
VAT number / Tax Code IT02212990994

Code of Ethics

Rev. 03 of 28.02.2025

CODE OF ETHICS

Approved on 28.02.2025

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1. PREMISE

1492 COLONIALE GROUP SRL has always carried out its activities observing the principles of honesty, transparency, fairness and integrity and has formalized them in this Code of Ethics.

The provisions contained in the Code of Ethics apply to all collaborators, consultants, partners with any type of contract or assignment and for any reason as well as, as far as compatible, to fixed-term and permanent employees and – insofar as compatible – to all those who directly or indirectly, in a stable or temporary way, establish or maintain relationships of any kind with 1492 COLONIALE GROUP SRL.

The provisions of the Code of Ethics supplement current national and international legislation, with particular reference to the principles and duties of correctness, diligence and good faith, to which all recipients must comply in the performance of their activities.

1492 COLONIALE GROUP SRL, at the same time as the signing of the employment contract, partnership or the act of conferring a professional assignment, makes available a copy of this Code of Ethics. In the deeds of assignment or in the contracts for the acquisition of collaborations, consultancy or services, specific provisions or clauses are included for the termination or forfeiture of the relationship in the event of violation of the obligations deriving from this Code.

All recipients, therefore, are obliged to know the content of this document and to apply it correctly, not delaying, limiting or preventing the verification of the application and implementation of the same by 1492 COLONIALE GROUP SRL.

The recipients – in addition to having to adapt their behaviour to the Code of Ethics – have the specific duty to report to the Manager any violations of the Code of Ethics by shareholders, employees, collaborators or third parties.

This Code of Ethics, considering its importance, is also made available by publication on the company website and sent by e-mail or other equivalent tool to all collaborators, consultants, partners, employees.

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2. FUNDAMENTAL ETHICAL PRINCIPLES

In carrying out all activities, 1492 COLONIALE GROUP SRL is inspired by and adheres to the principles listed below:

Fairness and honesty

1492 COLONIALE GROUP SRL complies with internal regulations as well as the general principles of integrity, fairness, good faith, objectivity, transparency, fairness and reasonableness.

Since the pursuit of the interests of the property, the company or individuals can never justify conduct contrary to the principles of fairness and honesty, the activities are carried out in full compliance with the laws in force, professional ethics and internal regulations.

Prohibition of discrimination, prevention of abuse and harassment

In relations with all stakeholders, 1492 COLONIALE GROUP SRL abstains from any discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality or health status of stakeholders. In particular, it avoids any arbitrary form of advantage or disadvantage towards employees, collaborators, suppliers, customers, institutions.

1492 COLONIALE GROUP SRL prevents and manages situations of harassment and abuse in the workplace. This includes creating a safe and respectful work environment, promoting equal treatment, and educating about inappropriate behaviour

1492 COLONIALE GROUP SRL also provides for the use of secure and confidential reporting channels for employees, the investigation of complaints, and the adoption of appropriate measures to protect employees and prevent further abuse or harassment. The goal is to ensure a fair and safe working environment for all employees.

Every employee has the right to be preserved in mental and physical integrity in the workplace.

Mobbing and sexual harassment in the workplace are considered forms of violence that represent a serious violation of the personal rights of the person involved. These behaviours compromise the development of the individual's personality, self-esteem and freedom of action and decision, violating his dignity and his social image.

Sexual harassment in the workplace also hampers the effective achievement of equality between men and women. Mobbing and sexual harassment are totally unacceptable, and this regulation provides for measures and sanctions aimed at preventing such abuses. People who are victims of harassment will receive support, while those who commit it will face sanctions.

Impartiality

In relations with all stakeholders, 1492 COLONIALE GROUP SRL abstains from any discrimination based on age, racial and ethnic origin, nationality, political opinions, religious beliefs, gender, sexuality or health status of stakeholders. In particular, it avoids any arbitrary form of advantage or disadvantage towards employees, collaborators, suppliers, customers, institutions.

Enhancement and empowerment of human resources

1492 COLONIALE GROUP SRL guarantees an adequate degree of professionalism in the execution of the tasks assigned to its employees, consultants and collaborators. The management and enhancement of resources is based on respect for the personality, competence and professionalism of each of them in the context of general of society.

Each person must carry out his or her work and perform his or her services with diligence, efficiency and fairness, making the best use of the tools and time made available to him, while assuming the responsibilities related to the

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required obligations.

All the work activities of those who work for 1492 COLONIALE GROUP SRL must be carried out with professional commitment, moral rigor and managerial correctness, also in order to protect its image. The managers must first represent with their work an example for all the workers and collaborators of 1492 COLONIALE GROUP SRL, adhering in the performance of their functions to the inspiring principles of the Code, to the procedures and internal regulations, taking care of their dissemination among employees and working members.

1492 COLONIALE GROUP SRL recognizes the value of members and workers, respect for their autonomy and the importance of their participation in social enterprise activities. Honesty, loyalty, ability, professionalism, seriousness, technical preparation, the ability to operate in a shared experience and the dedication of the staff are therefore among the fundamental characteristics of human resources.

Social equity and relationship with the community

The principle of the spirit of service implies that each recipient of the Code is always oriented, in his or her behaviour, towards sharing the social mission, striving for the best attention and care of customers and users.

Protection of the worker

1492 COLONIALE GROUP SRL considers the principle of worker protection as a primary value.

Each employee or collaborator of 1492 COLONIALE GROUP SRL, within the scope of their role, is committed to promoting a work environment free of prejudice, respecting the personality and safety of workers and actively collaborates to maintain an internal climate that guarantees respect for the dignity and health of everyone.

Relations between 1492 COLONIALE GROUP SRL employees are based on values of civil coexistence and are carried out in respect of the rights and freedom of persons and the fundamental principles that affirm equal social dignity without discrimination for reasons of nationality, language, sex, race, religious beliefs, political and trade union membership, physical or mental conditions.

Relationships between employees, regardless of levels of responsibility, must be based on the values of loyalty, fairness and mutual respect.

Each manager and/or head of the structure must exercise their powers with objectivity and balance, with a view to enhancing and empowering their employees and collaborators.

Each employee must be cooperative and perform their duties responsibly, efficiently and diligently.

For each pay period, workers will need to receive timely and understandable pay stubs that include enough information to allow for accurate verification of pay for the activities performed. Workers' compensation must comply with all applicable regulations, including those regarding minimum wages, overtime and statutory social security benefits. In accordance with local laws, overtime must be paid at a higher rate than the normal hourly rate.

Occupational safety

1492 COLONIALE GROUP SRL guarantees that employees, collaborators and partners operate in working conditions that respect individual dignity and in safe and healthy working environments, in full compliance with current national and international regulations on the protection of health and safety in the workplace.

Confidentiality and prohibition of misuse of confidential information

1492 COLONIALE GROUP SRL guarantees, in accordance with the provisions of the law, the confidentiality of the information in its possession. Employees, collaborators and consultants of 1492 COLONIALE GROUP SRL are prohibited from using confidential information for purposes not related to the exercise of their activity and/or unduly disclosing confidential information.

It is expressly forbidden to use or communicate to others, without justified reason and/or indication of 1492 COLONIALE GROUP SRL, confidential or internal information of the Organization itself. Any information may

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be provided to third parties only in full compliance with current legislation, or on the basis of precise and specific agreements between the parties. All persons operating in the name and on behalf of the Organization are prohibited from using confidential information for purposes unrelated to the exercise of their assigned professional functions.

Free and fair competition

1492 COLONIALE GROUP SRL recognizes that fair, free and fair competition is a decisive factor of growth and constant improvement for companies and the market and, therefore, the fundamental principles that guide its work include fair competition against competitors.

Transparency and completeness of information

The Code enshrines the ethical commitment and the consequent legal obligation of 1492 COLONIAL GROUP SRL to comply with the laws in force, as well as the willingness to operate, in every profile of concrete action, according to transparent and correct rules of conduct. Therefore, the company undertakes to disseminate information on the activities carried out and to be carried out, as clear, transparent, accurate and complete as possible; in doing so, it allows the recipients to make informed decisions about the relationships, to verify the consistency between the declared objectives and the results obtained.

It is forbidden to falsify documentation and make false representations about the conditions or practices used.

Intellectual property

Intellectual property rights must be respected. The transfer of technology and know-how must be carried out in a way that protects these property rights, and it is necessary to protect the information of customers and suppliers.

Respect for the environment

The choices are aimed at ensuring maximum compatibility between economic initiative and environmental needs, not only in compliance with current legislation, but also in compliance with the achievement of sustainability objectives set by the company: reducing or limiting the impact that the company may have on the environment in carrying out its activities, asking its employees and collaborators to adopt behaviours and/or measures in line with these expectations.

Condemnation of any form of corruption

The Company respects and requires compliance with current legislation on the prevention and fight against corruption to all parties operating in the name and on behalf of the same.

It absolutely prohibits conduct that may constitute corruption or attempted corruption or inducement to corruption. You may not offer, promise, provide, accept, or solicit an undue advantage of any value (economic or non-economic), directly or indirectly, and regardless of location, in violation of applicable law, as an inducement or reward for a person to act or omit to act in connection with the performance of that person's duties.

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3. RULES OF CONDUCT

Gifts, compensation, and other benefits

Anyone who receives offers of gifts, perks, or other benefits that cannot be considered as acts of commercial courtesy of modest value must refuse them.

1492 COLONIALE GROUP SRL does not request or solicit, for itself or for others, gifts or other benefits. He does not accept, for himself or for others, gifts or other benefits, except those of modest value made occasionally as part of normal courtesy relations.

Conflicts of interest

The employees, collaborators or consultants of 1492 COLONIALE GROUP SRL pursue, in the performance of their activities and/or assignments, the objectives and general interests of the company.

The administrative body, compatibly with the needs of profitable management and without prejudice to the supervisory obligations, must facilitate the separation of functions for the dual purpose of allowing the identification of the subjects who have operated and preventing the emergence of situations of conflict of interest.

In carrying out all activities, 1492 COLONIALE GROUP SRL works to avoid incurring situations of conflict of interest, real or even just potential.

Any situation that generates a possible conflict of interest must be immediately reported to the hierarchical superior or reported to the Whistleblower.

It is therefore not permitted to pursue one's own interests to the detriment of the interests of 1492 COLONIALE GROUP SRL, to make unauthorised personal use of company assets or information acquired in the exercise of one's functions, to hold interests directly or indirectly or to carry out tasks of any kind in competing companies or in the activities of Consultants or Partners.

Prevention of conflicts of interest

In order not to run into situations that create or may create conflicts of interest, employees must in particular avoid:

- conclude contracts in a personal capacity on particularly favourable terms or accept preferential treatment from companies or suppliers with whom the organisation has business relationships;
- carry out activities that conflict with the correct performance of office duties;
- accept from parties other than the Organization salaries or other benefits for services to which he/she is required for the performance of his/her office duties.

The subject also undertakes, should he find himself in actual or potential situations of conflict of interest, to promptly inform 1492 COLONIALE GROUP SRL in the person of his Legal Representative.

Anyone who has knowledge of situations of conflict of interest is required to promptly notify the Whistleblower in the manner provided.

Relations with Public Administrations or Public Officials

Relations with the Public Administration, with the public supervisory authorities as well as with public authorities and institutions must be undertaken and managed by the Recipients in absolute and strict compliance with the legislation in force, the principles and rules set out in this Code and in the internal procedures and regulations.

1492 COLONIALE GROUP SRL as far as possible, in such relationships will avoid being represented by a single natural person, on the assumption that the plurality of subjects allows to minimize the risk of interpersonal relationships that are not consistent with the will of the company itself.

1492 COLONIALE GROUP SRL will adopt adequate control and traceability mechanisms for information flows intended for the Public Administration, public supervisory authorities or public authorities or institutions. Any

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gift, advantage or other benefit given by 1492 COLONIALE GROUP SRL or by the staff, even if paid through the use of personal economic resources, to a Public Official is prohibited.

Relations with commercial interlocutors and private individuals

1492 COLONIALE GROUP SRL does not engage in any conduct that may harm the company's image and/or reputation.

It ensures, in its relations with the recipients of the services, full equality of treatment on equal terms, refraining from arbitrary actions on the aforementioned recipients or involving discrimination based on sex, nationality, ethnic origin, generic characteristics, language, religion or belief, personal or political beliefs, membership of a minority, disability, social or health conditions, age and sexual orientation or on other various factors.

In the conclusion of agreements, in the stipulation of contracts as well as in the execution phase of the same, 1492 COLONIALE GROUP SRL does not resort to the mediation of third parties, nor does it pay or promise anyone benefits by way of intermediation, nor to facilitate or have facilitated the conclusion or execution of the contract. If it were to evaluate collaboration with brokers, it would regulate contractual relations by expressly requiring acceptance of the anti-corruption commitment and the code of ethics, the availability of non-financial controls, economic conditions subject to transparency and traceability rules.

In the execution of contracts, it diligently provides the services provided for in the contract, repudiating any act of third parties aimed at obtaining certificates in the absence of regular payment of the service.

Relationships with consultants and partners

The relationships of 1492 COLONIALE GROUP SRL with Consultants, Partners, Suppliers and Outsourcers are inspired by the principles of fairness, loyalty, equity and transparency as well as full compliance with the contractual commitments undertaken.

The selection of Consultants, Supplier Partners and Outsourcers must be made according to the principles contained in this Code, in internal procedures and regulations, using the written form, on the basis of objective parameters such as quality, price of goods and/or services, the absence of conflicts of interest, adequate ethical/reputational profiles, the ability to supply and guarantee goods and/or services of a level appropriate to the needs of 1492 COLONIALE GROUP SRL.

In any case, 1492 COLONIALE GROUP SRL will make use of Consultants, Partners, Suppliers and Outsourcers who operate in compliance with current legislation and the principles and rules set out in this Code.

Customer Relations

1492 COLONIALE GROUP SRL is committed to guaranteeing quality standards, based on the available resources and contractual commitments undertaken, satisfying the needs of public and private customers. In this regard, it undertakes to develop constant information and collaboration relationships and evaluates the possibility of using tools for measuring satisfaction.

Prevention of corruption

1492 COLONIALE GROUP SRL complies with the measures necessary for the prevention of offences without prejudice to the obligation to report to the judicial authority. Encourages employees, partners and collaborators to report any situations of wrongdoing of which they have become aware to the Whistleblower. Situations of offence include, by way of

By way of example and not exhaustively, there are also cases of failure to abstain from activity in the event of a situation of conflict of interest.

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4. METHODS OF APPLICATION OF THE CODE OF ETHICS

Implementation and dissemination

In order to increase its visibility, the Code of Ethics is published on the company's website.

This Code and any future updates to it are defined and approved by the management

1492 COLONIALE GROUP SRL undertakes to disseminate the principles of the Code to all interlocutors with whom a business relationship is in place or is about to be formalized, with particular regard to human resources, collaborators and partners.

The Management is responsible for the application and dissemination and knowledge of this Code of Ethics throughout the company; similar responsibility falls on the persons at the top of each corporate area-function who, in particular, are required to ensure compliance with the Code by all those who work within the area or function itself.

Monitoring and sanctioning violations

In compliance with Legislative Decree no. 24/2023 1492, COLONIALE GROUP SRL has adopted the "Whistleblowing" procedure.

Specifically, Whistleblowing is an additional tool for corporate compliance, through the

Employees, collaborators or third parties (stakeholders) of a company can report, in a confidential and protected manner, any wrongdoing encountered during their activities.

Well, to this end, a special area has been set up dedicated to receiving reports that can be made completely anonymous, as expressly provided for by the aforementioned legislation.

The report can be made in total autonomy.

Protection of the Whistleblower

The identity of the whistleblower and any other information from which this identity may be inferred, directly or indirectly, may not be revealed, without his express consent, to persons other than those entitled and appointed to receive and manage the report.

1492 COLONIALE GROUP SRL, guarantees the confidentiality of the identity of the whistleblower, the reported person and any other persons involved, as well as the content of the Report and the related documentation, also through the use of encryption tools.

Reports are not used beyond what is necessary to adequately follow up on them.

Prohibition of retaliation

In any case, it is expressly forbidden for any company function that is involved or made part of the report and the consequent company actions to carry out acts of retaliation, direct or indirect, even if only attempted or threatened, against the whistleblower for reasons connected, directly or indirectly, to the report that cause or may cause unjust damage to SE. Any report, whether well-founded and/or in good faith, must therefore be immune from disciplinary proceedings and criminal, civil and administrative liability, including liability for defamation, slander, copyright and data protection.

This includes all types of harmful treatments, including:

- a) dismissal, suspension or equivalent measures;
- b) demotion in rank or non-promotion;
- c) the change of functions, the change of the place of work, the reduction of salary, the modification of working hours;
- d) suspension of training or any restriction of access to it;
- e) negative notes of merit or negative references;

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- f) the adoption of disciplinary measures or other sanctions, including financial sanctions;
- g) coercion, intimidation, harassment or ostracism;
- h) discrimination or otherwise unfavourable treatment;
- i) the failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the worker had a legitimate expectation of such conversion;
- j) the non-renewal or early termination of a fixed-term employment contract;
- k) damage, including to the reputation of the person, in particular
- l) on social media, or economic or financial bias, including loss of economic opportunity and loss of income;
- m) improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person not being able to find employment in the sector or industry in the future;
- n) the early conclusion or cancellation of the contract for the supply of goods or services;
- o) the cancellation of a licence or permit;
- p) the request for psychiatric or medical examinations and threats of such actions.

The retaliatory or discriminatory dismissal of the reporting party is null and void. The change of duties pursuant to Article 2103 of the Civil Code, as well as any other retaliatory measure adopted against the whistleblower, are also null and void.

It is the employer's responsibility, in the event of disputes related to the imposition of disciplinary sanctions, or demotion, dismissal, transfers, or subjection of the whistleblower to other organisational measures having direct or indirect negative effects on working conditions, subsequent to the submission of the report, to demonstrate that such measures are based on reasons unrelated to the report itself.

The adoption of discriminatory measures against the subjects who make the reports can be reported to ANAC, which informs the competent Labour Inspectorate.

Measures are also provided to protect the reported, who – in addition to what has already been indicated above – will (where possible) be involved and will have the right to defend himself against the charges against him.

Validity of the Code

This Code is valid for 1 year, starting from the date of approval by the Board of Directors. At least once a year, it is reviewed, supplemented and updated if necessary.

If the person in charge of Whistleblowing deems it necessary to update this Code, he or she may do so within a reasonable time and submit it to the Board of Directors for approval.

Violations of the Code of Ethics - Disciplinary and sanctioning system

In any case of violation of the principles contained in this Code of Ethics, where necessary for the protection of the company's interest and compatibly with the regulatory framework in force, also in terms of the provisions deriving from collective bargaining, the bodies appointed by 1492 COLONIALE GROUP SRL will evaluate any initiatives to be taken and the

measures, including disciplinary and sanctioning measures, to be taken against persons who have engaged in conduct that does not comply with this Code of Ethics.

The applicable sanctions include:

- disciplinary sanctions provided for by the applicable National Collective Labour Agreement (CCNL);
- the termination of the contract;
- the application of any pre-established penalty clauses;
- the request for compensation for damages, including to the image.

against directors, by way of suspension or revocation of office;

with regard to external collaborators and third parties, also in terms of termination of the related contractual relationships.

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All the above procedures must in any case guarantee the confidentiality of the relevant information and indications, except for legal provisions and/or specific provisions to the contrary made on the basis of the law in force.

The recipients of the code of ethics

The principles and rules of this Code of Ethics are applied to the following subjects:

- A. Shareholders, legal representatives and directors by law of the company;
- B. The general prosecutors, special prosecutors, persons with a special power of attorney ad acta and any institors and supervisors;
- C. members of the board of statutory auditors or of the company's supervisory bodies;
- D. the managers of the company;
- E. subordinate workers as well as subjects in a relationship of coordinated and continuous collaboration, project collaboration and program collaboration;
- F. the subjects (natural and/or legal persons) who carry out supervisory and control functions within 1492 COLONIALE GROUP SRL on the basis of the law, the Articles of Association and the internal regulations and models;
- G. subjects (natural and/or legal persons) having 1492 COLONIALE GROUP SRL consultancy relationships and/or external professional or technical services, agency and mandate relationships with or without representation, representation, mediation and business procurement relationships.

Serra Riccò (GE), 28.02.2025

1492 Coloniale Group Srl unipers.
Legal Representative
Ms. Carla Timossi