

**Project Informatica's  
Code of Ethics and Conduct**

### ***Foreword***

Project Informatica is based on essential values, deeply rooted in our culture. These values are a constant reference of our philosophy and way of acting.

Integrity and reliability of each employee are basic conditions for ensuring trust. This is applicable in all areas, economic, legal and ethical.

The strict adherence to these fundamental values and to the applicable regulatory framework will allow our firm not only to stand as a market leader from a commercial perspective but also, and more importantly, to be recognised as an ethical champion viewpoint by our stakeholders, people, institutions, suppliers and customers.

This is the aim of the Code of Ethics and Conduct: defining clear, precise and simple rules to pursuit common objectives: our company's success and corporate wellness before individual interests.

Aiming at respecting all colleagues, it is of the utmost importance that all Project Informatica's ethical values will be always adhered to. They must be clearly defined and they must become the standard for all employees.

The guidelines contained in Code of Ethics and Conduct must be used as reference in daily activity.

The Code, drawn up in a clear and simple manner, embeds all directives issued in the individual and corporate sphere.

To preserve the integrity of Project Informatica, we are all called upon to acknowledge and comply with its content.

Any behaviour aimed at gaining personal advantage, carried out to the benefits of third parties or to the detriment of Project Informatica, breaching directives, company's values or other internal regulation, policy or procedure will be punishable under the relevant legal framework.

It is the responsibility of all employees to obey to the principles and rules of the Code Ethics of Conduct in their conduct of business, to promote them within the firm and to lead by example by adopting them throughout their daily activity.

Any doubt or question is welcome. Therefore, feel free to ask a consult at any time.

We are confident that the Code of Ethics and Conduct will promote and strengthen a solid and loyal cooperation, which reflect our corporate culture and the fundamental values on which it is based.

## **Recipients**

This Code of Ethics and Conduct is binding for anyone representing the company, covering administration or management roles, or exercising control functions. It is also binding for anyone cooperating and collaborating with it for any reason, in the pursuit of its business objectives, for all employees without exception, collaborators (e.g. consultants, intermediaries, etc.) and for anyone who has any business relationships (hereinafter also referred to as “Addressees” with Project Informatica (hereinafter also referred to as “the Company”).

Addressees are required to know the provisions of this Ethical Code of Conduct and all the employees must contribute actively to its strict observance.

In particular, the Company’s Chief Executive Officer shall adopt the principles set out in this document when determining the objectives of the company, proposing investments and carrying out projects, including any decision or action concerned with the management of the Company.

Likewise, all heads of departments shall be led by the same principles in carrying out the Company’s management activities, both internally by strengthening cohesion and spirit of mutual collaboration, and vis-à-vis third parties with whom the Company maintain business relationships.

For this purpose, this documents is also brought to the attention of the collaborators as well as of anyone who has business relations with the Company. The Company is therefore committed to ensuring the highest dissemination of this document, also through the use of relevant cognitive and training tools, with the objective of raising awareness of its contents.

## **Guidelines**

### ***Conflict of interest***

The Company is inspired by the principles of loyalty, fairness and transparency in its dealings with suppliers.

Relationship with suppliers are governed by precise rules and objective criteria which exclude any personal interest.

Pursuing personal interests over the Company’s interest when dealing with suppliers and customers, will cause explicit conflicts of interest whose effects are harmful to the working environment and cause a loss of the reputation of the Company.

Any relationship with third parties, suppliers-customers-institutions developed as a result of personal interests, is deemed to be contrary to our ethical and behavioural principles, unless disclosed and approved by the administrator.

### ***Gifts and Benefits***

When dealing with suppliers it is required to employ an ethical, open, and honest behaviour, in line with internal procedures.

It is necessary to establish long-lasting business relationships which ensure the satisfaction of mutual needs, without losing sight of the professional nature of the relationship.

Employees must not abuse of their position, role or powers within the Company to exercise pressure of any kind on third parties (suppliers-clients-institutions) and to influence, in an improper manner and for improper purposes, the assigned activities.

The abuse of one's professional position represents an offence for which the person committing the offence is liable to prosecution together with anyone encouraging the perpetuation of such behaviour or anyone with knowledge of such behaviour who engages in omissive behaviour.

For any employees of the Company it is strictly forbidden to ask, give, accept or promise directly or indirectly, money, presents or any other benefits in a personal capacity for the purpose of drawing unfair advantages.

This is true for all the employees and suppliers-clients-institutions, regardless of the value or quantity of the goods.

### ***Handling of confidential information***

Documents, information and data that are not in the public domain and which, could be detrimental to the Company if made public, are considered confidential.

Unauthorised disclosure of confidential information may have consequences in accordance with applicable law.

The Company complies with all data protection and security laws.

All information are treated as confidential if necessary or expressly requested.

Company employees who become aware of confidential information must not disclose it to third parties except for official or professional reasons and subject to being compliant with the rules on insider trading and the protection of confidential information

The company adheres to a quality standard according to the GDPR and promotes constant information/ training courses for its employees.

### ***Relations with the competition***

The Company and its employees are committed to the utmost observance of the legislation on the protection of competition and the market in any jurisdiction.

No employee shall be involved in any initiatives and/or establish any contact with competitors (agreement on prices, quantities, markets, etc.), which may lead to a breach of competition and market protection legislation.

The Company's employees are required to comply strictly with these provisions. In particular, any information deemed confidential or covered by professional secrecy shall not be disclosed to competitors. Similarly, sensitive data concerning competitors should not be disclosed to third parties.

### ***Respect of human dignity***

Our employees and their capabilities are one of the strengths of Project Informatica.

The professional development of our staff is based on the principle of equal opportunities; the recognition of the results achieved, the professional potential and the skills expressed by people are considered essential criteria of judgment. Project Informatica respects, among others, the fundamental rights of persons: discriminatory behaviour is not allowed with reference to political opinions, religion, race, nationality, age, sex, sexual orientation, state of health. Failure to comply with these principles infringes not only existing national legislation but also the rights enshrined in the Universal Declaration of Human Rights.

The principle applies to both employees and third parties as customers and suppliers.

### ***Marketing of products***

Project Informatica is committed to complying with the legislation regarding the marketing of products.

No employee may be involved in the marketing of products for sale which might mislead the consumer on the origin, quality and characteristics of the goods. The Company shall refrain from any conduct liable to distribute products that might breach industrial property rights or that embed false trademarks.

For the Company, the consumer represents not only an end-customer, but a fundamental link in the value chain that has always characterized the company's business.

Project Informatica considers quality as a key value of its business activity, considered not only as the value of the product but also as dedication to the specific needs of customers.

### ***Compliance with laws***

In order to operate in line with the law, any reform and/or change to existing legislation framework, as well as internal directives, must be communicated and acknowledged. Even just the perception of a violation can influence public opinion and cause a damaging change of attitude of customers and business partners. In addition, the personal risk of any employee of incurring in claims or criminal penalties for failure to comply with the law shall be duly considered. Project Informatica employees must comply with all applicable regulations and internal guidelines which are relevant for their area of activity. If in doubt, employees shall consult their Functional Manager.

### ***Correctness and transparency of corporate information***

In order for the accounts to meet the requirements of truth, completeness and transparency of the recorded data, adequate and complete documentation supporting the activity carried out must be kept on file for each operation, in particular:

- accurate accounting records;
- the immediate identification of the characteristics and rationale for the operation itself;
- the easy formal and chronological reconstruction of the transaction;
- the verification of the decision-making, authorisation, and implementation process, as well as the identification of the various levels of responsibility.

Each Project Informatica employee ensures, within the relevant area of competence, that any fact relating to the management of the Company is correctly and promptly recorded in the accounts.

Each accounting entry must accurately reflect the results of the supporting documentation. It will be the responsibility of each employee to ensure that the supporting documentation is easily available and ordered according to logical criteria.

### ***Internal control system***

Project Informatica promotes and disseminates, at every level of the company, the culture of control and makes the employees aware of the relevance of the system of internal controls and the importance of complying with existing regulations and company procedures when carrying out business activities.

Internal controls are defined as those tools required or useful to direct, manage and verify the company's activities, with the purpose of ensuring compliance with relevant laws and

company procedures, protecting company assets, efficiently managing activities and providing accurate and complete accounting and financial data.

All employees, within the scope of the functions performed, are responsible for the definition and proper functioning of the control system through line controls, consisting of those control activities that each individual operating units perform on their relevant processes.

The monitoring and assessment of control and risk management processes are assigned to the Internal Audit function.

### ***Anti-Money Laundering***

The recipients of this Ethics and Conduct Code, shall never, in any way or under any circumstances, be involved in any activity connected to money laundering.

Before establishing any business, relationship or signing any contract with suppliers and other business partners, Project Informatica and its employees and/or collaborators shall, each within the limits of their powers and good name of the Company.

### ***Protection of the environment***

In consideration of the rights of the community and future generations, the protection of the environment and the sustainable development of the area in which it operates represents a key value for the Company.

The Company strongly believes that the environment is a common good to be safeguarded. At this objective, it carries out environmental protection actions, promotes activities aimed raising awareness on this subject and is committed to training employees in order to develop awareness on the environmental impacts of its activities.

The Company's activities are implemented taking into account environmental criteria and principles aimed at controlling the consumption of natural resources and minimizing negative impacts on the environment.

Therefore, the recipients of this code must:

- cooperate in promoting respect and care for the environment;
- promote environmental-friendly activities and processes, adopting advanced criteria and technologies in the areas of environmental protection, energy efficiency and sustainable use of resources;
- assessing the environmental impacts of all business activities and processes;
- manage waste disposal by promoting the use of recycling and recovery practices;
- limiting the consumption of resources by encouraging saving practises.

### ***Health and safety in the workplace***

Project Informatica guarantees working conditions respectful of individual dignity and ensures safe and healthy working environments, in compliance with accident prevention and health and hygiene regulations in force.

The Company strongly promotes the development of a culture of safety and awareness of the risks associated with the work activities carried out. It requires everyone, at all levels, to behave responsibly and respectfully with the safety system adopted. All company procedures do form an integral part of the safety system

At this regard, every employee, colleague and/or anyone working in any capacity in the offices together with the customers of Project Informatica are called upon to personally

contribute to maintaining the safety and quality of the working environment in which they operate.

Project Informatica is committed:

- to implement a safe working environment and carry out its activities to protect the health of its employees and local communities;
- to guarantee to anyone working in the offices and on the production site, proper training and sharing of information on the risks to which they are exposed in the course of their daily activity. In addition, the Company ensures that all the provisions of Individual Protection Devices and any other safety tools required by current legislation;
- to continuously monitor the efficiency of the safety risks control, in order to promote objectives of continuous improvement in this sensitive and critical sector.

### ***Abuse of alcohol or drugs. Smoking policy***

All employees shall personally contribute to promoting and maintaining a climate of common respect in the workplace; particular attention is paid to respect of diversity of each individual.

Project Informatica will therefore assume that any individual working under the effect of alcohol or drugs or any other similar substance is aware of the risk they might cause to their colleagues and to the Company. Chronic addictions to such substances which affect work performance, might lead to employment contractual consequences. Project Informatica is committed to favour social actions in this field as provided for by employment contracts.

It is forbidden to:

1. hold, consume, offer or exchange in the workplace for whatever reason, drugs or similar substances
2. Smoke in the workplace. Project Informatica supports voluntary initiatives aimed at quit smoking. The Company also support the identification of potential smoking areas, which shall take in due consideration the rights of those who do not share this practise and do wish to avoid any exposure to smoke in the workplace and be protected from any passive smoking in their place of work.

### ***Implementing rules***

#### **1 Commitments of Project Informatica**

Project Informatica will ensure:

- maximum diffusion of the Code to the Recipients.
- an adequate program of continuous training and awareness raising on issues related to the Code.
- regular review and updating of the Code to adapt it to the evolution of public awareness and regulations relevant to the Code itself.
- the provision of every tools capable of enhancing the level of knowledge regarding the interpretation and implementation of the rules contained in the Code.
- Prompt investigation upon any known violation of the rules of the Code of reference.
- an assessment of the facts and appropriate sanctions. in the event of ascertained violations
- that no one may suffer retaliation of any kind for disclosing potential violations of the

## Code

### **2 Obligations for all employees**

Each employee is required to acknowledge the rules contained in the Code and any other relevant rule applicable to his/her function. Employees are required to:

- refrain from putting in place conducts which are deemed to be contrary to these rules;
- refer to their direct reporting line if in need of clarification on how to apply rules
- report promptly to their direct reporting manager:
  - any event, known directly or indirectly, related to potential violations of the rules contained in the Code;
  - any request received requesting an exception to the rules.
- cooperate with the functions responsible for verifying potential violations.
- in general, to commit to comply with the laws and regulations in force in all countries in which the entity operates. This commitment must also apply to consultants, suppliers, customers and anyone who has business relationships with Project Informatica. Project Informatica will not initiate or continue any business relationship which does not comply with these rules.

### **3 Validity of the Code in relation to third parties**

In relation to third parties, all Project Informatica's employees, due to their skills, will take care of:

- properly inform them about the commitments and obligations imposed by the Code;
- demand compliance with the obligations that directly concern their activities;
- adopt the appropriate internal and, if within their competence, external initiatives in the event of failure by third parties to observe the obligation to comply with the rules of the Code.

### **4. Sanctioning system**

Compliance with the principles and rules of the Ethics and Conduct Code, their dissemination and the operational application within the scope of the responsibilities assigned, are an integral part of the contractual obligations of each Recipient as indicated above, pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

Any violation will be prosecuted by the Company within the terms of the law and may constitute a breach of contractual obligations, which might lead to legal consequences with regard to the resolution of the contract or the assignment conferred, and lead to compensation for damages caused.

Any violation carried out by any individual with powers of representation, administration or management of the Company will lead the relevant Company governing bodies to issue those sanctioning measures deemed appropriate in relation to the nature of the violation committed and the role held by the individual responsible for the violation, in accordance with the applicable legislation.

The general rules of conduct are contained in the internal directives issued by the Chief Executive of Project Informatica.

Recipients acknowledge that compliance with the Code is as an essential part of their work performance and shall therefore act and behave in line with this document.

The Code will be constantly reviewed and updated and submitted for approval to the Chief Executive of Project Informatica. Any changes and/or updates of the same will be promptly communicated to the Recipients.

### **Gifts and Benefits Guidelines**

The Company is committed to adopt an ethical and transparent behaviour with suppliers, in line with internal procedures. The Company strives to establish long-lasting business relationships which can ensure mutual satisfaction. Employees shall not abuse of their position, role or authority within the Company to exert pressure of any kind on third parties (suppliers-clients-institutions) and to influence, in an improper way and for improper purposes, the performance of the activities assigned.

The abuse of the role held within the Company is an offence which might lead to legal prosecution of the individual involved together with anyone else involved.

#### ***1. Business trips***

Business trips must be kept essential and justified solely for business purposes. In no circumstances business trips shall be considered as rewards or incentives of any kind.

Travel and accommodation expenses should never be paid by the supplier but directly by Project Informatica.

The Line Manager must be promptly informed, and every business end expenses trip must be expressly authorized. The details of the trip and its reasons must always accompany the expense report.

#### ***2. Working lunches/dinners***

Business lunches/dinners paid by suppliers is not contrary to the principles of the Code as long as there is a business rationale relevant for the Company.

The approval of the Functional Manager is required.

#### ***3. Promotional material and free samples***

The acceptance and distribution of promotional material and free samples are subject to the authorisation of the Functional Manager.

Receiving products for private use directly or through family members is strictly forbidden.

#### ***4. Training and demonstration actions***

Participation to courses and demonstrations should be assessed according to the topics covered, time required and travel expenses. Such participation must always be authorised by the Functional Manager. The agenda of the event must be included in the expense report.

#### ***5. Free products, tickets for events, travel or other rewards***

Should an employee receive free products, tickets for shows (sporting events, concerts, etc.), travel tickets or any other forms of reward by current or potential suppliers, the Functional Manager has to be immediately notified.

The donation of free products, tickets for shows (sporting events, concerts, etc.), travel tickets

or any other forms of reward for private use, to an employee or a member of his family, is strictly forbidden.

Line Manager must be promptly informed about donations of any kind from suppliers, especially if these are potentially or actually related to offers, discounts or turnovers.

Travel or short stays as part of business trips, the costs of which are partly or totally covered by the supplier, must always be authorised in advance by the Line Manager, in a first phase, and subsequently communicated to the Chief Director who will decide, at his own discretion, the destination of the invitations received.

It is established that invitations to travel or events are of an occasional nature and, above all, are independent of the closure of contracts. In this sense, it is forbidden to abuse one's position, role or powers to influence, in an improper manner and for improper purposes, the performance of activities.

## **6. Gifts**

Small gifts or products or not included in the above category may be accepted as commercial gesture, subject of their value being below the threshold that might compromise the integrity and reputation of the Company

The Functional Manager will decide, at his own discretion, the corporate destination of these items. In any case, it will not be allowed to assign gifts directly to an employee or any family members, nor to send them to his/her domicile.

## **7. Relations with Institutions (Public Administration and Independent Administrative Authorities)**

Relationships with public, national, EU and/or international institutions, as well as with public officials or persons in charge of a public service, or their bodies, representatives, agents, members, employees, consultants, persons in charge of public functions, must be based on the strictest compliance with current legislation; such relationships are managed exclusively by employees authorised to do so on the basis of relevant delegated powers and powers of attorney conferred by the Chief Executive of Project Informatica.

Project Informatica is committed to maintain an attitude of maximum collaboration, based on transparency and correctness, towards the above-mentioned subjects, with whom it relates.

## **8. Power abuse**

Should a supplier or its agent exert any influence on a Project Informatica's employee, though, as a way of example, personal pressure, gifts or sums of money, the Functional Manager of the employee shall be promptly notified.

The Chief Executive shall then ensure that the supplier involved will take all appropriate measures to ensure any recurrence of such events.

## **Conflict of Interest Guidelines**

In its relations with suppliers, customers and institutions, the Company is oriented towards the principles of loyalty, fairness, and transparency. Relations with suppliers are governed by precise rules and objective criteria that always exclude personal interests.

Personal interests are not allowed to take advantage over business operations.

If there is the impression that personal interests interfere with the work sphere, we must prevent possible conflicts with prompt and transparent intervention.

### ***1. Relationship between employer and employee***

The hiring of spouses, relatives or partner of the employee is permitted in Project Informatica. However, there is an obligation on the part of the employee to inform the Head of Department about this, as well as the Human Resources Department.

### ***2. Business relationship***

The conclusion of agency or service contracts with companies in which employees, spouses, relatives or partner of the employee, operate or in which they are shareholders are not contrary to the Code of Ethics or Conduct provided that the Functional Manager is promptly informed and in turn communicates this to the Chief Executive.

### ***3. Conditions***

If spouses, family members or relatives of employees purchase goods, it is not subject to reporting, provided that the business relationship is the one normally existing between seller and customer.