

CODE OF ETHICS

Version 0.0

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1 PREAMBLE

Following a corporate transaction on June 30, 2026, between the company Havant S.r.l. and the company In.Te.S.A. S.p.A., the Havant Group was born, which sees Havant S.r.l. as controlling parent company and In.Te.S.A. S.p.A. as controlled subsidiary.

Following such transaction, the Companies by mutual agreement decided to adopt a single Code of Ethics.

The Group Companies are leading companies in the sector of digitalization of company processes: electronic signature, Electronic Data Interchange, identification, legally compliant document preservation, and Supply Chain, whose mission is centered on growth and value creation for its shareholders, in full respect of the primary values of the company, namely ethics, legality, transparency, integrity, and loyalty.

The purpose of this Code of Ethics (hereinafter "the Code") is to ensure that the fundamental ethical values of the Group are clearly defined and constitute the base element of company culture, as well as to identify the standard of conduct of those who hold roles in Administration, Employed Personnel, and all persons who, by virtue of specific mandates or powers of attorney, represent the Company towards third parties (hereinafter "Collaborating Subjects") in the conduct of business and their activities.

The Code is binding for the behaviors of the Collaborating Subjects of the Group, which endeavors to ensure that the principles of this Code are observed also by customers, supplier personnel, external collaborating subjects, and partners (hereinafter "Third Parties") with whom it maintains business relations on a lasting basis.

The Company does not establish nor continue business relations with anyone who expressly refuses to respect the principles of the Code.

1.1 PERSONS ADDRESSED BY THE CODE OF ETHICS AND CONDUCT

Addressed Subjects of the Code are the components of the Board of Directors and Executive Personnel.

Addressed Subjects of the Code are furthermore the employed personnel and all persons who collaborate with the Group Companies, under any type of contract or engagement and in any capacity.

The provisions of the Code apply, as far as compatible, to collaborating subjects in any capacity of supplier companies of goods or services that perform works in favor of and/or on behalf of the Group Companies.

All addressed subjects are required to know the values, rules, and indications expressed in this Code, and to give concrete application thereto in every activity and relationship that they have in place or share with the company.

In the case of employed personnel, compliance with the provisions of this Code constitutes an integral and essential part of the obligations undertaken under the employment contract. Its violation constitutes a breach that can give rise to disciplinary sanctions.

For other addressed subjects, compliance with this Code constitutes a clause obligatorily inserted in contracts, engagement specifications, and, more generally, in the acts regulating the relationship with the Group Companies, whose violation constitutes cause for sanctions that can lead, in the most serious cases, to the termination or forfeiture of the relationship.

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1.2 COMPLIANCE WITH LEGAL NORMS AND INTERNAL DISCIPLINE

The employed person of the Group Company:

- a. carries out their tasks in compliance with the law, pursuing the interest of the Company without abusing the position or powers of which they are holder;
- b. respects the principles of integrity, correctness, good faith, proportionality, objectivity, transparency, equity, and reasonableness, and acts in a position of independence and impartiality, abstaining in case of conflict of interest;
- c. does not use for private ends the information available to them for official reasons, avoids situations and behaviors that may hinder the correct fulfillment of tasks or harm the interests or image of the Company;
- d. refrains from carrying out arbitrary actions involving discrimination based on sex, nationality, ethnic origin, genetic features, language, religion or belief, personal or political convictions, membership of a national minority, disability, social or health conditions, age, sexual orientation, or other factors;
- e. demonstrates maximum availability, loyalty, and cooperation in relations with public administrations, ensuring the exchange and transmission of information and data in any form, including telematics, in compliance with regulations in force.

The addressed subjects of this Code are required, within the scope of their respective competences, to know and observe with diligence:

- Laws and regulations in force, aware that their compliance constitutes an indispensable condition for pursuing company goals;
- This Code of Ethics, guarantee of a company environment shaped by a spirit of collaboration, transparency, correctness, and professionalism;
- Internal procedures, instructions, recommendations, and guidelines regulating conduct to be maintained in performing the activity;
- The Organization, Management, and Control Model pursuant to Legislative Decree 231/2001.

The addressed subjects of this Code of Ethics and Conduct are required to report to the Supervisory Body any potential violations of laws, of this Code, or of the Organization, Management, and Control Model pursuant to Legislative Decree 231/2001 through the Whistleblowing channel available internally and on the institutional websites of the relative Group Companies.

The addressees of this Code must likewise maintain behavior shaped by respect for the fundamental principles of honesty, moral integrity, correctness, transparency, objectivity, and respect for individual personality in pursuing company goals and in all relations with internal and external persons and entities.

Violations of norms in force, of the Code of Ethics, of regulations governing the activity, and of internal procedures are considered all the more serious the more they are placed in being—despite everything—to the advantage or in the interest of one of the Group Companies. In no case can the pursuit of the interest of one of the Group Companies justify conduct non-compliant with a line of honest action respectful of laws and regulations in force.

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1.3 GUARANTEES INHERENT TO THE REPORTING SYSTEM (WHISTLEBLOWING)

In conformity with what is established by Law 179/2017 and Guidelines No. 1/2025 regarding Whistleblowing on internal reporting channels approved by ANAC Resolution No. 478 of November 26, 2025, the violation of confidentiality obligations regarding the data of those who make reports is deemed a serious violation in the same way as a violation of the Organization, Management, and Control Model and as such must be sanctioned.

Retaliatory or discriminatory dismissal of the reporting subject for reasons linked, directly or indirectly, to the report is null.

Likewise null are any change of duties pursuant to Art. 2103 of the Civil Code, as well as any other retaliatory or discriminatory measure adopted against the whistleblower.

In case of disputes subsequent to the submission of the report and linked to the imposition of disciplinary sanctions, or demotions, dismissals, transfers, or subjection of the whistleblower to another organizational measure having negative direct or indirect effects on working conditions, it is the burden of the employer to demonstrate that such measures are founded on reasons extraneous to the report itself.

The adoption of discriminatory measures against subjects making reports can be denounced to the Labor Inspectorate, for measures of its competence, not only by the reporting party, but also by their trade union organization.

Behavior by anyone who makes reports with intent or gross negligence that prove to be unfounded is likewise sanctioned.

Such latter behavior will be deemed in the same way as a serious violation of the Organization, Management, and Control Model.

The Code constitutes a fundamental element of the "Organization and Management Model" adopted together with the Code of Ethics by the Boards of Directors of the Group Companies pursuant to Art. 6 of Legislative Decree 231/2001, which the Companies undertake to apply, strengthen, and continuously develop.

The Group Companies are committed, towards all subjects involved in the application of this Code, to:

- ensure its timely dissemination, both by making it available to all persons and by implementing adequate training programs;
- guarantee that all updates and modifications are promptly brought to the knowledge of all Addressed Subjects ("Collaborating Subjects" and "Third Parties") of the Code;
- prepare appropriate support tools to provide clarifications regarding the interpretation and implementation of the provisions of the Code;
- adopt adequate procedures for reporting, investigating, and handling any violations;
- guarantee that whoever reports Code violations is not subject to any form of retaliation;
- periodically verify compliance and observance of the Code.

The Code constitutes an integral part of the employment relationship and expresses the essential content of the fiduciary bond between Company and Collaborating Subjects.

All Collaborating Subjects undertake to:

- act and behave in line with what is indicated in the Code;
- report all Code violations as soon as they become aware of them;

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- cooperate in the definition and compliance of internal procedures prepared to give execution to the Code;
- consult their supervisor, or designated bodies, in relation to parts of the Code on which they need interpretations or guidance.

The Code is brought to the knowledge of all Collaborating Subjects and can be consulted on the institutional websites of the Group Companies, from which it is freely downloadable.

The Code is subject to review by the Board of Directors of the parent company. The review activity takes into account contributions received from Addressed Subjects, as well as regulatory developments and established national and international practices, as well as experience acquired in applying the Code itself.

The Code was last modified by resolution of the Board of Directors of the parent company on July 14, 2026.

2 ETHICS IN THE CONDUCT OF BUSINESS AND COMPANY ACTIVITIES

The Group Companies structure and develop their entrepreneurial activity by applying the ethical principles identified in this Code and requiring their Addressed Subjects to adapt their behaviors to such setup under any circumstance.

2.1 INTERNAL CONTROL SYSTEM

The Group Companies consider an adequate control environment a fundamental element of company culture, contributing to the improvement of efficiency and effectiveness of company operations and regarding which the Collaborating Subjects of the Company are made aware.

By Internal Control System is meant the set of processes, tools, and procedures necessary or useful to direct, verify, and control Company activities and apt to ensure with reasonable certainty:

- achievement of company goals;
- safeguarding of company assets;
- adoption of behaviors and processes guaranteeing compliance with regulations in force and compliant with internal directives;
- efficiency, effectiveness, and economic viability of company activities;
- reliability and accuracy of information, including accounting and financial information, circulating within the Company or disclosed to third parties;
- confidentiality of company information that is not subject to public dissemination.

The Internal Control System constitutes an essential element of "Corporate Governance" of the Group Companies and provides adequate protection to shareholders and all subjects interacting in various capacities with the enterprise.

The Board of Directors is responsible for the Internal Control System, of which, among other things, this Code constitutes one of the terms of reference; it sets its guidelines and periodically verifies its adequacy and effective operation.

The Board of Directors oversees compliance with the Code of Ethics by all Addressed Subjects.

All Collaborating Subjects render maximum and timely cooperation to all internal and external control bodies of the Company for the best fulfillment of their tasks.

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2.2 TRANSPARENCY OF ACCOUNTING

The Group Companies are aware of the importance of transparency, accuracy, and completeness of accounting information and endeavor to have a reliable administrative-accounting system in correctly representing management facts and providing tools to identify, prevent, and manage, within possible limits, financial and operational risks, as well as frauds to the detriment of the Company.

Accounting records and documents deriving therefrom must be based on precise, comprehensive, and verifiable information, must reflect the nature of the transaction to which they refer in compliance with external constraints (legal norms and accounting principles), as well as internal policies, plans, regulations, and procedures; furthermore, they must be accompanied by relevant supporting documentation necessary to allow objective analyses and verifications.

Accounting records must allow to:

- produce accurate and timely income, asset, and financial statements;
- provide tools to identify, prevent, and manage, within possible limits, financial and operational risks and frauds to the detriment of the Company;
- perform controls allowing reasonably to guarantee the safeguarding of asset values and protection from losses.

All Collaborating Subjects are required to operate so that management facts are represented correctly and promptly, so that the administrative-accounting system can achieve all purposes described above.

2.3 RELATIONS WITH EXTERNAL COLLABORATING SUBJECTS

External collaborating subjects (consultants, professional firms, intermediaries, etc.) are required to observe the principles contained in this Code.

All Collaborating Subjects of the Group Companies, in relation to their duties, must:

- carefully evaluate the opportunity of making use of external collaborating personnel;
- select only counterparties of adequate professional qualification and reputation;
- obtain from external collaborating personnel assurance of constant fulfillment of the most favorable ratio between performance level, quality, cost, and timeframes;
- operate within the scope of laws and regulations in force;
- require external collaborating personnel to adhere to the principles of this Code and include in contracts the express obligation to adhere thereto.

2.4 RELATIONS WITH PARTNERS

The Group Companies can undertake entrepreneurial initiatives jointly with other subjects, such as for example acquisition of equity investments.

In developing these initiatives, all Collaborating Subjects must:

- establish relations only with partners or other shareholders who inspire themselves by ethical principles comparable to those of the Company;
- ascertain that the investee Company operates in line with what is prescribed by this Code;
- ensure that no partner entity is guaranteed disproportionately favorable treatment relative to its

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contribution;

- ensure transparency of agreements and avoid signing secret pacts or agreements contrary to law;
- maintain with partner entities frank, open, and collaborative relations;
- report promptly to their superior personnel any behavior by the investee Company, a partner, or a shareholder that appears contrary to the ethical principles of the Code.
- refrain from soliciting and/or receiving, even through an intermediary, money or other utility (e.g. work or commercial opportunities) from supplier subjects, partners, or sponsors.

Addressed subjects of this Code receiving gifts, or other form of benefit, must take all appropriate initiatives to refuse said gift or other form of benefit and inform their direct superior personnel and/or the Supervisory Body.

The Group Companies take care of the dissemination of the Code of Ethics and Conduct among their supplier subjects, partners, and sponsors, raising their awareness towards respect for principles contained therein and asking them to refrain from behaviors that induce in any way addressed subjects to violate them.

2.5 RELATIONS WITH PUBLIC ADMINISTRATION

Relations with public functions must be managed only by functions and Collaborating Subjects delegated thereto.

No Collaborating Subject of the Group Companies must promise or pay sums, promise or grant goods in kind or other benefits, even indirect, to public officials with the purpose of promoting or favoring interests of the Company, even following unlawful pressures.

No Collaborating Subject of the Group Companies can circumvent the above prescriptions by recurring to different forms of aid or contributions that, under the guise of sponsorships, assignments, consultancies, advertising, etc., have instead the same purposes prohibited above.

Gifts and courtesies towards representatives of public institutions must be of modest value and in any case not exceeding 50.00 Euros and proportionate to the case and, in any case, such that they cannot be interpreted as aimed at acquiring undue advantages for the Company.

2.6 RELATIONS WITH REPRESENTATIVES OF POLITICAL PARTIES AND TRADE UNION ORGANIZATIONS

The Group Companies do not disburse direct or indirect contributions to political parties, movements, committees, and political and trade union organizations, nor to their representatives, nor do they support them in any way.

2.7 RELATIONS WITH CUSTOMERS AND SUPPLIERS

The Group Companies aspire to satisfy the best and legitimate expectations of their customers by providing them quality services at competitive conditions.

Supplier subjects play a fundamental role in improving the Company's competitiveness and, consequently, those possessing the best characteristics in terms of quality, innovation, cost, service, continuity, and ethics are selected, with whom stable, transparent, and collaborative relations are established.

Within relations with customers and supplier subjects, Collaborating Subjects are committed to:

- apply internal procedures for selection of suppliers and customers and for management of established relations;
- not place in being discriminations apt to unduly exploit positions of strength to the disadvantage of

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customers or to prevent potential supplier subjects possessing requirements to compete from competing for assignment of contracts;

- operate within the scope of laws and regulations in force;
- respect always commitments and obligations undertaken towards customers and supplier subjects;
- adopt a style of conduct shaped by efficiency, collaboration, and courtesy;
- provide accurate, complete, and truthful information;
- maintain with supplier subjects and customers a frank and open dialogue, in line with best commercial customs;
- require customers and suppliers to adhere to principles of this Code of Ethics and include in contracts, when provided for in procedures, the express obligation to adhere thereto;
- report to their superior personnel or Supervisory Body any behavior of a customer or supplier that appears contrary to principles of the Code.

2.8 RELATIONS WITH COMPETITION

The Group Companies recognize the fundamental importance of a competitive market and commit to respecting legal norms regarding protection of competition and market applicable where they operate, and to collaborating with market regulatory Authorities.

The Group Companies and their Collaborating Subjects avoid practices (by way of example, non-exhaustive: creation of cartels, division of markets, limitations to production or sales, conditional agreements, etc.) such as to represent a violation of regulations protecting competition and market.

2.9 CONFIDENTIALITY

Within the scope of performing its entrepreneurial activity, the Group Companies collect personal data and confidential information, which they commit to processing in compliance with all privacy laws in force and best practices for protection of confidentiality.

2.10 PROCESSING OF CONFIDENTIAL INFORMATION

Is considered "confidential information" knowledge of a project, proposal, initiative, negotiation, understanding, commitment, agreement, fact, or event, even if future and uncertain, pertaining to the sphere of activity of the Company, that is not public domain and that, if made public, could cause prejudice or constitute "relevant fact" pursuant to Art. 114 of Consolidated Law on Finance and Art. 66 of Consob Resolution no. 11971 of May 14, 1999 and subsequent amendments and integrations.

Is considered "price-sensitive news" information on a "relevant fact" or on forecast or actual accounting data that can significantly influence the quotation of the Company.

Collaborating Subjects of the Group Companies who, for office reasons, come to knowledge of confidential information, must not communicate it to third parties except for office or professional reasons. In communications to third parties, the confidential nature of transmitted information and obligation of confidentiality also on the part of the third party must be declared. Internal circulation and towards third parties of documents pertaining to confidential information must be subjected to particular attention to avoid prejudice to Group Companies and undue disclosures.

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3 WORK ETHICS AND PROTECTION AND VALORIZATION OF COLLABORATING SUBJECTS

3.1 PROTECTION OF DIGNITY AND INTEGRITY OF EMPLOYED PERSONNEL

The Group Companies recognize that human resources constitute an indispensable element for existence, development, and success of the enterprise and that motivation and professionalism of personnel are an essential factor for maintaining competitiveness and creating value for shareholders.

The Group Companies are therefore committed to developing skills and stimulating abilities and potential of their employed personnel so that they find full realization in achieving goals.

The Group Companies offer equal working opportunities to all employed personnel on the basis of specific professional qualifications and performance capabilities, without any discrimination as the competent function selects, hires, and manages employed personnel based on criteria of competence and merit, without any consideration of race, religious belief, sex, age, ancestry, in respect of laws and regulations in force.

3.2 HEALTH AND SAFETY AT WORK

The Group Companies commit to spreading and consolidating a culture of safety, developing risk awareness, and promoting responsible behavior by all collaborating subjects.

Competent functions vigil so that the work environment is, in addition to adequate from the point of view of personal health and safety, free of prejudices and that every individual is treated with respect, without any intimidation and in respect of their moral personality, avoiding unlawful conditioning and undue discomforts.

3.3 SITUATIONS OF CONFLICT OF INTEREST

All Collaborating Subjects must ensure that every business decision is taken in the interest of the Group Companies; they must therefore avoid any conflict of interest situation between personal or family economic activities and duties covered in the Group Companies.

Should a Collaborating Subject find themselves in a situation that, even potentially, can constitute or determine a conflict of interest, they must report it in writing promptly to their superior personnel who, provides to inform the Board of Directors and the OdV so that its effective presence is evaluated and possible intervention defined. By way of non-exhaustive example, the following situations can determine conflicts of interest:

- Having economic and financial interests (significant possession of shares, professional engagements, etc.), even through family members, with customers, supplier subjects, or competitors;
- Performing working activity, even on the part of family members, at customers, supplier subjects, or competitors;
- Accepting money, gifts, or favors of any nature from persons, companies, or entities that are or intend to enter into business relations with the Companies;
- Using one's position in Company or information acquired in one's work so that conflict can be created between one's own interests and those of the Company;
- Purchasing or selling shares when, in relation to one's work, one is aware of relevant information not yet public domain. In any case, negotiation of possible Company securities by relevant persons must always be performed with absolute transparency and correctness and respecting envisaged requirements of information to market.

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Should the employed subject come to find themselves in a conflict of interest situation of those described in previous points, they inform the Company pursuant to what is established by this Code.

On abstention decides the hierarchical superior, who communicates in written form their decision to the employed subject.

The decision can consist in relieving the employed subject from engagement, or in allowing anyway fulfillment of activity by the same employed subject, expressly motivating reasons justifying such decision.

Regarding obligation of abstention, firmly remaining what is provided for by regulations and this Code, it is specified that:

- a. obligations under this paragraph apply also to collaborating subjects;
- b. on abstention of executive personnel decides the Board of Directors which, examined circumstances and evaluated expressly situation submitted to its attention, must answer in writing to executive subject,
- c. relieving them from engagement or expressly motivating reasons allowing anyway fulfillment of activity by the same.

3.4 PROPER USE OF COMPANY ASSETS

Every Collaborating Subject is responsible for resources entrusted to them and has the duty to use company assets and resources to which they have access efficiently and with modalities suitable to protect their value.

Prohibited is any use of said assets and resources that is in contrast with interests of the Group Companies or is dictated by professional motives extraneous to relationship in place with the Company itself.

3.5 GIFTS AND GRATUITIES

Prohibited is offering directly or indirectly money, gifts, or benefits of any nature on a personal basis to managerial personnel, officials, or personnel of supplier subjects, external collaborating subjects, partner entities, public administration bodies, public institutions, or other organizations for the purpose of deriving undue advantages.

Acts of commercial courtesy, such as gifts or forms of hospitality, are allowed provided they are of modest value and in any case not exceeding 50.00 Euros and in any case such that they do not compromise integrity and reputation of one of the parties, and do not influence autonomy of judgment of addressed subject.

In the same way, Collaborating Subjects cannot receive gifts or favor treatments, except within limits of normal courtesy relations and provided they are of modest value and in any case not exceeding 50.00 Euros. Should a Collaborating Subject receive gifts beyond above limits, they must give immediate communication to their superior personnel who will promptly provide for return or most appropriate use of what received, and make present to donor subject principles of the Group Companies in the matter.

3.6 ANTI-MONEY LAUNDERING

The Group Companies and all their Collaborating Subjects must never perform or be involved in activities such as to imply laundering (i.e. acceptance or processing) of proceeds from criminal activities in any form or manner.

The Group Companies and all their Collaborating Subjects must verify preventively information available (including financial information) on commercial counterparties, supplier subjects, and third parties in general, in order to ascertain their respectability and legitimacy of their activity before establishing with these business relations.

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The Group Companies must always comply with application of anti-money laundering regulations in any competent jurisdiction.

3.7 ANTI-TERRORISM

The Group Companies recognize the high value of democratic principles and free political self-determination inspiring the State. Prohibited, and completely extraneous to spirit of the Group Companies, is any behavior that may constitute terrorist activity or subversion of democratic order of the State.

Every employee having news of commission of acts or behaviors that may constitute terrorist activity of any kind, aid, or financing to such activities or anyway subversion of democratic order must give immediate news to their superior or Supervisory Body.

4 ETHICS OF COMMUNICATION AND EXTERNAL RELATIONS

4.1 RELATIONS WITH INFORMATION MEDIA

Communication to information media plays an important role for valorization of Company image; therefore, all information concerning Group Companies must be provided in a truthful and homogenous manner exclusively by Collaborating Subjects responsible for mass media communication.

Relations with mass media are shaped by respect for the right to information.

Information towards mass media must be accurate, coordinated, and coherent with principles and policies of the Group Companies; it must respect laws, rules, and professional conduct practices; it must be realized with clarity and transparency. Absolutely prohibited is disclosing false news.

Collaborating Subjects must not provide non-public information relative to the Group Companies to representatives of mass media, nor have with these any type of contact aimed at dissemination of confidential company news, taking care to communicate to competent function any question posed by mass media.

4.2 CONDUCT ON DUTY

The employed subject:

- unless justified reason, does not delay nor adopt behaviors such as to make fall upon other employed subjects performance of activities or adoption of decisions falling under their purview;
- maintains with employed subjects and other collaborating subjects of the Company relations shaped by loyalty and professional correctness;
- refrains from using communication tools of their own or of the Company for purposes extraneous to institutional and professional ones;
- in internal professional communication, uses exclusively communication, dialogue, and comparison tools prepared by the Company;
- guarantees fulfillment of overall daily working hours, managing their time with orientation to results, safeguarding availability and coordination with manager and team; uses leaves in conformity with company procedures;
- custodies responsibly technological devices assigned and protects confidentiality of company information, both when operating inside company offices and during performance of service in smart working modality; systematically adopts preventive security measures, such as screen lock and protection of physical and digital assets upon every departure from workstation, in order to mitigate risk of unauthorized access, data theft,

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or threats to company network;

- g. uses assets owned by the Company, of any type and value, exclusively for purposes connected to exercise of working activity, avoiding improper uses that may cause undue costs, damage, or reduction of efficiency;
- h. uses company telematics and telephone services in conformity with policies in force, ensuring correct, responsible, and secure use of tools;
- i. operates in order to reduce risk of theft, damage, or other threats to present assets and resources, informing promptly preposed functions in case of anomalous situations.

4.3 RESPONSIBILITY OF THE MANAGERIAL FIGURE

The Managerial Figure has the responsibility to adopt systems and tools aimed at:

- a. Avoiding harmful consequences to Company activity deriving from negligent behavior;
- b. Guiding team valorizing work by objectives, coordinating management of leaves and planning of time card to guarantee clear and correct reporting;
- c. Monitoring correct use of material, equipment, and all other resources available to employed personnel and collaborating subjects in exercising their functions, in perspective of efficiency and economic viability of public action.

The Managerial Figure ensures:

- a. loyalty and transparency of behavior, guaranteeing impartiality in internal and external relations and use of resources for exclusively institutional purposes;
- b. care of organizational well-being, training and valorizing their personnel;
- c. equitable distribution of workloads, considered aptitudes, professionalisms, and rotation criteria;
- d. correctness and impartiality in evaluation of personnel;
- e. timeliness in facing illicit acts, with possible disciplinary proceedings, reporting and/or complaints to competent authorities, guaranteeing protection of reporting subject;
- f. non-dissemination of news not responding to truth;
- g. dissemination of knowledge of good practices.

Provisions of present paragraph apply, as far as compatible, also to collaborating subjects of the Group Companies, in any capacity, and to other subjects intervening in management of services and proceedings proper to the Group Companies.

4.4 INSTITUTIONAL COMMUNICATION

Information on Group Companies (Company Profiles, audiovisual presentations, etc.) is shaped by maximum transparency and truthfulness of provided data.

In cases of participation in conventions, congresses, and seminars, drafting of articles, essays, and publications in general, as well as participation in public interventions, information provided relatively to activities, results, positions, and strategies of the Company can be disclosed, salvo that they are not already public domain, in respect of internal procedures.

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5 IMPLEMENTATION NORMS

The Board of Directors of parent company makes use for preliminary activities connected to operational procedures for reporting and handling violations of the Supervisory Body ex D.Lgs. 231/2001.

Tasks of the Supervisory Body are:

- define operational procedures for reporting violations and their treatment. Such procedures, in allowing adequate safeguard of confidentiality, must also regulate the matter so as to ensure a general correctness of process in order to avoid reports of scarce significance, not supported by facts or completely lacking foundation;
- receive, analyze, and verify reports of violation of Code, communicating necessary operational modalities (fax, electronic mail, etc.), and guaranteeing confidentiality for reporters of possible violations;
- take decisions on significant violations;
- ensure effective communication, training, and involvement processes coordinating initiatives for dissemination and understanding of Code;
- constitute point of reference for interpretations of relevant aspects;
- provide for update of Code to submit to approval of Board of Directors;
- perform appropriate periodic verifications regarding application of Code.

The Supervisory Body has responsibility of managing all aspects linked to dissemination and application of present Code, making use also of Personnel Direction of the Group Companies which, on basis of its indications, implements appropriate internal communication and training plans for dissemination and knowledge of Code itself.

Analogous communication plans are realized to make known outside the Group Companies contents of Code and to bring to knowledge of interested subjects modalities of reporting possible violations.

5.1 PROCESSING OF PERSONAL DATA

The Group Companies process personal data according to prescriptions in force regarding personal data protection ("Code regarding personal data protection" D.Lgs. 30.06.03 no. 196 as amended by D.Lgs. 101/2018 and European General Data Protection Regulation GDPR EU 2016/679) adopting adequate security measures.

5.2 USE OF IT AND TELEMATICS TOOLS AND SAFEGUARDING OF COMPANY ASSETS

Addressed subjects of this Code are required to use IT and telematics tools made available to them exclusively for company purposes in compliance with security measures and usage procedures established. This to protect IT system and information assets not only of Company but also of third subjects, such as by way of non-exhaustive example public administration, customers, supplier subjects, competitors.

Regarding IT applications, addressed subjects of present Code are required to adopt with diligence what is provided for by company security policies in order not to compromise functioning and protection of IT systems.

Addressed subjects of present Code are responsible for protection of company resources entrusted to them and have duty to inform promptly direct responsible persons of events potentially harmful for the Group Companies. In particular, they are required to adopt following behaviors:

- operate with diligence to protect company assets, through responsible behaviors in line with company policies;

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- avoid improper uses or tampering of company assets that may be cause of damage or reduction of efficiency, or anyway in contrast with interest of the Group Companies.

5.3 PROTECTION OF SOFTWARE, DATABASES, AND ALL MATERIAL PROTECTED BY COPYRIGHT

Addressed subjects of this Code are required to respect rights of others on software, databases, and anyway on all material protected by copyright whether employed in performance of working duties, or for realization of products or services, or in promotional or demonstration scopes. To avoid even unconscious violations of rights of others on protected works, addressed subjects of the Code punctually adhere to instructions provided.

5.4 COMPLIANCE WITH MEASURES FOR THE SAFEGUARD OF WORKPLACE SAFETY

The Group Companies place particular attention on creation and management of environments and workplaces adequate to safety and health of managers and employees, in conformity with national legislation in the matter.

Prevention and protection measures safeguarding health and safety at work must be promptly adopted and respected. Addressed subjects of this Code must refrain from any behavior that may put at risk their own and others' safety and health and report promptly and timely any potential risk, violation of measures, or inadequacy of the same.

5.5 COMPLIANCE WITH ENVIRONMENTAL SAFEGUARD MEASURES

Prevention and protection measures safeguarding environment must be promptly adopted and respected. Addressed subjects of this Code must refrain from any behavior that may put at risk the environment and report promptly any potential risk, violation of measures, or inadequacy of the same.

5.6 MUTUAL RESPECT IN WORK RELATIONS

Relations between addressed subjects of this Code are shaped by mutual respect of rights and freedom of person. Discrimination, harassment, or vexations in any form they manifest themselves are not tolerated.

5.7 USE OF AI

The use of AI systems is informed by principles of transparency, proportionality, safety, personal data protection, accuracy, non-discrimination, and sustainability. Every employment must pursue lawful, determined, and explicit purposes, with absolute prohibition of practices that may generate discriminatory, opaque, or anyway harmful effects to confidentiality and decision-making autonomy of persons.

The Havant Group guarantees that employment of AI systems is always subject to human supervision, entrusted to personnel with adequate competence, training, and authority, according to what is provided for by Art. 26, par. 2, Reg. EU 2024/1689. Output of an AI system cannot constitute sole foundation of decisions producing legal or significant effects on interested subjects, remaining firm ultimate responsibility of preposed physical person.

In cases provided for by Art. 50 of Reg. EU 2024/1689, it informs in clear and distinguishable way physical persons interacting with AI systems about automated nature of interaction, as well as about operation and purposes of processing. Content artificially generated or manipulated is marked as such, salvo legal exclusions.

The Havant Group adopts technical and organizational measures adequate to oversee entire lifecycle of AI systems used, including obligations of monitoring, log preservation, and timely reporting of incidents or malfunctions to suppliers and competent authorities.

Every violation of present clause constitutes breach to organizational diligence obligations and may imply imposition of disciplinary sanctions provided for by Company disciplinary system, firm remaining civil, administrative, and penal responsibility of Company and involved subjects according to norms in force.

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5.8 ANTITRUST CLAUSE

The Havant Group operates in full respect of discipline protecting competition, recognizing that a free and competitive market constitutes indispensable prerequisite for integrity of economic initiative and protection of consumers.

In particular prohibited is to all employed subjects, collaborators, directors, and anyone acting in name and on behalf of Havant Group to: (i) conclude agreements or concerted practices with competitors having as object or effect restricting competition, such as price fixing, division of markets or supply sources, limitation of production or investments; (ii) abuse a dominant position on market through imposition of unjustifiably onerous contractual conditions, refusal to contract, or any discriminatory conduct; (iii) exchange with competitors commercially sensitive information relative to prices, discounts, sales volumes, commercial strategies, or development plans.

5.9 ESG CLAUSE - SUSTAINABILITY AND DUTY OF DILIGENCE

The Havant Group integrates environmental, social, and governance sustainability in its strategy and value chain, in coherence with European regulatory framework and commitments undertaken.

To such end the Company:

- i. Adopts and implements a duty of diligence policy aimed at identifying, preventing, mitigating, and accounting for negative impacts, actual or potential, on human rights and environment connected to its own activities, to that of its subsidiaries and its direct and indirect commercial partner subjects, along entire chain of activity;
- ii. Defines, subject to consultation of stakeholders, a code of conduct establishing binding norms and principles for employees, commercial partners in matter of respect of human rights, environmental protection, and governance integrity;
- iii. Prepares and updates periodically a transition plan aimed at guaranteeing that its business model is compatible with transition towards sustainable economy and containment of global warming to 1.5°C in line with Paris Agreement, in conformity with EU Directive 2024/1760 on corporate sustainability due diligence;
- iv. Guarantees complaint mechanisms and reporting channels accessible to stakeholders, ensuring that every violation is promptly examined and adequate repair measures adopted.

The Havant Group recognizes relevance of legality rating as tool for promoting ethical principles in company behaviors and endeavors so that its sustainability and diligence policies are object of transparent verification and punctual communication to stakeholders, in respect of standards and methodologies defined by EU Regulation 2024/3005 on ESG ratings.

5.10 SANCTIONS

Behaviors contrary to norms in force, this Code of Ethics, regulations governing activity of the Company, and internal procedures are intended detrimental to interest of the Company and determine application of sanctions provided for by organizational model of which Code is part. Organizational model determines also competences and modalities of application of sanctions.

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5.11 MANAGEMENT OF THE CODE OF CONDUCT

5.11.1 Dissemination and communication

For purposes of effectiveness of present Code, Group Companies commit to guaranteeing correct knowledge both to human resources already present in Company and those to be inserted, using all communication means and opportunities at disposal as, for example, information meetings and personnel training.

All employed personnel and collaborating subjects must be in possession of Code, know its contents, and observe what is prescribed therein.

For purpose of ensuring correct understanding of Code, Company prepares and realizes a training plan aimed at favoring knowledge of principles and norms of behavior. Training initiatives can be differentiated, depending on role and responsibility of persons and risk of performed duties also in terms of corruption and illegality.

5.11.2 Vigilance regarding implementation of the Code

Task of verifying, each according to respective competences, implementation and application of Code falls upon:

- Executives and managers of Group Companies;
- Supervisory Body.

In addition to monitoring respect of Code, having for such purpose access to all information sources of Group Companies, Supervisory Body can suggest appropriate updates of same, also based on reports received from personnel.

6 ENTRY INTO FORCE

The Code entered into force from date of its first approval by Board of Directors of Parent Company and subsequently adopted by subsidiary.

The Code was last modified by resolution of Board of Directors on date July 14, 2026.

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