

# Code of Ethics

Engineering Group

Approved by the B.o.D of  
**Engineering Ingegneria Informatica S.p.A**  
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## 1 FOREWORD

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### 1.1 GENERAL PRINCIPLES

Engineering is an industrial group which, due to its size and strong presence on the national Information and Communication Technology and Digital Transformation market, is invested with a significant role for the general economic development of the country and for the well-being of the subjects with which it interacts.

Engineering carries out its activities in compliance with the national regulations of all the countries in which it operates and with supranational regulations, as well as with internationally recognized best practices, according to a conduct based on the principles of honesty, integrity and respect for the interests of Clients, Employees, shareholders, commercial and financial Partners.

Engineering is also committed to respecting human rights, through compliance with the conventions of the International Labour Organization (ILO), of the Universal Declaration of Human Rights, of the international human rights standards and with the national legislation on labor and non-discrimination.

This Code of Ethics constitutes an integral and substantial part of the Organizational Model that the company has adopted in compliance with the provisions set out in L. Decree 231/2001 and summarizes the fundamental principles, directives and the rules of conduct which all those who, whether directly or indirectly, temporarily or permanently, establish collaborative relationships in any capacity or who operate in the interests of the Group, must apply when carrying out their business and in managing corporate activities. The organizational structure of the Company and its system of rules that defines the chain of command must at all times be consistent with this Code and facilitate its full application.

### 1.2 RECIPIENTS

Those who work in Engineering are committed, each within the scope of their own functions and responsibilities, to pursuing the corporate objectives in compliance with the rules contained in this Code of Ethics.

In particular, this document must be considered binding for all Directors, Executives and Employees, for the Board of Statutory Auditors, for members of the Supervisory Board, for temporary and permanent external Collaborators, for Commercial Partners, for Suppliers and for Customers.

Knowledge and compliance with the provisions of this Code of Ethics also represent an indispensable requirement for establishing and maintaining collaborative relationships with third parties, towards whom Engineering undertakes to disseminate its contents.

## 2 RULES OF BEHAVIOR

### 2.1 RULES OF BEHAVIOR IN RELATIONS WITH EMPLOYEES

The management policy of Engineering personnel has always been characterized by great attention towards all actions which can contribute to creating better conditions for employees' personal and family lives, beyond economic remuneration. The well-being of human resources is also achieved through constant attention to the environment and to the work organization, through mutually supportive behavior and any initiative capable of creating cohesion and corporate identity. Engineering also undertakes to avoid any use of forced and compulsory labor and to prohibit any type of abuse that may harm the dignity of Employees.

Engineering also refuses any recourse to or support for using child labor and is committed to ensuring that all young workers operate in roles appropriate to their age.

The Company undertakes to protect candidates and its employees and collaborators from any discriminatory behavior linked to race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibility, marital status, trade union membership, political opinions, age, or any other condition which could give rise to discrimination.

#### 2.1.1 SELECTION AND MANAGEMENT OF RELATIONS WITH PERSONNEL

The personnel recruitment criteria exclusively reflect the compliance of candidates' profiles with those sought by Engineering. Engineering allows all potential candidates equal entry opportunities and operates its selections only on the basis of objective and meritocratic principles, without any discrimination.

The General Department of Human Resources & Organization takes all possible measures, limited to the information in its possession or reasonably obtainable, to avoid favoritism in the selection process, and uses all means necessary in order that decision-making processes concerning promotions should be based exclusively on merit criteria.

Engineering acknowledges that training its Personnel is a strategic element for organizational development and for the professional and personal growth of its Employees.

For these reasons, the competent corporate bodies provide newly hired personnel with precise information concerning the tasks to be performed, the company procedures and the rules of the Code of Ethics and undertake to enhance the professionalism and growth of Personnel through specific training courses. Engineering Employees are hired with a standard employment contract according to the procedures provided for by legislation and by the National Labor Collective Agreement in force, as no form of irregular work is tolerated.

Each Manager is required to enhance the professionalism of their work team as much as possible and to manage their time appropriately, respecting the laws in force and the industry standards as regards working hours, rest periods, public holidays and overtime, requiring performances consistent with the duties of the individual Employee in line with the remuneration provided for in the employment contract for these duties. In this regard, the Company ensures that the definition of the salary remuneration is based on objective criteria and that overtime work is correctly remunerated, guaranteeing employees an adequate rest period that complies with the provisions of current legislation.

No Manager must take advantage of his/her position to request performances not in line with normal work activities and may not demand personal favors or activities which openly violate this Code and current regulations from his/her subordinates.

Each Employee, within the limits of his/her experience, the demonstrated skills and the corporate organization, must be involved in the decisions concerning planning and executing the work, constructively contributing to implementing the planned activities.

The Company undertakes to protect its Employees from acts damaging the dignity of the person and to this end agrees to protect its Personnel from acts of psychological violence, harassment of any type and any discriminatory behavior.

The Employee who believes that he/she has been a passive subject of objectively incorrect or discriminatory behavior, in addition to the ordinary legal actions envisaged by the national collective agreement and by the law, can send a confidential communication to the Supervisory Board, established pursuant to L. Decree no. 231/2001 (*see sub. par. no. 6.2*).

Engineering does not allow any form of marginalization and/or persecution ("bullying"), exploitation or harassment of any type, for work or personal reasons, by anyone, regardless of the level of responsibility or the function covered, while carrying out their activities within the Company.

Differences in treatment that are justified or justifiable on the basis of objective criteria (experience, competence, commitment, etc.) are not to be considered discriminations nor can they be classified as "bullying". Finally, Engineering prohibits any behavior which adversely affects the individual's personality, freedom or human dignity.

### 2.1.2 HEALTH AND SAFETY

The health and safety of workers, both employees and collaborators, at Group or customer offices, have the highest priority for Engineering.

For this reason, Engineering has set up a Workplace Health and Safety Management System ("WHSMS") in compliance with current laws, which aims to assess and eliminate risks as well as to ensure prevention and protection in the workplace, adequately published on the company Intranet and distributed to all Employees and Collaborators, who are required to promote and respect it.

### 2.1.3 DUTIES OF EMPLOYEES

All Employees and Collaborators must be aware that the level of achievement of professional and personal goals coincides with the achievement of company objectives and is directly proportional to the sense of responsibility and loyalty invested.

Employees must behave according to the principles of good faith, diligence and loyalty and comply with the provisions included in the contract signed, in this Code and in company procedures, as well as with the regulatory provisions. Employees are required to maintain any relationships with public entities in a manner which complies with the law.

### 2.1.4 PREVENTION OF CONFLICTS OF INTEREST

During corporate activities, Engineering Personnel are required to perform their work with diligence, competence and loyalty, refraining from promoting or taking part in situations that, even potentially, may appear to constitute a conflict of interest with corporate purposes, regardless of the possible criminal relevance of the behavior undertaken.

A conflict of interest is defined both as a situation in which an individual pursues an interest which differs from Engineering's mission, by "personally" taking advantage of the Company's economic opportunities, and as a situation in which representatives of the customers or suppliers should act in contrast with the fiduciary duties related to their position, during their relations with the Company.

Should the Employee have a conflict of interest, even if only potential, he/she must immediately notify his/her Manager/hierarchical Superior as well as the General Department of Human Resources & Organization and must in any case refrain from carrying out any type of decision-making activity concerning the subjects with whom he/she holds direct or indirect interests.

## 2.2 RULES OF BEHAVIOR WITH CUSTOMERS

Contracts with Customers must comply with current laws and must be clearly and completely defined. In their relations with clients, Employees must behave in a manner characterized by courtesy and availability, safeguarding the corporate image as much as possible. Engineering undertakes to provide high quality services and verifies the perceived quality through periodic customer satisfaction surveys.

Engineering guarantees that customers' personal data is processed in compliance with the regulations in force and based on the principles of this Code of Ethics. The Company also ensures that the data and information are recorded and processed in a complete, timely manner and with due respect for confidentiality.

When taking part in competitive procedures, Personnel must avoid any potential violation of the antitrust and unfair competition laws.

## 2.3 RULES OF BEHAVIOR WITH SUPPLIERS

Procurement processes are based on the utmost transparency, the efficient allocation of company resources as well as the preventive verification that Suppliers should possess the professional and legal qualification requirements for exercising the activity/profession they carry out. In order to become Engineering Business Partners, Suppliers must register in a special portal (see PAGE – <http://page.eng.it> -) subject to compliance with minimum requirements to be demonstrated by self-certification.

Engineering periodically evaluates the services offered by its Suppliers, and, through the opinion expressed by the various user units, resolves the permanence or exclusion of the supplier from the portal.

Engineering asks the Personnel involved in the Supplier selection to ensure that the appropriate documentation proving the objective criteria used for the selection may be verified at any time.

Suppliers are required to conduct themselves in a manner that complies with national and international laws and the provisions of this Code. In this regard, the supply contract expressly provides that the Purchaser has the right to terminate the contract, including partially, should the Supplier engage in unlawful conduct sanctioned by L. Decree 231/2001.

## 2.4 RULES OF BEHAVIOR WITH THE PUBLIC ADMINISTRATION

Relationships with the Public Administration as well as with central or peripheral Public Institutions, are reserved exclusively to the company departments specifically appointed by Engineering.

When working with the Public Administration, Engineering operates in compliance with the principles and criteria of good performance and impartiality on which its actions must be based.

Bribery, illegitimate favors, collusive behavior are considered unacceptable and therefore prohibited and sanctioned. Incentives through third parties to obtain personal and corporate advantages of an economic or professional nature are equally prohibited.

## 2.5 RULES OF BEHAVIOR IN RELATIONS WITH ALL OTHER PARTIES

### 2.5.1 RELATIONS WITH SHAREHOLDERS

Through its own structures, Engineering undertakes to provide its shareholders with all the information necessary to enable them to cast their vote in the Shareholders' Meeting. Furthermore, Engineering undertakes to encourage shareholders to participate in shareholders' meetings for their relevant decision-making and promotes the dissemination and knowledge of corporate events equally between shareholders.

### 2.5.2 RELATIONSHIPS WITH ORGANIZATIONS, POLITICAL PARTIES AND TRADE UNIONS

Engineering guarantees that all personnel have the right to establish, participate and organize trade unions of their choice and to bargain collectively with the company. It also ensures that staff are effectively informed of the right to freely join any employee organization of their choice, without this resulting in any negative consequences or retaliation.

Engineering does not interfere in any way in the formation, operation or management of workers' organizations or in the collective bargaining process and ensures that workers' representatives can have contact with their members in the workplace. In addition, the company guarantees that union members, workers' representatives and staff engaged in organizing workers are not subject to discrimination, harassment, intimidation or retaliation as a result of the union activities carried out.

Engineering can fund associations, non-profit organizations and similar organizations in Italy and abroad whose purposes represent interests which are widespread and "*super partes*".

Engineering can sponsor events with a high cultural content (exhibitions, conferences, etc.) whose quality level must be ensured through a direct participation in organizing the event.

The provisions of this Code concerning conflicts of interest and the transparency and correctness of the incurred expenses documentation also apply to funding organizations, movements and cultural events. For personal donations in favor of the above-mentioned associations and organizations, the utmost transparency and compliance with current legislation is required from those who hold general company representation duties (Chairman, Chief Executive Officer, Executive Vice President and Chief Officer).

### 2.5.3 RELATIONS WITH THE PRESS AND THE MEDIA.

Engineering requires that all external communications should always be truthful, transparent and such as to increase the support of public opinion through the proper dissemination of the programs implemented and the performances obtained. Relations with the media are reserved exclusively for the appointed corporate functions.

Any Employee contacted by a media representative must refrain from providing any type of information and promptly inform the competent Group Public Affairs and Corporate Communication Department concerning the subject's identity and the type of request received.

Engineering Directors and Employees may in no case offer payments, gifts and business opportunities in order to influence the professional ethics and impartiality of the operators in the information and communication sphere.

## 3 MANAGEMENT OF INFORMATION

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### 3.1 CONFIDENTIALITY

Engineering ensures the confidentiality of the information in its possession. Without prejudice to legal and contractual obligations, Engineering protects the confidentiality of information concerning its Personnel and stakeholders and guarantees the privacy of the correspondence and personal documentation of its Employees in all possible forms. Each Employee is required to protect the confidentiality and privacy of the information acquired by virtue of their work position and in particular to observe the confidentiality clauses requested by Customers and other counterparties.

All the information, knowledge and data acquired or processed by Employees through their work activity may not be used, communicated or disclosed without the prior and specific authorization of their Manager and according to the rules set out in the relevant company procedures on the subject.

All personnel, both internal personnel and external consultants, are strictly forbidden to use, in any form, the information they may acquire as a result of the activity carried out, whether related to Engineering Group, Clients, Suppliers or other parties.

## 4 BUSINESS CONDUCT

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### 4.1 DILIGENCE AND CORRECTNESS IN PERFORMING TASKS AND CONTRACTS

Duties deriving from all contracts and work assignments must be carried out with due diligence and according to what is knowingly established by the parties.

During all relationships, anyone operating in the name and on behalf of Engineering should avoid taking advantage of contractual loopholes, or unforeseen events, in order to negotiate the contract for the sole purpose of exploiting the position of dependence or weakness of the counterparty.

### 4.2 FAIR COMPETITION

Engineering recognizes the value of fair competition as a means of efficiently allocating community resources and undertakes not to behave in a collusive, profiteering manner such as to exploit any dominant position.

### 4.3 CORRUPTION PREVENTION

When carrying out its activities, Engineering prohibits any action against or by third parties aimed at promoting or favoring its own interests, at obtaining an advantage, or which is capable of damaging impartiality and independence of judgment. To this end, Engineering undertakes to implement all the measures necessary to prevent and avoid corruption and other conduct which may integrate the danger of committing the crimes provided for by L. Decree 231/2001.

Every action, operation or transaction as well as any accounting record must be managed correctly, exhaustively, transparently and truthfully.

In this regard, in compliance with the "zero tolerance" principle towards corruption and in line with the virtuous policy which the Company has always pursued, Engineering has implemented an Anti-Bribery Management system compliant with the UNI ISO 37001:2016 standard.



## 5 BEHAVIOR WITHIN THE COMPANY

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### 5.1 ACCOUNTING CORRECTNESS

The Company complies with the Laws and regulations in relation to preparing the annual and interim financial statements as well as any type of similar documentation required by current legislation.

Employees must fully cooperate to ensure that operating results are represented correctly and promptly within the corporate accounting system.

Adequate supporting documentation which guarantees the identification of the appropriate authorization and the economic motivation underlying the transaction must be kept for each transaction. The supporting documentation must be easily retrievable and filed according to suitable criteria which allow an easy consultation both by the internal bodies in charge of the control and by authorized external Bodies and Institutions.

### 5.2 GIFTS AND BENEFITS

Engineering does not authorize any form of gift or benefit, aimed at acquiring preferential treatment connected to the activity performed, except those that are part of normal commercial practice or a form of politeness, and which in any case must be of a modest value.

In particular, any type of offer to Italian and foreign Civil Servants, or their family members, which could influence their independence of judgment or induce them to ensure any direct or indirect economic advantage to Engineering, is forbidden. This norm may not be derogated from even in those countries where it is customary to offer gifts to business Partners and Civil Servants.

In the case of gifts received which exceed the habits<sup>1</sup>, customs, codes of ethics of bidding organizations, Directors and Employees must promptly communicate the occurrence to the Head of the Process and Internal Audit Department, who will estimate the appropriateness of the value of the gifts and bring the Engineering policy on the matter to the attention of the donating company or individual.

### 5.3 PROTECTION OF COMPANY ASSETS AND IT SECURITY

In compliance with company regulations, all Employees are required to use the Company assets available to them based on the principles of utmost diligence, good faith and fairness, complying with the purposes for which they were granted. With reference to the use of IT tools, and in particular to e-mail services and internet access, the conduct must be inspired by the principles of fairness and comply with the law as well as with the specific company regulations on the subject.

In particular, said personnel are strictly prohibited from accessing, copying, modifying or disclosing the Client's software and/or information concerning the organization, or from intercepting communications beyond the authorizations/enablement granted by the Client and, in any case, for purposes that fall outside the scope of the service provided by Engineering. Furthermore, it is forbidden to create false computer documents and to damage company data and information or IT and telematics systems.

For the correct use of the IT tools and the applications contained therein, the Employee is required to comply with all the measures necessary to preserve their functionality.

In the event of violation of the aforementioned regulations, the specific Legal provisions, the national labor contract and the company regulations will apply.

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<sup>1</sup> Maximum value of 150€

## 6 CODE IMPLEMENTATION PROCEDURES

### 6.1 ORGANIZATIONAL STRUCTURES AND CRITERIA FOR IMPLEMENTING THE CODE OF ETHICS

The Supervisory Board is responsible for overseeing compliance with the rules contained in this Code of Ethics and for monitoring, modifying and supplementing the provisions, submitting them to the attention of the Administrative Body for the necessary approval.

The principles and values contained in this Code, which are at the basis of every action and relation attributable to the Company, are the subject of appropriate forms of institutional communication, according to the means deemed most suitable by the Administrative Body. In addition to being brought to the attention of all Personnel and stakeholders, the provisions contained in this Code of Ethics will be subject, as a whole and/or for specific in-depth analysis sections, to autonomous and periodic training initiatives.

Breaching the provisions contained in this Code of Ethics leads to the application of disciplinary sanctions, which in any case guarantee the dignity and respect of all staff. These sanctions cannot in any way degenerate into forms of corporal punishment, physical or mental coercion, verbal abuse and harsh treatment of personnel.

### 6.2 VIOLATIONS OF THE CODE OF ETHICS: REPORTING METHODS AND DISCIPLINARY SYSTEM

Violation of the provisions contained in this Code of Ethics constitutes a disciplinary offense, punishable by Law and/or the national labor contract applied and, as regards external collaborators, a breach of contract.

Any violation of the principles and provisions contained in this Code must be promptly reported, by its recipients, to the Supervisory Board, established pursuant to L. Decree 231/2001.

To this end, the following communication channels are available to the reporting individual:

- Mail Service, by sending the communication to: Supervisory Board – Engineering Ingegneria Informatica S.p.A c/o Piazzale dell'Agricoltura no 24 – 00144 Rome. In this case, in order to guarantee confidentiality, the report must be placed in a closed envelope that bears the indication "confidential/personal".
- E-mail, by sending the report to the address [231@eng.it](mailto:231@eng.it).
- Whistleblowing - Reporting Portal, consistent with the provisions of law no 179/2017, accessible via the following link: <https://ewb.eng.it>.

Engineering guarantees the protection of the reporting subject from any possible retaliation and does not allow the adoption of any type of disciplinary and/or sanctioning consequence for reports that have been made in good faith.

Should the reports received require, in compliance with the regulations in force, confidential handling (including keeping an anonymous profile), the Company undertakes to protect this confidentiality, without prejudice to the provisions of the law, the national labor contract applied, the regulations or procedures applicable to the present case. Having ascertained the effectiveness of the transgression on the basis of the evidence gathered, the Supervisory Board proposes sanctions, whose possible imposition remains the exclusive competence of the Administrative Body.

Said sanctions are provided for by the disciplinary system adopted by the Company with the Organizational, Management and Control Model pursuant to L. Decree 231/2001 and may not in any way derogate from the provisions contained in the Workers' Statute and the national labor contract applied in the Company (see. par. 1.7 Engineering's Organizational, Management and Control Model).