

# SoFiGraf



G R O U P   C A P I T A L

## ***Code of Ethics***

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# 1. GENERAL ASPECTS AND GUIDING PRINCIPLES

## ***Section 1 Introduction and scope***

This Code of Ethics enshrines out the set of values and principles, commitments and ethical responsibilities that have consistently inspired SOFIGRAF S.r.l. in its dealings and company activities and which must be observed by all those who have relationships and dealings of any kind with the Company and with the Group companies.

The dissemination and implementation of the Code of Ethics also reflect the principles enshrined in Legislative Decree 231/2001, as amended, on the administrative liability of legal entities. In fact, the Code should be considered to be an essential component of the Organisation, Management and Control Model adopted by the Group companies, also pursuant to and for the purposes of the Decree.

## ***Section 2 Nature and aims of the Code of Ethics***

The Code of Ethics is an official document of SOFIGRAF S.r.l. adopted by formal approval of the Board of Directors.

It is addressed to and binding on all Recipients, including external (non-company) collaborators of the Group companies such as e.g. special representatives, project collaborators, 'continuous and coordinated' contract collaborators, consultants, representatives, agents, business procurement agents and all those with whom the Companies enter into various forms of business relationship (including, for example, customers, suppliers, consultants). External collaborators of SOFIGRAF S.r.l., such as special representatives, project collaborators or 'continuous and coordinated' contract collaborators, consultants, representatives, agents, business procurement agents, are obliged to comply with the principles and rules of conduct contained in the Code.

The Company and its subsidiaries undertake to transmit a copy of this Code to all external collaborators, before the commencement of each collaboration relationship, and to ensure compliance with the Code by inserting suitable contractual clauses.

Compliance with this Code of Ethics is inherent to the contractual obligations undertaken by employees, external collaborators and/or by those engaged in business dealings with the Company.

SOFIGRAF S.r.l. and the Group companies:

attribute legal relevance and mandatory status to the ethical principles and standards of conduct established by the Code of Ethics;

do not initiate or continue business dealings with any party who does not share or who fails to observe the principles of the Code;

make all persons who have dealings of any kind with SOFIGRAF S.r.l. and with the Group companies responsible for the observance of the said ethical principles, by deploying a disciplinary and sanctions system which ensures that the Code is effective and operates efficiently, and the Company undertakes to apply it to all categories of Recipient without distinction;

guarantee anonymity and confidentiality to Recipients who report violations of the Code, and ensure that they are not subject to any form of retaliation.

### **Section 3 Fundamental values of SOFIGRAF S.r.l.**

The Code contains the fundamental reference values that must guide the conduct of all collaborators of the Company and its subsidiaries, in order to ensure correctness in its business dealings and in its company activities, to protect the Company's assets and to safeguard the Company's trustworthiness and positive corporate image and reputation.

The rules and principles of conduct that ought to inform the conduct of all of the Company's collaborators are indicated in the paragraphs that follow.

The corporate governance system of SOFIGRAF S.r.l. and of its subsidiaries is oriented towards the following principles:

control of business risks;

pursuit of its corporate mission in full compliance with applicable laws, with the rules of the Code of Ethics and with the rules established through the adoption of Organisation, Management and Control Models aimed at preventing the commission of offences that are specified in the Decree.

In particular, all transactions, dealings and relationships within and outside SOFIGRAF S.r.l. and its subsidiaries are inspired by the following fundamental values:

Lawfulness, honesty, and correctness: SOFIGRAF S.r.l. and its subsidiaries operate in compliance with applicable laws, regulations, internal rules and procedures and with the provisions of this Code. In no circumstances shall the pursuit of the interests of the Company and its subsidiaries justify conduct that is contrary to the principles of correctness and lawfulness, and SOFIGRAF S.r.l. and its subsidiaries shall endeavour, within their respective corporate organisations, to promote, disseminate and raise awareness of applicable legal standards, of the Code of Ethics and of procedures whose purpose is to prevent violations of law.

Integrity: in its dealings with third parties and with Recipients, SOFIGRAF S.r.l. and its subsidiaries undertake to act correctly and transparently, avoiding misleading information and conduct aimed at directly or indirectly exploiting third parties' weak bargaining position or lesser knowledge;

Fair dealing and good faith: dealings with third parties and with Recipients shall be characterised by the imperative to honour one's agreements (including verbal agreements) and promises, to optimise corporate assets and to act in good faith in all decisions taken;

Relations with the Public Authorities: dealings with Public Authorities and the Public Administration shall be characterised by correctness, transparency, good faith and collaboration, in full compliance with law;

Transparency: information disseminated by SOFIGRAF S.r.l. and its subsidiaries shall be complete, transparent, comprehensible, accurate and should respect the principles of equal and concurrent access to such information by the general public;

Impartiality: in its dealings with stakeholders and with third parties in general, SOFIGRAF S.r.l. and its subsidiaries avoid any discrimination based on age, gender, health, ethnicity, nationality, political opinions and religious beliefs, and social and personal status;

Respect for persons and equal opportunities: SOFIGRAF S.r.l. and its subsidiaries respect the fundamental rights of persons and guarantee equal opportunities for all;

Professionalism and development of human resources: SOFIGRAF S.r.l. and its subsidiaries acknowledge the centrality of human resources and protect and promote the value of human resources in order to enhance and increase the store and competitiveness of each collaborator's skills and competences, based on a policy that recognises merit and equal opportunities, and providing specific programmes aimed at professional development and the acquisition of new or improved skills;

Confidentiality: SOFIGRAF S.r.l. and its subsidiaries guarantee that information in its possession will be kept confidential, and it refrains from seeking to acquire confidential data except where this is consciously consented to, and in conformity with applicable legal rules;

Conflicts of interest: SOFIGRAF S.r.l. and its subsidiaries endeavour to avoid situations of conflict of interest in the performance of its activities. Recipients make each and every business decision in the interest of SOFIGRAF S.r.l. and its subsidiaries;

Workplace safety, health protection and working conditions: SOFIGRAF S.r.l. and its subsidiaries consider the physical and moral integrity of its employees and external collaborators to be a fundamental value. SOFIGRAF S.r.l. and its subsidiaries safeguard health, safety and hygiene in the workplace and consider full respect for workers' rights and full compliance with applicable workplace health, safety and hygiene regulations to be of fundamental importance, and a priority in the conduct of their business activities;

Community and society: SOFIGRAF S.r.l. and its subsidiaries intend to contribute to the economic well-being and development of the communities in which they operate. SOFIGRAF S.r.l. and its subsidiaries are cognisant of social issues and take responsibility also in the social field, making their own contribution in various sectors.

Environment: SOFIGRAF S.r.l. and its subsidiaries promote respect for and protection of the environment, actively undertaking to ensure compliance with applicable environmental regulations in the conduct of company activities.

## **2. PRINCIPLES AND RULES OF CONDUCT IN RELATIONS WITH EMPLOYEES AND EXTERNAL COLLABORATORS**

### ***Section 1 Dealings with employees and external collaborators***

SOFIGRAF S.r.l.'s and its subsidiaries' dealings with external collaborators and especially with employees are characterised by good faith, transparency, mutual respect and non-discrimination, in conformity with the principles of respect and protection of human rights, which they are committed to upholding, and they undertake to offer all employees the very same work and professional development opportunities on the basis of criteria of merit.

The companies condemn all forms of exploitation of labour and child labour in particular, and undertake to carefully evaluate possible business partnerships with entities that operate in geographical areas that are considered to be at risk of exploitation.

SOFIGRAF S.r.l. and its subsidiaries strive to ensure that all activities are carried out with commitment and professional rigour, with a view to safeguarding its good name and image.

Personnel of SOFIGRAF S.r.l. and of its subsidiaries are obliged to perform their work diligently, competently and in good faith, investing their time and resources adequately in the performance of activities within their remit and refraining from promoting or participating in initiatives that place them in conflict of interest with the companies, on their own behalf or on behalf of third parties.

### ***Section 2 Respect for workers' health and safety***

SOFIGRAF S.r.l. and its subsidiaries consider the following to be important aspects of their activities: the safeguarding of suitable working conditions and work premises, machinery and equipment, the psycho-physical integrity of employees, the safety of all existing and planned company activities and full compliance with applicable legislative and regulatory provisions on prevention and protection in the workplace.

The companies undertake, in particular, to ensure:

that compliance with applicable legislation on workers' health and safety is considered a priority;

that risks to workers are avoided as far as possible and to the extent guaranteed by cutting-edge technology, also through the selection of materials and processes that are less hazardous and that mitigate risks at source;

that risks which cannot be avoided are correctly evaluated and mitigated by means of suitable personal and collective safety measures;

that the provision of information and training to employees and external collaborators is widespread, up-to-date and targeted to the job duties carried out;

that a process of consultation of workers on workplace health and safety is guaranteed;

that any safety issues that may arise during work activities or during audits and inspections are dealt with quickly and effectively;

that workplaces, plant, machinery, equipment, work organisation and the operational aspects thereof are such as to safeguard the health of workers, of third parties and of the community in which the companies operate;

that adequate workplaces and proper compliance with accident prevention rules by clients at whose facilities company employees carry out specific work activities (assembly and/or maintenance - as applicable) are guaranteed, by the insertion of appropriate contractual provisions;

that preventive actions and internal investigations and checks are prioritised in order to protect health and safety and to reduce the probability that accidents or injuries will occur, or situations of non-compliance with applicable laws, regulations and technical standards.

To this end, the companies undertake to make available organisational, instrumental and economic resources that can guarantee full compliance with applicable accident prevention rules and ensure the continuous improvement of workplace health and safety and related prevention measures.

Employees and external collaborators of the companies, each to the extent of their respective competences, are obliged to ensure full compliance with law, with the principles of this Code of Ethics and with company procedures, and also with any other internal provision or measure whose purpose is to ensure safety, health and hygiene in the workplace.

### **3. PRINCIPLES AND RULES OF CONDUCT IN CORPORATE MANAGEMENT**

#### ***Section 1 Safeguarding the Company's assets***

SOFIGRAF S.r.l. and its subsidiaries endeavour to ensure that the use of company resources and property will guarantee, increase and consolidate the company's assets.

Each employee and external collaborator of the companies is directly and personally responsible for the protection and preservation of physical and intangible assets and resources (human, tangible or intangible) entrusted to them by the companies, and they are obligated to use and deploy them in the interest of SOFIGRAF S.r.l. and of its subsidiaries, for exclusively professional or job-related purposes, in compliance with applicable legislative and regulatory provisions and with the provisions of the company Articles of Association, and in conformity with the principles enshrined in this Code of Ethics and with company procedures.

## **Section 2 Company administration**

### A) Company administration

SOFIGRAF S.r.l. and its subsidiaries - each within their respective remits - condemn conduct by any person that seeks to support, encourage, facilitate and/or induce Recipients, each within their respective spheres of competence, to infringe one or more of the following principles and rules of conduct:

observance of the highest standards of collaboration, correctness, integrity and efficiency in their dealings with auditing firms or with the board of statutory auditors, when responding to shareholders' requests and also in their dealings with public supervisory bodies;

diligence, expertise, correctness and precision in preparing and verifying data and information to be incorporated and transposed in the drafting of financial statements, reports or other corporate communications that are mandatory or are intended externally;

prohibition against undermining the integrity of the company's assets in any form and by any means; in particular, the following is prohibited (except in cases expressly permitted by law): (i) to return contributions in any form or to release shareholders from the obligation to make them; (ii) to distribute profits not actually earned or allocated by law to reserves, or reserves that cannot be distributed by law; (iii) to purchase or subscribe for shares or units of the company or of parent companies; to make reductions in share capital, mergers or demergers in violation of the rules safeguarding creditors; (v) to engage in the fictitious formation or raising of share capital; in the event of liquidation, to satisfy shareholders' claims to the detriment of the company's creditors;

prohibition against performing any act - fictitious or fraudulent or otherwise - whose purpose is to influence the will of members of the shareholders' meeting order to illegitimately secure a majority and/or to influence a particular company resolution;

prohibition against spreading false information inside or outside the company concerning SOFIGRAF S.r.l. and the subsidiaries, Recipients and third parties working for them.

### B) Accounting records



SOFIGRAF S.r.l. and its subsidiaries condemn any conduct aimed at altering accounting and corporate information and data that are communicated (inside and outside the companies) to the supervisory authorities or to stakeholders in general.

The companies through Recipients, each to the extent of their respective competences, guarantee the regular, clear and accurate keeping of accounting records and, accordingly:

they guarantee transparent and timely information provision to all the bodies and functions concerned, as well as proper cooperation between the aforementioned bodies and the relevant company functions;

they guarantee the veracity, authenticity and correctness of documentation and information provided in the course of accounting disclosure activities or in other mandatory corporate communications addressed to shareholders, to the general public and to the supervisory bodies;

they facilitate the requisite controls by the competent bodies and functions;

they ensure that all transactions are properly authorised and adequately documented, and that documentation is properly kept so as to facilitate the making of accounting entries at any time and to permit the identification of the various levels of responsibility and to enable transactions to be accurately reconstructed;

they guarantee that the reasons for the Company's corporate transactions and special transactions are specified, also in order to monitor and avert the possibility that transfers of funds may be linked to unlawful activities such as those that support terrorist or subversive groups or associations, from which activities the companies firmly distance themselves.

### **Section 3 Data Protection**

The activities of SOFIGRAF S.r.l. and its subsidiaries require the processing of personal data, which are protected by applicable data protection laws.

SOFIGRAF S.r.l. and the companies put in place, implement and comply with specific security measures to prevent data loss or the illicit or incorrect use of data that are processed by Recipients, and/or unauthorised access to the reserved area of the website and/or to the companies' intranet.

## **4. PRINCIPLES AND RULES OF CONDUCT IN THE HANDLING OF INFORMATION AND IN DEALINGS WITH THE MARKET**

### **A) Communications and Corporate Information**

SOFIGRAF S.r.l. and its subsidiaries are committed, as a fundamental principle, to promoting the widest possible participation of shareholders in the life of the company and in the exercise of

corporate rights, fully informing them so that they can make informed decisions, subject however to compliance with the rules on inside information.

The primary aim of SOFIGRAF S.r.l. and of its subsidiaries is to optimise the value of its shareholders' investment, also to enable them to make an informed use of their resources. Therefore, SOFIGRAF S.r.l. and its subsidiaries undertake:

to implement a company policy characterised by correctness that can guarantee appreciable economic results over time;

to promote knowledge of company policies, programmes and projects;

to ensure that its communications are drafted in conformity with the principles of veracity, clarity, completeness, transparency and timeliness, and based on uniform criteria and, in any case, in compliance with applicable law and with the rules, standards and practices of proper professional conduct;

to ensure compliance with the special procedure established for the internal management and external communication of documents and information concerning SOFIGRAF S.r.l. and its subsidiaries, with particular reference to Inside Information.

#### B) Confidential Information and Inside Information

The companies, also in compliance with applicable "market abuse" rules, maintain an updated "register of persons with access to Inside Information", in order to ensure maximum transparency in the event of direct or indirect purchase or sale of SOFIGRAF S.r.l. or of its subsidiaries by their directors, auditors or managers.

In any case, Recipients and, more generally, those who have access to information not available to the public, in the performance of their duties, are obliged:

to comply with corporate procedures adopted by SOFIGRAF S.r.l. and its subsidiaries, particularly the procedure for the communication of Inside Information, in order to avoid abuse in its use;

to disclose such information externally only if expressly authorised to do so, and in compliance with the principles of equal access and information contextuality;

not to exploit confidential or inside information in order to make or propose investments in the companies or to benefit directly (or have third parties benefit) in any way, whether directly or indirectly, immediately or in the future, financially or otherwise.

#### C) Relations with the Media

Relations with the press, communications and information media and, more generally, with external parties shall be managed exclusively by persons who have been delegated special powers for this

purpose, in compliance with the specific procedures and provisions issued by the senior management of SOFIGRAF S.r.l. and of its subsidiaries.

All other employees, unless specifically delegated by their own Department, shall abstain from providing information of any kind about the companies to representatives of the press and mass media in general, and from any form of contact with them aimed at disclosing company information or news, ensuring that any such request received is referred to the competent department.

## **5. PRINCIPLES AND RULES OF CONDUCT IN DEALINGS WITH EXTERNAL PARTIES**

### ***Section 1 Dealings with Customers***

It is a primary objective of SOFIGRAF S.r.l. and of its subsidiaries to fully satisfy its customers' needs, by conducting itself through its employees and collaborators in a manner characterised by trustworthiness and integrity and by guaranteeing optimal quality.

The companies enter into contracts and dealings with customers according to procedures that are characterised by correctness, completeness and transparency, in compliance with law (including the rules on anti-money laundering, personal data protection, transparency and the rules combating exorbitant interest), with the provisions of the Code of Ethics and with internal procedures.

Recipients of the Model are forbidden to maintain or initiate business dealings with customers or potential customers whose involvement in unlawful activities is known or suspected, and their customer evaluations shall take into account their ability to fulfil their payment commitments.

Recipients shall not, in their dealings with customers, offer or accept gifts or other forms of benefit and/or profit if they could be interpreted as a means to obtain preferential treatment for any activity associated with SOFIGRAF S.r.l. and its subsidiaries, and if they may be perceived as something over and above normal business or courtesy dealings.

### ***Section 2 Dealings with Suppliers***

Processes in place for the purchasing of goods or services shall seek to maximise the competitive advantage to SOFIGRAF S.r.l. and its subsidiaries, while observing the principles of fair dealing and impartiality towards each supplier that meets objective criteria provided for under company rules.

The supplier selection process shall be based on objective evaluations carried out in line with principles of correctness, fairness, clarity and cost-effectiveness; therefore Recipients who, in the name and on behalf of SOFIGRAF S.r.l. and its subsidiaries, purchase goods, merchandise and services shall be obliged:

to check and ensure that each and every operation and/or transaction is legitimate, authorised, consistent, reasonable, documented, recorded and verifiable at all times;

to evaluate the quality, expediency and cost-effectiveness of offers made and their consonance with the company's needs, in conformity with the principles of correctness and transparency;

to take into due consideration the professionalism, efficiency and general reliability of suppliers;

to verify that suppliers who participate in the selection process have the means (including financial resources), organisational structures, skills, know-how, quality systems and resources adequate to the needs and image of SOFIGRAF S.r.l. and its subsidiaries;

to have suppliers sign a special form acknowledging their familiarity with and acceptance of the Code of Ethics of SOFIGRAF S.r.l. and of its subsidiaries.

Recipients of the Model are forbidden to maintain or initiate business dealings with customers or potential customers whose involvement in unlawful activities is known or suspected. In any case, dealings with suppliers shall be characterised by absolute compliance with applicable legislative and regulatory provisions (including the rules on anti-money laundering, personal data protection, transparency and the rules combating exorbitant interest), with the provisions of the Code of Ethics and with internal procedures.

Recipients shall not, in their dealings with suppliers, offer or accept gifts or other forms of benefit and/or profit if they could be interpreted as a means to obtain preferential treatment for any activity associated with SOFIGRAF S.r.l. and its subsidiaries, and if they may be perceived as something over and above normal business or courtesy dealings.

### ***Section 3 Dealings with competing firms***

Competition with competitors must be fair, focused on the nature and quality of the products offered, and conducted also while rigorously safeguarding the tangible and intangible assets of SOFIGRAF S.r.l. and of its subsidiaries, ensuring the continuing development of know-how, overseeing the integrity of its rights and optimising its human assets and industrial resources.

### ***Section 4 Dealings with the Public Administration and other authorities or entities***

#### **A) Institutional Relations in General**

In their institutional relations, SOFIGRAF S.r.l. and its subsidiaries undertake:

to set up, without discrimination of any kind, stable channels of communication with all institutional interlocutors at local, State and EU level;

to represent the interests and positions of SOFIGRAF S.r.l. and of its subsidiaries transparently, rigorously, consistently and correctly, avoiding collusive conduct;

to strictly comply with domestic and international rules and standards and to observe internal company procedures;

to adapt their conduct to the imperative to respect the standards of impartiality and proper procedures that are binding on the Public Administration (hereinafter simply "PA");

to interface with institutional counterparts through officials who are so authorised under powers expressly delegated by the top management of SOFIGRAF S.r.l. and of its subsidiaries, and who are not in any conflict of interest.

#### B) Negotiations and Dealings with the Public Administration

SOFIGRAF S.r.l. and its subsidiaries are obliged to observe the principles set out below, when engaging in negotiations and any other activity whose purpose is the awarding of contracts with the Public Administration or with any other body entrusted with the performance of a public service:

prohibition to make or promise direct or indirect contributions, in any form whatsoever, and prohibition to allocate funds and loans to support public entities, except as permitted and provided for by applicable laws and regulations;

prohibition to offer or promise, directly or indirectly, money or other benefits to Italian "public officials" and/or "public service officers" (or their foreign equivalents) and/or to their relatives up to the second degree of kinship, either directly or through an intermediary, from which SOFIGRAF S.r.l. and its subsidiaries may gain an undue or illegitimate benefit or advantage, except where they fall within normal and legitimate business practices;

prohibition to offer employment and/or business opportunities that may unduly benefit PA employees, directly or indirectly;

prohibition to recruit employees or former employees of the PA, or their relatives up to the second degree, who participate or have participated personally in business negotiations with the companies or endorsed the latter's requests, unless the competent company departments have investigated the matter and found there to be adequate justification;

prohibition, during any business negotiation or request or dealings with the Italian and/or foreign PA, to improperly influence the decisions of Public Officials or Public Service Officers who handle or make decisions on behalf of the PA;

prohibition to solicit or obtain confidential information that could compromise the integrity or reputation of both parties or infringe equal treatment and violate public tendering procedures put in place by the PA.

#### C) Public Loans and Disbursements

SOFIGRAF S.r.l. and its subsidiaries condemn any conduct that is aimed:

to obtain from the State or from the EU or any other public body any type of subsidy, subvention, funding, subsidised loan or other similar disbursement, by submitting altered or falsified declarations and/or documents or by omitting information or, more generally, by using deceptive means, including with the aid of a computer or electronic telecommunications system, whose purpose is to mislead the disbursing entity;

to deploy grants, subsidies or loans or other disbursements obtained from the State or from another public body or from the EU for purposes other than those for which they were awarded.

#### D) Dealings with the Judicial Authorities

In carrying out its activities, SOFIGRAF S.r.l. and its subsidiaries operate lawfully and with propriety, cooperating with the judicial authorities, law enforcement agencies and with any "public official" and "public service officer" with inspection powers who conducts investigations into them.

No Recipient may engage in economic activities, grant professional appointments, give or promise gifts, money, or other benefits to persons who carry out inspections and investigations, or to the competent judicial authorities.

Recipients who become subject to investigations - also in a personal capacity - for acts or facts connected with the employment relationship, or who receive summonses, and/or persons who receive judicial notifications of other kinds shall promptly notify this to the Supervisory Body of the companies.

#### E) Relations with Political Parties

SOFIGRAF S.r.l. and its subsidiaries shall not provide, in any form, contributions that are intended to finance political parties, committees, public organisations or political candidates.

SOFIGRAF S.r.l. and its subsidiaries will not reimburse contributions granted by Recipients in a personal capacity.

#### F) Dealings with Public Supervisory Authorities and Market Management Companies

SOFIGRAF S.r.l. and its subsidiaries undertake to comply fully and scrupulously with directions and requests (including for inspection purposes) from public supervisory authorities and market management companies, and it has adopted special company directives to this end, and also to ensure maximum collaboration and transparency.

## **6. PRINCIPLES RELATED TO ANTI-MONEY LAUNDERING, TERRORIST FINANCING AND SAFEGUARDING OF PERSONAL DIGNITY**

A) Money-laundering, receiving stolen goods and counterfeiting of banknotes and coins, public currency/credit notes, revenue stamps and watermarked or paper

The Company condemns any conduct of persons in a senior management or subordinate role who facilitate, directly or indirectly, the commission of criminal offences such as criminal association, including criminal association for the purpose of illegal traffic of narcotics or psychotropic substances, money-laundering, receiving stolen goods and the use of goods, money or other benefits of illicit origin, and the obstruction of justice; the Company undertakes, to this end, to put in place all prior and subsequent controls required for the purpose (separation of duties, traceability of transactions, monitoring, etc.).

Recipients shall not, in any manner and under any circumstances:

receive or accept (or even promise to receive and accept) payments in cash exceeding applicable legal limits;

run the risk of being implicated in events involving the laundering of money originating from unlawful or criminal activities;

falsify and/or circulate (by accepting, purchasing and/or selling) banknotes, cash, public currency/credit notes, revenue stamps and watermarked paper.

Recipients who receive counterfeit or stolen banknotes or coins shall inform their superiors and also the Supervisory Board, thus enabling them to make the relevant formal reports.

B) Activities aimed at terrorist financing and subversion of the democratic order

The companies condemn the use of their resources for terrorist financing or to carry out any activity aimed at achieving terrorist objectives or subverting the democratic order.

C) Safeguarding of personal dignity

Within the framework of applicable laws, the companies condemn any conduct aimed at the commission of crimes against personal dignity and undertake to adopt the most appropriate supervisory measures to prevent the commission of such offences.

## **7. ENVIRONMENTAL PROTECTION**

Within the scope of its activities, SOFIGRAF S.r.l. and its subsidiaries promote respect for and protection of the environment and take steps to ensure that limited resources (such as electricity, water and raw materials) are used properly and efficiently, and that technologies and production methods are

developed and adopted that are increasingly compatible with the environment and operationally and economically viable, without prejudice to the commitment to comply with applicable domestic and international regulations.

## **8. IMPLEMENTATION OF THE CODE OF ETHICS**

SOFIGRAF S.r.l. and its subsidiaries have entrusted the function of overseeing the application of and compliance with the Code of Ethics to a Supervisory Body appointed pursuant to the Decree, which also ensures that Recipients are made aware of and familiar with the provisions of the Code of Ethics.

### ***Section 1 Communication and dissemination of the Code of Ethics***

In order to promote the commitment to correctness and ethical conduct that characterises the daily operations of SOFIGRAF S.r.l. and of its subsidiaries, the relevant Supervisory Bodies will disseminate the Code of Ethics to Recipients using suitable communication activities, emphasising its mandatory character as appropriate.

More specifically, the Code of Ethics will be:

transmitted by e-mail and/or fax and/or post and/or hand delivery to Recipients, who will sign a declaration of receipt;

published in dedicated pages of the intranet and/or on the company website, where the Code of Ethics can be freely downloaded;

made available in printed form at a location accessible to all collaborators (e.g. on the company notice board).

In addition, the relevant Supervisory Bodies may and/or shall:

organise meetings with a view to presenting any new developments of relevance to the principles and ethical values of this Code of Ethics;

verify that contracts signed by the companies include a clause whereby third parties are informed of the existence of the Code of Ethics and are committed to complying with the values and standards set out therein, and whereby termination for breach of contract occurs in the event of particularly serious violations of the Code, without prejudice to the right to seek compensation for any further loss incurred;

ensure that all updates and amendments to the Code are promptly notified to Recipients;

raise awareness and promote knowledge of the principles and ethical standards of the Code of Ethics also by drafting and submitting a training plan to the Boards of Directors and to the Sole Directors of the relevant Group companies headed by SOFIGRAF S.r.l., that will take into account the



role and responsibility of Recipients; a special training programme is envisaged for new recruits which will present those provisions of the Code of Ethics whose observance is strictly required.

### **Section 2 Infringements of the Code of Ethics and the Disciplinary and Sanctions System**

Compliance with the provisions of the Code of Ethics is an essential part of Recipients' and employees' obligations (for the latter, pursuant to Articles 2104 and 2105 of the Italian Civil Code and to the relevant National Collective Labour Agreement (CCNL) in force. Accordingly, any violation thereof may infringe the primary obligations of the employment relationship or constitute an offence subject to disciplinary procedures with all legal consequences that flow from this, including the termination of the employment relationship, as appropriate, and the possibility of actions for compensation for loss caused by the said infringement.

Any conduct contrary to the provisions of the Code of Ethics will be prosecuted and sanctioned, as being contrary to the principles upheld by SOFIGRAF S.r.l. and its subsidiaries. Any person who encounters any violation of the principles or rules of this Code of Ethics shall be obliged to promptly report it to the relevant Supervisory Bodies.

Any form of retaliation against persons who report possible infringements of the Code of Ethics shall also constitute a violation of the Code of Ethics.

The Supervisory Bodies are responsible for monitoring compliance with the principles and standards of conduct of the Code of Ethics.

Non-compliance with the principles and rules of conduct of the Code of Ethics shall entail the application of sanctions under the company disciplinary system adopted pursuant to the Decree, subject to the limits and in the specific manner provided for therein.

### **Section 3 Entry into Force and Amendments to the Code of Ethics**

The provisions of this Code of Ethics, which came into force on November 15<sup>th</sup> 2013, were updated and revised on April 23<sup>rd</sup> 2024 with approval by the Board of Directors and by the Sole Directors of SOFIGRAF S.r.l. and of its subsidiaries. This Code can be consulted on the following websites: <https://gv-group.it/>; <https://gv-group.it/grafica-veneta/>; <https://gv-capital.it/>; <https://sofigraf.it/>.

The Code of Ethics, thus revised, shall be notified to all Recipients according to the procedures set out in this chapter 8, section 1.