

CODE OF ETHICS

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Sommario

FOREWORD	4
GENERAL PART	4
1. THE COMPANY	4
1.1 THE FIVE PILLARS OF ADVPA CONSULTING	5
1.2 CERTIFICATIONS	6
2. THE OBJECTIVES	7
2.1 ALIGNMENT WITH SUSTAINABLE DEVELOPMENT GOALS (SDGS)	8
2.2 HOW CAN ADVPA ACHIEVE THE GOALS OF THE 2030 AGENDA	9
3. DISSEMINATION OF THE CODE OF ETHICS	11
4. SCOPE OF APPLICATION	11
4.1. RECIPIENTS OF ADVPA'S CODE OF ETHICS	11
5. CODE STRUCTURE	12
SECTION I - CHARTER OF VALUES AND ETHICAL PRINCIPLES	13
1. VALUES (SDG n. 3, 5, 8, 10, 12, 16)	13
2. ETHICAL PRINCIPLES	14
2.1 LEGALITY AND INTEGRITY (SDG n. 8 e 16) (SDG n. 8 e 16)	14
2.2 TRANSPARENCY (SDG n. 12 e 16)	14
2.3 BUSINESS ETHICS (SDG n. 8 e 16)	14
2.4 PROFESSIONALISM AND SPIRIT OF COLLABORATION (SDG n. 4, 5, 8 e 10)	14
SECTION II - CODE OF CONDUCT	15
3. CODES OF CONDUCT	15
3.1 EXTERNAL RELATIONS	15
3.2 CONTRIBUTIONS, BENEFITS, OR OTHER UTILITIES (SDG. n. 16)	15
3.3 RELATIONSHIPS WITH CLIENTS, CONSULTANTS, COLLABORATORS, AGENTS (SDG n. 8, 10, 12, 16 e 17)	16
3.4 RELATIONSHIPS WITH SUPPLIERS, VENDORS, AND BUSINESS PARTNERS (SDG n. 12 e 16)	17
3.5 RELATIONSHIPS WITH PUBLIC ADMINISTRATION, INSTITUTIONS, AND PUBLIC OFFICIALS (SDG n. 16 e 17)	18

3.5.1 RELATIONSHIPS WITH POLITICAL AND TRADE UNION ORGANIZATIONS (SDGn.16e17)	20
3.5.2 COMPETITION (SDG n. 8).....	20
3.6 FIGHT AGAINST CORRUPTION (SDG n. 16).....	20
3.7. SOCIETAL COMMUNICATIONS AND SOCIAL MEDIA (SDG 12 e 16)	21
4. HUMAN RESOURCES.....	21
4.1 RECRUITMENT, DEVELOPMENT, AND PROFESSIONAL TRAINING (SDG n. 4 e 5, 8 e 10)	21
4.2 BEHAVIOR OF EMPLOYEES AND COLLABORATORS (SDG n. 8 e 10).....	22
4.3.USE OF COMPANY ASSETS AND RESOURCES (SGD n. 3, 5, 8, 9, 10, 16)	23
5. CONFLICTS OF INTEREST (SDG n. 8 e 16).....	23
6. ACCOUNTING AND INTERNAL CONTROLS (SDG n. 8, 16 e 17)	23
6.1 TRACEABILITY OF PERFORMED ACTIVITIES	23
6.2 TRANSPARENCY AND COMPLETENESS OF INFORMATION	23
6.3 MANAGEMENT OF EXTRAORDINARY OPERATIONS.....	24
6.4 SOCIAL COMMUNICATIONS AND ACCOUNTING RECORDS	24
6.5 INTERNAL CONTROLS.....	24
7. COMPANY POLICIES.....	24
7.1 ENVIRONMENTAL PROTECTION (SDG n. 7, 9, 10 e 13, 15 e 17).....	24
7.2 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE (SDG 3 e 8).....	25
8. INFORMATION AND CONFIDENTIALITY (SDG 8, 9 e 16).....	25
8.1 CONFIDENTIAL AND PRIVILEGED INFORMATION	25
8.2 CONFIDENTIALITY	26
9. THE IMPLEMENTATION RULES OF THE CODE	26
9.1 IMPLEMENTATION AND REVIEW OF THE CODE.....	26
9.2. REPORTING VIOLATIONS (SDG 16).....	27
9.3 SANCTIONING SYSTEM (SDG n. 16).....	27
9.4 THE OVERSIGHT BODY PURSUANT TO ART.6 DEL D.LGS. N. 231/2001	28
9.5 MANAGEMENT PROCESS OF REPORTS TO THE ODV WITHIN ADVPA.....	29
10. ENTRY INTO FORCE.....	30

FOREWORD

ADVPA is committed to promoting corporate social responsibility through this Code of Ethics, which defines the principles of conduct that inspire all its activities. The Code of Ethics does not replace laws or contractual norms but complements them, aware that daily reality often goes beyond legal provisions. The behaviors of organization members, especially those in positions of greater responsibility, shape the company's image and influence its success. It is fundamental, therefore, that all ADVPA employees act with integrity, honesty, and respect for all stakeholders.

Objectives of the Code of Ethics: Objectives of the Code of Ethics:

- Shape employee behavior: The Code of Ethics provides guidance for the daily actions of all company members;
- Improve internal relationships and corporate image: Promoting a positive and cohesive work environment strengthens ADVPA's reputation;
- Motivate employees and increase productivity: An ethical and transparent environment promotes employee well-being and dedication to their work;
- Build a strong reputation: Adhering to solid ethical principles strengthens the trust of customers, partners, and all stakeholders.

The Code of Ethics has been updated to conform to behavioral norms aimed at preventing the commission of crimes and any conduct contrary to the company's values. It is an integral part of the Organizational Model adopted by ADVPA in compliance with Legislative Decree No. 231 of June 8, 2001, and aligned with the Sustainable Development Goals (SDGs) of the UN's 2030 Agenda. This alignment manifests itself in the norms and guidelines that stabilize ethical behavior within the organization.

GENERAL PART

1. THE COMPANY

ADVPA S.r.l. (hereinafter referred to as "ADVPA" or "the Company") specializes in consulting and assistance in the economic, financial, organizational, managerial, accounting, and management fields for private and public entities, with specific expertise in innovation and digital transformation of the Public Administration. The Company relies on a group of experienced professionals who accompany public administrations in all stages of their processes, from defining needs to achieving objectives. ADVPA stands out for its constant commitment to ensuring high levels of professionalism and neutrality, offering its clients customized solutions and quality support. ADVPA is a company that offers innovative and customized solutions, particularly for the Public Administration, contributing to improving the quality, speed, and transparency of services provided to citizens. The company has chosen to focus its activities almost exclusively on the public sector, acquiring a deep understanding of its specificities and challenges. Thanks to a group of experts and a network of qualified

partners, ADVPA is able to provide effective and reliable support services, meeting the diverse needs of the Public Administration.

1.1 THE FIVE PILLARS OF ADVPA CONSULTING

ADVPA's consulting is based on four fundamental pillars that ensure quality service for clients and the Public Administration. These pillars are:

➤ Management Consulting

Management consulting is a service that enables the Public Administration to improve its performance and achieve expected results. By investigating the issues and potential of the context, management consultants formulate and implement tailor-made solutions based on solid experience in the public sector and its dynamics. The goal is to generate value for the Public Administration and its stakeholders, whether they are citizens, businesses, or other entities. Innovation is a determining factor in management consulting, as it allows for the adoption of new working methods and communication, both internally and externally to the organization, in order to increase the efficiency, effectiveness, and transparency of processes and services offered.

➤ Change Management Program

The management change program is a unique opportunity to transform the Italian Public Administration into a model of excellence and best practices. Thanks to the funds from NextGenEU, the Company offers tailored and integrated services involving all stakeholders in the reform process. In particular, the Company supports public administrations in:

- Introduce a results-based management approach, based on performance indicators and impact monitoring;
- Optimize organizational and operational processes, eliminating obstacles, duplications, and inefficiencies;
- Leverage the opportunities of digital technologies, improving the efficiency, quality, and security of the services offered;
- Stimulate the development of public employees' skills through specific training paths and incentives for mobility and career advancement.

➤ Digital Transformation

The Company specializes in the digital transformation of the Public Administration, with the aim of creating an efficient, interoperable, and innovative organizational system. It is committed to offering citizens and businesses quality public services that are accessible and easy to use, thanks to the use of modern and secure technological solutions.

➤ Program & Project Management

To tackle the complex and ambitious challenges that arise in the field of technological projects and transformation, the Public Administration needs a reliable and competent partner. The Company provides the Public Administration with high-level consulting services in project management, following established

methodologies and international best practices. The Company supports the Public Administration in all phases of projects, from defining objectives to planning activities, from monitoring progress to risk control, from evaluating results to change management. In this way, the Company helps the Public Administration improve project performance, increase the chances of achieving set goals, and minimize risks associated with complexity and uncertainty.

➤ Supporto al Procurement

The Company provides procurement services to the Project Manager for the implementation of public projects or interventions, both in the design and implementation phases. The Company is responsible for preparing and controlling the technical, economic, and administrative documentation required to participate in tender processes, coordinating suppliers and subcontractors, verifying the progress of works and compliance with established deadlines, costs, and quality. The Company also provides consultancy and assistance for managing any problems or disputes that may arise during the development of projects or public interventions.

1.2 CERTIFICATIONS

The Company has obtained several certifications that demonstrate its high level of excellence, quality, safety, ethics, and social responsibility. These certifications are the result of the Company's ongoing commitment to meeting the highest standards in all its activities and satisfying the expectations of its stakeholders. The Company is aware of the importance of sustainable growth, environmental protection, safeguarding workers, and promoting ethical business practices. Its certifications testify to its commitment to seek innovation, continuously improve its performance, and have a positive impact on the communities in which it operates. The Company has obtained the following UNI EN ISO certifications, which attest to the quality, efficiency, and responsibility of its services:

- **UNI EN ISO 9001:2015** - *Quality of Services*: This certification attests to the Company's commitment to providing high-quality services and its ongoing dedication to meeting customer needs through the implementation of a rigorous quality management system.
- **UNI EN ISO 14001:2015** - *Environmental Management*: This certification highlights the Company's commitment to responsible environmental management, ensuring compliance with environmental regulations and the adoption of sustainable practices in its activities.
- **UNI EN ISO 45001:2018** - *Worker Protection*: This certification testifies to the Company's commitment to the safety and health of its employees through the implementation of a safe and healthy work environment.
- **UNI EN ISO 37001:2016** - *Anti-corruption*: This certification demonstrates the Company's commitment to transparency and corporate ethics, confirming the adoption of policies and procedures aimed at preventing corruption.

- **UNI EN ISO SA8000:2014 - Sustainable Development and Social Responsibility:** This certification confirms the Company's commitment to sustainable development and social responsibility, ensuring respect for workers' rights and the adoption of ethical business practices.

These certifications represent the result of a continuous improvement journey involving all levels of the organization and are a testament to the value the Company places on quality, environment, safety, ethics, and social responsibility.

2. THE OBJECTIVES

This document defines the ethical principles and standards of conduct that inspire the Company's actions. The Company aims to act according to the values of loyalty, fairness, transparency, compliance with laws, and safeguarding the interests of its customers, collaborators, and stakeholders, dedicating constant care to the valorization of human resources. The decision to focus its activities on the public sector allows ADVPA to guarantee high standards of professionalism, impartiality, and integrity in the provision of its assistance services. This strategic decision demonstrates the Company's commitment to providing specific and effective added value to public institutions, contributing to the improvement of public services offered and the achievement of institutional objectives. ADVPA aims to provide qualified and transparent assistance to private entities and public administrations, respecting the ethical, moral, and legal principles that guide its actions. ADVPA aims to:

- Safeguard the legitimate interests of clients and public administrations by offering high-level, honest, and clear consultancy to facilitate the smooth functioning of institutional activities;
- To meet the specific needs of Public Administrations and customers, with the aim of improving the quality of the public services provided and achieving organizational goals.
- Accompanying members and all employees in the development of essential professional competence to provide specialized consulting services compliant with regulations and best practices in both the Public Administration and private sectors.

ADVPA has embarked on a significant path of change based on the Code of Ethics. This document, which previously had a predominantly regulatory and disciplinary role, has become an authentic management tool. The Code of Ethics guides the decisions and behaviors of employees and all individuals interacting with the Company, with a perspective of responsibility and honesty. The Code of Ethics is also at the center of specific awareness and training initiatives involving all organizational levels and different business areas. These initiatives aim to promote discussion and reflection on ethical issues, as well as to gather suggestions and proposals for potential revisions of the Code. For ADVPA, ethical management is not just a matter of rules and regulations, but also of values and principles. The Company believes that to make effective decisions, it is necessary to consider not only economic aspects but also ethical ones. This applies to both long-term strategic choices and short-term operational decisions that every employee must face daily in their work environment or personal sphere. The objective of the Code of Ethics is therefore to promote an ethical culture within the

Company and, at the same time, to establish a constructive and transparent dialogue with all stakeholders. In this way, ADVPA aims to create an ethical and responsible working environment, contributing to the realization of a sustainable future for all.

The *mission* of ADVPA is to position itself as a strategic partner for the Public Administration, committing to offer tailored and high-quality consulting solutions. At the heart of its mission are also the employees and professionals who collaborate with the Company in various capacities, to whom a fundamental role is attributed in business excellence by enhancing their skills, motivation, and passion, thus making them an integral part of the Company's successes and results. In this perspective, ADVPA commits to providing a stimulating and rewarding work environment where everyone can fully develop their potential and feel part of a cohesive and dynamic team. For ADVPA, ethical management is a key element of its identity and strategy. The Company is guided by values and principles that direct its operations in every area and at every level, aiming to create shared value for all stakeholders. Therefore, ADVPA has adopted a Code of Ethics that defines the ethical principles and rules of conduct to be respected by all those who work for or with the Company, both internally and externally. The Code of Ethics serves as a reference point for the decisions and actions of all employees and collaborators of ADVPA, who are called to operate with integrity, professionalism, and responsibility, in compliance with laws, regulations, and best practices. The Code of Ethics also serves as a tool for communication and dialogue with clients, suppliers, partners, institutions, and the community, through which ADVPA intends to convey its vision, mission, and values.

- *Customers*: meet their needs and exceed their expectations by offering quality, innovative, and effective services.
- *Employees*: recognize their contribution, encourage their development, and ensure their well-being.
- *Shareholders*: ensure the economic, financial, and social sustainability of the Company, in accordance with ethical principles.
- *Community*: contribute to improving the economic, social, and environmental conditions of the communities in which it operates.
- *Suppliers*: regard them as key elements of the value chain and as partners in business growth.

2.1 ALIGNMENT WITH SUSTAINABLE DEVELOPMENT GOALS (SDGS)

The Code of Ethics of ADVPA is inspired by the United Nations Sustainable Development Goals (SDGs) of the 2030 Agenda, which represent a shared vision for a fairer, more peaceful, and prosperous world. The Code of Ethics establishes the rules and guidelines that guide the ethical behavior of members of the organization, both individually and collectively. Each rule and guideline of the Code of Ethics aims to support one or more of the SDGs.

The Code of Ethics of ADVPA is based on six essential ethical principles, which are consistent with the 17 Sustainable Development Goals (SDGs) of the United Nations' 2030 Agenda. These principles are:

1. **Integrity and honesty:** Act with integrity, honesty, and loyalty in all situations and with all stakeholders. Promote transparency and accountability in all business operations. Oppose any form of corruption, abuse, or coercion.
2. **Respect for human rights:** respect and protect the human rights of all individuals, in line with the Universal Declaration of Human Rights. Do not engage in any form of discrimination based on race, ethnicity, gender, religion, nationality, political opinion, or any other personal condition. Safeguard the rights of workers, including labor rights and the prohibition of child and forced labor.
3. **Environmental sustainability:** Take responsibility for the environmental impact of our activities and implement actions to minimize that impact. Promote the rational use of resources and conservation of biodiversity. Support the fight against climate change.
4. **Social responsibility:** Contribute to the sustainable development of the communities in which we operate. Promote the health and well-being of our employees and collaborators. Support solidarity and volunteer projects.
5. **Equity and inclusion:** Promote diversity and inclusion within the company. Ensure equal opportunities for all employees and collaborators. Combat all forms of discrimination and harassment.
6. **Ethical governance:** Adopt an effective and transparent corporate governance system that ensures compliance with regulations, rights, and expectations of all stakeholders. Ethical governance is based on shared values such as integrity, responsibility, sustainability, and participation. These values guide the decisions and actions of the company, contributing to creating value for the common good.

2.2 HOW CAN ADVPA ACHIEVE THE GOALS OF THE 2030 AGENDA

By positioning itself as a strategic consultant for the Public Administration (PA), ADVPA can play a key role in achieving the Sustainable Development Goals (SDGs) of the United Nations' 2030 Agenda. (<https://unric.org/it/wp-content/uploads/sites/3/2019/11/Agenda-2030-Onu-italia.pdf>)

ADVPA can achieve the objectives of the 2030 Agenda through the following activities:

1 ***Promotion of environmental sustainability:***

- ✓ Assisting the PA in designing and implementing policies and plans for reducing greenhouse gas emissions, increasing energy efficiency, and promoting renewable energy.
- ✓ Providing consultancy on sustainable management of natural resources and biodiversity protection.
- ✓ Assisting the PA in procuring sustainable goods and services.

2 ***Promotion of inclusive and sustainable economic growth:***

- ✓ Providing consultancy for the development of economic growth strategies that promote the creation of decent jobs and reduce disparities.
- ✓ Assisting the PA in designing and implementing programs to support businesses and innovation.
- ✓ Promoting social inclusion and access to services for all.

3 *Promotion of ethical governance:*

- ✓ Providing consultancy on transparency, accountability, and combating corruption in the Public Administration.
- ✓ Assisting the Public Administration in strengthening its management and control capabilities.
- ✓ Promoting citizen participation in the decision-making process.

4 *Promotion of access to justice and security:*

- ✓ Providing consultancy for the reform of the judicial system and access to justice for all.
- ✓ Assisting the Public Administration in the fight against organized crime and terrorism.
- ✓ Promoting security and social cohesion.

5 *Promotion of quality education:*

- ✓ Providing consultancy for the reform of the education system and access to quality education for all.
- ✓ Assisting the Public Administration in developing training programs for public employees.
- ✓ Promoting innovation and research in the field of education.

6 *Promotion of health and well-being:*

- ✓ Providing consultancy for the reform of the healthcare system and access to healthcare for all.
- ✓ Assisting the Public Administration in promoting healthy lifestyles and disease prevention.
- ✓ Promoting mental health and the well-being of citizens.

7 *Promotion of gender equality:*

- ✓ Providing consultancy for promoting gender equality in the Public Administration and society.
- ✓ Assisting the Public Administration in developing support programs for women and girls.
- ✓ Promoting the fight against gender discrimination.

8 *Promotion of international cooperation:*

- ✓ Collaborating with other international organizations for the development and implementation of development cooperation projects.
- ✓ Promoting the exchange of knowledge and best practices among different Public Administrations.
- ✓ Supporting the participation of the Public Administration in international forums.

In addition to these actions, the Company, besides developing and implementing its own Code of Ethics in line with the Agenda 2030, aims to:

- Measure and report its impact on sustainability.
- Provide training to its employees on the principles of the agenda 2030.
- Raise awareness among its clients about the importance of sustainability.

3. DISSEMINATION OF THE CODE OF ETHICS

ADVPA is committed to disseminating the Code of Ethics among all its members, employees, and collaborators. This commitment also extends to all stakeholders with whom it interacts. The goal is to promote a corporate culture based on shared values of integrity, transparency, and respect. Every member, employee, and collaborator is required to be familiar with the content of the code and is personally responsible if their conduct does not conform to it. The responsibility for disseminating the Code of Ethics and for any initiatives aimed at promoting its compliance lies with all members operating within the Company.

To ensure the effectiveness and dissemination of the Code of Ethics, ADVPA has planned a series of actions. These include conducting informative programs, organizing training sessions, promoting initiatives to convey the importance of the Code of Ethics, ensuring constant and transparent communication of the Code of Ethics, fostering an ethical culture, and actively involving members in the dissemination and implementation of the Code of Ethics. The Code of Ethics is also published on the company's website, making it easily accessible to all interested parties. For any inquiries or information regarding the contents of the Code of Ethics, you can contact ADVPA at the email address: odv@advpa.it.

4. SCOPE OF APPLICATION

The provisions of ADVPA's Code of Ethics apply to all those who, in various ways, operate in the interest of the Company, including customers, suppliers, and stakeholders. The principles and rules of the Code of Ethics must be interpreted in accordance with current legal regulations. At the company level, they are implemented through policies, protocols, and corporate procedures, including those of the Organizational Model pursuant to Legislative Decree 231/01. ADVPA requires all stakeholders to respect and adhere to the principles, guidelines, and procedures established by the Company. To ensure this, the Company includes contractual clauses that may also provide for the immediate termination of the contract in case of violations of the principles of the Code of Ethics. Furthermore, ADVPA establishes that no one can commit the Company with third parties without authorization, which can only be granted through a special power of attorney or a delegation of powers conferred by the Administrator.

4.1. RECIPIENTS OF ADVPA'S CODE OF ETHICS

The Code of Ethics of ADVPA is addressed to all parties who, in various capacities, come into contact with the Company.

1. **Employees and collaborators** for whom the Code of Ethics serves as a guide for daily behavior and applies to all members of the company, from executives to permanent or temporary collaborators, regardless of their contractual form or status with the Company. Respecting ethical principles is fundamental for professional growth and well-being within the work environment.
2. **Administrators and oversight bodies**: The Code of Ethics defines the principles of conduct that inspire the actions of the Administrator and oversight bodies, ensuring integrity and transparency in corporate

decisions. Respecting ethical principles is fundamental for corporate governance and the protection of corporate interests.

3. **Customers and suppliers:** The Code of Ethics represents a commitment to customers and suppliers to build relationships based on trust, fairness, and reciprocity. ADVPA is committed to conducting its business in a responsible and transparent manner, ensuring high-quality service that respects ethical principles.
4. **Partners and stakeholders:** The Code of Ethics communicates the values and principles that guide ADVPA's operations to all partners and stakeholders, strengthening the company's reputation and mutual trust. Collaboration with partners who share the same ethical principles is essential for the company's sustainable growth.
5. **Public Administration:** The Code of Ethics represents a commitment to transparency and fairness towards the Public Administration, with which ADVPA collaborates on sustainable development projects.

Respecting ethical principles is essential for building a trusting relationship with the Public Administration. In summary, ADVPA's Code of Ethics is addressed to all those who, directly or indirectly, interact with the Company, defining a common framework for ethical and responsible behavior. Adherence to this Code of Ethics is fundamental for the reputation, growth, and success of ADVPA.

5. CODE STRUCTURE

The present Code of Ethics is structured into two sections.

- **Section I - Charter of Values and Principles.**

This section articulates the ethical values and principles that the recipients of the Code must draw inspiration from in carrying out their activities. Alongside each of these ethical values and principles, the corresponding numbers of the Sustainable Development Goals (SDGs) of the United Nations' 2030 Agenda are indicated.

- **Section II - Code of Conduct.**

This section identifies specific behavioral rules that the recipients of the Code must adhere to. Also in this section, the behavioral rules are linked to the numbers of the relevant SDGs, for the reasons highlighted above. Therefore, ADVPA's Code of Ethics not only guides ethical behavior within the organization but also underscores the role of the Company in contributing to the achievement of the United Nations Sustainable Development Goals, strengthening ADVPA's commitment to sustainability and social responsibility.

SECTION I - CHARTER OF VALUES AND ETHICAL PRINCIPLES

1. VALUES (SDG n. 3, 5, 8, 10, 12, 16)

1.1. ENHANCEMENT OF PEOPLE AND THE WORKING ENVIRONMENT

ADVPA recognizes the fundamental importance of the people who contribute every day with their work and commitment to the development of the company and the achievement of set objectives. The company considers it essential to respect the fundamental rights of every individual and their physical, cultural, and moral integrity at all times during their activity. It acknowledges the fundamental value of cultural diversity and individual talents and ensures equal opportunities for all without distinction of sex, race, language, religion, political, and social opinions.

For ADVPA, valuing people means:

creating a work environment that ensures all individuals are treated with dignity and where individual characteristics do not lead to discrimination, conditioning, or limitations.

promoting the development of talents and skills of each employee or collaborator.

rewarding merit and commitment of each individual impartially and fairly, without favoritism.

In managing hierarchical relationships, the company requires that authority be exercised with fairness, prohibiting any behavior that may compromise the personal dignity and professionalism of the collaborator in any way.

Finally, the company commits to ensuring respect for privacy, especially concerning information related to the private sphere and the opinions of each of its employees, and more generally, all those who interact with it.

1.2. TRUST

ADVPA recognizes trust as a fundamental element for its inception, growth, and development. This trust comes from those who have believed and continue to believe in the company's projects, providing capital, passion, ingenuity, as well as their own skills and abilities. Furthermore, trust has been demonstrated by the Public Administration (PA), which relies on ADVPA's professional services, confident in the quality, reliability, flexibility, and seriousness of its professionals. For ADVPA, the trust relationship among the Company, the administrators, executives, staff, and collaborators, aimed at utilizing capabilities, resources, and information, is a fundamental and necessary asset for achieving the company's objectives and interests. Everyone operating on behalf of ADVPA (shareholders, administrators, executives, employees, collaborators, members of control bodies) must avoid situations or activities that could lead to conflicts of interest with those of ADVPA itself or that could compromise their independence of judgment and action when actions or choices need to be taken. This commitment is essential for maintaining integrity and transparency within the organization.

2. ETHICAL PRINCIPLES

2.1 LEGALITY AND INTEGRITY (SDG n. 8 e 16) (SDG n. 8 e 16)

ADVPA emphasizes the importance of complying with laws and regulations not only at the national level but also in all countries where it may operate. All those acting on behalf of the Company must respect the rules of the relevant legal system, whether national, supranational, or foreign, and refrain from violating laws, regardless of the potential legal consequences. Each recipient undertakes to diligently acquire the necessary knowledge of the applicable legal norms related to their duties. In addition to the general principles of diligence and loyalty, as indicated in Article 2104 of the Civil Code, recipients must also observe the behavioral prescriptions contained in the applicable collective agreements and maintain conduct inspired by moral integrity, transparency, as well as the values of honesty and good faith. All those acting on behalf of the Company must respect the rules of the legal system and refrain from violating laws, regardless of the potential legal consequences.

2.2 TRANSPARENCY (SDG n. 12 e 16)

ADVPA conducts its activities with transparency and commits to providing information that is complete, understandable, and accurate. This enables stakeholders to make autonomous and informed decisions, considering the involved interests, available alternatives, and relevant consequences.

Furthermore, ADVPA undertakes to verify available information about its suppliers and business partners in advance. This is to ascertain the respectability and legitimacy of their operations before establishing business relationships with them.

2.3 BUSINESS ETHICS (SDG n. 8 e 16)

The company operates in accordance with the principles of transparency and fairness towards its customers and partners, ensuring the quality of the services offered and the competitiveness of its proposals. The company commits not to engage in unlawful or unethical conduct that may prejudice the interests of other market operators or undermine the trust of consumers and institutions, or that may promote its own positioning at the expense of others.

2.4 PROFESSIONALISM AND SPIRIT OF COLLABORATION (SDG n. 4, 5, 8 e 10)

Professionalism, diligence, and collaboration are the fundamental values that guide the activities of every recipient of this code. Each recipient is expected to carry out their tasks and functions with competence, commitment, and responsibility, striving to achieve the objectives set by the Company. Additionally, each recipient is required to keep their knowledge and skills constantly updated and to promote teamwork and cooperation among the various parties involved in a project or business process. The conduct of each recipient must be consistent with these values, both within and outside the work environment.

SECTION II - CODE OF CONDUCT

3. CODES OF CONDUCT

ADVPA richiede ai destinatari di rispettare la legalità e l'etica in tutte le loro attività, evitando di favorire o incoraggiare qualsiasi azione, diretta o indiretta, che possa portare o contribuire a un ingiusto o illecito vantaggio economico o di altro tipo per sé o per altri o che abbia lo scopo di sostenere o facilitare interessi illegittimi o illeciti propri o altrui.

A tal fine, la Società ha stabilito precise norme di comportamento riguardanti:

- norme di condotta nei confronti degli stakeholder;
- norme di condotta nei confronti della comunità sociale e professionale.

3.1 EXTERNAL RELATIONS

ADVPA requires recipients to respect legality and ethics in all their activities, avoiding favoring or encouraging any action, direct or indirect, that may lead to or contribute to an unfair or unlawful economic advantage or otherwise for themselves or others or that aims to support or facilitate illegitimate or unlawful interests, whether their own or others'.

To this end, the Company has established specific rules of conduct regarding:

- Conduct rules towards stakeholders.
- Conduct rules towards the social and professional community.

3.2 CONTRIBUTIONS, BENEFITS, OR OTHER UTILITIES (SDG. n. 16)

Recipients must refrain from giving or receiving, directly or indirectly, any form of gift, benefit, or advantage (including in the form of money, goods, or services) that may compromise, or appear to compromise, their impartiality in business decisions regarding anyone with whom the company has commercial dealings. Only gifts that fall within the bounds of normal business courtesy and cannot be construed as a means to obtain or grant unlawful or immoral favors, either by the recipient or by a third-party observer, are permissible. A recipient who finds themselves in a conflict of interest situation due to a gift, or a proposed gift, not compliant with the above, must notify their immediate superior in writing if they are an employee or collaborator, or the Compliance Officer if they are a Manager or Corporate Officer, for appropriate assessment and actions.

3.2.1 LIBERALITY AND SPONSORSHIPS (SDG n. 8, 9, 10, 11 e 17)

ADVPA, if deemed appropriate, may support initiatives of non-profit organizations that have clear statutory and constitutional documentation and that present a high cultural or social value or involve widespread citizen participation, in compliance with current laws and the principles of this Code of Ethics. Sponsorship activities may encompass sectors such as social causes, environment, sports, entertainment, and the arts, and are intended only for events that ensure quality or for which the Company can contribute to the planning to ensure originality and effectiveness.

In choosing initiatives to support, ADVPA pays particular attention to avoiding any potential conflicts of interest of a personal or corporate nature. The Company prohibits the provision of liberalities and sponsorships that may constitute favors to private individuals or representatives of the Public Administration in exchange for economic benefits or preferential treatment.

3.3 RELATIONSHIPS WITH CLIENTS, CONSULTANTS, COLLABORATORS, AGENTS (SDG n. 8, 10, 12, 16 e 17)

The Company bases its conduct on principles of loyalty, fairness, integrity, and transparency in its relationships with clients, suppliers, consultants, collaborators, agents, and business partners, in accordance with the rules of conduct established in this Code.

In dealing with these parties, it is required to:

- Establish relationships only with counterparts who have a good reputation, operate legally, and share the company's ethical values, including through a preliminary verification of available information about them.
- Ensure clarity in agreements and refrain from entering into secret agreements or arrangements contrary to the law.
- In particular, for the selection of consultants, collaborators, and agents for the purchase of goods or services, the Company ensures that such activity is based solely on objective criteria of quality, convenience, price, competence, and efficiency, enabling the establishment of a relationship of trust with these entities.

ADVPA bases its business activity and conduct on quality, understood not only as excellence in the services offered but also as attention to the specific needs of clients and their stakeholders. The company is committed to establishing professional relationships of trust by providing transparent, comprehensive, accurate, detailed, truthful, and understandable information, enabling clients to make autonomous and informed decisions.

In managing relationships with its clients, the Company in particular commits to:

- Formalize, in a transparent and clear manner, the key aspects related to commercial negotiations; operate with diligence and care in the interest of the client.
- Faithfully and diligently adhere to the fulfillment of obligations agreed upon in commercial negotiations and contractual constraints.
- Provide high-quality services efficiently and courteously, satisfying or exceeding the reasonable expectations and needs of the client.
- Provide clear and simple information that is complete, accurate, and comprehensive, enabling the client to make informed decisions.
- Not treat clients arbitrarily or unequally, differentiating them based on economic importance or the size of the order.
- Adhere to truthfulness in advertising or other communications.

- Not discriminate against third parties (be they collaborators, suppliers, or beneficiaries of services) based on religious, political, ethnic beliefs, or sexual preferences.
- Adopt a behavior characterized by availability, respect, and courtesy, aiming for a collaborative relationship and high professionalism.
- Refrain from accepting gifts, favors, money, or any other form of utility from clients, as further specified in point 3.2.
- Avoid any situations of conflicts of interest, as further specified in the subsequent point 5.
- During the initial phase of establishing contractual relationships with new suppliers, consultants, collaborators, agents, and business partners, and in the management of existing ones, it is prohibited to:
- Engage in relationships with individuals involved in illegal activities, criminal organizations, particularly those connected to arms and drug trafficking, money laundering, and terrorism, and in any case, with individuals lacking the necessary requirements of seriousness and commercial reliability.
- Maintain financial relationships with entities that, directly or indirectly, hinder human development and contribute to violating fundamental human rights (e.g., by exploiting child labor, promoting sex tourism, etc.).
- Engage in relationships with entities that do not comply with health and safety regulations in the workplace.
- Use confidential information for purposes unrelated to the exercise of one's consultancy activity and/or beyond the limits prescribed by current regulations.
- Request and/or accept, directly or indirectly, forms of gifts as specified in point 3.2.

3.4 RELATIONSHIPS WITH SUPPLIERS, VENDORS, AND BUSINESS PARTNERS (SDG n. 12 e 16)

ADVPA adopts an ethical, transparent, and respectful behavior towards internal procedures in its relationships with suppliers, vendors, and business partners. The company is committed to establishing lasting relationships that ensure mutual satisfaction of needs while maintaining the professional nature of the relationship.

Employees of ADVPA are required not to abuse their position, role, or powers within the company to exert undue pressure on third parties or to improperly influence the conduct of assigned activities. The abuse of one's professional position is considered misconduct, for which not only the individual committing the offense may be prosecuted but also anyone who encourages such behavior.

ADVPA establishes relationships with suppliers, vendors, and business partners who have a respectable reputation, are engaged only in lawful activities, and whose corporate ethics are comparable to those of the company.

The selection of suppliers is made based on objective criteria of cost-effectiveness, suitability, and efficiency. The choice of suppliers based solely on subjective or personal grounds, or in contradiction with the interests of the Company, is precluded.

In this perspective, the Company, in managing relationships with suppliers, vendors, and business partners, commits to:

- Assign tasks/orders according to objective criteria, adhering to the principles of impartiality, transparency, and independence.
- Establish transparent, fair, and collaborative relationships to create a solid foundation for mutually beneficial and long-lasting relationships.
- Regulate and articulate mutual commitments through clear and comprehensive contracts.
- Verify that suppliers, vendors, and business partners have a respectable reputation and meet requirements of competence, professionalism, honesty, and moral integrity.
- Ensure that third parties are engaged only in lawful activities and adhere to ethical principles not in conflict with those of the Company.
- Guarantee maximum transparency of agreements, avoiding the subscription of secret agreements or pacts contrary to the law.
- Avoid deriving undue advantage from contractual dependency relationships in which suppliers, vendors, and business partners may find themselves due to their insufficient information about the Company's activities, especially concerning long-term relationships or performances advanced in comparison to payments and investments by the supplier.
- Refrain from accepting gifts, favors, money, and any other form of utility as outlined in point 3.2.

3.5 RELATIONSHIPS WITH PUBLIC ADMINISTRATION, INSTITUTIONS, AND PUBLIC OFFICIALS (SDG n. 16 e 17)

ADVPA is committed to maintaining fair, honest, and transparent relationships with Public Institutions, both national and international, with which it interacts in carrying out its activities. ADVPA respects the laws and ethical principles governing relationships with Public Institutions and refrains from any actions that may compromise their independence, integrity, and reputation. ADVPA interacts with Public Institutions only through duly authorized and delegated individuals, in accordance with internal provisions and applicable regulations. ADVPA cooperates with Public Institutions in an open, collaborative, and transparent manner, recognizing and valuing their role and authority.

ADVPA strongly condemns all forms of corruption, extortion, or conflicts of interest and adopts all appropriate measures to prevent and avoid such phenomena. In particular, in relationships with representatives, executives, officials, or employees of Public Institutions, both domestic and foreign, the following are expressly prohibited:

- Seeking and establishing personal relationships of favoritism, improper influence, and undue interference capable of directly or indirectly conditioning the decisions of the counterpart.
- All behaviors aimed at generating any opportunity for employment or other forms of collaboration and any other activity that may personally benefit the representative of Public Institutions.

- Offering or promising money, goods, or other utilities to representatives, executives, officials, or employees of Public Institutions, or to their relatives, unless they are gifts or items of modest value and are appropriate in nature, compliant with prevailing customs in the particular regulatory and social context, and with applicable laws.
- Offering or accepting any object, service, performance, or favor of value to obtain or grant preferential treatment in relation to any relationship maintained with Public Institutions.
- Actions aimed at soliciting or obtaining from Public Institutions confidential information beyond what is permitted by law.

In addition, ADVPA commits to not conceal, through fraudulent means, in whole or in part, detrimental facts related to its financial or asset situation. Anyone, in any capacity, who receives requests or offers, explicit or implicit, during the performance of tasks and activities on behalf of the Company, is required to promptly inform their superior or contact person and the Compliance Officer, and to suspend all dealings with the involved party until specific instructions are received.

In commercial dealings with the Public Administration, including participation in public tenders, ADVPA always operates in accordance with the law and proper commercial practice. It is not allowed to use or present false statements or documents, induce deception through tricks or deceit to procure unjust profit for the Company, manipulate the functioning of a computer or telematics system, offer or promise gifts, money, or any form of utility to induce the performance of an official act or acts contrary to official duties, offer, promise, or pay sums of money or any form of utility to obtain the awarding of public contracts, or solicit or obtain confidential information that may compromise the integrity or reputation of both parties (see point 3.2). ADVPA commits to not exploit or unduly boast about existing or asserted relationships with a public official or a public service appointee for the purpose of giving or promising, to oneself or others, money or other utilities, even as the price of one's own illicit mediation. Furthermore, it commits to not disclose facts that are not true, even if subject to evaluation regarding the economic, financial, or asset situation of the Company, or to conceal, through other fraudulent means, in whole or in part, facts to be communicated concerning the same situation.

In its relationship with the Judiciary Authority, the Company commits to respecting the principles of loyalty, fairness, and transparency, avoiding any behavior that could compromise the impartiality and efficiency of the judiciary function. The Company does not tolerate any form of pressure, influence, or interference towards anyone called upon to testify or provide information in a criminal proceeding involving the Company, nor any attempt to induce such individuals to omit their statements or make false statements. The Company scrupulously adheres to the current regulations concerning the administration of justice and collaborates with the competent authorities to ensure compliance with the law and the protection of its interests.

3.5.1 RELATIONSHIPS WITH POLITICAL AND TRADE UNION ORGANIZATIONS (SDGn.16e17)

Company representatives, or individuals delegated by them, are the only ones authorized to manage relationships with political and trade union organizations, in compliance with this Code, the Company's Statute, and relevant laws. In particular, they must act with impartiality and independence.

It is not permitted in any way to finance political parties or their representatives.

3.5.2 COMPETITION (SDG n. 8)

The Company is committed to respecting the rules of fair competition and antitrust regulations, as it believes that competition is an essential factor for the growth and economic and social well-being of the country. For this reason, the Company conducts its activities in a manner that ensures the general conditions for the freedom of economic initiative, allowing operators to participate in the market and compete on equal terms. The Company also fosters customer loyalty by promoting cost reduction and improvement in service quality resulting from free competition.

The Company provides transparently and promptly all information requested by the Antitrust Authority and regulatory bodies within the scope of their supervisory functions and actively cooperates during investigative proceedings. To avoid violating competition laws, the Company acts solely based on its strategic and commercial decisions, determining its policies autonomously and independently from those of its competitors. Employees and collaborators have the duty to report to their supervisor, and Managers and Company Representatives have the duty to report to the competent Oversight Body, any behaviors contrary to the above prohibitions. The provision of the Company's services must occur solely based on the merits and benefits they offer. This Code does not permit the false defamation of competitors or their products and services.

3.6 FIGHT AGAINST CORRUPTION (SDG n. 16)

The Company, in line with the values of integrity and responsibility, endeavors to take all necessary actions to prevent and combat phenomena of public and private corruption. This Code of Ethics constitutes the reference document where the principles of behavior to be followed are outlined in order to reduce the risk of violations of the various laws and regulations concerning corruption, and it is adopted to promote the creation of sustainable value through professionalism, legality, morality, dignity, and equality. In cases where there are aspects not regulated by laws and regulations, recipients, third parties involved and interested parties are required to adhere to the principles and guidelines contained in this document. The Company commits to:

- Adopting an anti-corruption management system appropriate to its size and characteristics.
- Providing its employees with adequate training on the risks of corruption and measures to prevent it.
- Reporting any suspicions of corruption to the competent authorities.

The Company has implemented a whistleblowing system that allows employees to anonymously report any suspicions of corruption.

3.7. SOCIETAL COMMUNICATIONS AND SOCIAL MEDIA (SDG 12 e 16)

All corporate communications managed through media channels are guided by respect for the right to information and the principles of transparency, correctness, and timeliness; under no circumstances are false or tendentious news, information, rumors, or comments permitted to be disclosed. Each communication activity is exclusively managed by officially appointed Managers; relations with the press are solely maintained by the Administrator (unless specific authorizations and/or delegations are granted), in full compliance with laws, rules, and professional conduct practices. ADVPA commits to using social media according to principles of transparency, correctness, and responsibility to ensure the protection and preservation of the Company's image and reputation, as well as that of its employees.

4. HUMAN RESOURCES

4.1 RECRUITMENT, DEVELOPMENT, AND PROFESSIONAL TRAINING (SDG n. 4 e 5, 8 e 10)

ADVPA recognizes that human resources are a fundamental factor for its existence and development: interpersonal relationships within the Company are based on principles of respect, loyalty, and transparency, and remuneration and career opportunities are fairly defined for all employees. In the selection and management of personnel, the Company adopts criteria of merit, competence, and evaluation of individual skills and potential. The Company does not establish any employment relationship or collaboration with individuals lacking a valid residence permit, or in violation of generally applied labor standards or national regulations.

ADVPA allows the hiring of spouses, relatives, or partners of employees, but with the obligation for the employee to inform their Managers.

The Company values and aims to develop the skills and abilities of each human resource, including through the organization of training and professional development activities. Each recipient diligently carries out these activities and reports any needs for further or specific activities to enable the adoption of necessary initiatives by the Company.

Each recipient must pay the utmost attention to carrying out their activities, strictly observing all established safety and prevention measures, to avoid any possible risk for themselves and their collaborators and colleagues. The responsibility of each recipient towards their collaborators and colleagues requires the utmost care in preventing the risks of accidents and the onset of occupational diseases. Every recipient must adhere to the instructions and directives provided by the entities to whom the Company has delegated the fulfillment of obligations regarding safety.

Any and all forms of harassment - psychological, physical, sexual - towards executives, employees, collaborators, suppliers, and visitors are prohibited. Harassment refers to any form of intimidation or threat (including non-verbal, derived from repeated behaviors over time or from different individuals) that obstructs

the peaceful performance of duties or the abuse by a hierarchical superior of their position of authority. In particular, any and all forms of mobbing are prohibited according to the concept elaborated over time by the prevailing Italian jurisprudential orientation and/or of the country in which the Company operates.

The mere proposition of increases in remuneration, other benefits, or career progression, as a counterpart to activities contrary to laws, the Code of Ethics, and internal rules and regulations, is also prohibited, even within one's competence. Any act of retaliation against those who refuse, complain about, or report the behaviors and facts described above is prohibited as well.

4.2 BEHAVIOR OF EMPLOYEES AND COLLABORATORS (SDG n. 8 e 10)

ADVPA requires its employees and collaborators to adhere to a series of guidelines during their activities:

- They must maintain respectful behavior towards the Company and clients, in order to safeguard the image and contribute to the company's enhancement.
- They must conduct themselves in a manner that respects individuals, the good name of the Company, and its working environment.
- They must ensure order and respect in the use of company spaces and take care of the company's entrusted assets.
- They must uphold a respectful conduct towards the rights and personality of colleagues, collaborators, and third parties.
- They must not use the name, trademarks, creations, and intellectual property of the Company for personal purposes.
- They must not disclose methodologies, processes, and work documents externally.
- They must refrain from deriving personal benefit from acts or information they become aware of during the performance of their duties.
- They must avoid situations of conflict of interest arising from their activities (see also the subsequent point 5).
- In the case of business trips, travel must have purely work-related purposes and should not be considered as rewards or incentives of any nature.
- They must seek approval from their Supervisor for business lunches and dinners, for the acceptance and sending of promotional material, and for participation in training and demonstration activities.
- If a collaborator receives complimentary products, tickets to shows, trips, or other forms of reward from current or potential suppliers, they must immediately inform their Supervisor; small gifts or products omitted from the aforementioned category may be accepted as acts of business courtesy, provided they are of a value that does not compromise the integrity and reputation of the Company.

4.3. USE OF COMPANY ASSETS AND RESOURCES (SGD n. 3, 5, 8, 9, 10, 16)

Company assets and resources are solely intended for the execution of company activities or those authorized by the function manager. They must be used efficiently and appropriately to preserve their value in compliance with current regulations, avoiding alterations or damage. It is not allowed to use company assets and resources for personal purposes, in conflict with the interests of the Company, or for purposes contrary to laws, public order, or good manners, as well as to commit or promote the commission of crimes. Each employee is responsible for the custody of the assigned resources, their security, avoiding fraudulent or improper use that may cause damage or reduce efficiency, or conflict with the interests of ADVPA.

5. CONFLICTS OF INTEREST (SDG n. 8 e 16)

In adherence to ethical and transparency principles, the Company commits to preventing and managing situations of conflict of interest, both actual and potential, which could compromise the fairness and independence of corporate decisions.

Recipients act within their collaboration in line with the Company's objectives and interests. Every recipient is obligated to promptly and fully disclose any conflict of interest situations to their respective Manager if an employee or collaborator, or to the Oversight Body if a Manager or Company Representative, concerning the Company and/or its affiliated companies, and in any other circumstance where significant reasons of opportunity exist.

The legislation on conflicts of interest for members of administration and control bodies remains in force according to the law.

6. ACCOUNTING AND INTERNAL CONTROLS (SDG n. 8, 16 e 17)

6.1 TRACEABILITY OF PERFORMED ACTIVITIES

To ensure transparency and accuracy in operations, each recipient is required to maintain comprehensive and accurate documentation of all activities performed. This is done to demonstrate and justify the reasons and characteristics of the operations during approval, execution, recording, communication, and control phases.

6.2 TRANSPARENCY AND COMPLETENESS OF INFORMATION

The Company commits to communicate clearly, accurately, promptly, and consistently the information regarding its activities, economic and financial situation, objectives, and strategies, in accordance with the principles of completeness, truthfulness, transparency, comprehensibility, and accuracy. This is aimed at enabling third parties to make informed and conscious judgments on the relationships to be established with the Company.

The Company diligently complies with all regulatory provisions and obligations in tax matters, constantly updating its knowledge of current regulations and managing all related processes with rigor and transparency. This is done to prevent behaviors that may lead to violations in the fiscal and tax domain.

6.3 MANAGEMENT OF EXTRAORDINARY OPERATIONS

The recipients of this Code must conduct themselves with honesty, fairness, and transparency in all extraordinary operations concerning the Company, such as the distribution of profits and reserves, capital operations, transactions involving treasury shares, mergers, spin-offs, and transformations. They must also comply with regulations protecting the interests of minority shareholders and creditors of the Company. When drafting documents or reports related to such operations, recipients must ensure truthfulness, completeness, clarity of information, and utmost accuracy in the processing of data and information.

6.4 SOCIAL COMMUNICATIONS AND ACCOUNTING RECORDS

The Company places great importance on the correctness and transparency of accounting and financial information and commits to adhering to the principles of truthfulness, completeness, clarity, precision, accuracy, and compliance with current regulations in maintaining accounting records and preparing the financial statements. The Company requires that each transaction be adequately documented and recorded to facilitate easy accounting verification, transaction reconstruction, and identification of any responsibilities. The Company ensures that the financial statements faithfully, clearly, and comprehensively reflect the economic, asset, or financial situation of the Company.

The Company complies with all regulations and obligations prescribed in corporate, administrative, financial, tax, and fiscal matters and adopts appropriate measures to prevent any conduct that may result in violations.

6.5 INTERNAL CONTROLS

The functionality and efficiency of a complex structure require the proper functioning of it at all levels; to ensure this, an internal control system is in place, aimed at verifying and guiding the organization. Each recipient, within the scope of their functions and assigned tasks, is responsible for defining and ensuring the proper functioning of the control system.

7. COMPANY POLICIES

7.1 ENVIRONMENTAL PROTECTION (SDG n. 7, 9, 10 e 13, 15 e 17)

ADVPA considers environmental protection and sustainable development of the territory in which it operates as of paramount importance, taking into account the rights of the community and future generations. The company directs its environmental protection actions based on the awareness that the environment is a common good to be safeguarded. For this reason, it promotes awareness-raising activities on this issue and commits to training its employees to be aware of the environmental aspects and impacts associated with their activities. ADVPA's social activities are managed in full compliance with current environmental regulations. The company actively contributes to the promotion of scientific and technological development aimed at environmental protection and the conservation of natural resources. ADVPA adopts methods and technologies aimed at reducing waste and conserving natural resources. It is committed to spreading and consolidating

among all its employees a culture of environmental protection and pollution prevention, developing awareness of risks, and promoting responsible behavior.

To achieve these objectives, ADVPA conducts its activities using the best available technologies for environmental protection and conservation of natural resources in compliance with current laws. Finally, ADVPA supports the challenge of combating climate change, transitioning to renewable energy, and promoting sustainable development through policies and corporate choices inspired by IT Green, an approach that promotes the use of sustainable information technology and practices.

7.2 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE (SDG 3 e 8)

ADVPA is committed to ensuring working conditions that respect individual dignity and providing safe and healthy work environments, in accordance with current regulations on occupational safety and health. The company actively promotes the dissemination of a safety culture and awareness of the risks associated with work activities. It requires all individuals, at every level, to exhibit responsible behavior and respect for the established safety system and all company procedures that are integral to it.

In this perspective, every employee, collaborator, and anyone performing work activities at ADVPA offices, including ADVPA's clients, is called upon to personally contribute to maintaining the safety and quality of the work environment in which they operate.

The protection of workers' health and safety entails:

- Making available the necessary resources for the continuous improvement of the machinery fleet and the production process, and for the constant increase in awareness and competence of workers;
- Constantly monitoring and measuring its performance in terms of health and safety, eliminating risks where possible and reducing hazards;
- Involving workers in decision-making processes that directly concern them and in monitoring health and safety conditions in the workplace.

The responsibility of each recipient towards their employees and colleagues makes it mandatory to exercise the utmost care for risk prevention. Therefore, the technical planning of workplaces, equipment, and processes must adhere to the highest level of compliance with current regulations on occupational safety and health.

Each recipient must pay the utmost attention in carrying out their activities, strictly adhering to all established safety and prevention measures to avoid any possible risk for themselves and their colleagues.

8. INFORMATION AND CONFIDENTIALITY (SDG 8, 9 e 16)

8.1 CONFIDENTIAL AND PRIVILEGED INFORMATION

ADVPA requires recipients, if in possession of confidential and/or privileged information, to maintain the utmost confidentiality. These pieces of information may only be disclosed to third parties, both internal and external to the Company, for work-related needs and ensuring that such individuals are bound by legal, regulatory, statutory, or contractual confidentiality obligations.

The communication and dissemination of news regarding the Company's operations are reserved exclusively for functions formally identified within the Company. This reflects the importance and sensitivity of such a task. Recipients must refrain from using non-public information for personal purposes or in the interest of the Company. They must not disseminate false or misleading information concerning the Company or third-party economic and financial entities, learned during the performance of work duties or business transactions, which may deceive the external community or cause undue fluctuations in stock prices or the value of the affected companies.

The obligation of confidentiality remains in effect even after the termination of the relationship with the Company in accordance with applicable regulations.

8.2 CONFIDENTIALITY

ADVPA emphasizes that all information obtained by recipients in relation to their employment and collaboration relationship is the property of the Company. This information includes:

- Personal data: "Personal data" refers to any information relating to an identified or identifiable natural person, legal entity, organization, or association, whether directly or indirectly identifiable by reference to any other information, including a personal identification number.
- Confidential information: "Confidential information" is any confidential information concerning the Company that, if disclosed unauthorized and/or unintentionally, could cause damage to the Company.

The Company ensures, in accordance with legal provisions - including privacy laws - the confidentiality of the information in its possession. It requires all recipients to use such information solely for purposes directly related to the performance of their professional activities.

9. THE IMPLEMENTATION RULES OF THE CODE

9.1 IMPLEMENTATION AND REVIEW OF THE CODE

ADVPA considers compliance with the rules contained in its Code of Ethics as an essential part of the contractual obligations of its employees, consultants, collaborators, and other third parties. This compliance is required by inserting specific clauses in the relevant contracts.

The Administrator of ADVPA appoints the Ethics Officer responsible for overseeing compliance with the Code of Ethics. In particular, their tasks include:

- Promoting consistency between the principles of the Code of Ethics and company policies;
- Promoting initiatives to facilitate the knowledge and understanding of the Code of Ethics, including through specific training sessions;
- Acquiring all necessary information to monitor corporate conduct and compliance with the Code by all recipients;
- Providing opinions on more complex clarification requests;

- Periodically liaising with the Supervisory Body and promptly informing it in case of reports of infringements and violations of the Code of Ethics.

The revision of the Code is approved by the Sole Administrator, taking into account the evaluation of stakeholders regarding the principles and contents of the Code, promoting their active contribution and reporting of any deficiencies.

9.2. REPORTING VIOLATIONS (SDG 16)

ADVPA is committed to ensuring the effectiveness of its Code of Ethics by establishing channels and methods of communication to allow anyone who becomes aware of any illicit behavior within the Company to report it freely, directly, and absolutely confidentially to the designated function.

It is the obligation of each recipient to promptly report any behavior that is not in line with the principles of the Code. For every violation or suspicion of violation (provided they are not based on mere conjecture or speculation) of the Code of Ethics, reports must be made in writing to the Supervisory Body or the Administrator and in a non-anonymous form, through the designated confidential reporting channel: email odv@advpa.it.

ADVPA actively supports and encourages the practice of whistleblowing in accordance with Legislative Decree 10 March 2023, no. 24 implementing EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019.

The company body designated to receive reports for whistleblowing activities ensures the confidentiality of the identity and personal data of the reporting individual, the involved individual, and the individual mentioned in the report, as well as the content of the report and related documentation. This is subject to legal obligations and the protection of the rights of the Company or individuals potentially involved in the report, which may be exercised within the limits established by law to protect privacy.

The whistleblower is a figure of fundamental importance within a company like ADVPA because they promptly report any misconduct, dangers, or issues they become aware of, allowing the company to intervene promptly to resolve them, thereby safeguarding the company's interests and reputation.

However, by choosing not to ignore such issues but actively committing to the common good, the whistleblower may expose themselves to possible retaliation, such as bullying, demotion, dismissal, or other actions detrimental to their rights. For this reason, ADVPA is committed to protecting those who take on the responsibility of reporting from any retaliation.

In the event that it is found that the report was made with malice or gross negligence, appropriate sanctions will be applied to the whistleblower.

9.3 SANCTIONING SYSTEM (SDG n. 16)

ADVPA classifies violations of its Code of Ethics into three categories:

- **Minor:** These are violations of a formal nature or those that have not caused significant damage to the company or its stakeholders.
- **Moderate:** These are violations that have caused significant damage to the company or its stakeholders.
- **Severe:** These are violations that have caused serious damage to the company or its stakeholders, or have posed a risk to the health and safety of workers or the environment.

The Company, through the specifically designated bodies and functions, is committed to imposing sanctions proportionate to the violations of the Code in a consistent, impartial, and uniform manner, and in accordance with current regulations governing labor relations.

Sanctions may be disciplinary in nature and, in the most severe cases, may result in the termination of the employment relationship, as well as compensation for damages. All sanctioning measures are adopted in accordance with the relevant provisions of the applied National Collective Labor Agreements.

Compliance with the provisions of the Code of Ethics is a contractual obligation for suppliers, agents, clients, and any external party who provides or receives services to or from ADVPA. Violations of the Code of Ethics will be considered as contractual breaches with all the consequences provided by law and the contract, including, if the conditions are met, termination of the ongoing relationship.

9.4 THE OVERSIGHT BODY PURSUANT TO ART.6 DEL D.LGS. N. 231/2001

The Oversight Body (OdV) of ADVPA is an independent body whose main role is to monitor the proper functioning of the Code of Ethics and the Organizational and Management Model (MOG) 231/2001, in order to prevent illicit behavior and crimes within the company. The OdV operates autonomously and with adequate powers, ensuring the confidentiality and impartiality of its actions. The OdV represents a fundamental element for the promotion of ethical culture and legality in ADVPA.

Among the tasks of the OdV are:

- Periodically verifying the application and compliance with the Code;
- Reviewing the content of the Code to identify the need for adjustments in light of evolving laws;
- Promoting activities for the dissemination of the Code in collaboration with the Ethics Officer;
- Proposing modifications and additions to the Code to the administrative body;
- Receiving reports of Code violations and conducting investigations into them;
- Ensuring and assisting individuals reporting non-compliant behavior under the Code, protecting them from pressures, interferences, intimidations, and retaliations.
- Periodically preparing a report on the activities carried out to be submitted to the administrative body.

Reports of any misconduct can be forwarded to the OdV, in addition to the hierarchical line, via the email address odv@advpa.it, or to the Administration. Strict confidentiality will be maintained for all received reports.

9.5 MANAGEMENT PROCESS OF REPORTS TO THE ODV WITHIN ADVPA

The process of managing reports to the OdV unfolds in the following stages:

1. Submission of the report:

- Reports of alleged violations of the Code of Ethics can be submitted by anyone, both internally and externally to the company, in written form as indicated above or even verbally to the Administrator or members of the OdV.
- The report must allow for the identification of the wrongdoing so that the OdV can conduct appropriate checks and initiate an investigation, such as describing the alleged violation, providing the data of the reporter and the accused party, and any evidence supporting the report using the dedicated form available on the company's confidential channels.

2. Receipt and evaluation of the report:

- The OdV ensures the confidentiality of the reporter and the content of the report.
- The OdV verifies the completeness and validity of the report and decides whether to initiate an investigation.
- If the OdV decides not to initiate an investigation, it informs the reporter of the reasons for its decision.

3. Investigation:

- If the OdV decides to initiate an investigation, it gathers all the necessary information to ascertain the facts subject to the report.
- The OdV may interview the reporter, the accused party, and other witnesses.
- The OdV may request documents and information from the company.
- The OdV ensures the right of defense for the accused party.

4. Conclusion of the investigation:

- At the conclusion of the investigation, the OdV prepares a report summarizing the findings and its conclusions.
- If the OdV determines that there has been no violation of the Code of Ethics, it archives the report.
- If the OdV concludes that there has been a violation of the Code of Ethics, it submits the report to the company's management for the adoption of the appropriate disciplinary measures.

5. Disciplinary measures:

The company's management, based on the severity of the violation, may take the following disciplinary measures:

- Verbal warning;

- Suspension from work;
- Termination of employment;
- Contract termination.

The OdV periodically monitors the effectiveness of the reporting management system and proposes any necessary improvements.

ADVPA is committed to ensuring that the reporting management process is transparent, efficient, and respectful of the rights of all involved parties.

10. ENTRY INTO FORCE

The current Code and its subsequent integrations and amendments are adopted by the Administrator of the Company, effective from the date of their registration.