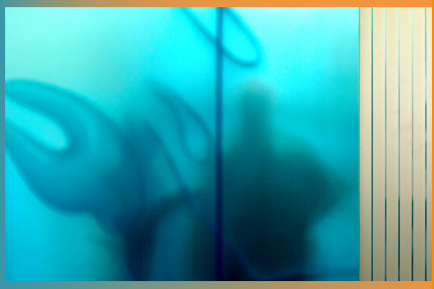
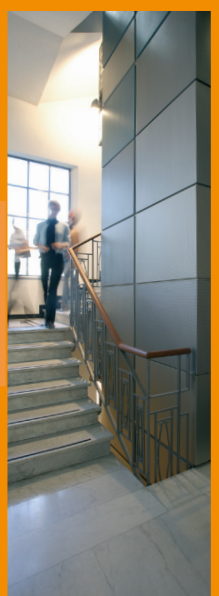


Code of Ethics

UPDATED NOVEMBER 2025



JACOBACCI
&
PARTNERS

Preamble

Jacobacci & Partners S.p.A. (hereinafter also “J&P” or the “Company”) is one of the leading European entities in the field of intellectual property protection, currently managing 100,000 patents and 100,000 trademarks on behalf of over 10,000 clients of all sizes, sectors, and geographical areas.

Founded in Turin in 1872, J&P has progressively grown, becoming a **benchmark** in the sector, boasting 14 offices today in various European cities where 90 professionals operate. Thanks also to a network of qualified correspondents worldwide, the Company is able to offer specialized assistance to a constantly developing clientele.

Drawing strength from a great past, J&P intends **to continue promoting the values and principles that have allowed it to establish and distinguish itself** over the last century, and which represent for it the essential starting point for proper economic and social development.

In this “Code of Ethics,” **to consistently embrace responsible and sustainable growth, the rules and guidelines whose observance is fundamental for the proper functioning, reliability, and reputation** of the Company have been gathered. Given the complexity of the situations in which the Company operates, it is important to clearly define the set of values that the Company recognizes, accepts, and promotes, and the set of responsibilities it assumes in internal relations and those with external parties.

J&P places values such as honesty, fairness, ethics, and transparency at the core of its business and promotes a culture of mutual trust as the cornerstone of all relationships it maintains, in order to build healthy and profitable relationships with its stakeholders for mutual growth.

The Company requires all parties with whom it interacts or establishes a relationship in the performance of its activities or in the pursuit of its objectives **to behave in conformity with the principles contained in the Code of Ethics, and, in particular, to always act loyally and fairly towards the Company itself, colleagues, and external parties.** For its part, the Company will diligently oversee the observance of the Code of Ethics, establishing adequate tools for information, prevention, and control, ensuring the transparency of operations and behaviors implemented, and intervening, if necessary, with corrective actions.

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1. Scope of application and addressees of the Code of Ethics

The Company identifies and defines through this Code of Ethics the core principles and values that form the basis of its activity and that it pursues in its **relationships with all the subjects with whom it comes into contact in the pursuit of its corporate purpose.**

The Code of Ethics aims **to base the operations, behaviors, and working methods on fairness, equity, integrity, loyalty, and professional rigor, both in internal relations within the Company and in relations with external parties,** focusing on compliance with the laws and regulations of the countries in which the Company operates, as well as compliance with internal company procedures.

The Code of Ethics sets out the values and principles that must be observed and shared by all individuals working within the Company, and in particular, it is binding for directors, executives, members of corporate bodies, employees, and, in general, for all those who work with the Company for the achievement of its corporate purpose for any reason, even based on a temporary contractual relationship (the “Addressees”).

The Addressees, without exception, are required to know and observe this Code of Ethics and all its updates, as well as to actively participate in its implementation and report any shortcomings to the management bodies.

The Company is committed **to ensure the widest dissemination** of the Code of Ethics so that all Addressees can achieve full knowledge and understanding of the principles contained therein, and to this end, specific dissemination activities are prepared.



2. General principles and rules of conduct

2.1 Legality

Respect for laws, regulations, and any other legal norm in force in all territories and contexts in which the Company operates is obviously a fundamental value for the Company. All decisions made by the Company in the performance of its activities comply with legal norms and procedures and are aimed at pursuing values such as honesty, impartiality, fairness, loyalty, transparency, and respect for people, organizations, institutions, and the environment.

Addressees are required to apply the legislation in force, the company procedures adopted for the pursuit of the Company's founding values, and must respect all legal and procedural requirements relating to their areas of competence and their functions, and must refrain from implementing conduct contrary to them. It is their responsibility to be aware of these aspects and the responsibilities associated with them.

The pursuit of company policies cannot translate into behavior contrary to the law, current regulations, or company procedures.

2.2 Fairness and professionalism

The Company's activity is aimed exclusively at achieving the corporate objective, which must be pursued in full compliance with the values of fairness, professionalism, collaboration, efficiency, openness to the market, and respect. Under no circumstances can the conviction of acting in the interest of the Company or in the pursuit of the corporate purpose justify conduct contrary to these rigorous principles.

Addressees acting in the name or on behalf of the Company are required to always behave in line with the principles of fairness and professionalism, as well as in compliance with the Company's policies.

2.3 Accounting transparency and financial integrity

All activities and actions carried out and implemented by the Addressees within their working activity must be verifiable.

Accounting transparency is based on the truthfulness, accuracy, completeness, and reliability of the documentation of management facts and related accounting records.

Each Addressee is required to collaborate so that management facts are represented correctly and promptly in the accounts.

Adequate supporting documentation of the work activity is kept on file for every transaction, in order to allow easy accounting registration, the identification of the different levels of responsibility, as well as the accurate reconstruction of the operation.

Each record must accurately reflect what is shown in the supporting documentation.

Addressees who become aware of omissions, falsifications, alterations, or negligence in the information and supporting documentation are required to report the facts to the management bodies.

2.4 Privacy protection

The Company pays great attention to the protection of the privacy and data of its stakeholders and to this end has adopted measures and processes aimed at ensuring an adequate standard of personal data protection. All information and personal data in the Company's possession are processed in full compliance with the legislation in force regarding privacy protection, and, in particular, in absolute conformity with the provisions of Legislative Decree 196/2003 and EU Regulation 2016/679 ("GDPR").

The confidentiality of third-party information processed by the Company in the performance of its activities is guaranteed, as is the safeguarding of the data of all so-called interested parties that are collected, processed, archived, and used, in complete compliance with the cited legal provisions. To this end, the Company has prepared a regulation called "Policy for the protection of personal data" which, in its articulations, defines measures and procedures aimed at ensuring secure conduct in relation to personal and company data processed in the performance of company processes, and the security measures that must be observed by all internal Addressees of the Company.

Addressees are required to ensure the confidentiality of data and information learned during the performance of their duties, and they are absolutely prohibited from using the data available to the Company for purposes other than those permitted or from disclosing

them for their own or others' advantage.

Addressees, in particular, must

- process data and information within the limits established by the Company and, in any case, limited to the execution of their activity;
- store data and information appropriately to prevent them from becoming available to unauthorized parties;
- maintain the utmost secrecy regarding confidential information, whether it concerns the Company or external parties with whom they operate;
- adhere to the Company's procedural guidelines regarding the disclosure of information and data, communicate information and data only in the case of express authorization from hierarchical superiors, and contact the latter in case of doubts regarding the matter;
- refrain from processing or disseminating data or information to parties outside the Company or even internal parties who do not necessarily need to have access to them for the performance of their work duties.

2.5 Fair competition

The Company pursues its success by offering high-quality services under competitive conditions and in compliance with national and community regulations aimed at protecting competition and the profession. For the Company, fair competition represents a resource, as well as a value, a constant stimulus for its development and for the growth of its activity necessary for the constant improvement of the quality of its work.

The Company carries out its activities in full respect of free competition, in adherence to its ethical principles and in complete compliance with legal norms, and shuns any form of anti-competitive agreement.

2.6 Safety and health of workers

The health and safety of workers constitute primary interests for the Company, which responsibly commits itself to ensuring their safeguarding and protection at work, acting in full compliance with the provisions of Legislative Decree 81/2008 and other relevant legislation.

The Company is committed to disseminating and consolidating a culture of safety, developing risk awareness, providing and ensuring adequate training, promoting responsible behavior by all collaborators, and working to preserve, especially through preventive actions, the health and safety of workers.

Addressees actively participate in company procedures aimed at risk prevention and health protection at work in order to preserve their own safety, that of colleagues, and that of third parties, and, to this end, are obliged to promptly communicate to the Workers' Safety Representatives (RLS) the eventual presence of dangers or safety risks, as well as any dangerous behavior implemented by workers.

The Company is also committed to ensuring the protection of working conditions by safeguarding the psycho-physical integrity of the worker, respecting their moral personality, and preventing them from suffering illegal conditioning or undue hardship. The Company therefore opposes any discriminatory behavior or attitude that harms the person, their beliefs, and their preferences (for example, in the case of insults, threats, isolation, or excessive invasiveness, professional limitations).

Any violation of the provisions of this article must be immediately communicated to the Human Resources Manager.

2.7 Environmental protection

The Company is actively committed, both in the performance of its daily activities and in strategic and decision-making processes, to promoting the culture of sustainability and environmental protection. To this end, the Company encourages the constant development of the sustainability of its activities by incentivizing energy saving and the use of recyclable resources, and commits to training personnel so that they develop awareness of environmental risks and implement responsible behavior in the performance of their duties.

Addressees actively participate in the dissemination of these principles and are called upon to implement appropriate conduct and promptly report any dangerous or harmful behavior for environmental protection to their managers.

2.8 Prevention of conflicts of interest

Addressees must avoid situations and/or activities that may lead to conflicts of interest with those of the Company or that could interfere with their ability to make impartial decisions, in safeguarding the best interest of the Company.

If ever the Addressees find themselves in a situation of conflict with the interests of the Company, Addressees must immediately notify their superior or one of the management bodies and refrain from any activity related to the situation that is the source of the conflict.

In relations between the Company and third parties, Addressees must act according to ethical and legal norms, with an explicit prohibition of resorting to illegitimate favoritism, collusive practices, corruption, or the solicitation of personal advantages for themselves or others.

There is an obligation to promptly report to their superior and/or one of the management bodies any information that may suggest or foreshadow a situation of potential conflict of interest with the Company.

By way of example, and not exhaustive, the following situations may lead to conflicts of interest:

- having economic and financial interests (significant possession of shares, professional assignments, etc.), also through family members, clients, suppliers, or competitors;
- carrying out work activity, even by family members, at clients, suppliers, or competitors;
- accepting money, gifts, or favors of any nature from people, companies, or entities that are or intend to enter into business relationships with the Company;
- using one's position in the company or the information acquired in one's work in a way that could create a conflict between one's own interests and those of the company;
- buying or selling shares when, in relation to one's work, one is aware of relevant information not yet in the public domain.

2.9 Protection of intellectual property and copyright

The Company, in accordance with the principles of loyalty and fairness referred to in this Code of Ethics and due to its core business, recognizes the primary importance of intellectual property in all its forms, such as, by way of example only, trademarks, patents, and copyrights, and scrupulously respects the know-how of clients, competitors, commercial partners, or other third parties.

To this end, it commits to ensuring that these rights are respected and that behaviors suitable for causing damage to third parties and violating legal norms on the matter are not implemented. Therefore, any company activity involving the use of the intellectual property of others must take place in compliance with the principles provided herein and the provisions of the law.

Addressees are prohibited from using or altering for any purpose, the products of ingenuity or materials protected by copyright, as well as any kind of intellectual or industrial property right, without the consent of the rights holders or those who legitimately possess them.

2.10 Combating corruption and fraud

The Company repudiates corruption in all its forms and openly fights it in the management of its activity both in relations with public entities and in relations with private entities, and pays particular attention to all potentially fraudulent situations in order to prevent any illicit conduct.

Addressees are prohibited from requesting, giving, accepting gifts, compensation of any nature, offers of money, or other forms of personal utility aimed at obtaining undue real or apparent advantages, even through an intermediary, during the performance of their duties on behalf of the Company.

Excluded from this prohibition are acts of commercial courtesy, provided they are permitted by the reference legislation and of modest value, and, in any case, such as not to compromise the integrity and reputation and not to influence the independent judgment of the Addressee, and in any case that cannot be interpreted by impartial observers as acts aimed at achieving improper advantages or favors.

Addressees who receive gifts, beyond the limits of normal courtesy relations and not of modest value, must refuse them and immediately inform their superior or one of the management bodies.

2.11 Social responsibility

In the performance of its activities, the Company combines the application of the values indicated in this Code of Ethics for the achievement of increasingly competitive business results with the observance of the principle of sustainability. The Company strongly believes in the pursuit of its objectives through the promotion of human rights and fundamental freedoms, the principles of equality, transparency, solidarity, through the promotion of respect for the environment and health in the workplace, and the combating of all forms of violence.

The Company is actively committed to ensure that its work environments meet the respect of these principles and that work environments are constantly improved in relation to working standards. The Company promotes respect and trust in relations between employees and in relations between the latter and the Company, encouraging a culture of open discussion, as it believes in the centrality of the value of team spirit as an indispensable element for achieving business objectives.

The Company promotes respect for the physical, moral, and cultural integrity of the person, shuns all discrimination based on age, sex, sexuality, health status and physical integrity, race, nationality, religious and political beliefs, and the Addressees of this Code of Ethics must refrain from implementing any form of discrimination, which will not be tolerated by the Company in any way.

The Company encourages the professional growth of individuals and the assumption of responsibility by the same, aspects that it considers essential for its success and for maintaining relationships with external parties.

2.12 Proper use of company assets

Every Addressee is responsible for the protection of the resources entrusted to them and has the duty to promptly inform their manager or the management bodies of any threats or damaging events to the Company.

In particular, every Addressee must:

- operate diligently to protect company assets, through responsible behavior and in line with the operating procedures prepared to regulate their use;
- avoid improper use of company assets that may cause damage or reduction in efficiency, or in any case be contrary to the company's interest;
- obtain the necessary authorizations in the event of using the asset outside the company scope.

The growing dependence on information technology requires ensuring the availability, security, integrity, and maximum efficiency of this particular category of assets.

Every Addressee is required to:

- not send threatening or abusive emails, not resort to low-level language, not express inappropriate or undesirable comments that may cause offense to the person and/or damage to the company image;
- avoid spamming or "chain letters" that may generate data/information/process traffic within the company's telematics network that could significantly reduce the network's efficiency with negative impacts on productivity;
- not browse websites with indecent and offensive content;
- scrupulously adopt the provisions of the company's security policies, in order not to compromise the functionality and protection of information systems;
- avoid loading borrowed or unauthorized software onto company systems and never make unauthorized copies of licensed programs for personal, company, or third-party use.

The use, even involuntary, of these assets for any purpose outside of company activity, can cause serious damage (economic, image, competitiveness, etc.) to the Company, with the aggravation that improper use may entail potential criminal and administrative sanctions for any illicit acts and the need to undertake disciplinary measures against the Addressees.

When an expense report is presented, reasonable, actual, and authorized expenses will be reimbursed, according to the rules contained in the specific procedures. Receipts must always be requested, and personal expenses must be separated from those for work needs in all circumstances.

3. Rules of conduct in relationships with stakeholders

The Code of Ethics identifies and clarifies the core values and principles on which the Company bases its behaviors and conduct towards all parties with whom it relates during the performance of its activity.

3.1 Relations with clients

The Company pursues its success by offering high-quality services under competitive conditions and in compliance with regulations aimed at protecting competition and the profession.

Each Addressee, in relations with clients and in compliance with internal procedures, must promote maximum client satisfaction, providing, among other things, comprehensive and accurate information on the services provided to them, in order to encourage informed choices.

The Company ensures that the contracts stipulated with clients meet criteria of transparency, simplicity, and clarity and that misleading or unfair practices are not used.

3.2 Relations with suppliers and correspondents

The selection of suppliers, correspondents, and the formulation of conditions for the purchase of goods and services for the Company is dictated by values and parameters of competition, objectivity, fairness, impartiality, price equity, quality of the good and/or service, carefully evaluating assistance guarantees and the general range of offers.

The purchasing/assignment processes must be aimed at seeking the maximum competitive advantage for the Company and loyalty and impartiality towards every supplier and/or correspondent possessing the required qualifications. Furthermore, the collaboration of suppliers and correspondents must be pursued in constantly ensuring the satisfaction of the needs of the Company's clients in terms of quality and timing of service execution.

The stipulation of a contract with a supplier and/or correspondent must always be based on relationships of extreme clarity, avoiding, where possible, the assumption of contractual obligations that involve forms of dependence on the supplier and/or correspondent.

The Company selects suppliers and correspondents with absolute impartiality, autonomy, and independent judgment and manages relations with them according to criteria of transparency, fairness, and integrity, avoiding situations of conflict of interest, even potential ones.

In relations with the aforementioned parties, the Company, and on its behalf every professional, employee, collaborator, consultant, or more generally the Addressees, must not improperly seek to influence the decisions of the interested counterparty, in order to obtain the commission of acts that are non-compliant or contrary to official duties or loyalty obligations, in particular by offering or promising, directly or indirectly, gifts, money, favors, or utilities of any kind.

3.3 Relations with the public

Relations and interactions with the public or with external interlocutors must be conducted exclusively by individuals who have been authorized and identified for this purpose by the Company in adherence to the company policies, in order to provide appropriate protection to the Company's image. Authorized individuals must communicate with the public by providing information that meets the criteria of clarity, accuracy, and truthfulness. The Company is directly responsible for the information provided through its representatives and the promotional activities conducted by them.

Marketing activity must conform to the principles indicated in this Code of Ethics and must reflect the Company's corporate image, and individual initiatives that could prejudice the Company's standards of transparency and fairness are excluded for this purpose.

3.4 Relations with the media

The Company promotes communication through mass media and social media in compliance with the principles of transparency, accuracy, and timeliness through the delegated company and group functions.

Information towards the media must be consistent with the Company's communication principles and policies and must respect laws, rules, and practices of conduct and professional ethics.

It is forbidden to disclose false information and news.

The Company centrally manages all external relations with the media (press, social channels, TV, etc.), events, webinars, sector analysis activities, and all initiatives of this nature, to protect the value of its brand and to appropriately coordinate company communications.

The Jacobacci & Partners brand is an essential asset, in which the Company has invested for years and which differentiates it from the competition.

Individual corporate behaviors and decisions, and the corporate decisions that the Company adopts as a company, consistently accompany the brand throughout the world.

To ensure that the Company's communications are targeted and effective and to avoid violations of the law, all media and sector analyst relations activities must be coordinated by the Marketing & Communication Area.

3.5 Relations with political parties, trade unions, and associations

Any relationship with political parties and trade union organizations and their representatives or candidates must be guided by the principles of transparency, fairness, and collaboration in the interest of the Company and employees.

The Company does not provide direct or indirect contributions to political parties either in Italy or abroad, nor to their representatives or candidates.

Every employee must recognize that any form of involvement in political activities takes place on a personal basis, in their free time, at their own expense, and in compliance with the laws in force.

Furthermore, the Company does not provide contributions to organizations with which a conflict of interest may be recognized (such as trade unions, consumer protection, or environmental associations). Forms of cooperation are possible when: the purpose is traceable to the Company's mission or relates to projects of public interest; the destination of resources is clear and documentable; there is express authorization from the designated company functions.

3.6 Relations with the Public Administration and the Judicial Authority

In relations of any nature with subjects of the central or peripheral Public Administration, with public bodies, local authorities, public supervisory authorities, public officials, employees, and officials who operate on behalf of the Public Administration, the Company acts in compliance with the law and the principles of transparency, loyalty, and fairness.

It is prohibited to offer, promise, or deliver directly or indirectly to the aforementioned subjects money or goods of any utility, and likewise to establish any type of personal relationship with them aimed at generating favoritism, interference, or influence.

More generally, it is absolutely forbidden to interfere in any way and by any means in the free and autonomous decisions of public officials or public service appointees or, in any case, public employees.

The relationships between the Company and the judicial authority, supervisory authorities, law enforcement agencies, and any public official or public service appointee who holds inspection and/or investigative powers are guided by principles of loyal collaboration, fairness, transparency, and completeness, truthfulness, and verifiability of the information provided.

Gifts and acts of courtesy and hospitality towards representatives such as public officials or public service appointees are permitted when they are of modest value and, in any case, such that they cannot be interpreted by a third party as aimed at improperly acquiring advantages. In any case, this type of expense must be authorized and adequately documented.

The Addressees of this Code of Ethics must not in any way obstruct, even by omitting due communications, the exercise of the functions of the aforementioned Authorities and the correct administration of justice.

4. Relations with employees and collaborators

4.1 Value of people

The Company recognizes, protects, and promotes the value of human resources as the engine of its development and a fundamental element of its success.

There is an awareness within the Company that human resources are an indispensable element for the existence and prosperity of the business, which is committed to developing the capacity and competence of each collaborator in order to encourage individual creativity and channel their positive energy towards the pursuit of the corporate purpose.

The Company acts in compliance with the principles of protecting individual rights both in relation to their individual sphere and in relation to their relational dimension, recognizing and promoting the development of its human resources and offering opportunities for professional growth and advancement inspired by criteria of meritocracy.

In light of the above, the selection, evaluation, and enhancement of collaborators are carried out following known and consolidated practices and procedures that recognize equal opportunities for all. The Company is also very careful to use exclusively personnel employed in accordance with the contractual types provided for by the applicable legislation and national collective labor agreements.

With a view to valuing its collaborators, the Company is committed to fostering an environment and working conditions that respect the dignity of the person where professional skills can grow daily.

Therefore, forms of discrimination based on race, skin color, sex, age, religion, physical condition, marital status, sexual orientation, citizenship, ethnic origin, or any other discrimination contrary to law are not permissible within the Company.

The Company actively promotes a strong culture of safety, educating personnel on the ethics of safety in the workplace and the importance of preserving, inside and outside the professional environment, their psycho-physical health.

In this regard, the Company is committed to ensuring a high level of prevention and protection of the health of its employees by promoting the performance of sustainable activity, with particular reference to the objectives of environmental protection and energy efficiency.

With a view to valuing the importance and understanding the needs of its employees, the Company transparently and fairly supports its legitimate interests in industrial relations, encouraging constructive dialogue with trade unions, entrepreneurial, and category associations.

Any violation of this article must be immediately communicated, by anyone who noticed it, to Human Resources.

4.2 Zero tolerance

On the subject of gender equality, the Company adopts the “zero tolerance” principle towards any form of discrimination or segregation, with particular attention to distinctions related to the personal characteristics of male and female collaborators.

The protection of the psycho-physical integrity and moral dignity of each person is a priority. The Company firmly opposes any manifestation of abuse, including harassment and bullying, in every work environment.

In this sense, the Company is committed to identifying, isolating, and removing any discriminatory manifestation implemented in the workplace, believing that respect for heterogeneity and daily discussion are the essential ingredients for the economic and human growth of the company.

4.3 Harassment

The right to working conditions that respect the dignity of the person is guaranteed.

To this end, the Company ensures that acts of psychological or physical violence are not implemented in internal and external working relationships, with particular reference to physical and/or verbal abuse that may disadvantage the employee due to factors external to their abilities and competences, such as age, gender, race, ethnicity, physical or mental disabilities, genetic information, maternity, or pregnancy. This prohibition concerns any form of harassment, explicit or implicit.

In particular, behaviors aimed at inducing sexual harassment are prohibited, considered, by way of example and not exhaustive, as: proposals for private interpersonal relationships, conduct despite an express or reasonably obvious lack of welcome, which have the capacity, in

relation to the specificity of the situation, to disturb the recipient's serenity; the exploitation of one's hierarchical position in order to impose, induce, or in any way practice psychophysical sexual violence against subordinates; any phenomenon of salary or career subordination conditioned upon the acceptance of sexual favors.

4.4 Abuse of alcoholic substances, drugs, and smoking

The Company condemns any conduct aimed at endangering colleagues and/or collaborators during work activity and in the workplace. In particular, it is forbidden to work under the effects of alcohol abuse, drug abuse, or substances with a similar effect, and it is also forbidden to consume or give away drugs for any reason during the working performance.

Such conduct, in fact, seriously jeopardizes the safety of personnel, and therefore, its execution is condemned and punished.

The Company, in consideration of the desire to create a healthy and comfortable environment for its employees and visitors, has generally provided for the prohibition of smoking in the workplace. It is also the Company's responsibility to safeguard the health of its employees, raising their awareness of the negative effects of tobacco consumption on their own health and that of close colleagues, friends, and family members.

5. Implementation and control methods

The Company is required to implement this Code of Ethics and commits to disseminating it, ensuring that the principles and values contained therein are applied, and implementing the company disciplinary system in cases where there are behaviors that deviate from these guidelines.

5.1 Control and reporting of violations

It is the Company's will to disseminate a conscious culture of the importance of an adequate internal control system at all levels of its organization. In particular, the Company believes that the internal control system must favor the achievement of corporate objectives and must, therefore, be oriented towards improving the effectiveness and efficiency of production and management processes.

All Addressees, within the scope of the functions performed, are responsible for the correct functioning of the control system. Everyone must feel responsibly custodian of the company assets, material and immaterial, which are instrumental to the activity performed.

Anyone who becomes aware of violations of the principles or values referred to in this Code is required to promptly report them by following the procedures established by the Company for this purpose.

5.2 Dissemination and implementation of the Code of Ethics

The Company disseminates this Code of Ethics to all Addressees and makes the principles and values contained therein known to all parties linked to it by relationships of interest.

All Company employees, in light of their competences, in relations with external parties, must adequately inform them about the commitments and obligations imposed by the Code of Ethics, demand compliance with the obligations that directly concern their activity, and adopt the appropriate internal and, if within their competence, external initiatives in case of

non-compliance by third parties with the obligation to conform to the norms of the Code of Ethics.

In particular, to ensure the widest possible dissemination, the Company makes the Code of Ethics available on its website.

The Company also commits to conducting periodic checks regarding the actual observance of the provisions contained therein and to promoting updating activities in relation to the occurrence of changes related to the corporate structure, economic, social, and commercial realities.

5.3 Consequences of violating the Code of Ethics

The Code of Ethics constitutes an integral part of the employment relationship.

Observance of the norms of the Code of Ethics must be considered an essential part of the obligations of the Company's employees.

Violation of the norms of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, with all legal consequences, including with regard to the preservation of the employment relationship, and may lead to actions for compensation for damages caused by the violation itself.

The ascertainment of the aforementioned infractions, the management of disciplinary proceedings, and the imposition of sanctions remain the responsibility of the company functions and/or corporate bodies appointed and delegated for this purpose.

Any violations of the provisions of this Code of Ethics by professionals, collaborators, consultants, suppliers, or other third parties connected to the Company by a contractual relationship other than employment may determine the contractual remedies provided for pursuant to and for the purposes of the applicable law.

Compliance with the principles and values referred to in this Code of Ethics must be considered an integral part of the contractual obligation underlying the relationship between the Company and the Addressees in accordance with the applicable law.

5.4 Adoption and effectiveness

This Code of Ethics is adopted by resolution of the Company's Board of Directors on September 28, 2021, with immediate effect from that date.

Any update, modification, or revision to this Code of Ethics must be approved by the Board of Directors.

Turin, November 4th, 2025