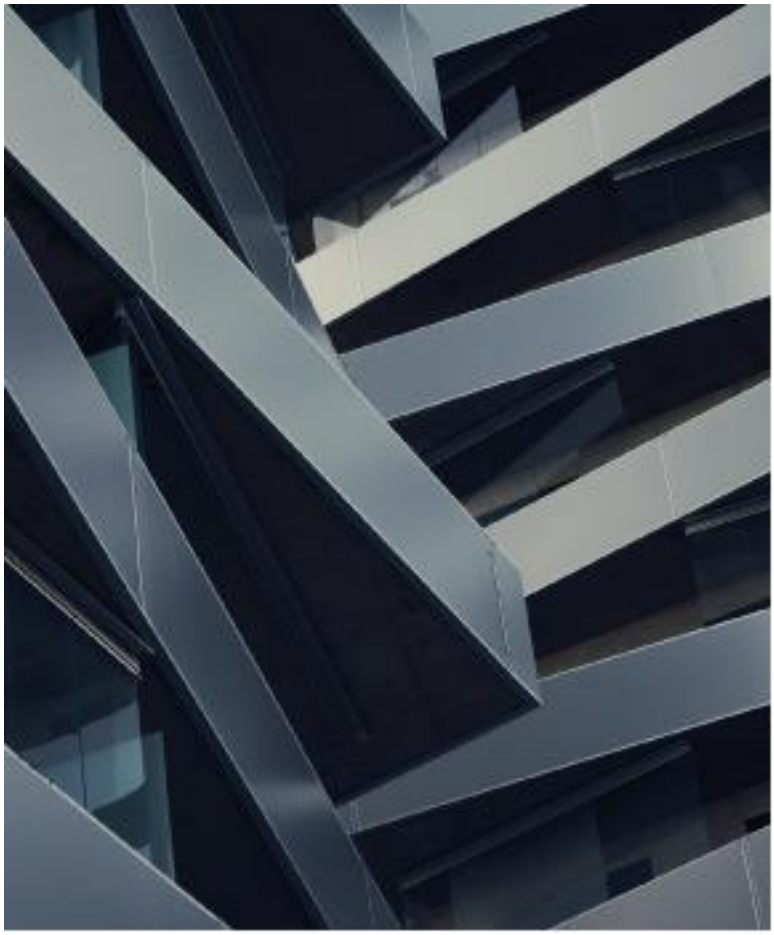
Code of ethics

This is an English translation of the original document titled "Codice etico". For any interpretation and legal purpose, the original version in Italian of this document is the only one with legal effect.



LATTANZIO
KIBS
knowledge
intensive
business
services

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Version	Author	Date	Notes
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REV 02	Elisabetta Artioli	29/11/2023	Second version: revision of the entire document following the adoption of Benefit Corporation status and in line with the principles of non-discrimination and equal opportunities
REV 03	Compliance Team	31/10/2026	Third version: terminology update on disability (Legislative Decree 62/2024, Art. 4); update of the approving body (Legal Representative); editorial corrections; revision of Art. 12.3 (internships)

Introduction

Concurrently with the adoption of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01, on 29 September 2020 LATTANZIO KIBS S.p.A. (hereinafter the "Company") adopted the Code of Ethics that the parent company had approved in 2016.

In 2022, the Company integrated the text of the Code of Ethics and the set of management procedures in line with the principles of non-discrimination and equal opportunities, respect for human rights, respect for workers' rights, protection against the exploitation of minors and safety in the workplace.

In 2026, the text was further revised to align with the provisions of Article 4 of Legislative Decree 62/2024 on disability.

The observance of the Code of Ethics is of fundamental importance for the good functioning, the reliability, the reputation of the Company itself, as well as to avoid any involvement of the Company in the possible realization of criminally relevant conduct by its employees.

We also intend to further define and reinforce the commitment so that all company activity, in compliance with the law, is based on the principles of honesty, integrity and good faith, objectivity, fairness and reasonableness, independence and impartiality, abstention in case of conflict of interest, in respect of the rights of third parties, employees, partners, commercial and financial partners and in general of anyone involved in the Company's activity. Furthermore, in light of the provisions of Law 190/2012 and of the Legislative Decree 33/2013, as well as of the Anti-corruption and Transparency Plan, the company activity is based on the principles of transparency as a value in itself and as a tool for the prevention and repression of corruption and embezzlement phenomena in the management of resources.

Although the Company is not a Public Administration and is not subject to the provisions of Presidential Decree no. 62/2013, *Regulation laying down the code of conduct for public employees,* pursuant to Article 54 of the Legislative Decree no. 165 of March 30, 2001, in the revision of this Code, the Company has voluntarily got inspired from the relevant principles and guidelines defined in the aforementioned Presidential Decree. All those who work in the Company, without distinction or exception, are committed to observing and enforcing these principles within the scope of their duties and responsibilities.

Under no circumstances, may the conviction of acting for the benefit of the Company justify the adoption of behaviours in contrast with these principles, or with the ethical rules set out below, as well as with the internal procedures/regulations that govern all company activities.

The ethical vision of a consulting Company

The general principles of a code of ethics are integrated in this code with the "ethical vision" of management consulting, through which the Company fulfils its mission (as envisaged by the Assoconsult Association, in which the Company actively participates).

Essential parts of the ethical vision of management consulting are:

- **the moral responsibility towards the Client** for the consequences and effects of the consultancy, especially those that the client is not perfectly able to foresee because he doesn't possess all the knowledge and information that the consultant does, both whether it is to help make strategic decisions, or to assist the implementation of company policies, for which special knowledge is required. This knowledge difference is part of the management consulting profession itself, including when the knowledge is used to express an external evaluation based on additional elements, information and knowledge about the feasibility of hypotheses and action plans developed by the company, provided that it is not a mere cover and legitimization of decisions already taken - in which case it cannot be classified as a professional service;
- **taking care of the fiduciary relationship with the Client**, in the sense of the obligation of exercising his own independent capacity of judgment and choice regarding the recommended strategies and implementation decisions, to favour and promote the customer's interest, as it was expressed and clarified during the preliminary stages, but also as it turned out during the consulting activity.
  In the context of taking care of the fiduciary relationship, the ethics of consulting always requires respecting and promoting the autonomy of the client and therefore his responsibility in making his own decisions in the phases in which such choices are required.

The ethical vision always takes into account the complexity of the organizational contexts in which the Company enters. Finally, the ethical vision requires to be aware that the consulting activity can have important consequences on third parties and especially on the stakeholders of the client or the client's organization, and therefore to do everything possible to foresee them. These stakeholders, in fact, have themselves legitimate interests, rights and expectations that are relevant for the purposes of the consultant's Code of Ethics, and towards which the consultant is therefore morally responsible. In particular, the consultant, while trying to act in the best interest of

the client and of the client's company or organization, intends this interest as consistent or at least compatible with that of the stakeholders of the client's company or organization. Therefore, the ethics of consulting adheres to the principle of corporate social responsibility and therefore means the pursuit of the interest of companies or organizations in line with the principle of value creation for their stakeholders, as well as the exercise of the role of who governs the companies, and therefore of those who, thanks to greater knowledge, advise them on the exercise of management functions, as based on a fiduciary duty towards all the organization's stakeholders. This means promoting their mutual interest in a balanced way, making decisions to generate a common advantage, and at the same time resolving distribution conflicts equitably, aiming at the financial, social and environmental sustainability of the activities of companies and organizations, as well as of the resulting economic development.

In conclusion, the ethical vision of management consulting is the basis of the social legitimacy of the profession of consultant itself, which even when exercised by a Company is legitimized by the use of specialized knowledge aimed at achieving the goals of a particular social institution.



General Provisions

Art.1 Scope and recipients

1.1 This version of the Code of Ethics (hereinafter the “Code”) was approved, as an Annex of the Organization, Management and Control Model, by the Legal Representative and it is an official document of the Company.

1.2 The principles and provisions of this Code represent illustrative specifications of the general obligations of diligence, correctness and loyalty, which qualify work performance and behaviour in the workplace. In particular, these are:

- EQUALITY

  Each person is worthy of equal consideration and respect. Consequently, we equally respect all stakeholders, considering them a source of rights and values in themselves, and not a mere means for our own purposes.

- AUTONOMY

  We promote the autonomy and freedom of choice of the client and stakeholders. Based on the advice offered, the client must be in a position to make his own decisions responsibly.

- CLIENT INTEREST

  We operate in the interests of the client, that is not only the single commissioner of the assignment, but the organization-client in the name and on behalf of which the task is assigned. Therefore, we encourage the focusing of the effective interests of the client-organization and of the actual objectives of the consultancy.

- TRUST

  We operate in such a way as to justify and safeguard the trust placed in us, pursuing the client's interest with loyalty and diligence in the performance of the tasks, preventing and avoiding conflicts of interest.

- OBJECTIVITY AND INDEPENDENCE

  In the use and transfer of knowledge and information, we maintain our independence of judgment, and make our statements on matters of fact in compliance with the utmost objectivity and with the search for truth.

- IMPARTIALITY, EMPATHY AND FAIR BALANCE

  In recommending choices and solutions, we form our judgment impartially but sympathetically towards the parties involved. Faced with the conflict between legitimate interests, we seek solutions of fair balance, which could be accepted through an impartial, informed and non-forced agreement by the parties.

- CONFIDENTIALITY AND PRIVACY

  We guarantee the confidentiality of private information obtained from the client and the respect for the privacy of the client, the members of the organization and the other stakeholders with whom he comes into contact.

- TRANSPARENCY

  We follow the criterion of transparency in bringing out the problems posed by contrasts, undeclared intentions or deceptive behaviours, so that everyone is put in a position to take a stand and make his/her choices responsibly.

- SOCIAL RESPONSIBILITY

  We are socially responsible in considering the consequences, even if not immediate, of the consulting activities and also for the client's stakeholders. Therefore, we seek solutions in the common good of the client and the stakeholders, such as to be at the same time sustainable from a financial, social, environmental and corporate governance perspective.

  We adopt the principles laid down in the SA8000 (Social Accountability 8000) standard and are committed to guaranteeing the fundamental rights of personnel, in compliance with the laws in force in the countries in which we operate, with agreements signed with third parties and in accordance with the conventions of the International Labour Organization.

  The social responsibility requirements of the standard have an impact on the company's processes and activities, also involving customers, suppliers and subcontractors.

- FAIR CONTRACTUAL CONDUCT

  We offer real benefits to the client against fair remuneration. The terms of the consultancy service must be described as completely as possible at the outset. Upon the occurrence of unforeseen events, we propose terms that would have been commonly accepted in an initial agreement in which all the information had been equally owned by the parties.

- PROMOTION OF SKILLS AND PROFESSIONAL GROWTH

  We promote skills and professional growth, paying attention to the constant updating and growth of our skills and of those of our collaborators, as well as supporting the career prospects and employability of collaborators and employees.

- RIGHT REMUNERATION

  In advising client organizations and organizing its own business, we pursue fairness in remuneration, i.e. the proportionality of remuneration to the contribution given both in individual and group work. We pay attention to the fact that the initial opportunities of the different people are substantially fair, so that everyone can make his contribution by being effectively equipped with the means he needs.

- COOPERATION AND FAIR COMPETITION

  We cooperate with competing companies to develop and disseminate scientific, technological and cultural knowledge and innovations within the professional community that allow the overall improvement of the quality and social utility of the consultancy. In addition, consultants compete with each other fairly and in the client's interest.

- LEGALITY

  Apart from extreme cases of conscientious objection, the law must always be respected regardless of the particular contents of the individual rules. As a result, we refuse the tasks that involve violations of the law. The Code of Ethics requires the observance of the law, but it can establish further ethical obligations with respect to the legal ones, provided that they are not in contrast with the law and with the aim of pursuing objectives compatible with it.

- INTEGRITY AND RECIPROCITY

  The professional conduct of the Company must be morally complete, that is to make the facts correspond to the words, especially in observance of the Code of Ethics. We cooperate in the professional community with those who mutually respect the Code of Ethics and expect reciprocity in the observance of similar ethical principles by our interlocutors.

- REPUTATION AND ACCOUNTABILITY

  We support the reputation of the profession primarily through compliance with the Code of Ethics. For this reason, the Company is committed to “give an

account" of its conduct, with respect to the provisions of the Code of Ethics, to the various stakeholders.

1.3 The principles and provisions of the Code are binding for all persons bound by subordinate employment relationships with the Company ("employees") and for all those who work for the Company, whatever the relationship, even temporary, which binds them to the same ("collaborators"). Employees and collaborators are hereinafter jointly referred to as "professionals".

1.4 The conduct obligations, where compatible, are extended also to all the collaborators or consultants, also of companies supplying goods and services, through the explicit recall of such obligations in the assignments and contracts.

1.5 The Code is published on the Company intranet (dashboard), also for the purpose of guaranteeing its knowledge to third parties.

Art.2 Communication

2.1 The Company shall inform all the Recipients of the provisions and application of the Code, recommending compliance to it.

2.2 In particular, the Company provides - also through the designation of subjects to which specific internal functions will be attributed through specific acts - to the dissemination of the Code, to the interpretation and clarification of the provisions contained in the Code, to verifying the actual compliance with the Code, to updating the provisions of the Code with regard to the needs that occasionally arise. The Company also provides the following with respect to collaborators to demand from them, natural or legal persons, compliance with the rules of the Code of Ethics, and to adopt the *ipso iure* contractual termination with respect to third parties who have not complied with the ethical rules in carrying out their activities.

2.3 The Company makes available a whistleblowing channel, also in application of the provisions of Legislative Decree n. 24 of 2023, dedicated to reporting, even anonymously as long as it is circumstantiated, illegal or illegitimate conduct or behavior, commissioned or omitted, that constitutes or may constitute a violation, or inducement to violate this Code. The channel can be reached through the following link https://lattanzio.whistlelink.com

Supervisory Body
Lattanzio KIBS S.p.A.
c/o Studio Demetrio
Piazza della Vittoria, 2
27100 Pavia (PV)

2.4 Any doubts concerning the application of this Code must be promptly submitted to and discussed with the Supervisory Body.

Counter
for non-discrimination
and equal opportunities
Lattanzio KIBS S.p.A.

2.5 With regard to compliance with social responsibility requirements, the e-mail address csr@lattanziokibs.com is

available to which reports of facts concerning working conditions deemed unfair or discriminatory can be sent.

2.6 To report any incidents or complaints related to abuse, offense, or illegality occurring in or related to the work environment and violating the principles of social responsibility outlined in the SA8000:2014 standard, please use the dedicated e-mail addresses:

- Certification Body SA8000 iqnetltd@iqnet.ch
- Accreditation Body saas@saasaccreditation.org

Art.3 Responsibility

3.1 Each professional carries out his work and his services with diligence, efficiency and correctness, making the best use of the tools and time available to him and assuming the responsibilities connected with the obligations, in compliance with the current legislation, as well as with the procedures and competencies established by the Company. Furthermore, in his/her activity on behalf and/or in favour of the Company, the professional undertakes to respect the principles of integrity, correctness, good faith, proportionality, objectivity, transparency, fairness and reasonableness, independence and impartiality, abstention in the event of a conflict of interests.

3.2 The professionals, also in compliance with current legislation, must refrain from engaging in behaviour contrary to the provisions contained in the Code.

3.3 The professionals must promptly communicate any act or fact of which they become aware in the exercise of their activity which is contrary to the provisions contained in the Code.

3.4 It is the duty of the heads of the individual offices and departments of the Company to make their professionals understand the importance of compliance with the provisions contained in the Code and to guide them to the necessary compliance and implementation.

Art.4 Fairness

4.1 All actions and operations carried out and the conduct of each of the professionals in the performance of their roles or duties are inspired by legitimacy, both formally and substantially, according to the current regulations, internal regulations and procedures, as well as by fairness, collaboration, loyalty and mutual respect.

4.2 Professionals do not use for personal purposes information, goods and equipment available to them in the performance of their roles or duties.

4.3 The employees of the Company must refrain from competing with the latter, respect company rules and the precepts of this Code, whose observance is also required pursuant to and for the purposes of art. 2104 of the Civil Code. In any case, employees must inform the Company, and possibly obtain authorization, regarding other personal and professional activities that may come into conflict with the principles of the Code.

4.4 Professionals shall not accept, or carry out, for themselves or others, pressures, recommendations or notices, which may harm the Company or bring undue advantages for themselves, for the Company or for third parties; Professionals shall also reject and make no promises and/or undue offers of money or other benefits and gifts, unless the latter are of modest value and not related to requests of any kind. If the Professional receives a third party's offer or request for benefits, except for commercial gifts or of modest value, he shall not accept this offer, nor shall he adhere to that request and shall immediately inform his immediate superior or the person designated to deal with such eventualities.

Diligence of the employee
Art. 2104 c.c.: "The employee must use the diligence required by the nature of the due service, by the interest of the company and by the higher interest of the national production. He must also observe the provisions for the execution and for the discipline of the work issued by the entrepreneur and by the collaborators of the latter, which he hierarchically depends on".

Art.5 Compliance with laws, regulations and procedures

Professionals are required to diligently comply with the laws in force in all countries where the Company operates, the Code, the company operating procedures and the internal regulations. Under no circumstances may the pursuit of the Company's interest justify inadequate conduct that does not comply with current legislation and this Code.

Art.6 Conflict of interest

6.1 The Company requires the most rigorous compliance with the rules governing the conflict of interest contained in laws and regulations.

6.2 In the performance of their activity and/or assignment, the Recipients pursue the general objectives and interests of the Company, in compliance with current legislation and this Code.

6.3 The Company does not act in conflict of interest with the client and prevents situations of potential conflict of interest. The situation in which the Company offers its services in support of a customer's activity that is directly competitive with another customer served by the Company, without both customers being informed of it, represents a potential conflict of interest.

The support for directly competitive activities means that consultancy is provided with reference to activities in market segments and territorial areas with respect to which the success of the consulting project provided to a client would directly contrast the benefit that the other client could draw from the consulting project provided to him by the same company.

6.4 A situation of potential conflict of interest is intended when the Company exchanges private utilities with subjects influencing the client's decisions (for example, managers or administrators of the client-organization), who in their turn are in the position of inducing the customer to give an assignment to the Company; or when the Company has the task of selecting suppliers for the client, while having business relationships with them, so that this selection may not be impartial, or the task to select personnel on behalf of a client while at the same time operating on a mandate of another client for the relocation of the same personnel, without the two parties being aware of it.

6.5 There is a potential conflict of interest in advising a client to do business with another client if the former is not aware of the Company's business relationship with the latter. Finally, it is acting in conflict of interest if the Company develops on its own a business opportunity of the client and which has come to its attention through information obtained from the client if this inhibits or reduces the possibility of the client himself to efficiently develop the same opportunity.

6.6 The Company assesses the circumstances that could give rise to conflicts of interest due to commitments made with other clients, whose interest is in potential conflict with those of the first client and, if not remediable, declares them promptly; in the case of existing relationships between the Company, its partners and shareholders, on the one hand, and the client's executives or directors, on the other, it refrains from exploiting these relationships to obtain favourable conditions; it informs the client about its economic and professional relationships with other clients if it advises the former to establish a business relationship with the latter, or if it advises a client to hire personnel dismissed by another client by means of the mobility procedure; it declares each commercial partnership with suppliers of technologies, goods and services, for which it recommends the purchase to the client; it refrains from developing a business opportunity that came to its attention during customer consultancy and that it could develop on its own, unless it received the customer's agreement to do so.

6.7 Professionals shall inform without delay, considering the circumstances, their superiors or contact persons of situations or activities in which they may have interests in conflict with those of the Company (or where the holders of such interests are their close relatives), and in any other case where important reasons of self-interest are involved. The Recipients respect the

decisions taken by the Company in this regard, refraining, in any case, from carrying out operations in conflict of interest. All professionals shall inform the Company, and possibly obtain authorization, regarding carrying out other activities of a personal and professional nature that may result in a conflict of interest.

Art.7 Confidentiality and privacy

7.1 Each professional shall ensure the utmost confidentiality about news and information constituting the corporate assets or inherent to the Company's activity, in compliance with the provisions of law, current regulations, this Code and internal procedures.

7.2 The Company undertakes to protect information relating to employees and to all those who work for the Company itself, generated or acquired within the corporate structure and/or in the management of business relations, and to avoid any improper use of such information.

7.3 In relation to the client’s privacy and of his data, the Company, in addition to guaranteeing the confidentiality of private information obtained from the client and the respect of its privacy, of the members of the organization and of the other stakeholders with whom it has come into contact, refrains from revealing confidential information to the media and the market without prior authorization from the client itself. Furthermore, it is recommended that the contracts signed with the collaborators provide for a confidentiality obligation of at least two-year validity, according to which, should they change their job, the collaborators must not reveal confidential information about the client. We undertake not to use the confidential information provided by the client for the benefit of itself or of other parties, without the explicit consent of the client.

7.4 With regard to privacy, the Company undertakes to act in accordance with the European Regulation on the protection of personal data (GDPR 2016/679) by processing the data and information in its possession in accordance with the principles of lawfulness, correctness, transparency, for specific, explicit and legitimate purposes, according to the criterion of minimization and only for the time necessary. In particular, each employee is instructed and trained to:

- carry out data processing only if expressly authorized;
- exercise the utmost diligence in the collection of personal data and in their preservation;
- not to communicate or in any way disseminate personal data to unauthorized third parties.

In the use of procedures, including IT procedures, for the processing of personal data and confidential information, the

Company applies high and adequate security standards to protect the rights and fundamental freedoms and dignity of the data subject.

7.5 With regards to the signing of contracts, if there are non-competition contractual agreements, these should contain the obligations of confidentiality about client; this constraint does not extend to the case in which the disclosure of confidential information is necessary to report the offence to the judicial authority, or to prevent serious damage to the client's stakeholders.



General Principles of the organization

Art.8 Operations and transactions

8.1 Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorized, consistent, congruous, documented, recorded and verifiable over ten years.

- The procedures governing the transactions must allow the possibility of carrying out checks on the characteristics of the transaction, on the reasons that allowed its execution, on the authorizations to carry it out, and on the execution of the transaction itself.
- Every person who carries out operations and/or transactions involving sums of money, goods or other economically assessable assets belonging to the Company, must act upon authorization and provide any valid evidence upon request for verification.
- Each company function is responsible for the truthfulness, authenticity and originality of the documentation produced and of the information provided in carrying out the activity for which it is responsible.

8.2 Employees, and in general all the subjects who carry out any purchase of goods and/or services, including external consultants, on behalf of the Company, must act in compliance with the principles of traceability, transparency, correctness, cost-effectiveness, quality and lawfulness and act with due diligence at all times.

8.3 Professionals, whose actions may in some way be linked to the Company, must follow correct behaviour in the affairs of interest of the Company and, in particular, in relations with the Public Administration, regardless of market competitiveness or of importance of the business in question, refraining from engaging in, legitimizing, accepting or favouring behaviours that do not strictly comply with the current legislation and with the principles of correctness, diligence and loyalty referred to in this Code.

Art.9 Human resources

9.1 We recognize that human resources are a factor of fundamental importance for the development of the Company itself. Respect for others and their professionalism is the basis for creating a working environment based on an understanding of the added value of diversity and collaboration to create a successful workplace.

9.2 The Company supports and respects the protection of internationally proclaimed human rights. It is therefore against and prohibits any kind of discrimination, exploitation of child or

forced labour, promoting freedom, dignity, equality of persons, privacy and health, in compliance with local laws wherever it operates.

Relations between the Company and its employees must be marked by the principles of civil coexistence and respect for personal rights and freedoms.

In its relations with all its stakeholders, the Company avoids any discrimination based on age, race and ethnic origin, nationality, political opinions, religious beliefs, gender, health or disability status and treats everyone fairly and equitably.

9.3 It is the Company's task to promote and develop the working attitudes and skills of each employee, as well as to foster a climate of loyalty and mutual respect, providing adequate tools and opportunities for professional growth.

9.4 We are aware that the high level of professionalism achieved by our professionals and their dedication to the Company are essential and determining factors in the pursuit and achievement of the Company's objectives.

9.5 The Company will not tolerate any reprisals against anyone who makes a report in good faith concerning facts potentially relating to offences under Law 231, discrimination, harassment, or mobbing.

Art.10 Personnel recruitment

10.1 The selection of the personnel to be hired is made because of the procedures envisaged by the Professional Management Manual adopted by the Company and published on the company intranet (dashboard). The profiles and the specific competences of the candidates must always correspond to the business needs, as they result from the request made by the requesting function, and always in respect of equal opportunities for all interested parties.

10.2 The information requested is strictly connected to the verification of the aspects envisaged by the professional and psycho-aptitude profile, respecting the private sphere and the opinions of the candidate.

10.3 It is forbidden to have employment and consultancy relationships with former employees of the Italian or foreign PA, who, due to their institutional functions, personally and actively participate or have participated in business negotiations or endorsed requests made by the Company to the Italian or foreign PA, unless they have been preliminarily and adequately evaluated by the *recruitment* manager, and reported to the Supervisory Body if there are elements of potential conflict with

the current regulations (e.g. two years have not passed for those who have carried out authoritative functions).

10.4 The Company encourages respect for fairness and equal opportunity in the selection and hiring of personnel, rejecting any kind of favouritism and offering equal employment opportunities to all applicants and employees. In our recruitment processes, decisions are made without regard to race, colour, religion, national or ethnic origin, ancestry, age, disability status, gender, pregnancy, marital status, sexual orientation, gender identity or expression, political or personal beliefs, union membership or any other characteristic protected by local laws and regulations.

These principles extend to all employment decisions, including recruitment, training, evaluation, promotion and rewards.

Employment relationships are formalised by regular contracts, which reject any kind of irregular employment.

The Company encourages maximum collaboration and transparency towards new employees, so that they are clearly aware of their duties and responsibilities.

Art.11 Selection of collaborators and consultants

11.1 The selection of collaborators, including Experts and Partners, is carried out according to the procedure PR 05 | GOODS AND SERVICES SUPPLY adopted by the Company and published on the company intranet (dashboard). The selection is made based on the business needs defined by the project managers.

11.2 The information requested is strictly connected to the verification of the aspects envisaged by the professional and psycho-aptitude profile, respecting the private sphere and the opinions of the candidate.

11.3 It is forbidden to have collaboration and consultancy relationships with former Italian or foreign executives or public officials who, due to their institutional functions, personally and actively participate or have participated in business negotiations or endorsed requests made by the Company to the Italian or foreign PA, unless such relationships have been preliminarily and adequately evaluated by the *recruitment* manager, and reported to the Supervisory Body if there are elements of potential conflict with the current regulations (e.g. two years have not passed for those who have carried out authoritative functions).

11.4 We do not discriminate collaborators in decisions concerning their selection and in terms of remuneration and use, based on race, colour, religion, national or ethnic origin, ancestry, age, disability status, gender, pregnancy, marital status, sexual

orientation, gender identity or expression, political or personal beliefs, union membership or any other characteristic protected by local laws and regulations.

Art.12 Protection, professional growth, and remuneration of personnel

12.1 We undertake to ensure that our both general and individual envisaged annual objectives regarding the personnel are such as not to lead to unlawful conduct and are, instead, focused on a possible, specific, concrete, measurable result and that is feasible within the set time limit.

12.2 The Company does not tolerate any kind of violence, explicit or implicit, physical or mental, including threatening behaviour, physical intimidation and coercion. In particular:

- we are committed to ensuring a working environment free from discrimination, harassment and bullying of any kind, and from any other offensive or disrespectful behaviour that causes an individual to unfairly give up his or her expectations to avoid the negative effects of the working environment. Harassment may take the form of verbal, visual, physical or other unwanted behaviour that creates an intimidating, offensive or hostile working environment;
- we do not tolerate sexual harassment of any kind against any employee;
- we care about the health and well-being of employees and collaborators, ensuring decent working conditions and a safe and healthy workplace;
- we protect the *privacy*.

12.3 We invest in the learning, skill development and professional growth of the people who work with us. With regard to internships:

- we offer internships only for a genuine training and career guidance purpose, based on a training project with defined objectives and a dedicated tutor, and we do not use them to replace staff or to meet production needs;
- from the selection stage, we clarify the characteristics of the internship and the realistic prospects at the end of the programme, including any possibility of employment;
- we provide a structured assessment and feedback on the skills acquired.

12.4 We remunerate our employees and collaborators fairly in relation to our investment in human capital and professionalism within the Company. Their remuneration policy is based on the recognition of merit for the contribution given in terms of effort and results; we adopt assessment, incentive and remuneration systems that favour not those who are more skilled at prevailing over colleagues, but those who favour collaboration and team spirit to solve problems and create value for the Company and its stakeholders; all collaborators are given equal opportunity to contribute and to apply and develop their abilities, without favouritism or nepotism.

Art.13 Health and safety at work

Under the current legislation on the protection of health and safety at work (pursuant to Legislative Decree No. 81/2008), we undertake to take all necessary measures to protect the physical and moral integrity of its employees. We are committed to ensuring that:

- compliance with current legislation on safety, hygiene and health of workers is given the utmost attention;
- the risks for workers are, as far as possible and guaranteed by the evolution of the best technique, avoided also by choosing the most suitable and least dangerous materials and equipment and such as to mitigate risks at source;
- the unavoidable risks are correctly assessed and adequately mitigated through the appropriate collective and individual security measures;
- information and training of workers is widespread, updated and specific with reference to the job performed;
- consultation of workers on health and safety in the workplace is guaranteed;
- deal quickly and effectively with any emerging need or non-compliance in the field of safety during work activities or during audits and inspections;
- the organization 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 Company operates.

In pursuit of the purposes, the Company allocates organizational, instrumental and economic resources with the aim of ensuring full compliance with the accident prevention regulations in force, including the continuous improvement of the health and safety of workers in the workplace and the related prevention measures.

Employees, each for their own part of responsibility, are required to ensure full compliance with the law, the principles of this Code, company procedures and any other internal provisions envisaged to guarantee the protection of safety, health and hygiene in the places of work.

Art.14 Relations with the institutions

14.1 The relations of the Company and of the professionals with national, EU and international public institutions ("**Institutions**"), as well as with public officials or public employees, i.e. bodies, representatives, agents, members, employees, consultants, public service officers, public institutions, public administrations, public bodies (including economic ones), local, national or international bodies or organizations ("**Public Officials**") are held by each employee, regardless of their function or assignment, or, if necessary, by each collaborator, in compliance with the regulations in force and on the basis of the general principles of correctness and loyalty, adapting their conduct to the respect of *impartiality* and *good performance* that the Public Administration requires.

14.2 Illegal payments in relations with institutions or public officials are prohibited. All Recipients are required to refrain from making payments of any entity in order to obtain unlawful benefits in representing the interests of the company before the Public Administration.

14.3 We expressly prohibit bribery, favouritism, collusion, direct and/or indirect solicitations also through promises of personal advantages, towards any subject belonging to the Public Administration. In particular, the following behaviours are not permitted and are expressly prohibited:

- to pay or offer, directly or indirectly, payments and material benefits of any entity to public officials or public service officers in order to influence or offset an act of their office and/or the omission of an act of their office;
- to offer gifts or other donations that may constitute forms of payment to officials or employees of the Public Administration;
- to collect and therefore grant requests for money, favours, utilities from individuals, natural or legal persons who intend to enter into business relationships with the Company as well as from any subject belonging to the Public Administration.

14.4 Courtesy acts, such as gifts or other forms of hospitality are permitted when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the

parties and which cannot be interpreted by an impartial observer such as aimed at obtaining undue advantages.

14.5 We will never be represented, in the context of relations with the Institutions or Public Officials, by employees or collaborators with reference to whom conflicts of interest may arise. In this regard, we prohibit from being appointed as our representatives individuals who:

- have been accused of illegal conduct in business;
- are in conflict of interest or have family or other relationships - which they are aware of - such as to be able to illicitly influence the decisions of any subject belonging to the Public Administration.

14.6 In order to avoid or in any case drastically restrict the risk related to the behaviour described above, each employee, in function of his/her own powers and functions, must promptly report to his/her superior and to the Supervisory Body, doubts regarding possible violations of the Code by external collaborators.

14.7 In the specific case of a tender with the Public Administration, the Company and the professionals must operate in compliance with the law and correct commercial practice.

14.8 Without prejudice to all the obligations imposed by the applicable legislation, the professionals shall refrain, during business negotiations, requests or commercial relations with the Institutions or Public Officials, from undertaking (directly or indirectly) the following actions:

- examining or proposing employment and/or commercial opportunities that may favour individual employees of Institutions or Public Officials;
- offering or in any way providing, accepting or encouraging gifts, favours or commercial or behavioural practices that are not based on the most open transparency, correctness and loyalty and, in any case, that do not comply with the applicable legislation in force;
- soliciting or obtaining confidential information that could compromise the integrity or reputation of both parties or that in any case violate the equality of treatment and the procedures of public evidence activated by the institutions or Public Officials.

14.9 We condemn any behaviour aimed at obtaining, from the State, the European Communities or any other public body, any kind of contribution, financing, facilitated loan or other disbursement of the same type, by means of altered or falsified declarations and/or documents, or through the omission of due information or, more generally, through artifices or deceptions, including those made by means of a computer or electronic system, aimed at misleading the disbursing body.

14.10 We undertake to respect the destination of contributions, subsidies or financing, including those of modest value and/or amount, aimed at encouraging any initiative, obtained from the State or other public body or from the European Communities.

Art.15 Control and accounting transparency

15.1 Professionals undertake, in accordance with their respective functions and duties, to ensure that the facts relating to the management of the company are represented correctly and truthfully in the accounting of the Company. All actions and operations carried out by the Company are inspired by the following principles:

- maximum managerial correctness;
- completeness and transparency of information;
- legitimacy in legal and substantial terms;
- clarity and truthfulness of accounting records in accordance with current regulations, internal regulations and procedures.

15.2 We require from all our employees full and ample dedication so that the management facts and the operations carried out during all their activities are represented in accounting correctly and promptly. Each accounting transaction must therefore be supported by appropriate documentation certifying the activity performed so as to allow:

- easy accounting entries;
- identification of the origin and/or formation of the documents;
- accounting and mathematical reconstruction of operations.

It is the duty of every employee involved in the preparation of the Company's budget, also for the purposes of the consolidated accounts and of the explanatory notes, to ensure that the accounting documentation meets the aforementioned principles and it is easily traceable, as well as ordered according to logical criteria.

15.3 Especially in the case of items translated into budgets and in the explanatory notes that require estimates (so-called evaluations), it is essential to respect the accounting principles by anyone involved (including third-party consultants) in the forming process of such items.

15.4 We require that the inclusion in the budget of all items, such as receivables, inventories, equity investments, provisions for risks and charges, arise from the unconditional respect of all the

current regulations concerning the formation and assessment of the budget. In particular, the employees in charge of processing the year-end accounting balances are required to check or promote the control of all accounting operations that are prodromal to the production of said balances, also in order to reduce the possibility of interpretative errors.

15.5 The documents certifying the activity of accounting registration must be able to allow the rapid reconstruction of the accounting transaction, the identification of any error, as well as of the degree of responsibility within the single operating process.

15.6 The Recipients are obliged, always within the scope of their respective functions and duties, to check the correctness and truthfulness of the accounting records and to disclose, to those of competence, any errors, omissions and/or falsifications of the same.

Art.16 Control activities and transparency

16.1 Transparency is the criterion chosen by us in the management of problems arising from contrasts, undeclared intentions or misleading behaviour, in order to provide, to anyone interested, all the information necessary to know the facts and make the relevant choices.

16.2 The Recipients undertake, in compliance with the tasks and contributions defined in the assignments and contracts, and in line with what is defined in the Anti-corruption and Transparency Plan, to collaborate in finding and transmitting the data subject to publication and transparency on the institutional website and to guarantee replicability through adequate documentary support.

16.3 More generally, the Recipients undertake to collaborate in the implementation of the measures envisaged in the Anti-corruption and Transparency Plan.

16.4 We are available to provide maximum transparency and collaboration to the investigating Authorities and to our own trade Association (“Assoconsult”) on situations of alleged legal violations in public tenders.

Art.17 Relations with the Company’s control bodies

We require all personnel to observe correct and transparent conduct in the performance of their duties, especially in relation to any request made by the shareholders, the board of statutory auditors and other corporate bodies in the exercise of their respective institutional functions.

Art.18 Influence on the shareholders' meeting

We condemn any simulated or fraudulent act aimed at influencing the will of the members of the shareholders' meeting in order to obtain the irregular formation of a majority and/or of a resolution different from that which otherwise would have been assumed.

Art.19 Safeguarding of the social capital

19.1 We expressly prohibit that any employee, directly or indirectly, contributes to the execution of unlawful operations or conduct on the company quotas or that may however prejudice the integrity of the share capital.

19.2 We pursue, as an ethical principle, the protection of the integrity of profits and reserves that cannot be distributed by law; we therefore prohibit administrators from returning, out of the cases expressly established by law, capital to shareholders or exempting them from the obligation to pay it.

Art.20Safeguarding of the rights of social creditors

20.1 We pursue, as an ethical principle, the protection of the interests of the social creditors in not having the guarantees of their credit diminished.

20.2 We, therefore, expressly prohibit our employees from carrying out any operation to the detriment of creditors. The directors are also prohibited from making reductions in share capital or mergers with other companies, or to carry out demergers in order to cause damage to creditors.

Art.21 Use of banknotes public credit cards, revenue stamps

Sensitive to the need to ensure fairness and transparency in the conduct of business, we require the employees to comply with the regulations in force on the use and circulation of coins, public credit cards and revenue stamps. Therefore, we will sanction any behaviour aimed at the illicit use as well as at the falsification of credit cards, revenue stamps, coins and banknotes.

Art.22 Activities aimed at terrorism and subversion of the democratic order

22.1 We require compliance with all laws and regulations that prohibit the performance of terrorist activities and the subversion of the democratic order. We also prohibit the simple belonging to associations with such purposes.

22.2 We condemn the use of our own resources for financing and carrying out any activity aimed at achieving terrorist objectives or at subverting the democratic order.

22.3 It is also expressly forbidden to anyone of the Company, wherever operating or displaced, to become involved in any practice or other action suitable for integrating terrorist conduct or subversion of the system. In the event of doubt or if a situation appears equivocal, every employee is required to contact his department manager or a Company lawyer.

Art.23 Protection of the individual personality

We condemn any possible behaviour aimed at committing crimes against the individual.

Art.24 Environmental protection

24.1 We consider the environment a primary asset to be safeguarded and strictly comply with regulations.

24.2 We make environmental protection one of the values on which our activity is inspired, committing ourselves to incentivize the increasing use of energy from renewable sources and to improve the environmental quality of the territory.

24.3 We manage our business in an environmentally compatible manner, but above all we exercise the profession in such a way as to suggest solutions that are environmentally friendly.

24.4 We undertake not to suggest production plant relocation plans aimed at obtaining cost reductions essentially through the possibility of exploiting less demanding environmental regulations or claims with less punctual controls, thanks to which the environmental sustainability of the production activities in question would be substantially worsened.

24.5 We promote a strong awareness of environmental issues on an ongoing basis and favour the use of recyclable office materials and equipment, adhering to the highest environmental

standards for the disposal of polluting waste and organising our work to ensure maximum energy savings and the use of renewable energy sources wherever possible.

Art.25 Protection of industry and commerce

25.1 We believe in the free and correct exercise of industry and commerce, encouraging initiatives that can favour free competition, in compliance with national and supranational regulations and ethical rules.

25.2 We condemn any behaviour of disturbed freedom of the industry, as well as of illicit competition and fraud in the exercise of commerce.

Art.26 Transnational offences

We condemn any behaviour, both subjects who hold an apical and subordinate role, which can even only indirectly facilitate the realization of criminal cases such as the criminal association, the mafia-type association and the obstruction of justice. To this end, we undertake to activate all the preventive and subsequent control methods necessary for the purpose.

Art.27 Anti-money laundering

We condemn any behaviour, both subjects who hold an apical and subordinate role, which can even only indirectly facilitate the realization of criminal cases such as receiving, recycling and using money, goods or other utilities of illicit origin and self-laundering. To this end, we undertake to activate all the preventive and subsequent control methods necessary for the purpose.

Art.28 Computer systems management

28.1 We condemn any behaviour consisting in altering the functioning of a computer or electronic system, or in having access without right to data, information or programs contained therein, aimed at procuring the Company an unfair profit to the detriment of the State.

28.2 We condemn any possible behaviour, both subjects who hold an apical and subordinate role, which may even only indirectly facilitate the realization of the so-called computer crimes. To

this end, we undertake to activate all the preventive and subsequent control methods necessary for the purpose.

Art.29 Copyright protection

We condemn the abusive use of intellectual works or devices and elements of unlawful decoding, as well as the illegal diffusion of the aforementioned works and the abusive duplication of programs and data processing systems.

Art.30 Internal and external controls

30.1 We promote the dissemination, at all levels, of a culture regarding the existence of internal and external controls and characterized by the awareness, for each employee, of the contribution that these controls give to the improvement of the efficiency of all its activities.

- Internal controls are all the instruments prepared by the Company to direct, manage and verify its activities in order to:
  - promote compliance with laws, regulations and internal procedures;
  - obtain an effective management of these activities;
  - provide accurate and complete financial accounting data;
  - exchange correct and truthful information.

  We ask everyone - employees and collaborators - to demonstrate availability to the controls that the Company will decide to dispose of within the limits established by the law and the Code of Ethics, accurately documenting, where it is possible and requested, the controls carried out.
- External controls are the controls legally assigned to the shareholders or other corporate bodies or auditing companies, as well as to all the Public Supervisory Authorities. We declare that we are subject to internal and external audits by Assoconsult (ethical audit). In this case, we require that, in the relevant communication with the aforementioned supervisory and control authorities, the conduct held is based on correctness and transparency, providing complete, truthful and timely information and avoiding generic confused wording. The directors must not prevent or in any way hinder the control and auditing activities

legally attributed to the shareholders, to the other corporate bodies or to any independent auditors.

30.2 On the occasion of verifications and inspections by the competent public Authorities, the Corporate Bodies and their members, the employees of the Company, consultants, collaborators and third parties who act on behalf of the Company must maintain an attitude of collaboration towards the inspection and control bodies.



Control bodies and mechanisms

Art.31 Supervisory Body and Non-Discrimination Counter

31.1 The Supervisory Body is a body within the Company, responsible for controlling and updating the Organizational and Management Model and the Code. The Supervisory Body, in the exercise of its functions, will have free access to company data and information useful for carrying out its activities.

31.2 The Company has a Non-Discrimination and Equal Opportunities Counter specifically dedicated to collecting any reports of discriminatory and/or equal opportunity behaviour.

31.3 The Recipients and third parties acting on behalf of the Company are required to provide the utmost cooperation in facilitating the performance of the functions of the Supervisory Board and the Non-Discrimination and Equal Opportunities Counter.

Art.32 Internal reporting

32.1 Anyone who becomes aware of violations of the principles of this Code and/or of the operational procedures that make up the Model or of other events that may alter their value and effectiveness must promptly report them to the Supervisory Body. The Recipients must promptly report the following information to the Supervisory Body:

- any information regarding the violation, or possible violation, of the provisions contained in the Code;
- any request for violation of the Code that has been submitted to them.

32.2 Anyone who becomes aware of violations of the principles of social responsibility (discrimination, harassment or mobbing, etc.) should promptly report them to the Non-Discrimination and Equal Opportunities Desk.

32.3 The company has equipped itself with a whistleblowing channel, also in application of the provisions of Legislative Decree n. 24 of 2023, dedicated to the reporting of illegal or illegitimate conduct or behavior, commission or omission, which constitutes or may constitute a violation, or inducement to violate the Code of Ethics or the Organization, Management and Control Model pursuant to Legislative Decree 231/01 adopted by the Company or the policies and/or rules governing business processes.

The channel can be reached through the following link https://lattanzio.whistlelink.com.

Art.33 Sanctions provisions

Compliance with the provisions of the Code of Ethics must be considered an essential part of the contractual obligations of employees pursuant to and by effect of art. 2104 of the Civil Code. The violation of the rules of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, in compliance with the procedures set forth in art. 7 of the Workers' Statute, with all legal consequences, also with regard to the preservation of the employment relationship and may lead to compensation for the resulting damages. Violation of a rule and/or a procedure may also constitute a criminal offence.

Art.34 Relations with Suppliers and External Partners

34.1 Fair contractual relations with suppliers and information communications to protect itself

We do not take unfair advantage of the contractual dependency relationships in which partners or suppliers may find themselves, due to their insufficient information on the Company's activities, especially when establishing long-term relationships, when the activities/services are performed, and the investments are made by the supplier in advance with respect to payments.

Ethical principles
- transparency
- fair contractual conduct
- impartiality, empathy and fair balance

34.2 Relevance to the principle of equity in the reformulation of contracts

We do not exploit the occurrence of unforeseen events such as, for example, the interruption or modification of the contractual relationship with the end client and the situation of dependence in which the supplier or partner may be due to his investments made for the purpose of collaborating with the Company itself, to opportunistically renegotiate the contracts. In particular, we do not attempt to impose payment delays, lower prices or look for benefits that involve damage to the supplier or partner with respect to the initial agreements.

Ethical principles
- fair contractual conduct
- impartiality, empathy and fair balance
- fair remuneration

34.3 Respect for the rights of stakeholders in the supply chain

If we make use of suppliers or commercial or professional partners operating in countries characterized by lower regulatory conditions regarding the protection of stakeholders and the environment, or in which the compliance with these regulations is systematically lower than in the country where the Company has headquarters, it is required a compliance with the standards of conduct established by the Code of Ethics, reviewing the contractual terms if this constitutes an excessive economic burden for the supplier or partner.

Ethical principles
- social responsibility
- impartiality, empathy, and fair balance
- fair remuneration
- integrity and reciprocity

Art.35 Commitments toward the professional community of consultants

Cooperation in the professional community

We are aware that cooperation within the professional community is a determining factor for the development of the reputation of the profession and that it allows the improvement of the overall quality of the consultancy services provided to all clients and of the social utility of the profession in the eyes of the community.

Ethical principles

- cooperation and fair competition
- Client interest
- reputation



Final Provisions

Art.36 Non reputability of the Code

36.1 Exceptions to the rules contained in this Code are not permitted.

36.2 Under no circumstances, the conviction of acting for the benefit of the Company may justify the adoption of behaviours contrary to all the principles set out above, since the violation of the present Code coincides with the violation of the criminal law and involves the imposition of criminal penalties to be borne by the material offender, also exposing the company to the risk of being subjected to a criminal trial for the crime committed by the infringer.

36.3 For all the above, the Company will sanction the violations of this Code of Ethics, of the internal regulations and of procedures that have determined the behaviours described above, or that are even only abstractly suitable to determine them, with the imposition of disciplinary sanctions.

Art.37 Changes and additions

This Code, which acknowledges company practice, is approved by the Legal Representative of Lattanzio KIBS S.p.A. Any variation and/or integration of the same will be approved by the same Legal Representative and circulated promptly to the Recipients.

Art.38 Conflict with the Code

If even one of the provisions of this Code should come into conflict with provisions set forth in internal regulations or procedures, the Code will prevail over any of these provisions.

