



# **CODE OF ETHICS**

**Approved by the Board of Directors on the 26<sup>th</sup> October 2022**

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## 1. THE COMPANY AND THE RECIPIENTS

In compliance with the Italian Law Decree no. 231/2001, EOS Mktg&Communication S.r.l. (hereinafter also referred to as “EOS” or “Company”) has chosen to formalise this Code of Ethics (hereinafter also referred to as “Code”) in order to share its values, principles, and rules of conduct with its collaborators and communicate them to all other stakeholders. This is done with the aim of building a transparent environment oriented towards compliance with ethical and behavioural standards and in the belief that a company’s success should never disregard ethics in the conduct of business, while competitiveness should always be paired with ethical sensitivity, social involvement, and respect for the environment.

The adoption of this Code aims, among other things, at meeting the needs and expectations of EOS’ stakeholders in the best possible way, by recommending and promoting a high level of professionalism and prohibiting any behaviour that conflicts not only with the regulatory provisions that are relevant from time to time, but also with the values that the Company intends to promote.

All those who hold functions of representation, administration, or management within EOS, all employees without exception, collaborators, and anyone else who has relations with it directly or indirectly, permanently or temporarily, namely anyone who works to pursue the objectives of the Company (e.g. clients, business partners, advertisers, suppliers, consultants, institutions, and public bodies, hereinafter collectively referred to as “Recipients”) shall respect the principles and provisions set forth in this Code. Recipients who violate the principles and rules of this Code damage the relationship of trust established with the Company.

The Recipients are aware that following the entry into force of the Italian Law Decree no. 231, the Company may be held liable in the event of the commission of offences included in such regulation; to this end, the Company imposes absolute compliance with the obligations and prohibitions set out in this Code.

All the Recipients are required to know the Code of Ethics and contribute to its implementation, improvement, and dissemination. The Company undertakes to distribute a copy of this Code to all employees and collaborators and to disseminate its contents and objectives.

In view of the above, EOS also undertakes to do as follows:

- ensure the timely dissemination of the Code to all Recipients;
- guarantee that all updates and amendments are promptly brought to the attention of all Recipients of the Code;
- provide adequate training and information, making available appropriate support in case of doubts about the interpretation of the Code;
- ensure that employees who report violations of the Code are not subject to any form of retaliation;
- adopt sanctions that are fair and commensurate with the type of breach of the Code and ensure that they are applied indiscriminately to all categories of employees, with reference to the legal, contractual, and internal regulations in force in the jurisdictions in which it operates.

## 2. GENERAL PRINCIPLES

The Code is based on a set of general principles, the observance of which is of crucial importance for the smooth operation, the reliable management, and the corporate image of EOS.

The Code of Ethics is thus the fundamental charter of moral rights and duties that defines the ethical and social responsibility of each member of the EOS’ corporate organisation.

These general principles are rules of conduct that govern the Company’s internal and external relations and they are therefore the benchmark that every EOS employee is required to meet.

### 2.1 Transparency

EOS assures all stakeholders of full transparency on its actions by using simple and immediately comprehensible language, without prejudice to the requirements of confidentiality in the conduct of business and of safeguarding the competitiveness of the Company’s activities. EOS also undertakes to correctly inform its clients, including through

commercial communication that is not aimed at influencing their judgement.

In particular, the Recipients shall provide any information legitimately requested by any private individual, natural or legal person, or public authority with correctness and truthfulness, guaranteeing maximum transparency and cooperation.

Information of any kind concerning the Company shall be provided exclusively by the corporate departments appointed for this purpose, through the designated official channels and in compliance with the applicable regulations in force.

## **2.2 Fairness and honesty**

EOS operates in compliance with the applicable laws, professional ethics principles, and internal regulations. The pursuit of EOS' interest can never justify conduct contrary to the principles of fairness and honesty.

The employees and the other Recipients of the Code are committed to the highest standards of integrity, honesty, and fairness in all dealings within and outside the Company.

EOS considers the honesty of its actions to be a fundamental value. To this end, only those expressly conferred relevant powers, within the scope of their role and prerogatives and within the limits of the powers conferred upon them, can make decisions binding the Company towards third parties.

No Recipient shall nor may directly and/or indirectly accept, solicit, offer, or pay nor attempt to solicit, offer, or pay sums of money or other benefits (including gifts or presents, with the exception of items of modest value commonly accepted in commercial practices) even as a result of unlawful pressure.

EOS does not tolerate any kind of bribery of private individuals, public officials, or any other party connected or related to public officials, in any form or manner and in any relevant jurisdiction, including those where such activities are in practice permitted or not judicially prosecuted.

With regard to the above, it is forbidden for employees, collaborators, and all other Recipients to offer or attempt to offer commercial gifts, presents, or other benefits that may constitute violations of laws or regulations or that are in contrast with the Code, or that may be detrimental to EOS, even only in terms of image.

It is likewise forbidden for employees, collaborators and all other Recipients (including through their family members) to accept gifts, presents, or other benefits that might compromise their independence of judgement. To this end, each employee and Recipient shall avoid situations in which personal interests may conflict with the Company's interests.

The Recipients are obliged to immediately report any such solicitations or offers, from whomever they receive them, to their superiors or to the competent company departments.

It is strictly forbidden to impose or accept services imposed by other parties as a condition for the conclusion or processing of a deal.

## **2.3 Impartiality**

EOS operates in a fair and impartial manner by adopting the same behaviour towards all stakeholders that come into contact with the Company. It shall be impartial, in form and substance, in all decisions that must be taken objectively, avoiding any form of discrimination based on nationality, gender, racial or ethnic origin, religion, political opinion, age, sexual orientation, disability, state of health of those involved, and in general any characteristic of the human person. EOS is committed to offering equal opportunities to all employees and collaborators on the basis of their professional qualifications and performance capabilities, without discrimination based on ethnicity, religion, opinion, nationality, gender, age, and physical and social conditions.

In this respect, the Company expects the Recipients to abide by the same principles and to treat all individuals fairly and impartially, without prejudice.

## **2.4 Protection of competition**

EOS recognises the fundamental importance of a competitive market in which free competition is a decisive factor in ensuring growth and constant business improvement.

Therefore, EOS avoids conduct that would constitute a violation of competition laws.

In particular, EOS undertakes and imposes to the Recipients to do as follows:

- not use prohibited or unfair methods to steal clients from competing companies;
- not discredit any competitors in order to gain business;
- provide true and complete information on the services provided, avoiding statements that could mislead any third party.

## **2.5 Conflict of interest prevention**

In carrying out their activities, the Recipients must avoid situations where they and/or the persons involved in transactions are, or may even just appear to be, in conflict of interest.

“Conflict of interest” is to be understood as any case in which the Recipient pursues an interest that differs from the mission of EOS, or in any case carries out activities that may interfere with his or her ability to make decisions in the exclusive interest of the Company, or personally takes advantage of any business opportunities of the Company itself. If any situations of conflict or potential conflict should arise on an occasional basis, the utmost openness and transparency are required towards the manager or the department responsible for any necessary measures.

The Recipients are required to declare in advance any possible conflict of interest, with particular reference but without limitation to personal or family interests (e.g. financial or commercial shareholdings in suppliers, customers, partners, or competitors) that may compromise their independent judgement in deciding what is in the best interest of the Company and the best way to pursue it.

Therefore, each Recipient shall declare such conflicts of interest without delay to his or her direct hierarchical superior, who will assess their actual presence and relevance on a case-by-case basis, if necessary together with the competent corporate departments, and shall refrain from making decisions on matters in which he or she has a conflict of interest.

In the event that the conflict of interest involves a member of the administrative body, he or she shall declare the conflict of interest in compliance with legal obligations.

## **2.6 Bribery and corruption**

The Recipients are committed to the highest standards of integrity, honesty, and fairness in all dealings within and outside the Company. EOS does not tolerate bribery and corruption in any form, committed by or against anyone, in any relevant jurisdiction, even in those where such activities are in practice permitted or not prosecuted.

The Recipients are made aware that the commission of such offences to the advantage or in the interest of the Company renders the person subject to the application of the sanctions provided for in the Italian Law Decree No. 231/2001.; therefore, they shall promptly report any such phenomenon to the competent corporate departments.

## **2.7 Confidentiality and protection of privacy**

EOS recognises the strategic value of information by defining precise confidentiality rules in order to avoid improper disclosure. In particular, specific caution is required in dealing with information relating to the Company’s business and with the data of collaborators and third parties in general (including clients) and in protecting information generated or acquired within the Company’s structure and/or in the management of business relations.

Recipients may become aware of confidential data in the performance of their activities; therefore, the Company endeavours to process such information in compliance with the regulations and provisions laid down by the Italian Data Protection Authority.

Information must be disclosed to third parties, for official or work-related reasons, only by authorised persons and, in any case, in compliance with the provisions in force and with the principles of parity and contextual information; when disclosing confidential information to third parties, the confidential nature of the information must be expressly stated and compliance with the obligation of confidentiality must be requested from the third party itself.

All information obtained or generated in connection with one’s employment and/or collaboration relationship is the property of EOS. The obligation of confidentiality in relation to any acquired confidential information is also

imposed on parties with whom the Company has business relations, by means of specific contractual clauses or confidentiality agreements. Without prejudice to the application of the laws in force on the duty of loyalty (in particular, Art. 2105 of the Italian Civil Code), no Recipient may draw any direct or indirect, personal or financial advantage of any kind from the use of confidential information nor communicate such information to others.

### **2.8 Compliance with current regulations**

EOS aims at pursuing its goals and operating in strict compliance with the laws and regulations in force in Italy and in all the countries where it operates.

EOS does not promote or maintain relations with organisations, associations, or movements that directly or indirectly pursue aims prohibited by law.

In this respect, the Recipients shall act in compliance with the laws, obligations under applicable licences, recognitions and/or authorisations, and all other applicable regulations in the performance of their work activities. Any activity that does not comply with the law is expressly forbidden, even if it generates significant profits for the Company.

### **2.9 Safety at work and environmental protection**

EOS promotes and guarantees the health and safety at work of its employees and collaborators in all the places where they are called to work and in all the countries where EOS operates.

It is also committed to guaranteeing working conditions that respect individual dignity and foster a safe and healthy work environment, also through the dissemination of a culture of safety and risk awareness and the promotion of responsible behaviour by employees and collaborators, who, within the scope of their duties and functions, participate in the process of risk prevention, environmental protection, and health and safety protection for themselves, their colleagues, and third parties.

EOS is committed to ensuring that sexual harassment does not take place in neither internal nor external work relations and to preventing behaviours or initiatives that create an intimidating, hostile, or isolating work environment for individuals or groups of workers, which may negatively affect their work performance or hinder their work and/or career prospects for mere reasons of personal competitiveness. To this end, all employees shall contribute personally to maintaining the safety of the work environment in which they operate and they shall behave responsibly for their own protection and that of others, avoiding actions or behaviour that may put other employees' health or physical safety at risk. Each person with delegated powers or authority in the field of health, safety, and the environment shall ensure compliance with the regulations in force in the areas for which he or she is responsible and shall not put other employees' health or physical safety at risk in the performance of these activities.

In terms of environmental protection, EOS carries out its activities taking into account the need to protect the environment in compliance with the provisions of current environmental legislation.

In particular, with regard to respect for and protection of the environment, EOS does as follows:

- it manages the waste it produces through selected suppliers and in compliance with the regulations in force, verifying that such third parties have the necessary authorisations, registrations, or communications to carry out their activities and working on the traceability of the processes and the control of the supply chain;
- it makes its choices taking into account and limiting the potential impacts on the territory and the environment;
- for the printing of its magazines and any other promotional and non-promotional material, it relies on FSC-certified printers, this being an independent, third-party, international certification specifically related to the forestry sector and wood and non-wood forest-derived products;
- it ships its magazines and publishing material using registered, certified biodegradable and compostable material ("cellophane");
- it has promoted as much as possible the elimination of plastic in daily operations, conscious use of paper, and the use of recycled paper for all internal activities wherever possible;
- it implements energy-saving activities such as switching off monitors during lunch breaks, using underfloor heating,

and promoting individual temperature regulation of one's work environment.

EOS condemns any kind of action or behaviour potentially damaging to the environment and the territory.

### **2.10 Control, accounting transparency, and payments**

In accordance with its line of business, EOS undertakes to ensure that the facts relating to its own management are correctly and truthfully represented in its accounts.

Every operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent, and congruent. All actions and operations must be properly recorded and it must be possible to verify their related decision-making, authorisation, and execution processes.

Adequate supporting documentation must be kept for each accounting entry.

Such documentation must enable to identify the reason for the transaction that generated the entry itself and the relevant authorisation. Supporting documentation must be easily retrievable and archived according to appropriate criteria that allow it to be easily consulted by both internal and external control bodies.

Each payment must refer to regularly delivered and invoiced supplies of goods or services, of which the objective evidence, lawfulness, and strict necessity for the conduct of the Company's business can be easily reconstructed.

The use of Company funds for illegal or improper purposes is strictly prohibited.

Under no circumstances, shall any payments that are not based on properly authorised business transactions be made to anyone nor any illegal forms of remuneration be performed.

Any neglect, omission, or falsification of which employees become aware must be promptly reported to the administrative bodies.

### **2.11 Prevention of money laundering**

Within the scope of their activities, the Recipients must not engage in conduct consisting in the use, transformation, or concealment of capital of unlawful origin. With reference to such conduct, the replacement or transfer of money, goods, or other benefits resulting from an offence committed with criminal intent and the carrying out of other transactions in relation to such assets aimed at obstructing the identification of their criminal origin constitute an offence.

Before establishing relations or stipulating contracts with non-occasional suppliers and other business partners, EOS and the Recipients shall make sure of their moral integrity, reputation, and good name by carefully checking the information available on these subjects, including financial information and the legitimacy of their activity.

In addition to the provisions of the preceding paragraph on payments, it is also expressly forbidden to accept cash payments in excess of the maximum threshold provided for by the regulations in force and to carry out transactions that are individually below the threshold, but are actually artificially divided in order to circumvent such regulations.

### **2.12 Prevention of computer crime**

The Recipients' computer equipment must be utilised in full compliance with the laws in force, its intended use, and internal regulations and in such a way as to protect its preservation and functionality, also in relation to computer security.

The Recipients are required to use the IT tools and access to telecommunication networks provided to them by EOS in compliance with the laws in force and Company procedures.

It is therefore forbidden and foreign to EOS to make improper use of the computer tools owned by the Company, which may lead to the commission of conduct constituting unauthorised access to a third party's computer or telematic system, the unlawful interception, obstruction, or interruption of computer or telematic communications, the damaging of information, data, and computer programs, whether private or used by the State or by other public bodies or in any case of public utility, and the damaging of computer or telematic systems, whether private or of public utility.

In addition, the unlawful possession and dissemination of access codes to computer or telematic systems and the dissemination of computer equipment, devices, or programmes aimed at damaging or interrupting a computer or

telematic system, as well as the installation of equipment designed to intercept, prevent, or interrupt computer or telematic communications are also absolutely prohibited.

### **2.13 Intellectual property protection**

In implementing the principle of compliance with the law, EOS abides by domestic, EU, and international regulations for the protection of intellectual property.

As an operator in the publishing and new media sector, EOS is particularly aware of the importance of intellectual property and it therefore respects and protects all forms of its own and other people's intellectual property, including copyrights, patents, trademarks, trade secrets, and other intangible assets.

The Recipients shall promote the correct use, for any purpose and in any form, of all intellectual works of a creative nature, including computer programs and databases, to protect the patrimonial and moral rights of their authors and they are expressly required to comply with the applicable regulations.

### **2.14 Protection of corporate assets**

EOS safeguards and protects its corporate assets, including by equipping itself with tools to prevent embezzlement, theft, and fraud to its own detriment. It is therefore strictly forbidden to appropriate any goods belonging to the Company, even of modest value, without having been authorised to do so by the competent departments.

Everyone must feel a caretaker and responsible for the tangible and intangible assets of EOS that are instrumental to the performance of his or her activities. Each employee and/or collaborator shall ensure the utmost respect for the company's infrastructure, means, tools, and materials, promptly reporting to his or her supervisor any improper use of such equipment that he or she believes others are making. These categories include, for example, premises, furniture and ornaments, operating equipment (such as company cars, tools, personal computers, printers, photocopiers, servers, or communication tools such as telephone, fax, e-mail, personal stationery, paper), functions offered by the company's information system (such as processing procedures, software, and access to the Internet, databases, and the like), books, manuals, and newspapers and magazines in general.

Each employee and/or collaborator shall use the Company's equipment only for the performance of the work tasks to which he or she is assigned. It is therefore strictly forbidden for employees and/or collaborators to utilise the Company's means, be they of IT, technical, or any other nature, for the pursuit of private ends or interests or in competition with the Company's activities.

Every employee and/or collaborator is permitted to use Company equipment and/or material outside the Company's facilities only due to work-related reasons such as, for example, work with clients, advertisers, or third-party companies, participation in events, exhibitions, or trade fairs, and any and all promotional activities in favour of the Company.

## **3. RELATIONS WITH THIRD PARTIES**

### **3.1 Relations with clients**

Clients are at the heart of the Company's activities: work is carried out first and foremost to ensure each client's own growth. A Client is understood to be anyone who uses the Company's services and work in whatever legal form they may take.

In line with its vision, EOS is focused on providing its clients with the best possible protection and service, ensuring the right balance between ethical values and a technologically and commercially advanced approach.

EOS aims meeting the needs of its clients through behaviour based on fairness, competence, courtesy, and maximum cooperation.

The Company expects the Recipients' relations with clients to be characterised by as follows:

- full transparency, fairness, and professionalism;
- compliance with the law, with particular reference to anti-money laundering, anti-usury, and transparency

provisions, as well as supervisory regulations;

- independence from all forms of internal and external conditioning.

### **3.2 Relations with business partners**

Each business partner must be assessed on the basis of requirements of honourableness and professionalism that are both subjective (e.g. its institutional history and reputation) and objective (e.g. activities usually carried out by it, consistency between them and the type of operation requested).

As a general rule, no relations shall be established with partners of any kind, should any exceptions regarding their reliability, honourableness, and professionalism be identified through average due diligence.

### **3.3 Relations with suppliers and external collaborators**

As a general rule, EOS' relations with its suppliers and external collaborators in the pursuit of maximum competitive advantage are marked by compliance with the rules in force and the principles laid down in this Code.

In particular, new potential suppliers and/or collaborators are assessed and chosen primarily on the basis of their compliance with the laws in force and respect for the values set forth in this Code of Ethics. The choice of the supplying companies and the determination of the purchase conditions must be based on objective methods, taking into consideration the quality, cost, and type of their offered goods and/or services, their ability to promptly supply and guarantee goods and services of a level appropriate to the Company's needs, their characteristics of integrity, honourableness, and professionalism, and the absence of any past or present suspicion of their involvement in unlawful activities, terrorism, or subversion of public order.

Suppliers, in all cases, expressly accept the principles set out in this Code.

In the event that a supplier adopts behaviour not in line with these principles in performing its activity for EOS, the Company is entitled to take appropriate measures up to precluding any further opportunities for collaboration.

All the Recipients shall cooperate with the Company departments in charge of verifying any violations of the principles governing the selection of suppliers.

### **3.4 Relations with competitors**

EOS intends to protect the value of fair competition by refraining from collusive and abusive behaviour, in the firm belief that collaboration and competition are an opportunity to improve its own quality standard.

The provisions of Paragraph 2.4 of this Code of Ethics apply.

### **3.5 Relations with employees, cooperation, and work environment**

EOS recognises the professional contribution of the people working in it, within a framework of loyalty and mutual trust, as one of the main success factors of any company. Employees, collaborators, and operators are an indispensable factor for the success of the Company. EOS therefore protects and promotes the value of human resources with the aim of improving and increasing each individual's wealth and skill competitiveness.

The competitive advantage of EOS is based on the competence and commitment of each individual employee or collaborator.

Personnel to be recruited are assessed on the basis of whether the candidates' profiles correspond to the Company's expectations and needs, while guaranteeing equal opportunities for all concerned.

EOS offers all workers equal opportunities, so that everyone can enjoy fair treatment based on merit criteria.

Any form of discrimination is avoided, both at the selection stage and in terms of personnel management and career development.

Therefore, the competent departments shall undertake to do as follows:

- adopt criteria based on merit and competence for decisions concerning employees;
- select, recruit, train, and remunerate employees without discrimination;
- comply with labour laws and regulations.

The physical and moral integrity of all employees and collaborators is considered a primary value for EOS.

To this end, EOS is committed to protecting the moral integrity of employees and collaborators by guaranteeing the right to working conditions that respect personal dignity.

All Recipients shall contribute to the continuous search for excellence in the quality of the products and services offered by the Company according to their own skills and competences.

Cooperation among its employees and collaborators is a key element for the success of the Company. In this regard, conduct based on favouritism or the exchange of services that is or can even potentially be detrimental to the work of any colleagues is not permitted in the performance of one's work duties.

The Recipients shall also endeavour to maintain a decent work environment in which the dignity of each individual is fully respected.

To this end, it is absolutely forbidden to act as follows:

- performing tasks under the influence of alcohol or drugs;
- smoking in the workplace, in order to protect one's own health and the health of others, even in countries where this is permitted;
- behaving in such a way as to create an intimidating or offensive climate for colleagues and/or subordinates in order to marginalise and/or discredit them in the work environment.

The Company considers absolutely unacceptable any kind of behaviour defined as harassment, bullying, and mobbing, and more generally any undesirable behaviour that has the purpose or effect of violating a person's dignity. In accordance with the principles defined in this Code of Ethics, moreover, when the employment or collaboration relationship between an employee and EOS is terminated, both parties are required to behave correctly, ensuring the fulfilment of the obligations to which they are bound by virtue of the contracts stipulated up to the date of effective termination of the relationship and fulfilling the reciprocal obligations of confidentiality that may be pending even after the relationship has been terminated.

At the time of the effective termination of the employment relationship, the Recipients shall also return any Company assets they may be in possession of and undertake not to defame or, in general, behave in such a way as to bring EOS into disrepute.

### **3.6 Relations with institutions**

EOS recognises the importance of a correct, healthy, and fruitful collaboration with all Public Institutions and, more generally, with the Public Administration.

To this end, all the Recipients shall maintain relations of full cooperation with local, national, and supranational Institutions and Public Authorities (where applicable), marked by utmost transparency and respect for the values contained in this Code of Ethics.

In particular, in the relations that the Recipients of this Code have with the Public Administration, also through third parties, the following principles must be respected:

- it is necessary to operate at all times in compliance with the law, with the express prohibition of conduct that, in order to benefit EOS or pursue an interest of the Company itself, is such as to constitute an offence.
- in the framework of any business negotiation, request, or relationship with the Public Administration, employees, collaborators, and those working on behalf of the Company must not seek to improperly influence decisions or induce the performance of acts contrary to their official duties by managers, officials (including officials who negotiate or make decisions on behalf of the Public Administration), employees of the Public Administration, or their relatives or cohabitants, even if this is to the advantage or in the interest of the Company.

### **3.7 Relations with political and trade union organisations**

Each Recipient is aware that any involvement in associations of a religious nature or for the performance of political and trade union activities, towards which the Company remains neutral, shall take place exclusively on a personal basis, in compliance with the law, in their own time and at their own expense.

### **3.8 Relations with the media**

The Company and all its employees and collaborators shall ensure that the image of EOS appears consonant with the prestige and importance of the role that the Company has in the landscape of companies operating in its same sectors.

Relations with both the national and foreign press, television, radio, social networks, and mass media in general shall be maintained exclusively by the Company representatives authorised to do so or by the persons delegated by them. Employees and collaborators may not provide information or opinions and make statements on behalf of the Company to any representatives of the media, nor undertake to do so without the necessary authorisation of the competent departments.

### **3.9 Marketing activities**

In its marketing campaigns, EOS undertakes to provide only information that corresponds to reality.

It also undertakes to comply with privacy-related regulations with regard to addresses and other information relating to the target audience of the campaigns, by providing the possibility for anyone who so requests to obtain information on how his or her name was found and by offering the possibility of being deleted from the lists. For this communication tool, EOS also undertakes to do as follows:

- manage the names and data contained in its mailing lists in accordance with current privacy regulations and not send untruthful or defamatory information by e-mail;
- not carry out spamming actions towards current and potential customers, giving the possibility to unsubscribe from its mailing lists at any time and providing information on how a user's data were found at all times;
- equip itself with all the necessary technological tools to ensure that, when sending e-mail communications, no files are attached that may contain computer viruses capable of damaging the contents of the receiving computers or their e-mail systems.

## **4. EFFECTIVENESS OF THE CODE OF ETHICS AND SANCTIONS**

Compliance with the provisions of this Code shall be considered an essential part of the contractual obligations of employees of the Company pursuant to and for the purposes of Art. 2104 and 2105 of the Italian Civil Code.

Any breach of the provisions of this Code may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence. As the case may be, it may result in the application of the sanctions and disciplinary measures provided for in the applicable Collective Agreements, with all legal consequences, including with regard to the preservation of the employment relationship, and it may entail compensation for any damages arising therefrom. In this respect, the Recipients are required to be familiar with this Code of Ethics and to report any violation of the rules laid down herein to their hierarchical superior.

Compliance with the principles of this Code forms an essential part of the contractual obligations of those who have business relations with EOS. Consequently, any breach of the provisions contained therein may constitute a breach of such obligations, with all legal consequences.

## **5. APPROVAL AND AMENDMENT OF THE CODE OF ETHICS**

This Code of Ethics is approved by the Board of Directors of EOS.

Any amendments will be approved in the same manner.

