES OF CONDUCT IN RELATIONS WITH SUPPLIERS AND CUSTOMERS**

### **4.1 SELECTION**

#### **General principles**

In relations with suppliers, everyone must be inspired by the principles of absolute honesty, loyalty, good faith, balance, correctness, diligence, effectiveness, efficiency, clarity, impartiality, transparency and confidentiality.

#### **Operational requirements**

In particular, conduct must be avoided which may cause prejudice or damage, even indirectly, to the Group, and which may cause unjustified favouritism, favouring one supplier over others.

In the choice of suppliers, the primary objective is to avoid any discrimination and to allow maximum participation and competition between potential suppliers. Therefore, within the framework of the provisions of current legislation and internal provisions, the procedures established to make the best choice of suppliers and to operate a proper management of the relationship with them, including in the phases of execution of the contract, must be observed.

Business relations must be maintained exclusively with customers, companies, partners and suppliers of a certain reputation, who carry out legitimate business activities and whose proceeds derive from legitimate sources.

#### ***4.2 MANAGEMENT OF THE CONTRACTUAL RELATIONSHIP***

##### **Operational requirements**

In relations with suppliers, Recipients are required not to:

- accept non-existent services;
- authorise undue payments,
- to hire third parties to carry out illegal or unethical activities.

At the same time, Recipients must:

- to give third parties the opportunity to compare themselves according to rules of correctness in order to maintain business relations with the Group;
- consider the presence of any potential conflicts of interest before involving a third party;
- choose qualified business partners with a good reputation for quality and honesty;
- ensure that all agreements with business partners comply with the Group's corporate policies.

#### ***4.3 GIFTS, OFFERS AND TRIBUTES***

Gifts are tangible assets, such as gifts or money, but also intangible assets or services or any other direct or indirect benefit.

##### **General principles**

With regard to customer relations, gifts and entertainment expenses must be compatible with current legislation and market practices, must not exceed the permitted value limits and must have been approved and registered in accordance with the internal rules.

Relations with clients, both public and private, are based on a sense of responsibility, commercial fairness and a spirit of cooperation.

The general principles expressed in paragraph 3.5 of this Code of Ethics are hereby referred to.

##### **Operational requirements**

No one may solicit, nor in any case accept, directly or indirectly, for example through their family members, gifts from suppliers, even if only potential, of the Group, if they may appear in any way connected to the

relationships in place with the same or, in any case, may leave it to be understood that their purpose is to acquire undue advantages.

It is possible to accept gifts of symbolic value or even of modest value, as long as they are the same at the same time:

- are carried out in accordance with the applicable legislation;
- cannot leave it to be understood that they are linked to advantages obtained or that they are intended to acquire undue advantages;
- are normally offered to any other person who has similar relationships or on the occasion of holidays or public holidays.

In addition, there is an obligation to:

- not pay or offer, directly or indirectly, payments and material benefits of any entity to influence or compensate for an act of their office;
- not to engage in illegal, collusive, illicit payment, attempted bribery and favouritism practices and behaviours.

Anyone who receives, even at home, gifts as a result of the activities carried out or to be carried out for the benefit of the Group and falling within the scope of the prohibitions indicated above, has the duty to inform their Manager or Top Management, providing for the immediate return of such gifts.

Gifts/charges offered must always be authorised by the function manager and must be adequately documented to allow for verification.

Each function manager periodically and/or upon specific request of the competent local functions (i.e. Local Compliance Office, etc.), shall send specific reports/information regarding the quantity, extent and beneficiaries of any gifts granted/authorized.

## **5. RULES OF CONDUCT IN RELATIONS WITH THE COMMUNITY**

### **5.1 RELATIONS WITH THE MEDIA**

#### **General principles**

The Group's communication with the media must be transparent and truthful. Any form of pressure or acquisition of favourable attitudes by the media shall be avoided.

#### **Operational requirements**

Relations with the media are reserved exclusively for the corporate function responsible for managing them, with the prior authorisation of Top Management and in compliance with Group policies. All other Recipients are prohibited from providing information to media representatives, and are obliged to inform the competent function of any questions asked by the media themselves.

The Group also recommends that all Recipients of:

- avoid speaking or writing on behalf of the Company of the Group of reference, unless they have been previously authorized;
- avoid talking or writing about topics that do not fall within their professional competence;
- ensure that there is no confusion between personal interests and those of the Company (for example, you should avoid using Company letterhead or e-mail to express personal opinions or to authorize transactions for personal purposes).

## **5.2 ECONOMIC RELATIONS WITH POLITICAL PARTIES AND TRADE UNIONS**

### **Operational requirements**

Direct or indirect contributions in any form to political or trade union parties, movements, committees and organisations, their representatives and candidates are prohibited.

The Group also prohibits any sponsorship of events/congresses or parties for the purpose of political propaganda, except to the extent permitted by law and subject to the adoption of an express resolution by the administrative body, refraining from any direct or indirect pressure on political figures.

## **6. RULES OF CONDUCT IN CORPORATE ACTIVITIES**

### **6.1 TRANSACTIONS**

#### **Operational requirements**

Every operation and/or transaction, in the broadest sense of the term, must be legitimate, authorised, consistent, appropriate, documented, recorded and verifiable at all times.

The procedures governing the operations must allow for the possibility of carrying out checks on the characteristics of the transaction, on the reasons that allowed its execution, on the authorisations to carry out, on the execution of the operation itself.

Any person who carries out operations and/or transactions involving sums of money, goods or other economically assessable benefits belonging to the Group must act with authorisation and provide, on request, all valid evidence for its verification at any time.

Each corporate function is responsible for the truthfulness, authenticity and originality of the documentation produced and the information provided in the performance of the activity for which it is responsible.

Compliance with the principles of fairness, transparency and good faith in relations with all contractual counterparties must be guaranteed.

The assignments given to any service companies and/or individuals who are responsible for the economic/financial interests of Group companies must be drawn up in writing, with an indication of the agreed contents and economic conditions. Any derogation must be duly authorised and justified.

With reference to the commercial/professional reliability of suppliers and partners, all the necessary information must be requested and obtained in order to assess the reputation/reliability of the contractual counterparty.

## **6.2 THE PURCHASE OF GOODS AND SERVICES AND THE PROVISION OF EXTERNAL CONSULTANCY SERVICES**

### **General principles**

Employees and persons who make any purchase of goods and/or services, including the outsourcing of external consultancy services, on behalf of the Group, must act in compliance with the principles of transparency, correctness, economy, quality, pertinence and lawfulness and operate with the diligence of a good family man, and in compliance with the specific procedures and/or internal regulations of the Group.

### **Operational requirements**

In addition, these parties must commit themselves to:

- select consultants on the basis of current procedures, in compliance with the criteria of reliability and competence of the professional and assign them tasks by formal contract/letter of assignment;
- define as much as possible the exact content of the performance and any design outputs so as to allow the verification of the performance rendered also a posteriori;
- duly archive all documentation, in particular the final version of the documents, including correspondence;
- deliver the Group's Code of Ethics to the consultant, so that he can comply, in the context of the activities carried out on behalf of the Group, with the provisions contained therein, in order to sanction any conduct contrary to the company's ethical principles;
- not pay or offer, directly or indirectly, payments and material benefits of any entity to influence or compensate for an act of their office;
- not to engage in illegal, collusive, illicit payment, attempted bribery and favouritism practices and behaviours;
- avoid exchanging courtesy or hospitality gifts that do not have an eminently symbolic value;
- not to recognise fees that are not justified by the type of assignment or by local practice.

## **6.3 MANAGEMENT OF INFORMATION SYSTEMS, CONFIDENTIALITY OF INFORMATION AND PRIVACY**

### **General principles**

The Group condemns any behaviour consisting in altering the operation of a computer or telecommunications system or in accessing the data, information or programmes contained therein without the right, with the aim of obtaining an unfair profit for the Group Company to the detriment of the State.

The Company undertakes to ensure that all confidential information acquired during the course of its normal business activities is processed in compliance with all the relevant laws in force in all the countries in which

it operates, and with the best existing practices for the protection of the confidentiality of information and the processing of sensitive data.

### **Operational requirements**

It is also forbidden to:

- alter, counterfeit, falsely attest, delete, destroy and/or conceal public or private computer documents;
- illegally introduce into computer or telematic systems protected by security measures or that allow them to remain (without authorisation) within them, in violation of the measures taken to protect them by the owner of the data or programs that you intend to keep or keep confidential;
- retrieve, disseminate, share and/or communicate passwords, access keys, or other means suitable to allow the conduct referred to in the two preceding points;
- damage or disrupt a computer or telecommunications system;
- unlawfully intercepting, preventing or interrupting computer or telematic communications, even if they are between several systems;
- destroy, deteriorate, delete, render totally or partially useless, alter or delete data or computer programs of others or serious obstacle to their operation;
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All Recipients are also required to:

- comply with the company's information protection policies and data protection requirements;
- correctly use and protect the credentials for access to the company's systems and network;
- to store sensitive, proprietary or confidential information in protected files on protected company servers, in line with the Group's internal regulations;
- protect all electronic devices used to carry out activities on behalf of the Group.

### ***6.4 USE OF BANKNOTES, PUBLIC CREDIT CARDS, REVENUE STAMPS***

#### **General principles**

The Group, sensitive to the need to ensure fairness and transparency in the conduct of business, requires that the Recipients comply with current legislation on the use and circulation of coins, public credit cards and revenue stamps, and therefore severely punishes any conduct aimed at the unlawful use and circulation of credit cards, revenue stamps, coins and counterfeit banknotes.

### ***6.5 INSTRUMENTS AND SIGNS OF RECOGNITION AND PROTECTION OF COPYRIGHT***

#### **General principles**

The Group safeguards intellectual property rights, including copyrights, patents, trademarks and signs of recognition, complying with the policies and procedures for their protection and also respecting the

intellectual property of others, in all activities of the Company also with reference to the management of marketing.

The Group prohibits any conduct aimed at determining the loss, theft, unauthorised disclosure or improper use of its own or others' intellectual property or confidential information. To this end, the Group undertakes to activate all the preventive and subsequent control procedures necessary for this purpose, guaranteeing compliance with the legislation on copyright, as well as on the protection of signs of recognition, such as trademarks and patents. The Group also condemns the extraction, reproduction of data, public presentation, etc. of contents taken from databases, as well as their use for different purposes for which they were established and, in any case, contrary to what is permitted by copyright law.

The Group condemns all conduct carried out for the purpose of unlawfully seizing trade secrets, supplier lists and other information relating to the economic activity of third parties.

#### **Operational requirements**

The unauthorised reproduction of software, documentation or other materials protected by copyright is therefore prohibited and, at the same time, the Recipients of this Code undertake to comply with the restrictions specified in the licence agreements relating to the production/distribution of third-party products, or those stipulated with their own software suppliers.

The use or reproduction of software or documentation other than as permitted by any such license agreement is also prohibited.

### ***6.6 TERRORISM AND SUBVERSION OF THE DEMOCRATIC ORDER***

#### **General principles**

Alfasigma requires compliance with all laws and regulations that prohibit the performance of terrorist activities and subversion of the democratic order, and therefore also prohibits mere membership in associations with such purposes.

Alfasigma condemns the use of its resources for financing and carrying out any activity intended to achieve terrorist objectives or subversion of the democratic order, and undertakes to adopt the most appropriate control and supervision measures in order to prevent any possible conduct aimed at committing such crimes.

### ***6.7 PROTECTION OF THE INDIVIDUAL'S PERSONALITY***

#### **General principles**

Alfasigma condemns any possible conduct aimed at committing crimes against the individual, such as, for example, reduction or maintenance in slavery or servitude, child prostitution, child pornography, possession of pornographic material, tourist initiatives aimed at exploiting child prostitution, etc.. and undertakes to adopt the supervisory measures that are deemed most appropriate in order to prevent the commission of such crimes.

Alfasigma condemns any form of exploitation or reduction to a state of subjection of the person, taking advantage of the state of need of the same, and instead intends to ensure working conditions of maximum decorum, respectful of the requirements of the law and aimed at avoiding any situation of exploitation or serious danger.

***6.8 PRINCIPLES OF COMBATING THE PHENOMENA OF RECEIVING STOLEN GOODS, MONEY LAUNDERING, USE OF MONEY, GOODS OR UTILITIES OF ILLEGAL ORIGIN***

Alfasigma carries out its activities in full compliance with current anti-money laundering regulations and the provisions issued by the competent authorities.

**General principles**

In compliance with the applicable regulations, the Group undertakes to avoid carrying out operations that are suspect from the point of view of correctness and transparency and to verify in advance the information available concerning customers, suppliers, external collaborators and agents, in order to verify the respectability and legitimacy of their activities.

**Operational requirements**

All Recipients undertake to operate in such a way as to avoid implications in operations even potentially suitable for encouraging the laundering of money deriving from illegal or criminal activities.

Each Recipient who carries out, on behalf of the Group Company, operations and/or transactions involving sums of money, goods or other economically assessable benefits must act with authorisation, provide on request all valid evidence for its verification at any time.

The monitoring of the financial flow coming from companies/bodies outside the Company and aimed at the investments necessary to carry out the company's activities and/or when shareholders increase the capital, in order to ensure a correct identification of the source of the funding, is an obligatory measure.

Collections and payments must be made by bank orders and/or bank cheques issued with the non-transferability clause.

There is also an obligation for all Recipients to:

- not to accept money where there is even the doubt of its illegal/uncertain origin;
- not to accept goods and/or services and/or other utilities for which there is no properly authorised order/contract;
- not to make or accept cash payments equal to or greater than the legal threshold provided for in the countries in which the Group operates.

Finally, the personnel working on behalf of the Group are kept:

- to verify, as far as possible, in advance, the information available on users, counterparties, partners, suppliers and consultants, in order to assess their reputation and the legitimacy of their activity before establishing any relationship with them that involves obtaining goods or sums of money;

- to operate in such a way as to avoid the establishment of any relationship, if there is even only doubt, aimed at encouraging the laundering of money deriving from illegal or criminal activities, acting in full compliance with the primary and secondary anti-money laundering legislation and the internal control procedures established for this purpose.

## 6.9 TRANSNATIONAL ACTIVITIES AND PROTECTION AGAINST ORGANISED CRIME

### General principles

The Group condemns any conduct adopted, both nationally and transnationally, by persons with a senior or subordinate role, which may even indirectly facilitate the commission of criminal offences such as criminal association, mafia-type association and obstruction of justice.

The Group undertakes to activate all the preventive and subsequent control procedures necessary for the purpose (verifiability, traceability, monitoring, *segregation of duties*, etc.), so as not to have relations with persons belonging to such associations.

The Group also undertakes to control any form of internal association in order to prevent the occurrence of internal association phenomena aimed at engaging in unlawful conduct and which, for these purposes, make use of the means, resources and assets of the company.

Finally, the Group promotes development and legality within the territorial areas in which it operates; it therefore promotes participation in any memorandum of understanding (or similar agreement) defined between public entities, companies, trade associations and trade unions, aimed at preventing criminal infiltration.

### Operational requirements

Business relations must be maintained exclusively with customers, collaborators, partners and suppliers of certain reputation, who carry out legitimate business activities and whose proceeds derive from legitimate sources. To this end, rules and procedures are in place to ensure the correct identification of customers and the appropriate selection and assessment of suppliers or partners with whom to collaborate.

All the necessary control instruments are adopted so that the decision-making centres act and decide through codified rules and keep track of their actions (e.g. minutes of meetings, reporting mechanisms, etc.).

## 6.10 PROTECTION OF COMPETITION

### General principles

The Group and all recipients undertake to comply with antitrust regulations (which prohibit conduct aimed at restricting competition) and to avoid any improper action against commercial counterparties (e.g. sabotage, falsification of technical, commercial and accounting documents and, in general, any pattern of fraud).

## 7. PRINCIPLES RELATING TO CORPORATE OFFENCES

### 7.1 MANAGEMENT OF THE COMPANY'S ACCOUNTING, ASSET AND FINANCIAL DATA AND INFORMATION'

#### **General principles**

The Group condemns any conduct by anyone aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to shareholders and the public.

#### **Operational requirements**

All the subjects called to the formation of the aforementioned acts are required to verify, with due diligence, the correctness of the data and information which will then be received for the preparation of the acts indicated above.

All financial statement items, the determination and quantification of which requires discretionary assessments by the relevant functions, must be supported by legitimate choices and appropriate documentation.

### 7.2 CONFLICT OF INTEREST OF DIRECTORS

#### **Operational requirements**

The director is obliged to make known to the first useful shareholders' meeting and to the board of statutory auditors or to the control functions/bodies of the individual Group Company, any interest, on his own behalf or on behalf of third parties, he may have in a specific Company transaction on which he is called to decide. Such communication shall be precise and punctual or shall specify the nature, terms, origin and extent of the interest itself.

### 7.3 DISSEMINATION OF FALSE NEWS

#### **Operational requirements**

It is forbidden to spread false information both inside and outside the Group, concerning the Companies of the Group itself, their employees, consultants, collaborators and third parties who work for it.

It is forbidden to obstruct, in any way, the functions of the public supervisory authorities that come into contact with

### 7.4 RELATIONS WITH BANKING OPERATORS

#### **Operational requirements**

In the context of relations with banking operators, the activities of the individual Group companies must comply with the following control principles:

- respect for the roles and responsibilities defined by the company organisational chart, and by the authorisation system with reference to the management of relations with financial/bank operators;
- fairness and transparency in relations with banking institutions, in compliance with the principles of correct management and transparency;
- integrity, impartiality and independence, not improperly influencing the decisions of the counterparty and not requesting favourable treatment (prohibition of promising, granting or receiving favours, sums and benefits of any kind);
- completeness, accuracy and truthfulness of all information and data transmitted to banking institutions.

### **7.5 RELATIONS BETWEEN PRIVATE INDIVIDUALS**

#### **Operational requirements**

Recipients of this Code of Ethics are prohibited from:

- make cash donations or grant other advantages of any kind (promises of employment, use of company assets, etc.) to representatives (top management or subordinates) of other private companies in order to obtain any advantage for the Group and its member companies;
- provide services or grant benefits of any kind in favour of representatives of commercial partners and/or consultants who are not adequately justified in the context of the relationship established with them;
- pay compensation or other advantages of any kind in favour of external Agents/Collaborators that are not adequately justified in relation to the type of task to be performed and current local practices;
- make cash donations or recognise other benefits in favour of its suppliers, which are not adequately justified in the context of the relationship established with them or which may induce them to ensure an undue advantage for the Group Company;
- receive advantages of any kind, in excess of normal commercial or courtesy practices, or in any case aimed at acquiring undue preferential treatment in the conduct of any business activity, in exchange for the payment of money or benefits of any kind.

## **8. IMPLEMENTATION, CONTROL AND DISSEMINATION ARRANGEMENTS**

### **8.1 THE GUARANTOR OF THE CODE OF ETHICS**

The Compliance Committee, together with the network of Local Compliance Offices, are committed to ensuring that the Code of Ethics is regularly observed within the Group.

*The Compliance Committee / Local Compliance Office*

Each Group company has appointed a Local Compliance Office which has, among other things, the following responsibilities:

- ensure that employees know where to turn for help and advice if they are in any doubt about the proper conduct of their business activities;
- coordinating local compliance training efforts, initiatives and programmes;
- supporting and directing compliance monitoring, controls and audits;
- supporting local line management with regard to local procedures for managing integrity risks;
- support line management in dealing adequately with cases of local non-compliance, including the system for reporting violations of the principle of integrity;
- Encourage employees to raise concerns about compliance issues.

The Compliance Committee coordinates the network of local compliance offices and takes care of them:

- that examples of best practice are regularly shared and disseminated within it, and
- that the global compliance tools - are constantly checked and updated.

## **8.2 SANCTIONS**

Failure to comply with the principles contained in this Code may result in the application of the sanctioning measures adopted by each Group Company in accordance with applicable local laws and regulations. The gravity of the infringement will be assessed on the basis of the following circumstances

- (a) the time limits and the practical arrangements for implementing the infringement;
- (b) the presence and intensity of the intentional element;
- c) the extent of the damage or danger as a consequence of the infringement for the Company and for all employees and stakeholders of the Company;
- (d) the foreseeability of the consequences;
- (e) the circumstances in which the infringement took place.

Recidivism is an aggravating circumstance and a more serious penalty must be imposed.

## **8.3 INTERNAL REPORTING**

In the event of information about possible violations of the Code and/or the operating procedures that make up the Group's compliance system or other events that could alter its value and effectiveness, each person must contact the competent functions indicated above (see the section "Assumptions, purpose and value of the Code").

Failure to report a violation of this Code may be considered a form of participation in the violation itself.

You may not conduct personal investigations or report information to anyone other than those specifically designated.

All bodies that have been informed of the violation protect those who have provided information about possible violations of the Code, from any pressure, intimidation and retaliation also ensuring the confidentiality of the identity of the reporter, without prejudice to legal obligations and the protection of the rights of the Group or of persons accused wrongly or in bad faith.

#### ***8.4 KNOWLEDGE***

This Code is brought to the attention of the corporate bodies and their members, employees, consultants, collaborators and any other third party who may act on behalf of the Company. All these subjects are obliged to learn the contents and to respect the precepts.

Any application doubts related to this Code must be promptly submitted and discussed with the competent Functions (; Compliance Committee; Local Compliance Office, etc.).

### **9. FINAL PROVISIONS**

#### ***9.1 CONFLICT WITH THE CODE***

In the event that even one of the provisions of this Code of Ethics conflicts with the provisions of the internal regulations or procedures, the Code shall prevail over any of these provisions.

#### ***9.2 CHANGES TO THE CODE***

Any changes and/or additions to this Code of Ethics must be made and approved in the same way as for its initial approval.

**10. DECLARATION OF ACKNOWLEDGEMENT AND ACCEPTANCE OF THE ALFASIGMA GROUP'S CODE OF ETHICS.**

The Declaration of acknowledgement and acceptance of the Code of Ethics must be signed each time the Code is updated.

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*"I, the undersigned, have read and understood the Alfasigma Group's Code of Ethics.  
I also declare that I accept the Code of Ethics in its entirety and that I am aware that I am obliged to fully comply with its provisions and that any violation will be punishable in accordance with applicable regulations.*

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*Name (Extended)*

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*Role*

*Signature*

*Date and time*