

GROUP CODE OF ETHICS



DIGITAL 360
EMPOWERING INNOVATION



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Foreword

The **Digital360 Group** (hereafter: "**Group**") was founded in 2012 with the specific purpose of promoting digital innovation by offering consultancy, editorial and support services for public administrations, companies and innovative start-ups that are interested in exploiting digital Transformation&Innovation, in order to improve or rethink business through proprietary methodologies as well as a unique database of information and benchmarks. As of 2017, Digital360 S.p.A. (hereinafter also "**Parent Company**") is listed on the Euronext Growth Milan market (formerly AIM of Borsa Italiana).

The Group is characterised by knowledge, skills and methodologies that are unique in the world of innovation and digital business – to the extent that it was able to build true market leadership, and a capillary network involving all key players (companies, vendors, start-ups and institutions) which facilitates the effective matching of supply and demand for digital solutions at an international level.

As of June 1st 2021, Digital360 S.p.A. has integrated into its charter the objective of a sustainable and inclusive growth, both economic and social, through the spreading of digital culture, thus becoming a *Società Benefit* in accordance with national Italian legislation. This choice constituted the natural continuation of a path started years ago, aimed at accelerating the process of modernisation and digital innovation of the economy, as well as Public Administrations and society as a whole – which resulted in important benefits for Digital360 S.p.A. in terms of competitiveness, productivity, sustainability and inclusiveness.

The Group promotes a vision of business development that considers the direct and indirect impact of its activities on key stakeholders from an environmental, social and governance sustainability perspective. Digital innovation is the main tool implemented by the Group to achieve sustainable development, reduce social inequalities, promote policies to support productive activities and accelerate economic development.

The provision of support for entities and organisations – which is carried out through advisory and coaching activities as well as communication, marketing and lead generation activities – is accompanied by the mission of promoting a more inclusive labour market through the creation of dignified jobs, favouring the entry of resources that are fragile because of social, cultural, ethnic, physical, psychological, gender-related or other reasons.

This Code of Ethics (hereinafter also referred to as the "**Code**"), adopted by the Parent Company's Board of Directors with its first resolution on September 14th 2016 and last updated on March 30th 2023, constitutes a single document for the entire Group. For this reason, all Companies directly or indirectly subject to the control of the Parent Company are required to accept it and implement it through their administrative bodies on the first useful occasion following the completion of the acquisition operations, while also making any amendments that may be made necessary by local regulations. Group companies are also required to share the Code of Ethics with all Recipients.

Any request for clarification regarding the interpretation of the contents of this document may be addressed to the Compliance&Audit Function of Digital360 S.p.A.

Introduction: the concept of Ethics and the Code of Ethics of the Digital360 Group

1.

Ethics can be defined as the set of moral and behavioural norms that characterise an individual, a group or a time period. In the corporate world, any behaviour aimed at establishing healthy and correct competition, as well as constructive and respectful relations with corporate interlocutors – which excludes opportunistic and market-damaging behaviour – can be considered “ethical”.

The purpose of the Code of Ethics is to define, formalise and share the set of ethical values by which the Group is inspired: its observance by the Recipients constitutes the founding element for the good functioning, reliability and reputation of the Group itself.

The document is drafted and shared in order to inform the entire corporate population, as well as third parties that interact in various ways with the Group Companies – in Italy and abroad –, about the values that characterise the Group, so that standards of conduct may be identified and serve as a reference and com-

parison point for every action taken and decision made by those operating within the Group, regardless of their role and hierarchical position. All Group companies undertake to respect and ensure compliance with the Code, which represents a primary instrument of corporate ethics.

The preparation of a Code of Ethics also contributes to the implementation of an effective activity of prevention, detection and contrast of violations of laws and regulations applicable to the operating sector of each Group Company. The Code is an integral part of the measures adopted by the Parent Company and the individual Group Companies to combat corporate crime on the basis of locally applicable regulations.

The Group interprets the concept of Ethics not only as a set of rules and conducts, but also as a *modus vivendi*, framing it as the ability to integrate the Group’s business activities with the respect and protection of the interests of all the individuals with whom the Group Companies

relate, as well as of society as a whole. The objective is to ensure that the Group's core values are clearly defined and shared by all Italian and international stakeholders, so that they constitute a constant reference in the performance of activities by employees and collaborators, but also by customers, suppliers and third parties, for the pursuit of a common goal of integrity and excellence.

The pursuit of an interest or an advantage for the Group or one of its member Companies may in no case justify conduct contrary to the principles and rules of conduct set out in this Code.

*The Group interprets
the concept
of Ethics also as
modus vivendi*



Recipients

2.

This Code applies to the Board of Directors, corporate bodies, employees of the Parent Company and of the Group Companies, external collaborators, consultants, third party professionals, intermediaries, business partners – and, more generally, all those who have relations with Group Companies–, suppliers, contractors, customers and all other stakeholders (hereinafter referred to as “Recipients”).

Each Recipient, in addition to being personally required to comply with the provisions contained in the Code, is considered accountable – based on his or her role – with re-

gard to the verification of the compliance with the same principles by his or her collaborators, in consideration of his or her role within the corporate structure – so as to protect and preserve the image of the Group and the Companies that it is composed of, as well as the integrity of their economic and human assets.

The Group and its member Companies commit to sharing the Code of Ethics with the Recipients through the appropriate channels, accompanied – where necessary – by internal regulations and applicable corporate memos.



Scope of application

3.

The principles and contents of the Code of Ethics establish obligations of diligence, loyalty and impartiality for all Recipients and, as such, constitute essential elements of the correct performance of work or professional activities, thus translating into conduct that is held accountable by the Group and each Group Company. The violation of such principles constitutes a breach of contract and, as such, may lead to the appropriate consequences – as better described in the relevant section of the Code itself. The Code shall be valid from the moment of its adoption by the administrative bodies of each Group Company, and in compliance with the amendments that may be necessary or appropriate in the countries in which the Group Companies operate.

Should national regulations impose higher levels of protection, or the application of more stringent behavioural principles, the Group Companies shall ensure their compliance with said regulations. In the event that even one of the provisions set out in the Code should conflict with provisions outlined in the internal regulations or procedures of the Group and/or of each of the Companies, the former shall prevail over the latter – without prejudice to the duty to promptly report the issue detected through the channels that have been made available (see section 7.2 of this Code).

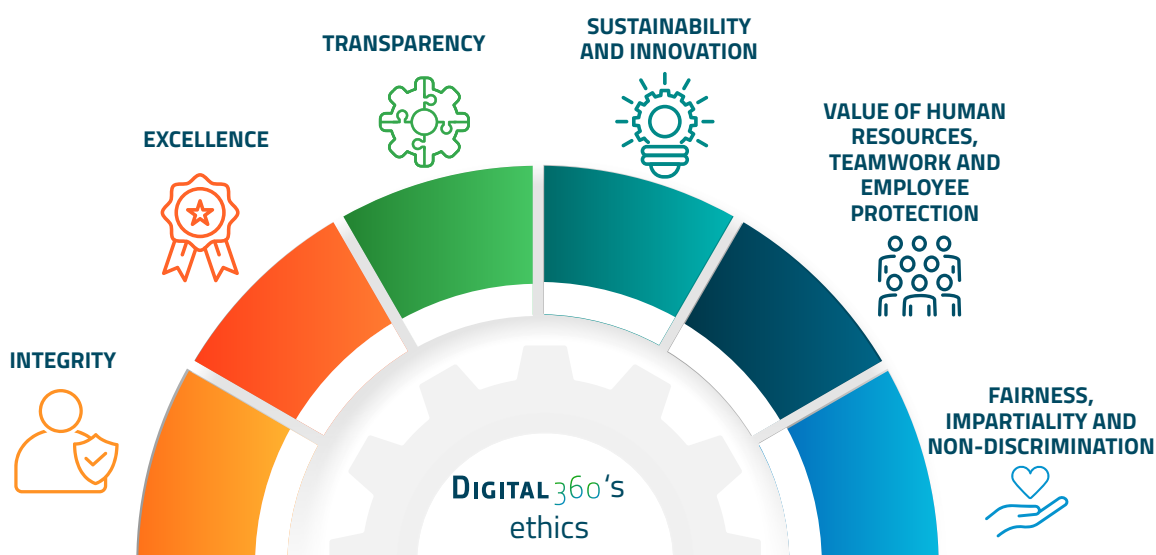
The provisions of this Code are integrated by the provisions of the Group Policy for the Prevention of Bribery and the Group Policy for Gender Equality.

Our values

4.

In the context of the establishment and the maintenance of a relationship of trust between the Group's companies and their respective stakeholders, both internal (management, employees, collaborators) and external (customers and suppliers – current and potential – sponsors and credi-

tors, public institutions and the community), ethics must be regarded as having primary importance, as well as being a means and a value to guide the conduct of corporate bodies, management, internal and external personnel, beyond the law and company procedures.





INTEGRITY

The essential elements of any activity conducted by the Group Companies are the respect for the principles of fairness and good faith and the compliance with applicable national and supranational regulations.

The Parent Company and each Group Company shun the use of improper conducts and adopt organisational tools to prevent their occurrence, also overseeing their practical implementation.



EXCELLENCE

The Group is committed to pursuing its economic and social objectives exclusively through the excellence of its performance, in terms of the quality of the products and services it offers – which was achieved through experience and customer care –, while also shunning the adoption of any improper behaviour to achieve such objectives. All Group Companies operate with the utmost commitment, as well as with professional and moral responsibility, in the performance of tasks for their customers and in the management of internal activities, aiming their conduct at the obtainment of mutual satisfaction and always guaranteeing the quality of their services.



TRANSPARENCY

We consider it essential to maintain a transparent dialogue with our stakeholders, internal and external, respecting their needs and expectations. We are committed to providing clear, complete and accurate information on the conduct of our business and the achievement of objectives and results.



SUSTAINABILITY AND INNOVATION

Digital innovation and the sharing of digital culture represent the core business and mission of the Group Companies: they contribute every day to accelerating the process of digitalisation and making sustainable development a reality, by making it possible to reduce waste, resource consumption and pollution, and thus protecting the natural ecosystem as a whole.



VALUE OF HUMAN RESOURCES, TEAMWORK AND EMPLOYEE PROTECTION

The Group and the Companies that it is composed of consider internal human resources, as well as their cohesion, as essential for the success of their activities: because of this, they reject the use of undeclared work and the employment of minors and illegal immigrants, and favour the growth of employees and collaborators through training and professional development initiatives, team building, and skill transfer. Each Group Company is also committed to enhancing the personal aptitudes of its staff and ensuring a balance between professional and personal life, in a healthy and meritocratic environment.



FAIRNESS, IMPARTIALITY AND NON-DISCRIMINATION

The Group condemns any kind of discrimination based on social, cultural, economic, ethnic, physical, psychological, gender or other grounds. The Group recognises an added value in the diversity of its employees and collaborators and pledges to operate fairly.

Standards of conduct in professional relations

5.

The conduct of persons who have professional relations with each of the Group Companies, whether internal or external to the corporate structure, must always be based on respect for the values and principles contained in this Code. The Companies of the Group, and with them all employees and collaborators in the performance of their duties, commit not to establishing relations with employees, collaborators, suppliers, customers or third parties in general, if there is a well-founded suspicion that this may expose the individual Company or the entire Group to the risk of felonies being committed.

In fact, the Group's primary objective is to establish relations with all stakeholders in compliance with the law and the Group's own system of values, guaranteeing the respect of the commitments made to the aforementioned stakeholders, respecting their interests and pursuing its own objectives.

In pursuit of this purpose, all Group companies are committed to ensuring compliance with a number of fun-

damental principles, with regards to their professional relationships with all persons, inside and outside the company:

- **Prohibition and prevention of corrupt practices in the public and private sector** – The Group operates in compliance with the law and with its own ideals of integrity and transparency, repudiating any practice aimed – directly or indirectly – at the pursuit of purposes related to bribery. For further details on the matter, please refer to the Group's Policy for the Prevention of Bribery, which is hereby referred to in full.
- **Conflict of interest prevention and management** – In exercising its activity, each Group Company commits to preventing the Recipients of the Code from being in a situation where they have an interest that diverges from that of the Group itself or of one or more of its component Companies. Should a conflict of interest arise – by way of example, family or economic relations or other types of

relations with representatives of the Public Administration or third parties –, the Recipients must abstain from the possibility of benefiting themselves or others, and must immediately inform the administrative body (e.g. Board of Directors) of the Company concerned, in order to identify an operational solution that will safeguard the correct performance of activities.

- **Security and Data Protection** – The Group operates predominantly in the digital world: it therefore fully understands the need to protect personal data from threats and attacks of any kind and ensures that the most appropriate security measures are put in place to guarantee their confidentiality and integrity. The Group and the Companies it is composed of, in the context of the performance of their business activities, are also committed to guaranteeing the correct use of the confidential information at their disposal as well as the compliance of the processing of personal data with relevant regulations, whether they refer to internal subjects – such as employees and collaborators – or external subjects – such as suppliers, customers, third parties. Group companies require the same degree of care from their stakeholders in the management of personal data referring to the Group itself,

to one or more of the Group Companies or to subjects functionally linked to them, such compliance being an essential component of compliance with this Code.

- **Protection of intellectual property, confidential information and respect for confidentiality** – The Group recognises the importance of intellectual property as a fundamental resource – both for the Group in itself and for its customers and suppliers – and acknowledges the need to protect the confidentiality of privileged and strategic information. For this reason, the Group implements appropriate measures to ensure its protection, binding to the duty of confidentiality its employees and collaborators, its customers and suppliers, as well as any third party that may become aware of information concerning the Company's technical, technological and commercial knowledge, its economic conditions or any other strategic information, even after the end of the contractual relationship with them or regardless of its conclusion. Exceptions are constituted by those cases in which the disclosure of specific information is required by law or expressly provided for in contractual agreements, whereby the parties involved have committed to using it for agreed purposes.

5.1. Standards of conduct in the context of relations with internal and external staff

The Group and its member companies recognise the value of their human resources and undertake to ensure that it is always respected, by all subjects and in all internal and external processes; they therefore favour the creation of initiatives aimed at achieving optimal organisational well-being and categorically condemn any type of discrimination, physical or psychological violence, mobbing and/or harassment (to be understood in the broadest sense, also when directed at personal and cultural differences) or, in general, any disturbance to the guarantee of a healthy, safe and competitive working environment. Group Companies, in compliance with applicable regulations, international recommendations and best practices on the protection of dignity in the workplace, have the objective of ensuring that all professional relationships are characterised by equality, fairness and mutual respect. Any conduct in contrast with the abovementioned and/or the following norms of behaviour must be promptly reported through the appropriate channels (see section 7.2 of the Code) and will not be tolerated.

The Group believes that diversity and variety – whether for social, cultural,

political, trade union, ethnic, physical, professional or other reasons – are elements essential to the pursuit of its social objectives. For this reason, the Group guarantees that the recruiting process of employees and collaborators is carried out by only assessing the candidates' educational background, their previous experience and the elements characterising their professional figure, ensuring that they are not discriminated against on the basis of personal aspects, and guaranteeing complete transparency in the management of the entire selection process. In turn, candidates are asked to behave correctly, passing on all information useful for assessing their profile in such a way as to make the recruiting process effective and efficient.

During the employment relationship, Group Companies are committed to constantly enhancing and favouring the growth of the professional skills of their employees and collaborators, offering training activities – which can also be cross-team, in order to extend the skills of each employee and allow for fruitful internal comparison – and team-building initiatives. At the same time, Group Companies ensure the proportionality of the salary with the employee's responsibilities, in line with the salary levels of the reference market, and guarantee career

progress based on meritocracy, thanks to periodic initiatives aimed at assessing the results achieved.

Group Companies are active promoters of equal opportunities: tangible evidence of the application of this principle can be observed in the constant commitment to achieving and maintaining an equal distribution of work positions, including managerial positions, held by men and women. On the contrary, the Group firmly rejects any form of forced and/or child labour. All Group Companies formalise relations with their employees and collaborators by means of regular employment contracts, rejecting any practice of undeclared work or circumvention of current provisions, including the employment of personnel not in compliance with the provisions of the applicable immigration regulations. The Group Companies also ensure fair remuneration to their staff.

Each Group Company requires from all employees and collaborators the same commitment in guaranteeing dedication, correctness, professionalism, respect, and transparency in the management of their tasks, as well as of internal and external relations. It is forbidden to perform one's work under the effect of alcoholic or narcotic substances or substances having the same effect, as well as to possess, consume or

offer them in the workplace.

Group companies strive to convey to their employees the importance of the Group's image and the quality of its services. It is essential that this image is also preserved in the context of the expression of personal opinions within digital platforms and social networks. The Group does not require daily adherence to a formal **dress code**, as long as the clothing is appropriate to a work context.

All staff is committed to respecting the principle of cooperation, in particular with internal control functions, to ensure the optimal running of company operations, facilitate its constant monitoring and enable prompt intervention in the event of critical situations. Each employee also undertakes to avoid situations in which a conflict of interest arises, or which may undermine his or her ability to make impartial decisions in line with the Group's best interests. Should such situations arise, employees shall refrain from participating in decision-making processes and will promptly inform their supervisors.

The Group attaches fundamental importance to workplace health and safety issues, regarding which it offers informational and awareness-raising activities for employees and external personnel – both at the time of the signing of a working contract and during the continuation of the

professional relationship.

Group companies operate to continuously improve the working conditions of employees, to prevent and contain occupational risks, in compliance with the best international prevention and protection practices in terms of environmental safety and the health and physical integrity of workers, as well as the specific laws and regulations of the countries of reference. This objective is pursued by avoiding, where possible, the risk; if the risk is unavoidable, the Group shall combat it and avoid it at the source, through behaviours aimed at preventing, eliminating, or mitigating it, giving priority to collective protection measures over individual ones, and issuing adequate instructions to the staff, so that they do not behave in an unlawful or dangerous manner. Each Group Company also provides for working time and rest periods in line with the applicable standards, in order to ensure the physical and psychological well-being of its personnel.

All staff is required to comply with the preventive and safety measures adopted.

In order to ensure a full understanding of this Code, and consequently the effective application of the principles contained herein, the Group Companies undertake to ensure the

periodic provision of training activities and to make available channels to answer any interpretative doubts regarding its contents, consistency with any internal policies or the legitimacy of a given conduct.

5.2. Standards of conduct in the context of relations with clients

Group Companies consider the satisfaction of their customers as their primary objective, which they aim to achieve by providing high-quality services at competitive conditions, in compliance with laws regulating competition.

Each Group Company applies the utmost transparency in the drafting of commercial offers, including technical and economic offers prepared for participation in tenders launched by the PA, and subsequent contractual documentation, in order to provide clients with accurate and exhaustive information on the services offered and allow them to make informed choices. Group companies prohibit their employees and collaborators from engaging in bribery towards potential and/or current customers.

In the management of customer relations, the Group is committed to offering fair and high-quality services, aiming to fully achieve the objectives that have been set. This

is made possible, first and foremost, by the excellence of the internal and external resources the Group makes use of, as well as by many years of experience and constant improvement in the services offered – also thanks to continuous optimisation and innovation activities.

5.3. Standards of conduct in the context of relations with suppliers

The Group considers it essential to avail itself of suppliers who can guarantee both compliance with the values set out in this Code and the provision of quality services – due to said suppliers' essential role in the management of internal processes and, indirectly, in maintaining standards of excellence for the customers of Group Companies.

In order to secure the best suppliers, the Group Companies shall carry out the selection process according to principles of fairness, cost-effectiveness and quality, on the basis of objective assessments aimed at protecting their own commercial and industrial interests and creating greater value for themselves and for the Group.

Under no circumstances shall the Companies enter into commercial agreements with suppliers as a result of a promise or offer of payments

or goods to the advantage or in the interest of the Companies themselves or of the Group. The adherence of suppliers to the contents of the Code of Ethics, as well as their compliance with the applicable regulations, is a necessary condition for the establishment and continuation of any relationship of a commercial nature. The Companies of the Group reserve the right to carry out appropriate checks, preliminary and ongoing, to monitor compliance with the requirements.

The Companies of the Group shall adopt objective criteria for the assignment of orders and for the management of relations with suppliers, so as to ensure compliance with the principles of transparency and fairness in the performance of their contractual services – which must be outlined in such a way as to prevent any doubts with regard to their content, and to foresee any circumstances that could significantly affect the established professional relationship.

The remuneration shall be commensurate exclusively with the service indicated in the contract; payments may not be made to a party other than the supplier, nor in a country other than that of the parties, except in cases expressly provided for and regulated in the contract.

.5.4. Standards of conduct in the context of relations with shareholders and bondholders

The Group considers it essential to ensure a constant, correct and transparent relationship with all those who have placed their trust in its growth, as shareholders or bondholders, in order to increase their level of involvement and understanding of the Group Companies' activities and their performance, as well as to comply with national and EU regulations on market abuse. The Group and the Companies it is composed of are committed to increasing their own value, tending to their economic performance, so that investments can be profitable.

5.5 Standards of conduct in the context of relations with Group Companies

Each Group Company acts in compliance with the principles of integrity, transparency, professionalism, reliability, cost-effectiveness and motivation in the management of intra-group relations and ensures that each intra-group service or loan is regulated in writing and signed by all parties in specific agreements.

The companies undertake to promptly disclose any situation that significantly affects the Group's economic, social

and sustainability performance or that may jeopardise the Group's image.

In the case of new acquisitions, each Group Company shall ensure that it only establishes relations with persons whose identity is certain and who exhibit the appropriate documentation proving the existence of suitable powers of representation of the company being acquired. Prior to the transaction, the information available on the company to be acquired is collected and verified through a due diligence process, aimed at confirming the consistency and suitability of the company that is to be acquired with respect to the values and principles contained in the Code of Ethics.

5.6. Standards of conduct in the context of relations with public institutions

For the purposes of this Code, "members of the Public Administration" should be understood to mean,

The Group considers it essential to ensure a constant, correct and transparent relationship with all those who have placed their trust in its growth

roughly, all persons who are called upon to perform a public function, according to the different connotations in which this term appears within the different legal systems under whose jurisdiction the Group Companies belong. In Italy, for example, the perimeter of the Public Administration also includes private concessionaires of public services, companies and bodies governed by public law (such as Enel, Poste Italiane, ENI, Ferrovie dello Stato, etc.); therefore, those who operate in such institutions may be qualified as public officials or as persons in charge of a public service. The Group inspires and adapts its conduct to the principles of legality, correctness and transparency in its relations with Public Officials, in order to avoid any circumstance that could lead to the violation of the principles of impartiality and good performance to which public institutions are bound. Contacts with public institutions are managed exclusively by persons specifically and formally appointed by the Group Companies to deal with or have contact with Public Officials. Within the scope of any business negotiation, request, or relationship with the Italian and/or foreign Public Administration, no conduct aimed at unlawfully influencing its decisions – in order to obtain an undue or unlawful advantage for the Group or one or

more of the Companies it is composed of – must be carried out. Each Group Company carefully monitors the processes of requesting, using, and accounting of public funds – whether they be in the form of contributions, subsidies, financing or similar means – ensuring the utmost transparency at every stage of the activity and strictly forbidding its employees and collaborators from any use of the funds received that differs from their pursued purposes.

5.7 Standards of conduct in the context of relations with the Judicial Authority

The Group and each of its member Companies undertake to cooperate actively in order to manage the requests of the Judicial Authority and shall refrain from any conduct likely to influence the operations of the Judicial Authority itself.

5.8 Standards of conduct in the context of relations with trade unions and political parties

Within the Group, the management of relations with political organisations and trade unions – characterised by high standards of integrity, transparency and fairness as well as the maintenance of a constructive dialogue – is normally reserved to the corporate functions that have received the ap-

appropriate authorisation, on the basis of the assigned tasks and on account of what is established by service orders and *pro tempore* procedures in force.

The Group prohibits all the Companies it is composed of from making contributions to trade unions, political parties and their representatives, except in the presence of an express concession or regulatory provision permitting it and, in any case, following the authorisation of the competent corporate bodies.

Any charitable donations made by employees or collaborators of the Companies of the Group must be considered of a personal and voluntary nature.

5.9. Standards of conduct in the context of relations with supervisory bodies

The Group guarantees that all relations with the supervisory bodies envisaged and recognised by locally applicable regulations are marked by the utmost professionalism, diligence, transparency, collaboration and availability. Each Group Company acts with the highest respect for the institutional role of such bodies, and guarantees full and punctual execution of the prescriptions and fulfilments required, including by providing the necessary information in a clear,

punctual and exhaustive manner.

In the context of relations with supervisory bodies, the Group and the Companies it is composed of undertake, in particular, to avoid the occurrence of situations of conflict of interest and to assess in advance the possible assignment to such bodies of tasks beyond those envisaged by their institutional functions, which may prejudice their independence and objectivity.

5.10. Standards of conduct in the context of relations with competitors

The Group is committed to protecting fair competition and developing its business policy in full compliance with all relevant laws and regulations.

Communication and information management

6.

6.1 Company communications

The Group undertakes to provide all required communications to the competent supervisory authorities in a clear, timely, correct and complete manner. Only specially appointed corporate functions may carry out the aforementioned communications to the supervisory authorities.

6.2. Relations with the media

Information pertaining to the Group and to each of its member Companies, addressed to the media, may only be disclosed by the corporate functions delegated to do so, in compliance with the *pro tempore* procedures in force. Should a member of staff or a collaborator intend to provide information or give interviews concerning one or more Group Companies, he/she shall inform the competent function in advance, in order to request a specific authorisation.

In any case, the external communication of data or information shall be truthful, clear, complete, and transparent, and may only be carried out

in compliance with the limits provided for by the rules on confidentiality contained in this Code, and in such a way as to reflect the images and strategies adopted by the Group, favouring consensus on corporate policies.

6.3. Transparency of accounting records

In the preparation of documents and accounting data, in reports or other corporate communications, which are required by law and/or addressed to shareholders and the public, as well as in any record pertaining to administration, the internal and external staff of each Group Company shall comply with the strictest principles of transparency, accuracy and truthfulness.

In particular, all Recipients called upon to formulate the aforesaid documents are required to verify – for the parts of their respective competence – the accuracy of the data and information that will then be used to compose the documents.

The procurement and disbursement

of financial resources, as well as their management and control, must always comply with the approval and authorisation procedures laid down by the Parent Company and each

Group Company.

Each accounting entry shall reflect exactly what is written in the supporting documentation, which must be complete and open to verification.



Implementation Model of the Code of Ethics

7.

7.1. The Group Compliance&Audit Function

The Parent Company's Board of Directors has assigned the task of supervising the application of the Code in all Group Companies to the Group's Compliance&Audit Function. To this end, the Compliance&Audit Function appropriately coordinates with the competent bodies and functions, for the correct implementation and adequate control of the principles contained in the aforementioned Code.

The Compliance&Audit Function also has the task of promoting the circu-

lation and acknowledgement of the Code, and of ensuring that it is applied and updated, including by taking action (on its own initiative or upon notification) to prevent or suppress, through the competent corporate functions (e.g. Human Resources, Legal, etc.), any violations thereof. Where necessary, the Compliance&Audit Function may visit each Group Company's head office. In the exercise of its functions, the Compliance&Audit Function must have free access to company data and information relevant to the performance of its activities. The cor-

Reports of violations of the Code of Ethics must be made in writing.

Interested parties **may use the following link** to send a report

https://digital360groupwb_whistleblowing.keisdata.it/Home

using a special code (token) provided by the Company

or, alternatively, send it in hard copy to the following postal address:

“Reporting Committee, at Digital360 S.p.A”

Via Copernico 38, Milano – 20135

porate bodies and their members, employees, consultants, internal and external staff and third parties acting on behalf of the Company are obliged to provide the utmost cooperation in order to facilitate the Compliance&Audit Function in the performance of its tasks.

Any interested party may contact the Group Compliance&Audit Function to obtain clarification on the application of the Code of Ethics and the regulations it refers to, by contacting it at the following email address: compliance@digital360.it

7.2. Violations of the Code of Ethics and the Reporting Committee

Group companies have set up special channels for sending reports of violations of the principles of this Code of Ethics or other events that may alter its scope and effectiveness.

Reports will be handled by the Reporting Committee guaranteeing the utmost confidentiality as to the identity of the whistleblowers and the facts they report, as well as ensuring that whistleblowers do not suffer any retaliation, discrimination or penalisation as a result of their report. If the whistleblowers so wish, they may submit anonymous reports via the platform, which will in no way be traced back to the identity of the whistleblower.

Whistleblowers will receive a notice

of reception of the report not more than 7 days after its reception, as well as a response to said report within 3 months of the date of the notice of reception.

7.3. Disciplinary system and contractual remedies

All Recipients of the Code, regardless of the nature of the contractual relationship that binds them to one or more Group Companies, are required to comply with its contents and ensure that their collaborators also comply with the principles and behavioural guidelines outlined therein. The Group Companies, as a matter of fact, will not entertain any type of relationship with persons who do not intend to operate in compliance with their primary values. The obligation to comply with the provisions of this Code is ensured by signing specific contractual clauses, the breach of which may give rise both to compensation for any damage suffered, without any limit whatsoever, as well as to termination of the existing contract between the parties, pursuant to and for the purposes of the applicable legislation, should the Group Company deem it appropriate at its sole discretion. With particular reference to the staff hired by each Group Company, violation of the Code shall constitute a breach of the primary obligations of the employment relationship or a

disciplinary offence, since it is an essential part of the existing contractual obligations. In particular, in the event of violations, the provisions of the disciplinary system adopted by each Group Company and shared at the time of hiring shall apply. Violations will be prosecuted incisively, promptly and immediately, through the adoption of disciplinary measures against those responsible – where deemed necessary for the protection of the company's interests and consistent with the provisions of the applicable regulatory framework. Such disciplinary measures will be adequate and proportionate to the seriousness of the violation committed, regardless of the possible criminal relevance of such conduct and the initiation of criminal proceedings in cases where they constitute a crime.

7.4. Communication, knowledge and application

The Code of Ethics and the principles contained therein are brought to the attention of all Recipients, through publication on the institutional website of the Parent Company and of each of the Group Companies, and on the corporate Intranet accessible to employees and collaborators.

It is the duty of every shareholder, director, employee, collaborator, supplier or customer or third party in any

capacity involved in relations with the Group or one or more of its member Companies to:

- refrain from conduct contrary to the rules, principles and regulations set out in the Code;
- refer to their superiors, company contact persons and the Compliance&Audit Function if they need to receive clarification on how the Code is applied;
- report possible violations of the Code to the Reporting Committee.

7.5. Adoption and updates of the Code of Ethics

The Parent Company's Board of Directors adopted this version of the Code of Ethics on March 30th 2023. Each Group Company undertakes to incorporate the document through specific approval by their respective Boards of Directors.

It is also ensured that the Code of Ethics is periodically reviewed and updated, in order to adapt it to regulatory and social changes, as well as in response to reports from Recipients and the experience gained through its application. Any amendment and/or integration to the Code shall be made in the same modality as that implemented for its initial approval and shall be made known to all Recipients by means of a specific communication.

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