

Code Ethics

WIIT SpA

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Contents and Purpose

The code of ethics constitutes the set of principles and rules of conduct that the WIIT Group recognises. It establishes high standards of transparency, responsibility and integrity in all company activities. Compliance with the rules of the Code of Ethics constitutes an essential element of the relationship of trust between the company and its stakeholders.

This document is an integral part of the Organisational, Management and Control Model adopted by WIIT (hereinafter also referred to as the "Company" or "Company") pursuant to Legislative Decree 231/2001, and, together with Model 231, is the basis of the Company's internal control system and aims to prevent non-compliant behaviour and to ensure the adoption of high standards of transparency, responsibility and integrity in our operations.

The topics contained in this Code are dealt with in more detail in the Organisation and Management Model, company policies and specific procedures. These policies are consulted and updated to ensure consistency and support for company activities.

Addressees and scope of application

The rules contained in the code apply to the following "Addressees" who, in due compliance with the law and regulations in force, will adapt their actions and conduct to the principles, objectives and commitments set out in the code.

- To the Shareholders, Directors, Auditors
- To employees and collaborators
- To any other person who directly or indirectly, permanently or temporarily, establishes, in any capacity whatsoever, relations and relationships of collaboration or works in the interest of the Company.

The Code of Ethics is an integral part of company policies, and all addressees are required to respect its principles. Everyone is required to be familiar with the content of the rules contained in the Code and, in particular, has a duty to refrain from any behaviour contrary to these rules or to the legislation in force.

General principles and rules of conduct

WIIT's operations are entirely guided by the principles :

- Responsibility
- Integrity and Transparency
- Respect for the Person and Norms
- Equity and Equal Opportunities
- Rejection of corruption and unfair competition

which are applied at every stage and level of one's activity.

In particular, WIIT:

- shares the company's goals and values with its employees, collaborators and customers, basing professional relationships on loyalty and trust;
- condemns, rejects and prevents forms of corruption, whether active (offering, promising, giving, paying, authorising someone to give or pay, directly or indirectly, an economic advantage or other benefit to a Public Official or a private individual) or passive (accepting a request from, or solicitation by, or authorising someone to accept or solicit, directly or indirectly, an economic advantage or other benefit from a Public Official or a private individual). Prohibited conduct includes offering to, or receiving from, WIIT Personnel (direct bribery), or from anyone acting on behalf of the company (indirect bribery), a financial advantage or other benefit in relation to business activities;
- avoids any discrimination based on age, gender, health, ethnicity, language, sexual orientation, personal convictions, nationality, political opinions, religious beliefs of its interlocutors, membership or non-membership of a trade union association or termination of membership, as well as any discrimination based on the status of disabled persons;
- condemns all kinds of harassment, ensuring the respect and dignity of every individual;
- conducts its business under the banner of transparency, both in the internal management of the company's activities and in the allocation of tasks and responsibilities, and in its relations with customers, suppliers, external collaborators and the public administration;
- condemns and rejects any action not based on honesty, integrity and fairness;
- promotes compliance with current legislation as a prerequisite and guideline for all activities;
- promotes a safe and health-compliant working environment, including by providing employees with training and tools to promote safe and health-conscious behaviour;
- strives for the valorisation of people as an indispensable element for the existence and development of the company, promotes paths of growth and training, actively involves its employees in the company project, including decision-making, in order to allow the expression of personal skills and professional fulfilment;
- promotes a high level of corporate cyber security commensurate with the management of critical services to its customers;

The competent Functions undertake to adopt criteria of merit and competence, and in any case strictly professional criteria, for any decision concerning an employee and to ensure a working environment in which individual characteristics cannot give rise to discrimination of any kind.

All those who perform professional activities on behalf of WIIT must refrain from practising or facilitating in any way the practice of:

- acts of corruption;
- illegitimate favours of any kind to colleagues or persons outside the company;

- direct or indirect solicitation of personal and career advantages for oneself or others;
- carrying professional activities under the influence of alcohol and/or drugs;
- insulting, defamatory, threatening or violent behaviour;
- conduct constituting forms of physical or moral coercion of other persons, such as to prevent the exercise of personal will, except in the case of legitimate defence;
- dissemination of confidential information concerning Company's business.

It is also forbidden for all apical persons to induce employees and collaborators to make false and misleading declarations to public and judicial authorities.

Relations with Members

WIIT, aware of the importance of the role played by the member, undertakes to provide accurate, truthful and timely information and to improve the conditions of its participation, within the scope of its prerogatives, in corporate decisions.

It is the company's commitment to protect and increase the value of its business, against the commitment made by the shareholders with their investments, through the enhancement of management, the pursuit of high standards in the use of production and the solidity of its assets.

WIIT also undertakes to safeguard and protect the company's resources and assets.

Relations with current or potential customers

In relations with current or potential customers, whether private or public, it is obligatory to scrupulously observe conduct in accordance with this code of ethics.

The customer must be adequately informed about the services offered and must be put in a position to make informed choices based on real and verifiable elements.

Towards all customers, and in particular in relations with customers belonging to the Public Administration and those with public shareholdings, any form of misleading or deceptive advertising of the services provided by the Company, of information tending not to allow the customer an assessment based on objective and transparent elements, is prohibited.

Relations with Partners and suppliers

In dealings with supplier partners, internal procedures for the selection and management of the business relationship must be scrupulously observed.

In particular, it is forbidden to preclude a supplier company meeting the requirements from competing for the award of a supply contract, by adopting objective and transparent evaluation criteria. In particular, the selection criteria for the awarding of orders shall be subject to objective and transparent assessments of quality, cost, innovation, and the manner in which the service is performed.

WIIT, while favouring the creation of stable relations, periodically reviews its supplier list in order to rationalise it and increase cost-effectiveness and efficiency. Therefore, no potential supplier, in possession of the necessary requirements, must be precluded from competing to offer its products/services.

In the case of contracting out the execution of works, WIIT guarantees that the rights of the contractors are respected and ensures that they comply with the laws in force when carrying out the individual activities. Furthermore, the Company verifies that the execution of the entrusted works is carried out in a workmanlike manner; during the contract execution phase it objectively assesses compliance with the contractual conditions and ensures that the relevant accounting is timely and accurate, avoiding delays in the progress of works.

Relations with Public Institutions and Authorities

Relationships pertaining to Company's activity with public officials or public service - operating on behalf of the Public Administration, EU institutions, international public organisations and any foreign State - with the judiciary, public supervisory authorities and other independent authorities, must be undertaken and managed in absolute and strict compliance with the laws and regulations in force, with the principles laid down in the Code of Ethics and in internal protocols, so as not to compromise the integrity and reputation of both parties.

Caution and care must be exercised in relations with the above-mentioned parties, in particular in transactions relating to contracts, authorisations, licences, concessions, requests for and/or management and use of financing, however denominated, of public origin (national or EU), management of orders, relations with supervisory authorities or other independent authorities, social security bodies, tax collection bodies, bodies involved in bankruptcy proceedings, civil, criminal or administrative proceedings, etc.

It is forbidden to pay or offer, either directly or indirectly, payments or material benefits of any kind and entity or employment opportunities to public officials, Public Administration employees or their relatives to influence or compensate them for an act of their office.

Relations with the media

Personnel do not engage in relations with the press or other mass media, including social media and social networks, in relation to the Company's activities, unless such relations are specifically mandated or expressly authorised by the Management and, in any case, in accordance with current internal procedures.

In any case, it is absolutely forbidden to disseminate news that is false, defamatory and/or damaging to the image and reputation of WIIT, including through personal use of social media and social networks.

Obligations of Directors and Auditors

WIIT will carry out adequate checks on any reports of violations of the rules and principles set out in this Code, both through the internal functions assigned to this task and through the Supervisory Body, insofar as it is competent pursuant to Legislative Decree 231/01. In any case, it constantly monitors the observance, updating and functioning of the Company's organisational model pursuant to Legislative Decree 231/01.

The Supervisory Board is a company body endowed with independence, full autonomy of action and control, whose activity is characterised by professionalism and impartiality. It is placed in an apical position within the corporate hierarchy and in direct relation with the Board of Directors to which it reports any breaches of this Code.

Obligations of Employees, Collaborators and Staff in Managerial Roles

Employees and external collaborators undertake to observe the provisions of this Code when they are hired or, if they have already been hired, when they are disclosed.

All employees are required to be familiar with the content of the rules contained in the Code and, in particular, have a duty to refrain from any conduct contrary to those rules or to the legislation in force.

Relations with colleagues are characterised by fairness, cooperation and mutual respect. Harassment of any kind and behaviour tending to offend or isolate individual workers or groups of them through hostile and intimidating attitudes is forbidden.

Employees and collaborators undertake to use the company's IT tools consistently with the principles of this Code of Ethics and in accordance with the provisions of the relevant company regulations, so as not to create risks for the cyber security of WIIT Group, its stakeholders and Customers.

In addition, those who have management and/or responsibility functions with regard to personnel under their supervision and direction must avoid any abuse of their position:

- be impartial and not indulge in favourable treatment;
- take decisions with the utmost transparency and be able to justify their reasons at any time;
- reject undue pressure;
- not lead to, or contribute to, privileged situations;
- not use unduly the own power decision-making and management for the purpose of gaining advantages for oneself or others.

Healthy working environment and safe

It is the company's policy to strive for and maintain a safe, healthy and productive working environment for all its employees.

The Company is aware that the abuse of alcohol, drugs and other similar substances by employees can adversely affect the effectiveness of their work performance and can have serious detrimental consequences for themselves and for the safety, efficiency and productivity of their colleagues. It is therefore forbidden to appear or perform work activities while intoxicated and/or under the influence of drugs.

Employees are also advised to avoid alcohol abuse and the consumption of narcotics even outside of working hours, as the effects these can be seriously detrimental to health as well as impairing work performance.

Dissemination, Enforcement and Training on the Code of Ethics

The Company:

- ensures the dissemination of this Code through publication on the Corporate website and ensures, for employees, individual viewing of the document, also through the dedicated platform;
- implements a specific training plan, differentiated according to company roles, aimed at disseminating the principles and ethical standards on which the Company's entire activity is based;
- provides every interested party with the tools necessary for clarification regarding implementation of the rules contained in the Code;
- promptly update the content of the Code in order to adapt it to any relevant regulatory changes, disseminating it as specified above.

Reporting and Handling of Breaches of the Code

Compliance with the rules of the Code must be considered an essential part of the obligations of the directors, auditors, as well as of the contractual obligations of the company's employees and of those who have collaborative relationships.

The company has set up a system for reporting violations of the Code of Ethics, in accordance with whistleblowing rules. Reports can be made according to the guidelines described in the company's Whistleblowing Policy, and will be treated with the utmost seriousness and promptness, while respecting the privacy of the reporter. The current Whistleblowing Policy can be found on the corporate website.

Violations of the Code of Ethics will be subject to sanctions, proportionate to the seriousness of the act and in line with current legislation

Conclusion

The Code of Ethics a fundamental guide for all company behaviour and represents WIIT's commitment to maintaining integrity, transparency and accountability towards all stakeholders. Respecting these principles is essential to building an environment of trust and ensuring the success and reputation of the company. All recipients of the Code of Ethics are required to follow its provisions, contributing to a healthy, safe working environment based on shared ethical values.