CODE OF ETHICS

2026

Impresoft Group

Impresoft S.p.A.
Impresoft Digital PA
Impresoft Engage S.r.l.
Impresoft Univerce S.r.l.
Impresoft Switzerland SA
Addiction S.r.l.
Marketplace Generation S.r.l.
Blulink S.r.l.
Formula S.p.A.
GN Techonomy S.r.l.
HBS S.p.A.
Kipcast S.r.l.
Mainsim S.r.l.
Open-Co S.r.l.
Qualitas S.p.A.
Syscons S.r.l.

REGISTERED OFFICE:

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CODE OF ETHICS

IMPRESOFT GROUP

IMPRESOFT'S VISION

To become a European-level player in guiding the digital and sustainable transformation of companies, inspiring and enabling them to embrace technology and sustainability as the main drivers of their success, to improve the quality of work and life.

IMPRESOFT'S MISSION

To generate sustainable value and be the lifelong partner of medium-to-large companies in the digital transformation of their key processes and in the adoption of the most advanced technological enablers.

We do this by leveraging: deep process knowledge, the skills and passion of our talents, an ecosystem of excellent technology and distribution partners, and a unique and distinctive offering capable of simplifying complexity.

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Guiding Principles

Sustainability Policies
They extend and integrate the Code of Ethics adopted by the Group. The Guiding Principles are their cornerstone, further detailed in four dedicated policies: Health and Safety, Environment and Resources, Rights and Society, Quality and Responsibility.

Partnership Charter
summarises the specific requirements for business partners.

UN Global Compact
It promotes the creation of a more inclusive and sustainable global economy, engaging its signatories to share, support and apply within their sphere of influence the Ten Principles, relating to human rights, labour standards, environmental protection and anti-corruption, and to support the objectives of the United Nations, including the *Sustainable Development Goals*

Sustainable Development Goals
On 25 September 2015, the United Nations General Assembly adopted the 2030 Agenda for Sustainable Development, which comprises 17 goals - the *Sustainable Development Goals* (SDGs) - e 169 sotto-obiettivi (*target*). The SDGs and their related targets identify the global priorities for 2030, applicable also to business, and define an integrated action plan for people, the planet, prosperity and peace.

This Code of Ethics sets out the fundamental principles and rules of conduct to which the Impresoft Group (the "Group") and all companies belonging to the Group (the "Group Companies") adhere. These principles and rules, together with the further guidance provided by the Sustainability Policies adopted and periodically updated, guide the sustainable success of the Group, contributing to the creation of shared value in the long term.

The Group is inspired by and promotes, within its sphere of activities, values consistent with the most advanced international practices in the field of governance, including the United Nations Global Compact, the largest strategic initiative for *corporate responsibility*. The Group reaffirms its support for the Ten Principles and intends to contribute to the Sustainable Development Goals as well as to the broader objectives of the United Nations.

To this end, the Group fully embraces a sustainable strategy through policies, management, operational methods and initiatives tailored to its own specificities, contributing to the promotion of a healthy, inclusive and sustainable global economy, respectful of human and labour rights, capable of safeguarding the environment and actively engaged in ensuring the integrity of every aspect of the business.

Compliance with the principles and provisions of the Code of Ethics is the fundamental conduct that binds directors, employees, collaborators and all those who operate in any capacity with the Group in all internal and external relations of the Group Companies.

In particular, the members of the Boards of Directors of the Group Companies are required to be guided by the principles of the Code in setting objectives, proposing investments and carrying out projects, as well as in any decision or action relating to the activities managed; similarly, managers, in giving practical effect to their management activities, shall be guided by the same principles, both internally, thereby strengthening cohesion and the spirit of mutual collaboration, and in dealings with third parties who come into contact with the Group Companies.

Vision, Mission and Values

IMPRESOFT'S VISION

To become a European-level player in guiding the digital and sustainable transformation of companies, inspiring and enabling them to embrace technology and sustainability as the main drivers of their success, to improve the quality of work and life.

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OUR VALUES

They embody the identity of Impresoft and represent our work both internally and externally. They are our principles, compasses to always have a clear and defined direction to follow.

Generating sustainable positive impact
Creating sustainable value for people, customers, the company and society at large
Guiding companies towards the generation of sustainable value through digital technology
Maintaining high professional and ethical standards
Working with passion for the success of our customers, always placing them at the centre

Fostering an excellent environment to attract and develop talent
Valuing everyone's talent
Being inclusive and recognising diversity as a strength
Constantly setting new ambitious goals
Actively listening and maintaining an objective point of view

Playing as a team, with method and rhythm, to win
Building lasting relationships based on trust
Embracing different perspectives and respecting them
Building an effective working method conducive to the best teamwork
Expanding our skills and codified knowledge for the benefit of colleagues

Being passionate about innovation and generating enthusiasm
Always maintaining a positive attitude even in the face of challenging conditions
Being innovative, hungry, passionate, and having fun
Being a positive role model that inspires other people and organisations
Combining passions, skills and experiences to bring digitalisation to a higher level

Impresoft Group was born from the union of several innovative and complementary companies: Formula, X-Techarts, Impresoft HBS, Impresoft GN Techonomy, Impresoft Syscons, Qualitas, Open-Co, Blulink, Mainsim, Impresoft Engage, Impresoft Univerce, Kipcast, Cooder, Webformat, Addiction Digital Pioneers, Marketplace Generation and Impresoft Switzerland. Thanks to the expertise gained over many years of experience, the Group is able to provide companies of various sizes operating in multiple market segments with support and consulting in selecting the best business applications, from ERP, MES and CRM technologies to CPM solutions and data centres. Furthermore, it offers a complete range of services and products related to digital transformation in the areas of application modernisation, digitalisation of business processes, managed services, modern workplace, security and training.

All Group companies have been active on the market for decades and have decided to pool their wealth of skills, technologies and human resources in a joint journey that began at the end of 2019 with the merger of Impresoft and Formula, and continued with the acquisition of Qualitas Informatica, the merger of 4ward with Progel, and the entry between 2020, 2021 and 2022 of NextTech, OpenSymbol, NextCRM, GN Techonomy, Kipcast, Cloudnova and Hiteco.

An ongoing project that aims to transform a wealth of experiences and skills into a single point of reference for the technological innovation needs of the Italian business community, covering these needs comprehensively.

Scope of Application

Corporate Bodies
Boards of Directors, Board of Statutory Auditors, Internal Board Committees.

Employees
Employment contracts of any type and nature, including those concerning managers, project-based personnel, part-time employees, temporary workers, interns and quasi-subordinate collaboration agreements.

Contractors
Those who, by virtue of a contract or mandate, act in the name and on behalf of the Group Companies (consultants, intermediaries, special attorneys).

Third Parties
Those who maintain commercial relationships with the Group Companies, such as suppliers, customers, partners, investors, and the beneficiaries of social initiatives, donations and sponsorships.

The recipients of the Code of Ethics, unless otherwise expressly specified in the individual sections of this document, are the members of the Corporate Bodies, the Personnel, the Collaborators of the Group Companies and Third Parties.

The Code of Ethics constitutes a set of principles and rules to which Personnel must conform, also pursuant to the provisions of the National Collective Labour Agreements regarding behavioural rules and disciplinary sanctions. Compliance with the provisions of the Code of Ethics is required under employment contracts of any type and nature, including those concerning managers, project-based Personnel, part-time employees and quasi-subordinate collaboration agreements.

For members of the Corporate Bodies, compliance with the Code of Ethics is a prerequisite for establishing or continuing a relationship with the Group Companies.

The application of the Code of Ethics to Collaborators and Third Parties is subject to the signing of declarations and/or the inclusion in contracts, mandates, assignments or partnership agreements binding them to the Company of specific clauses committing the party to compliance with the Code of Ethics and formalising the penalties for breaches of such commitment.

Protection and Development of People

INCLUSIVE WORK ENVIRONMENT

The Group believes in people as a fundamental element of business success. For this reason, it promotes in all its activities a work environment free from any form of discrimination or abuse, in which respect, collaboration and mutual support can fully develop the potential of human capital. In particular, the Group Companies:

- reject all forms of forced and child labour;
- reject any conduct constituting physical or psychological violence, coercion, harassment, bullying or any attitude attributable to mobbing and harassment practices;
- reject any form of sexual harassment, however carried out, and, regardless of legal definitions, consider unacceptable and prohibited any attitude or behaviour that may cause discomfort or instil fear in another person;
- establish working relationships characterised by fairness, equality, non-discrimination, attention and respect for personal dignity;
- promote equal opportunities, in particular between genders, for every employee or candidate;
- respect workers' rights and trade union freedoms, in particular freedom of association and collective bargaining, also through a responsible and constructive dialogue with labour protection organisations that fosters a climate of mutual respect in line with the principles of fairness, transparency and participation;
- adopt selection and evaluation processes based on criteria of merit, competence and achievable objectives;
- recognise fair treatment in relation to role, commitment and results achieved and promote a fair redistribution of the value created.

Relations with Personnel are primarily based on the values of fairness, loyalty, transparency and mutual respect and are governed, from a contractual perspective, in compliance with the applicable regulatory provisions in the various countries regarding labour matters.

The values expressed in the Code of Ethics represent the rules of conduct underpinning professional and personal relationships within the company. Under no circumstances is it permitted to pursue or realise private or corporate interests in violation of the law, regulations, sector-specific rules, internal procedures or the control system.

All individuals within the Group Companies contribute in a concrete way to the achievement of corporate objectives, in compliance with the values and rules of conduct set out in the Code of Ethics. Relations between the different levels of responsibility must be conducted with loyalty and fairness.

UN Global Compact

Principle I: businesses are required to promote and respect universally recognised human rights within their respective spheres of influence.

Principle II: businesses are required to ensure that they are not, even indirectly, complicit in human rights abuses.

These principles derive from the Universal Declaration of Human Rights, which represents the international minimum standard for the protection of individual rights and freedoms. These fundamental provisions are today considered the basis of international law. The principles of equality, life and safety, and personal, economic, social and cultural freedom are considered customary international law, i.e. directly recognised as legal norms.

Principle III: businesses are required to support the freedom of association of workers and recognise the right to collective bargaining

Principle IV: businesses are required to support the elimination of all forms of forced and compulsory labour

Principle V: businesses are required to support the effective elimination of child labour

Principle VI: businesses are required to support the elimination of all forms of discrimination in employment and occupation

These principles were derived from the International Labour Organization Declaration on Fundamental Principles and Rights at Work, which calls on all ILO member states to apply its principles, in line with the conventions on which it is based. It is a shared approach that all countries, regardless of their level of economic development, cultural values and number of ratified ILO Conventions, respect, promote and realise these fundamental principles and rights.

DIVERSITY AND CULTURE OF PLURALITY

The Group, within the context of its own organisation, promotes and supports working conditions and interpersonal relationships that foster the integration and valorisation of different cultures and lifestyles, starting from respect for characteristics of gender, sexual orientation, age, nationality, health status, political opinions, race, religious beliefs and any other diversity. The Group regards plurality and diversity as sources of enrichment and resources for the development of humanity, respects and values the unique contribution of each individual to the company's activities, creating an inclusive work environment that respects everyone's dignity, taking into account each person's contribution and recognising the strength of differences. The Group Companies require all Recipients to adopt conduct that conveys and reinforces the values of diversity, avoiding and condemning any form of discrimination. Furthermore, they support organisational models that enhance cooperation among people from different cultures, perspectives and experiences, and adopt training, communication, behavioural and operational measures that contribute to evolving the internal culture towards extensive models of active inclusion of all diversities. In particular, in support of the specific commitment to gender equality, considered an essential element for the professional growth of the Group, the Group Companies promote the Women Empowerment Principles in all activities.

Women Empowerment Principles (WEP)
Promoted by UN Women and the United Nations Global Compact, they commit signatories to gender equality and women's empowerment in the workplace, in the economy and in communities.

1. Establishing a high-level corporate culture and managerial leadership that aims for equality between men and women.
2. Equal treatment of men and women in the world of work – maintaining and promoting Human Rights and non-discrimination.
3. Ensuring the health, safety and physical and mental wellbeing of all workers during their activities.
4. Promoting personal and professional development and supporting women in the context of their careers.
5. Promoting women's entrepreneurial activities, recognising their role in the HR field and respecting their dignity in all forms of marketing.
6. Promoting equality through shared initiatives and advocacy activities.
7. Measuring and reporting on all progress made in the field of equal treatment of men and women at work.

PROFESSIONALISM AND CONTINUOUS TRAINING

The Group regards the full range of relational, intellectual, organisational and technical competencies of each person as a strategic resource, to be protected and developed so that individual aptitudes can be realised and recognised, also through appropriate professional development paths. It therefore promotes the development of a culture based on the sharing of knowledge, which valorises the behaviour and contributions of each individual. The Group Companies believe in continuous training as a tool for the enrichment of people, the dissemination of ethical values, organisational integration and the promotion of change and innovation.

HEALTH, SAFETY AND WELLBEING

The Group promotes a healthy and safe work environment. Furthermore, well beyond legislative compliance, it supports across all Group activities and companies the development of a health and safety culture built on managerial leadership and a solid management system, with the aim of ensuring and protecting the physical and psychological wellbeing of Personnel and all people who work in, access or remain on the premises and facilities of the Group Companies.

A similar approach is dedicated to building and maintaining inclusive and motivating work environments, aimed at the wellbeing of people.

All Recipients are required to ensure full compliance with legal regulations, internal procedures and any other provision designed to prevent risks to their own and others' safety and to ensure the protection of health and hygiene in the workplace.

Responsible Relationships with Stakeholders

SHAREHOLDERS AND INVESTORS

The Group aims to establish a constant dialogue with shareholders, investors and, in general, with the market, so as to provide systematic dissemination of comprehensive and timely information about its activities, subject only to the confidentiality requirements that certain information may entail.

In compliance with the Vision, Mission and Values that inspire strategies and the flow of investments and divestments, the Group Companies guarantee:

- transparent, clear, accurate and complete communication of information relating to the development of the company and its performance;
- equal information for all shareholders and investors, without discrimination or preferential treatment. Information is made available through multiple channels, including the institutional website where mandatory periodic reports and principal corporate documents are published;

The Corporate Governance system adopted, in addition to being an essential tool for the sustainable success of the Group, contributing to the creation of shared value in the long term, ensures effective management for the Group Companies, value creation for shareholders, control of business risks and transparency towards the market.

PUBLIC ADMINISTRATION AND INSTITUTIONS

The Group, within the scope of its activities, intends to promote a constructive and transparent dialogue with Institutions and Public Administration, also with a view to fostering greater mutual understanding within the dialogue between the public and private sectors, functional to the development of business culture.

It is prohibited to give, offer or promise, even indirectly, money, goods, services, benefits or undue favours (including in terms of employment opportunities) to public officials and persons in charge of a public service in order to influence their decisions in relation to matters from which the Group Companies may derive any advantage.

It is also prohibited to establish personal relationships with Public Administration solely aimed at exerting improper influence and undue interference in decisions in which the Group Companies are a counterparty.

Those who, in the course of their duties, legitimately have dealings with Public Administration and Public Institutions, are responsible for verifying in advance, and with due diligence, that what is declared or certified in the interest of or on behalf of the Group Companies is truthful and accurate.

JUDICIAL AUTHORITY AND SUPERVISORY AND CONTROL AUTHORITIES

Relations with the judicial authority and control authorities are guided by the utmost collaboration and transparency.

The Group undertakes to cooperate with the judicial authority and supervisory and control authorities, when investigations are conducted against it or against business partners, avoiding obstructing in any way, actively or passively, their institutional activities.

Specifically, it is prohibited:

- to exert pressure on a person called to make statements before the Judicial Authority and Control Authorities, with the aim of inducing them not to make statements or to make false statements;
- to help anyone who has committed a criminally relevant act to evade the investigations of the Authorities, or to avoid their searches.

In the context of periodic communications and reports and in specific dealings, the Group Companies undertake to ensure the completeness and integrity of the information provided and the objectivity of the assessments made, carrying out the required obligations within the deadlines established by law or requested by the Authorities.

It is prohibited to give, offer or promise, even indirectly, to representatives of the judicial authority and supervisory and control authorities money, gifts, goods, services, benefits or favours (including in terms of employment opportunities) in order to obtain undue favourable treatment or outcome during audits, inspections or documentary access procedures.

POLITICAL AND TRADE UNION ORGANIZATIONS

Participation by Personnel in political organisations takes place outside working hours and without any connection to the role held at the Group Companies.

The Group Companies recognise and promote the right to participate in trade union activities in compliance with applicable regulations and collective labour agreements.

The Group Companies refrain from any direct or indirect pressure on political figures in order to obtain undue advantages. Any potential provision of direct or indirect contributions, in cash, in kind or in any other form to political parties, movements, committees and other political and trade union organisations is made within the limits and in compliance with the transparency required by law and recorded in accordance with internal accounting procedures.

MEDIA

The Group recognises and appreciates the informational role played by the Media and analysts in terms of financial education and public communication.

These are objectives to which the Group Companies intend to contribute, by fully cooperating with information bodies, in compliance with their respective roles.

Communications from the Group Companies to information bodies must be truthful, clear and transparent, and must be consistent, accurate and in conformity with company policies and programmes, subject only to the confidentiality requirements that certain information may entail.

An employee or collaborator invited, in the name of or on behalf of each Company, to participate as a speaker at conferences, congresses or seminars, or to write articles intended for the public, shall express content and positions consistent with those of the Group.

Promotional strategies and practices must respect the values expressed in the Code of Ethics. The Group Companies manage the information published on the institutional website so as to make it a comprehensive, effective tool aligned with market information expectations.

GLOBAL AND LOCAL COMMUNITIES

The Group considers its relationship with the local area of the utmost importance. Beyond the creation of shared value through investment activities, it supports the initiatives of associations, foundations and non-profit organisations on topics relating to culture, social issues, the environment, health, sport, entertainment and the arts.

Financial support is intended only for events or entities that offer guarantees of reliability and for which activities aimed at undermining the values and principles of conduct expressed in the Code of Ethics can be excluded.

BUSINESS PARTNERS

Suppliers are encouraged to carry out their activities in accordance with standards of conduct consistent with those set out in the Code of Ethics. The Group, in order to protect its operational effectiveness and safeguard its resources, including its image and reputation, does not maintain relationships with parties that are unwilling or that have demonstrated an inability to operate in compliance with applicable regulations and in accordance with the values expressed in the Code of Ethics.

Suppliers are selected through transparent and objective assessments of their professional competence and business structure, taking into account the quality, price and methods of supply of goods or provision of services.

Business Partners
Business partners include suppliers of goods and services, contractors, customers and any other business partner, co-investor or beneficiary, in their direct activities, in contractual relationships with any sub-suppliers or subcontractors and, in general, in the creation and management of their respective value chains.

Partnership Charter
Impresoft Group has adopted the Partnership Charter which, in addition to applicable regulations, takes into account the values expressed in the Code of Ethics, the guidance provided by the Sustainability Policies and, in general, all the aspects necessary to create relationships based on integrity and sustainability, such as human and labour rights, health and safety, environment, animal welfare, product and service safety and quality, business integrity and the protection of privacy and intellectual property.

Suppliers are also selected by evaluating their ability to fulfil the confidentiality obligations required by the nature of the service offered.

Recipients are prohibited from offering, promising or giving money, goods, utilities or any other benefit (whether direct or indirect) that is not adequately justified within the context of the contractual relationship with the Supplier or that is intended to obtain preferential treatment for the Group Companies.

It is also prohibited to accept the promise or gift of money, goods or other benefits from the Supplier in order to perform acts in violation of the duty of loyalty or the obligations inherent in one's role, or for the sole purpose of favouring the Supplier with the Group Companies.

CUSTOMERS AND CONSUMERS

The Group promotes across all activities, in particular for services and products intended for markets business or consumer, national or international, commercial policies and strategic choices aligned with best practices and the principle of professional loyalty towards customers and consumers. Commercial initiatives aimed at promoting the company and encouraging the purchase of products or services must be carried out in compliance with regulations protecting consumer interests and customer satisfaction. Furthermore, customers and consumers must have access to complete, up-to-date, verified and transparent information on the characteristics and quality of products and services, including, where necessary, aspects related to environmental and social performance. This is not only to enable free and informed choices, but also to promote responsible lifestyles and consumption.

COMPETITORS

The Group believes in the value of free and fair competition as a fundamental tool for development and for defining the best offering in all the fields in which it operates. To this end, it operates with the utmost transparency in compliance with applicable antitrust regulations and with full respect for its competitors. In the event of contacts with third-party companies or competitors, Recipients must refrain from providing confidential information, data or details that could give rise to initiatives or conduct contrary to rules and laws relating to the protection of the market and competition.

REPRESENTATIVE ORGANIZATIONS

The Group considers active participation in sectoral and professional representative organisations, whether mandatory or voluntary, governmental or non-governmental, an opportunity to promote, disseminate and consolidate its ethical practices. Recipients who represent the Group Companies in such contexts are called upon to adopt conduct, express positions and make any other active contribution in line with the principles and rules set out in the Code of Ethics and related documents such as the Sustainability Policies.

Environmental Commitment

ENVIRONMENTAL PROTECTION

The Group undertakes to comply with applicable environmental protection regulations and to prevent, minimise, mitigate and offset the footprint generated by Group activities on the environment and living species. Furthermore, the Group recognises the need for a proactive transition towards a regenerative economy, respectful of the sentient nature of animals and low in carbon, while at the same time capable of creating social value.

The Group Companies promote, in all activities, tailoring them to sectoral specificities, policies and actions on environmental matters aimed at:

- adopting measures aimed at minimising, mitigating and balancing the environmental footprint generated by activities;
- prioritising the adoption of measures aimed at preventing potential environmental harm through risk prevention programmes and continuous improvement of the technologies used and management and control practices, even beyond the requirements and parameters set by applicable regulations;
- promoting the responsible use of natural resources and the reduction of consumption;
- ensuring transparency towards Stakeholders and, in particular, towards the community and the territory in which industrial activities are carried out.
- promoting the adoption of international best practices in terms of industrial processes, the highest standards of quality, safety, environmental protection and process and product innovation policies, towards sustainable solutions compatible with responsible lifestyles and consumption.
- actively contributing to global challenges such as climate change, the conservation of biodiversity and the preservation of non-renewable resources.

UN Global Compact

Principle VII: businesses are required to support a precautionary approach to environmental challenges

Principle VIII: businesses are required to undertake initiatives to promote greater environmental responsibility

Principle IX: businesses are required to encourage the development and diffusion of environmentally friendly technologies

The three environmental protection principles expressed by the Global Compact were drawn from the United Nations Declaration of Principles and International Programme of Action on Sustainable Development (Agenda 21) defined at the United Nations Conference on Environment and Development, held in Rio de Janeiro from 3 to 14 June 1992. Chapter 30 of Agenda 21 expresses the concept that business and industry should play a key role in the conservation of natural resources and the environment. In particular, companies can contribute through the use of cleaner production methods and more responsible corporate

Integrity and Compliance

LAWS AND REGULATIONS

UN Global Compact

Principle X: businesses are required to work against corruption in all its forms, including extortion and bribery

The fight against corruption is one of the world's greatest challenges. Corruption is a major obstacle to sustainable development and democracy and has a devastating effect, especially on the poorest communities. The impact of corruption on the private sector is also considerable: it impedes economic growth, distorts competition between companies and presents serious legal and reputational risks for businesses.

The international fight against corruption has recently gained great momentum following the adoption by the Organisation for Economic Co-operation and Development (OECD) of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and following the entry into force in December 2005 of the first internationally adopted instrument at global level: the United Nations Convention against Corruption (UNCAC).

The Group adopts, as an essential value of its operations, compliance with the principle of legality and with applicable legislation in Italy and in the international contexts in which it operates, including applicable technical standards.

Impresoft Group is committed to rigorously respecting its obligations regarding the protection of copyright and the industrial and intellectual property rights of third parties, considering these rights fundamental to the proper functioning of the market and to the protection of innovation and creativity. Therefore, all Impresoft Group employees and collaborators are required to refrain from any conduct that may violate or otherwise infringe such rights and to comply with applicable regulations in this field.

Impresoft Group also ensures compliance with the highest standards of fairness and transparency with regard to the management of internal processes and external communications relating to the certifications obtained. Therefore, all information relating to the Group's certifications or those of the individual legal entities forming part of it is communicated in a clear, truthful and timely manner, in compliance with applicable regulations and internal organisational and management procedures, in order to guarantee customers, partners and stakeholders a high level of reliability and integrity, thereby consolidating its reputation for excellence and professionalism in the sector.

To this end, the Group Companies undertake to ensure that everyone is aware of the requirements arising from the laws applicable in the national or international contexts in which they operate and from the internal governance rules adopted. Each person, in relation to their role, mandate or type of relationship with the Group Companies, must know their responsibilities and understand the conduct to be adopted.

ANTI-CORRUPTION

The Group excludes and condemns all forms of corruption, extortion, undue inducement and influence peddling, both in the public and private sectors, and adopts prevention and control measures aimed at avoiding the commission of such offences in the course of its activities.

ANTI-MONEY LAUNDERING

The Group operates in accordance with the principle of maximum transparency in commercial and financial transactions and adopts the most appropriate tools to combat money laundering and the reinvestment of illicit proceeds, at both national and transnational levels.

COMBATING CRIMINAL ORGANIZATIONS

The Group condemns all forms of criminal organisation, whether national or transnational, and adopts suitable measures to prevent the risk of its own involvement in relations and activities maintained in any capacity and by any means, including in the form of mere assistance and support, with such organisations. Therefore, the Group Companies do not enter into any working, collaborative or investment relationships with parties, whether natural or legal persons, whose involvement in acts of terrorism or criminal organisations is known or suspected, and do not finance or facilitate any activity attributable to such organisations.

CONFLICT OF INTEREST

The activities of the Group Companies are conducted for the benefit of all their Stakeholders in accordance with the principles of integrity, fairness, loyalty and transparency. Under no circumstances may partial interests prevail at the expense of a global and shared interest. In the event of a conflict of interest, the Group Companies undertake to manage the situation in compliance with applicable law, the internal governance and the principle of transparency. The members of the Corporate Bodies maintain conduct inspired by autonomy and independence with regard to Public Institutions, economic and political institutions, as well as with any other natural or legal person. The Corporate Bodies are required, in particular:

- to assess and communicate to the management and control bodies any situations of conflict of interest, even potential, or incompatibility of functions, assignments or positions outside and within the Group Companies;
- to refrain from performing acts that may cause harm to the Group Companies and from participating in the approval of resolutions of the relevant body relating to matters that present aspects, even potential ones, of conflict of interest;
- to avoid making use of confidential information that they are aware of by reason of their position or office in order to obtain personal advantages, direct and indirect, or to allow third parties to obtain them.
- The Personnel of the Group Companies, undertaking to respect the constraints of transparency and loyalty in their activities, may not:
- take up employment with third parties, or assume consultancy assignments or other responsibilities on behalf of third parties without the prior authorisation of the Group Companies;
- assume a decision-making or operational role in corporate activities if they may be influenced by personal interests that would hinder the making of impartial decisions;
- personally benefit from business opportunities that have come to their attention in the course of their duties.

PRIVACY

The Group Companies undertake to process personal data and confidential information that may be collected in the course of their activities in compliance with applicable laws and best practices.

Therefore, the Group Companies protect the right to privacy of individuals, customers, suppliers, business partners and all those with whom they establish relationships, using data and information only for defined and appropriate purposes.

TRANSPARENCY, FAIRNESS AND COMPLETENESS OF INFORMATION

The Group pays the utmost attention to making accurate, timely and complete information available to all stakeholders regarding the performance of the Group Companies.

This principle applies to financial and non-financial reporting, in accordance with established and verified accounting principles, and to all public corporate documents, with the aim of providing a truthful and comprehensive representation of the facts.

Artificial Intelligence

ETHICAL GUIDELINES FOR TRUSTWORTHY ARTIFICIAL INTELLIGENCE

For Impresoft Group, innovation is a core value. For this reason, it supports technologies, digital solutions and the pursuit of the new, with full openness to change and a proactive and dynamic approach that looks at the world from a different perspective, aiming at individual and corporate growth. With regard to Artificial Intelligence, in addition to having approved a policy for the ethical use of Artificial Intelligence, the Group has adopted the ethical guidelines expressed by the High-Level Expert Group established by the European Commission, which are set out below.

Human agency and oversight: AI systems should empower human beings, enabling them to make informed decisions and promoting their fundamental rights. At the same time, adequate oversight mechanisms must be ensured, which can be achieved through "human-in-the-loop", "human-on-the-loop" and "human-in-command" approaches.

Technical robustness and safety: AI systems must be resilient and secure. They must be safe, provide a fallback plan in case of problems, and be accurate, reliable and reproducible. This is the only way to ensure that even unintentional harm can be minimised and prevented.

Privacy and data governance: in addition to ensuring full respect for privacy and data protection, adequate data governance mechanisms must be ensured, taking into account data quality and integrity and guaranteeing legitimate access to data. In this context, the protection and responsible management of data, recognised as a true corporate asset, represents a fundamental pillar for Impresoft, which is committed to developing transparent, secure and reliable technological solutions, creating sustainable value for all stakeholders.

Transparency: business models relating to data, the system and AI should be transparent. Traceability mechanisms can help achieve this objective. Furthermore, AI systems and their decisions should be explained in a manner adapted to the relevant stakeholders. Human beings must be aware of interacting with an AI system and must be informed of the system's capabilities and limitations.

Diversity, non-discrimination and fairness: Unfair biases must be avoided, as they could have multiple negative implications, from the marginalisation of vulnerable groups to the exacerbation of prejudice and discrimination. By promoting diversity, AI systems should be accessible to all, regardless of any disability, and should involve relevant stakeholders throughout their entire lifecycle.

Societal and environmental wellbeing: AI systems should benefit all human beings, including future generations. It must therefore be ensured that they are sustainable and respectful of the environment. Furthermore, they should take into account the environment, including other living beings, and their social impact on society as a whole should be carefully considered.

Accountability: Mechanisms should be put in place to ensure the responsibility and accountability of AI systems and their outcomes. Auditability, which enables the assessment of algorithms, data and design processes, plays a key role in this context, particularly in critical applications. Furthermore, adequate accessible redress should be guaranteed.

Company Resources and Assets

RESPONSIBLE USE OF COMPANY ASSETS AND IT SYSTEMS

Every Recipient is required to act diligently to protect company assets and prevent their improper use, which could cause damage, reduce efficiency or otherwise be contrary to company procedures.

All individuals are responsible for the protection of corporate assets and the use of IT systems under their direct control.

The use of the internet and email messages from corporate accounts must relate exclusively to matters consistent with work activities.

CONFIDENTIALITY, BUSINESS INFORMATION AND INTELLECTUAL PROPERTY

Business information and documentation are among the principal elements of the assets of the Group Companies and therefore of each stakeholder, and their unauthorised disclosure can cause economic and reputational damage.

Subject to applicable legal provisions, Personnel and collaborators are required to maintain the utmost confidentiality regarding documents and, in general, all news and information learned in the context of investment projects and corporate operations.

Personnel and Collaborators may not use the information and documentation to which they have access in the course of their duties for any non-professional purpose and are required to rigorously observe professional, commercial or industrial secrecy. Confidential information may only be disclosed within the corporate organisation to those who demonstrate a work-related need to know it.

All forms of personal investment, direct or through intermediaries, based on confidential corporate information or privileged information are prohibited for all Recipients.

REPUTATION

All Recipients, and in particular the Corporate Bodies and Personnel, protect the reputation of the Group, acting in compliance with the principles of the Code of Ethics and safeguarding its relational capital, taking into account stakeholder expectations.

This also entails the use of the brand in a manner fully consistent with the Vision, Mission and Values, and conduct on social networks, or in any public domain, that does not, even potentially, damage the reputation of the Group Companies.

Implementation and Control Mechanisms

PROMOTION, DISSEMINATION AND TRAINING

The Group undertakes to ensure that all stakeholders are informed of and familiar with the Code of Ethics and related documents, at least through publication on the institutional website.

The Group Companies undertake to implement specific training programmes for Corporate Bodies and Personnel, aimed at guaranteeing and maintaining over time an effective knowledge of the Code of Ethics. Training activities are mandatory for those to whom they are directed.

The Code of Ethics is also shared with counterparties during the exchange of documentation in the stages of defining investments.

Internal Reporting Channels

Online Platform
https://whistleblowing-impresoftgroup.hawk-aml.com/Whistleblowing/home.
E-mail
whistleblowing@impresoft.com.

ORGANISATIONAL, MANAGEMENT AND CONTROL MODEL PURSUANT TO LEGISLATIVE DECREE 231/01

The Code of Ethics is a prerequisite and an integral part of the Organisational, Management and Control Model adopted by the Group Companies that have one, pursuant to and for the purposes of Legislative Decree no. 231 of 8 June 2001.

Each Supervisory Body, appointed by the respective Board of Directors pursuant to Legislative Decree no. 231 of 8 June 2001, is called upon to supervise compliance with the Code of Ethics.

The Boards of Directors of the Group Companies are called upon, through their decisions and actions, to promote within their respective entities an ethical climate consistent with the values expressed in the Code of Ethics.

The operational implementation of the rules of conduct of the Code of Ethics is the responsibility of the Directors duly delegated for this purpose and of all Personnel of the Group Companies, each within their own area of competence.

It is the responsibility of the Board of Directors of the parent company, also on the basis of corrective or improvement measures proposed by the Supervisory Body, to update the Code of Ethics in order to adapt it to changes in civil and social awareness or to changes in applicable regulations and reference practices.

REPORTING

Impresoft Group adopts the measures deemed most appropriate to facilitate the timely reporting of violations of the Code of Ethics, drawing inspiration from the principles and provisions of Legislative Decree no. 24 of 10 March 2023 on whistleblowing.

The duty to report involves the members of the Corporate Bodies, Personnel and Collaborators, and concerns facts or conduct in violation of the Code of Ethics of which they have direct knowledge or of which they have become aware through communication from others, including Third Parties.

Reports may also be made anonymously. Reports must be as detailed as possible and based on factual elements.

Reports must be made through dedicated channels, identified for the purpose of ensuring the protection of the confidentiality of the reporting person's identity.

Reports are managed in accordance with a specific procedure and the provisions set out in the "Whistleblowing and report management" section of the Organisational, Management and Control Model of each Group company.

The Group prohibits any act of retaliation or discrimination, direct or indirect, against the reporting person for reasons connected, directly or indirectly, to the report, even where the report turns out to be unfounded on the merits.

The Group reserves the right to take any action against those who, with intent or gross negligence, make untruthful reports or reports aimed at damaging the Group, the Corporate Bodies or Personnel.

DISCIPLINARY SYSTEM

The Group condemns any conduct that deviates from the provisions of the Code of Ethics, even where such conduct is carried out in the interest of the Group Companies or with the intention of providing them with a benefit.

Violations of the Code of Ethics are subject to the disciplinary system adopted pursuant to the Organisational, Management and Control Models of each Group Company, which are hereby incorporated by reference.

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