

Company Ethics and Conduct Code

The company Ethics and Conduct Code (from here on out “ECC”) proposes to bind the company EUSEBIO S.R.L. (from here on out “the Company”), its managers, all its employees and partners to act with honesty and integrity, in accordance with ECC.

Application of ECC

The ECC concerns all the employees and partners that work for and with the Company, as direct employees or as partner.

No-kickback and no-bribery Policy

It is illegal to offer, promise, pay, request or receive a bribe or other improper advantage, directly or indirectly. A bribe can include giving money or anything of value to influence another person's actions. It also covers payments or gifts as a reward for another person's improper actions.

It's forbidden from giving or receiving any kind of money and/or anything of value from a Government Officer and/or from anyone where this is to obtain or retain business or other commercial advantage for the Company.

Books, records, accounting and internal control

The Company's records must be proper and reliable. All business records, including expense reports, financial statements, production and operating reports, auditors' reports and reports to government agencies, must be prepared with diligence and honesty.

For any reason, no false or misleading entry should be entered into the company's records. Compliance with generally accepted accounting principles and established internal controls is required at all times.

All payments must be supported by invoice and a contract or order with all the details reporting the services which have been performed, recorded accurately. False, misleading, incomplete, inaccurate or contrived entries in the company's records are strictly prohibited.

Whistleblowing Policy

The Company respects the highest standards of transparency, probity and responsibility. This important aspect of responsibility and transparency allows employees and other members to express their concerns, reports, complaints and suggestions responsibly and effectively.

According to this, the Whistleblowing Policy establishes the process to report an unlawful act or omission which constitutes or may constitute, a violation of laws and regulations, of the values and principles established in the ECC, and/or which could cause any type of damage.

This Policy constitutes the reference document for the Company, except for any specific local laws that could be in conflict with it.

The recipient of this policy are social office's members, employees and partners. If the recipients discover any unlawful conduct or irregularities must immediately report the acts, events and circumstances.

This Policy supports people to show up their name or anonymously in any reports. Anyway, the reports must be detailed and recorded to give usefull information and details verifying the reported events' substance.

The reports must be reported to the Company management that is responsible for their admission and analysis.

The Company guarantees the confidentiality of the report and the information contained therein, as well as the anonymity of the sender, even if the report subsequently turns out to be erroneous or unfounded. Any type of threat, retaliation, sanction or discrimination against the whistleblower is not tolerated.

The Company guarantees that the personal data of the sender and any other subjects involved (including any sensitive data) will be treated in full respect of what is provided by the current policy on the protection of personal data. They will only be processed if strictly necessary to verify the validity of the signal and to manage it.

Personal Data Management

The Company undertakes to treat personal data in order to fulfill its obligations in terms of guarantee and protection of the fundamental rights and freedoms of people, in particular the right of privacy, family life and private life, with respect to personal data processing.

The Company adopts adequate technical and organizational measures to protect personal data against destruction, loss, alteration, disclosure, unauthorized access or any other form of illegal processing.

Sanction system

Any behavior that does not comply with this ECC entails, regardless of and without regard to any legal action against the author of the crime, the application of disciplinary sanctions in accordance with the current regulations and/or the employment contract.

Date

14/02/2022

Stamp and signature of the
authorized representative

EUSEBIO S.r.l.

Via Risaia 24
21020 - Crugnola di Mornago VA
CF/PI 01219630124