

Assist Digital S.p.A.

Via Inganni, 93 - 20147 Milan, Italy

Tax number IT11961610158

Ethical Code

Assist Digital S.p.A.

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1 Foreword

This document, called the Code of Ethics, regulates the set of rights and responsibilities that Assist Digital expressly upholds with and towards those with whom it interacts in carrying out its business activities.

The company believes in the value of work and considers the legality, correctness, and transparency of action essential prerequisites for achieving one's economic, productive and social objectives.

Assist Digital affirms the congruity of its Code of Ethics in the pursuit of its social mission.

The Code of Ethics also has the purpose of introducing and making the principles and rules binding regarding company conduct relevant to the reasonable prevention of the crimes indicated in Legislative Decree 231/2001.

The Code of Ethics, considered as a whole and together with all the specific implementation procedures approved by the company, it is considered an integral part of the employment contracts in place and from stipulate, pursuant to art. 2104 of the Italian Civil Code (Employee diligence).

The violation of its provisions will therefore constitute a disciplinary offense and, as such, it will be prosecuted and sanctioned by the company pursuant to and for the purposes of Art. 7 (Disciplinary sanctions) of Law no. 300/1970 (Workers' Statute - Rules on the protection of the freedom and dignity of workers, of freedom trade union activity and trade union activity in the workplace and placement regulations) and may involve the compensation for damage caused to the organization.

As for collaborators, consultants and self-employed workers (specified below among the recipients) that lend their business in favor of the company and other third parties, the signing of this Code Ethics or an extract of it or, in any case, adherence to the provisions and principles contained therein represent a sine qua non for the stipulation of contracts of any nature between the company and such subjects. The provisions thus signed or, in any case, approved, even for conclusive facts, constitute an integral part of the contracts themselves.

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By reason of what has been described up to now, any violations by the aforementioned subjects or provisions of the Code of Ethics, based on their severity, can legitimize the withdrawal by the company of any existing contractual relationships with these subjects and can also be identified ex ante as cause for automatic termination of the contract pursuant to Art. 1456 of the Italian Civil Code (express termination clause).

2 Recipients of the company's Code of Ethics

By adopting the Code of Ethics, the company intends to define moral values, clear rules and procedures to which related parties conform to.

The Code of Ethics is aimed at:

Members of the related bodies

Employees (both temporary and permanent)

Collaborators

External and internal consultants

Suppliers of goods and services

Any other person who may act in the name of and on behalf of the company either directly or indirectly, permanently or temporarily or those who establish relationships or relationships with the company and work to pursue its objectives.

The recipients of this Code of Ethics are required to learn its contents and to adhere to the concepts and norms listed.

The Code of Ethics will be made available to them, as specified below.

Assist Digital is responsible for the effective implementation of the Code of Ethics and its dissemination within and outside the organization.

Company employees, in addition to compliance per se due to current regulations and the provisions of collective bargaining - where applicable - are to undertake all actions to adapt methods of performance of the activities for the purposes and provisions of this Code of Ethics.

This is required both in inter-company relationships and in relationships with subjects outside the company and, in particular, in relation to Public Administrative entities and with other public authorities.

An essential requirement of any fruitful collaboration relationship with the company is represented by respect of the principles and provisions contained in this Code of Ethics

In this sense, at the time of entering into contracts or agreements with other recipients, the company will provide

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stakeholders a copy of this document

3 Principles that inspire Assist Digital S.p.A.

The principles listed below are considered fundamental, Assist Digital as an organization works to hold everyone accountable to them.

Moreover, it is essential that these values do not remain mere statements but are translated into actions and behaviors inherent in the company.

As an organization and as individuals, all recipients in the workplace are required to apply them in the correct way across internal and external operations and relationships.

The fundamental values on which the company's business is based are:

Integrity in compliance with Laws and Regulations

Rejection of any discrimination

Focus, development and enhancement of human resources and equity of authority

Territorial roots

Transparency and business ethics

Quality

Diversity

Legality and a fight against terrorism and crime

The company expects these values to define its identity, unite employees and collaborators to the global organization.

4 Integrity of Conduct and Compliance with Laws and Regulations

The company is committed to creating and providing quality services and competing on the market according to principles of fairness and free competition and transparency, maintaining correct relations with all public/governmental institutions and administration, with citizens and with third-party companies.

Everyone is required to operate, in any given situation, with integrity, transparency, consistency and fairness, conducting every business relationship honestly.

Assist Digital operates in strict compliance with the law and makes every effort to ensure that all staff act in this sense: people must behave in accordance with the law, whatever the context and the activities carried out and where they operate.

This commitment must also apply to consultants, suppliers, customers and anyone who has relations with our

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business.

5 Rejection of Discrimination

In decisions affecting relations with interested parties (employees management and organization of work, selection and management of suppliers, relationship with the surrounding community and institutions), Assist Digital avoids any discrimination based on age, sex, sexuality, state of health, race, nationality, political views and religious beliefs of those we work with.

6 Focus, development and enhancement of human resources and equity of authority

The company recognizes and focuses on human resources. We believe it is an essential factor for success and development and it is the basis of the professional contribution of the people who work there.

Assist Digital has always placed the professionalism and individual contribution of businesses at the center of everything, giving continuity to a relationship style which aims at recognizing everyone's work as a fundamental element for business and personal development.

The business at the same time also places dialogue and the exchange of information at the center of its daily work - at all levels -, with the enhancement and professional training of every team member, thereby enhancing a corporate identity and sense of belonging.

This value translates into:

- creating a work environment capable of enhancing individual contribution and potential through gradual empowerment of staff
- creation of a relationship system that favors teamwork over hierarchical relationships

As part of the daily effort aimed at sharing skills and knowledge via the use of innovative systems, Assist Digital attaches the utmost importance to those who work within its own organization, contributing to their development in collaboration with human resources enabling the company to provide, develop, improve and ensure optimal management of its services.

Without prejudice to the legal and contractual provisions regarding the duties of workers, employees are required to be professional, dedicated to their work, loyalty, embody a spirit of collaboration, mutual respect, sense of belonging and moral principles.

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Regarding the management of contractual relationships that involve the establishment of hierarchical relationships, Assist Digital undertakes them ensuring that authority is exercised with equity and correctness and that avoid any form of abuse: in particular, the company guarantees that the relevant authority does not exercise power which compromises the dignity and autonomy of subordinates. These values must be safeguarded where making choices regarding the organization of work and business activities.

7 Territorial roots

The business aims at carrying out projects which tend to directly involve citizens, public and private institutions, entrepreneurship and associations with regards to all things related to education, health and responsibility for one's well-being. The company is actively engaged and will continue to remain so, as well as ensure that our partners and collaborators comply with the same behavioral patterns and regulations thereby orienting everyone to the same principles and values.

Assist Digital also promotes local development through a strong connection with the various stakeholders of the local community in reference. It therefore plays a role in the local community in the development of a rich society capable of recognizing and enhancing the resources that make it up, in the development of skills, in recognising the benefits of differences in gender, cultural and ethnicities as well as promoting well-being, integration, social development and enhancing the recognition of the above by all employees and collaborators.

8 Transparency and business ethics

The history, identity and values of the organization are expressed in a business ethics code based on:

Reliability

- intended as a guarantee of absolute seriousness in the projects launched, in the contractual obligations/transactions and in the commitments undertaken

Solidness

- relating to an entity that has the defined asset base

Transparency

- relating to a social role which requires not only respect for ethical principles and work but also the implementation of methods that allow everyone including social stakeholders access to information to be able to undertake their role.

Fairness in the contractual context

- this relates to avoiding where there are existing relationships the possibility that anyone who works on behalf of the company tries to take advantage of contractual gaps or unforeseen events in order to renegotiate a contract for the sole purpose of exploiting a/the position of dependence or weakness in which the related person has found himself

Protection of competition

- refraining from behaviours which are collusive, predatory and involve an abuse of power.

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Quality is a hallmark of Assist Digital. The organization is committed and responsible in ensuring quality in every activity, in line with its long-term strategy.

Activities are carried out by the company through a set of processes managed via a system of quality management that offers external uniformity, transparency and service improvement.

10 Diversity

Assist Digital requires the utmost respect of the dignity of people from its directors, employees and collaborators. The organization therefore:

- Guarantees the most scrupulous observance of the rules for the protection of minors, protections against child labor as well as workers' rights and freedoms.
- Guarantees conditions of free membership in trade union organizations.
- Operates a no tolerance approach regarding human rights violations.
- Promotes integration as a form of collective enrichment in a social context.

The company in particular condemns any form of discrimination based on gender, ethnicity, political and religious orientation.

11 Legality and fight against terrorism and crime

The company deeply believes in democratic values and condemns any activity that may have the purpose of terrorism or subversion of order.

The organization also condemns any activity that involves:

- Counterfeits, falsifying, modification and / or spending of coins, public credit cards and revenue stamps
- Acceptance of and treatment of proceeds from criminal activities (money laundering)
- Unauthorized access to external IT systems
- Illegal possession of access codes
- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Interceptions, impediments and interruptions of computer communications
- Dissemination of ideas of tolerance and silence relating to the use of drugs or substances that create any form of addiction
- Incitement to carry out illegal acts or acts which are contrary to moral sense
- Negligence in combating violence, damage to public property and compliance with regulations

12 Customers

The primary objective of the company is the full satisfaction of the needs of its customers.

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In this context, the organization guarantees the customer execution of the assigned tasks and is constantly oriented to propose increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness.

The company provides accurate, complete and truthful information in order to allow the customer to make a rational decision. It protects the privacy of its customers according to the regulations, making sure not to communicate or share information and personal data with regards to its legal obligations.

The company also adopts a communication style based on efficiency, collaboration and respect.

13 Financial Institutions

The organization maintains relationships with financial institutions based on fairness and transparency, from the point of view of creating value for the company.

For this reason, financial institutions are chosen based on their reputation, including for adherence to values in line with those expressed in this Code of Ethics manual.

14 Suppliers

Providers of goods and services

The company defines collaborative relationships with its suppliers, in compliance with current regulations and principles outlined in this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment.

Internal and external consultants

Consultants are chosen in relation to professionalism and reputation as well as reliability and adherence to values in line with those expressed in this document.

Contracts and professional relationships with consultants are based on transparent agreements and on a constructive dialogue aimed at the achievement of common objectives, in line with the regulations and principles of this Code of Ethics.

15 Public Administration Bodies

The term Public Administration relates to any person, subject, stakeholder who can be qualified as a Public Official or Public Service Officer operating on behalf of central or related Public Administration bodies, or Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners and/or concessionaires of a public service.

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The company aspires to and adapts its conduct, in relations with the Public Administration, to principles of fairness and honesty. On this basis, the personnel appointed by the company to manage any negotiation, request or institutional relationship with the Public Administration, (Italian or foreign), must not for any reason try to improperly influence their decisions or engage in unlawful behavior, such as the offer of money or other benefits, which may alter the impartiality of judgment of the Public Administration representative.

The persons appointed by the company to manage relations with any authority of Public Administration must verify that the information provided in any manner and to any purpose, are true, accurate and correct. Persons who are allowed to have direct contact with the Public Administration body on behalf of the company should be only the persons expressly indicated by Assist Digital to this end.

No other collaborator may have any relationship of any kind with the Public Administration body for the activities related to the corporate objectives of the company.

In carrying out tenders, the subjects appointed by the company must comply with the law and related regulations.

Employment relationships with former Public Administration employees

The hiring of former employees of the Public Administration who in the course of exercising their functions have a relationship with the company, their relatives and / or similar, should take place in strict compliance with the procedures and standards defined by the organization for the selection of personnel.

Additionally, the definition of other employment and / or consultancy relationships with former employees of the Public Administration body or with their relatives and / or similar, should take place in strict compliance with standard procedures.

Grants and funding

Contributions, grants or funding obtained from the European Union, the State or other public bodies, if of modest value and / or amount, must be used for the purposes for which they were requested and granted.

The company prohibits the recipients of this Code of Ethics guideline from using the funds received by Public Administrations and / or inter-professional funds for purposes other than those for which they were disbursed.

Similarly, in the event of participation in public tender procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practice, avoiding in particular inducing public administrations to unduly operate in favor of the company.

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The business undertakes an active role to prevent acts which indicate that the recipients of this Code of Ethics have or carry out actions aimed at procuring illegal advantages.

The use of modified/falsified declarations/documents or omission of information is illegal as is the execution of any tricks or acts to deceive which are aimed at falsely obtaining concessions and/or authorizations, funding, contributions from the European Union, the state or other public body.

16 Public Supervisory Authorities

Assist Digital engages transparently with all the political entities and associations present across our territory and public institutions (both territorial and national) in order to duly represent their positions across all areas and topics of interest.

17 Political forces, Associations and Institutions with interests

The recipients of this Code of Ethics undertake the following:

- scrupulous observation of the provisions issued by the relevant institutions or Public Authorities of Supervision regarding compliance with current legislation across the sectors connected to respective areas of activity
- the absence of (as part of ongoing investigations with Institutions and / or Public Authorities of Supervision) any requests particularly those containing untruthful declarations in order to obtain disbursements public funds, grants or subsidized loans or to obtain undue concessions, authorizations, licenses or other administrative acts
- compliance with any requests from the aforementioned institutions or authorities in the context of respective supervisory functions, providing - where required - full cooperation and avoiding any form of obstructive conduct

18 Specific Employee Obligations

Each person is required to carry out their work and perform with diligence, efficiency and fairness, making the best use of the tools and time at one's disposal and assuming the responsibilities related to the obligations.

People are required to be loyal to the company.

As part of their work, employees of the company are required to know and respect with diligence the 231 Model and the laws in place. Honesty is the fundamental principle for all activities across the business and its initiatives constituting an essential value of organizational management. Relations with stakeholders, at all levels, must be ethical behavior and conduct, cooperation, loyalty and mutual respect. Under no circumstances can the pursuit of corporate interest justify dishonest conduct.

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The organization will undertake all required actions to comply with all national rules, laws, directives, regulations as well as international and all generally recognized practices. It also encourages decisions and conduct in the care of the public interest entrusted to personnel.

People should not use information, goods and equipment they have at their disposal in the performance of the function or office assigned to them for personal purposes. They should not accept (both for themselves and for others) pressures, recommendations or reports that may harm the company or gain undue advantages for oneself, for the company or for third parties.

They should reject and make no promises of undue offers of money or other such benefits. The company will also undertake all required actions to operate in a clear and transparent manner, without favoring any group of interest or individual.

Personnel should ensure the utmost confidentiality in relation to news and information constituting the assets, activities related to business operations, with compliance to the provisions of the law, current regulations and internet procedures. In addition, personnel are prohibited from the use of confidential information for purposes not connected with the exercise of its business functions and work scope.

The company, given its awareness of its social role regarding economic and social development as well as the general well-being of the community, intends to operate in compliance with national and local communities, supporting initiatives bearing cultural and social value in order to improve its reputation and legitimacy to operate.

Personnel will pursue the general objectives and interests in carrying out their work within the company. They will inform their superiors or contact persons without delaying situations or activities in which there may be an interest in conflict with that of the company, by the personnel themselves or by close relatives and in any other case in which there are significant conflicts of interests. People will respect decisions that have been made by the company in this regard.

Personnel will pursue, in carrying out their work activities, all that does not hinder a sense of belonging of people to their organization, work environment or towards third parties.

Personnel engaged in any capacity in collaboration with the company will demand and actively manifest respect for the duties, skills, methods of carrying out the duties also through the omission of personal considerations to third parties.

19 Rules of Conduct

The following rules are intended to indicate to the recipients of this Code of Ethics and the attitudes and behaviors to observe during the performance of the various company activities in compliance with the values that underpin this document.

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All recipients of this Code of Ethics guideline must observe the correct and transparent conduct in the carrying out their functions, thereby contributing to the effectiveness of internal control systems to protect the business.

In compliance with the law, all recipients must maintain an attitude based on availability when required to corporate bodies and supervisory authorities.

20 Relationship with Personnel/Staff

Personnel/ staff selection

Evaluations of the personnel or collaborators to be hired are carried out on the basis of the correspondence regarding the profiles of candidates, compared to expected and internal needs, and in compliance with equal opportunities for all stakeholders. Information requested is strictly connected to an evaluation of information provided via the professional and psych-attitudinal profile and in compliance with the opinions/information shared by the candidate. During the selection process, General Management adopts appropriate measures to avoid favoritism and facilitates a careful selection based on mandatory requirements as well as preferential requirements from the Board of Directors.

Establishment of the employment relationship

Staff is hired with a regular employment, professional service or internship contract: any type of contract outside of this is not tolerated.

Integrity and protection of the personnel

In the context of personnel management and development processes, as well as in the selection phase, decisions taken are based on correspondence between expected profiles and profiles owned by personnel and evaluations. Access to roles and positions is based on skills and abilities. Furthermore, compatibility with the general work environment and flexibility are favored in the organization of work to facilitate those on maternity as well as those with parental responsibilities.

Enhancement and training of resources

Assist Digital provides people with information and training tools with the aim to enhance specific skills and preserve the professional value of staff. The first is company training, provided at certain touch points across professional life (example: onboarding is provided for new hires), and recurring training aimed at already existing personnel (example: safety training in the workplace, training regarding 231 management and Code of Ethics).

21 Health and Safety

Assist Digital is committed to providing a work environment that protects the health and safety of

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staff, disseminates information to establish a culture of safety as well as developing awareness of risks and promoting responsible behavior on the part of all staff.

The company is also committed to preserve the health and safety of personnel with preventive actions.

One of the main objectives is to protect human resources by constantly seeking synergies which are necessary not only internally but also with suppliers, external consultants and customers involved in business activities.

All employees are required to comply with internal rules and procedures regarding risk prevention to protect health and safety as well as promptly reporting any deficiencies or failure to comply with applicable regulations.

The company also adopts the general measures for the protection of health and safety at work prescribed by law with particular reference to the provisions of Legislative Decree 81/08 and subsequent amendments. The organization is committed to the utmost scrupulous compliance with all regulations concerning health and safety at work for employees, collaborators and users. This involves in particular:

- **Defining operational procedures to be followed and coordinating activities related to health and safety in the workplace.**
- **Ensuring the application of current regulations through the creation of documents, risk assessment and the definition of processing procedures in line with safety standards in place.**
- **Consistently monitoring legislative innovations and striving for their implementation.**

The company also undertakes actions to ensure:

- Assessment of all health and safety risks
- Prevention planning, aimed at a structure that coherently integrates the operating conditions, as well as the influence of environmental factors and work organization
- The elimination of risks and, where this is not possible, their reduction to a minimum in relation to knowledge acquired on the basis of technical progress
- Respect for the ergonomic principles of work organization in the conception of workplaces, in the choice of equipment and in the definition of working methods and service delivery, particularly to reduce the health effects of monotonous and repetitive work
- The reduction of risks at source
- Replacement of what is dangerous with what is not or is less dangerous
- Limitation to a minimum of the number of workers who are or may be exposed to risk
- Limited use of chemical, physical and biological agents in the workplace

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- Prioritisation of collective protection measures over individual protection measures
- Health check of workers
- Removal of workers from exposure to risk for health reasons and transfer to another job where possible
- Adequate information and training for workers, managers, proposals, the Workers' Safety Representative and all personnel.
- Adequate instructions for workers
- Participation and consultation of workers and the Workers' Safety Representative
- Planning of measures deemed appropriate to ensure the improvement over time of safety levels (also through the adoption of codes of conduct and good practice guidelines)
- Emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and of grave and immediate danger
- Use of warning and safety signs
- Regular maintenance of environments, equipment, systems with particular regard to any safety devices in accordance with the indications of the respective manufacturers
 - Adequate instructions to employees, collaborators and training according to the provisions of the law and the CCNL applied to personnel

22 Privacy Policy

Regarding the treatment of personnel data, Assist Digital has implemented the management of business processes according to the provisions contained in Legislative Decree 196/03 and European Regulation 679/2016

Assist Digital is committed to guaranteeing full protection and protection of the information and data managed as part of its business according to the aforementioned regulations, without distinction at all levels within the company.

Assist Digital places particular care and attention in protecting personal data from lose/misuse// unauthorized access and with the use of specific company protection technologies and procedures.

Implementation of protection measure is mandatory for all staff and applies to any person who, in any capacity, may be involved with the processing of information falling within the field of application of the privacy management system adopted by Assist Digital

Individuals are given a privacy policy which identifies:

- **Purposes and methods of processing**
- **Any subjects to whom the data is communicated**
- **Information necessary for exercising the right of access pursuant to Art. 15 of the GDPR**

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Where required by the law, individuals are asked for specific consent regarding the processing of their personal data. Any investigation into the ideology, preferences, personal tastes and general private life of employees and collaborators is prohibited.

The same procedure is also applied for the online communication and management of information and personal data

23 Protection of the Environment

Assist Digital is committed to environmental protection through compliance with legislation as well as national and community legislation.

Assist Digital is also committed to the prevention of pollution and activities to spread the awareness to its personnel and collaborators regarding environmental issues.

24 Duties of Personnel

Personnel must act fairly and in compliance with the obligations underwritten in their employment contract as well as those provided for by the Code of Ethics. For any further information, please also refer to the 231 Management System procedures.

25 Delegations and responsibilities

The duties, responsibilities, powers of directors, employees and collaborators are defined via specific deliberation and approved procedure.

These duties, responsibilities and powers must be known, accepted and respected.

26 Code of Ethics Obligations for Department Heads

Each functional manager, identified as such in the organizational chart and as part of their job descriptions has the obligation to:

- Ensure compliance with the Code of Ethics by directly or indirectly subordinated under their responsibility
- To be an example for one's employees / collaborators through their behavior
- Make every effort to ensure that employees understand the provisions outlined in this Code of Ethics and that they form an integral part of their day-to-day work
- Promptly report or delegate and special needs from their subordinates to the relevant superior / NGO
- Failure of department heads to comply with the obligations set out in this chapter may result in

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application of disciplinary sanctions, as required by the sanctioning authority.

27 Obligations for all employees towards the Code of Ethics and documentation produced by the company

Each employee is required to know the provisions contained in the Code of Ethics as well as the relevant laws governing the activity carried out as part of his functions which form an integral part of collective and individual work performance.

Any employee who becomes aware of alleged illegal conduct is required to communicate the information in his possession with regard to such conduct to only their superiors or to the relevant department and / or in the manner prescribed by the internal guidelines.

Employees also have an obligation to

- Refrain from conduct contrary to these provisions and rules
- Contact their superiors or the Supervisory Body and / or delegated person in charge of managing such situations and for the necessary clarifications on the application methods of the Code of Ethics or the relevant regulations
- Promptly report to at least one of the subjects indicated above any information regarding possible violations of the Code of Ethics
- Collaborate with the organization in the event of any investigations aimed at verifying and sanctioning possible violations

These requirements are also obligatory for all external consultants and collaborators

28 Protection of Company Assets

Each recipient is required to work diligently to protect company assets from improper or incorrect use

Personnel must know and implement the provisions of internal security policies and information to ensure integrity, confidentiality and availability of information.

Information and know-how must be protected with the utmost confidentiality. Significant data assets that Assist Digital acquires or creates in the course of its business must be considered confidential information and subject to adequate attention: this also includes information acquired from and regarding third parties (customers, contacts, partners, employees, etc..)

People who come into possession of information, materials or documents in the performance of their duties should inform their superiors.

Personnel are permitted to use the data/information assets exclusively for the company's benefit

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during and after the termination of the employment relationship with the company. No other reason is permitted.

29 Confidential Information regarding Third Parties

Company staff must refrain from using illegal means in order to acquire confidential information about other organizations and third parties.

Those who in the framework of a contractual relationship become aware of confidential information about other subjects are required to utilise the information only for use provided for in the contract in question.

Individuals cannot ask for, receive or use confidential information concerning third parties without proper authorization. If confidential account information that isn't already subject to a non-disclosure agreement or other form of protection, contact should be made to receive assistance in processing such information.

30 Use of company assets

Each person is required to work diligently to protect company assets through responsible conduct and in line with the operating procedures set up to regulate their use by documenting them with precision in their use.

In particular, each person must:

- Use the goods entrusted to him with care and prudence
- Avoid improper use of company assets that may cause damage or reduction in efficiency or are in any way inconsistent with corporate interest(s)
- Adequately safeguard resources entrusted to him/her and promptly inform the relevant persons where there are threats to the company

With regard to IT applications, personnel are expressly required to:

- Scrupulously adopt company provisions and safety policies in order to avoid compromising the functionality and security of IT systems
- Refrain from sending threatening or insulting e-mail messages, using inappropriate language and comments that may cause offense to people and / or damage the image of the company
- Refrain from browsing websites with indecent and offensive content, particularly those not related to business activities

31 Relationship with Customers/Clients

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Assist Digital is committed to offering its products and services without any discrimination between private parties.

Contracts and communications to customers by the company must always be:

- Clear and simple, formulated with the language as close as possible to that which is normally used by business representatives and stakeholders.
- Compliant with current regulations and as such to avoid elusive or otherwise incorrect practices
- Complete so as not to overlook any relevant element, for the purposes of the customer's decision

The behavioural style of the company's personnel towards customers is based on helpfulness, respect and courtesy, with a view to a collaborative and professional relationship.

In the processing of customer personal data, the organization complies with the provisions contained in Legislative Decree 196/03 and in the European Regulation 679/2016.

Assist Digital is committed to guaranteeing full protection of the information and data managed as part of its business according to the aforementioned regulations, without exception at any level of the company.

Assist Digital places particular care and attention in protecting personal data from loss, misuse and unauthorized access, using specific company protection technologies and procedures.

Privacy policies are developed and which identify:

- Purposes and methods of processing
- Any subjects to whom the data is communicated
- Information necessary for exercising the right of access pursuant to Art. 15 of the GDPR

In cases where the law requires it, individuals are asked for specific consent to the processing of their personal data and any investigation into the ideology, preferences, personal tastes and general private life of clients are avoided.

Staff are required to process data with the utmost discretion and confidentiality; the same procedure is also applied for the online management of information and personal data

32 Relationship with Suppliers

Buying processes are important with particular focus to :

- Find the maximum competitive advantage for Assist Digital
- Granting of equal opportunities to suppliers
- Loyalty
- Impartiality

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The selection of suppliers and purchase conditions are based on an objective evaluation of quality, the price of the good or service, its availability as well as guarantees of assistance and timeliness.

A further selection criterion is the exclusion of suppliers who have ongoing criminal proceedings for tenders or other such unethical character or activities.

Relations with suppliers, including those concerning financial and consultancy related contracts, are monitored on a regular basis by the company.

The stipulation of a contract with a supplier must always be on the basis of wholly clear relationships, avoiding any form of overdependence.

Documents exchanged with suppliers must be appropriately archived: in particular, those of an accounting nature must be kept for the periods established by current legislation.

33 Relations with Public Administration Bodies

Assist Digital intends to conduct activities in collaboration with Public Administration with the utmost transparency and ethical behavior. These relationships must take place in compliance with current legislation and are bound by general principles of correctness and loyalty so as not to compromise the integrity of both parties.

No person in the company can give money or offer economic advantages or other types of benefits to subjects of Public Administration bodies for the purpose of obtaining assignments or other personal or company benefits.

Any form of gift that can be interpreted as beyond normal practices is not allowed nor is any activity which is in way aimed at acquiring preferential treatment in the conduct of any activity that can be connected to the company.

Any form of gifting to Italian and external public officials or their family members which may or affect their independence of judgment in order to obtain more favorable treatments, benefits or advantages of various kinds is prohibited.

By gift we mean any kind of benefit: not only material goods but also, for example, free participation at conferences, training courses, the promise of a job offer etc.

The above cannot be circumvented by resorting to third parties: in this regard, they are considered to be acts of corruption. These prohibitions are not only regarding illicit payments made directly to entities or their employees but also illicit payments made to persons acting on behalf of such entities.

On the occasion of anniversaries, public holidays etc, the donation of goods is allowed as long as they are modest and are within the limits approved by the Board of Directors.

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Where Assist Digital personnel on the other hand receive explicit or implicit requests for benefits from a member of the Public Administration, they should inform the Board of Directors or the person to whom they are required to report it to for the adoption of appropriate checks and initiatives.

34 Relations and external effectiveness of the Code of Ethics

Anyone acting in the name and on behalf of Assist Digital who comes into contact with third parties and with whom the organization intends to undertake a commercial relationship or is required to have a relationship with them (institutional, social, political or of any kind) has the obligation to:

- Inform these subjects of the commitments and obligations imposed by the Code of Ethics
- Require compliance with the obligations of the Code of Ethics in carrying out their activities
- Take the necessary initiatives in case of refusal by third parties to comply with the Code of Ethics or in failure of partial execution of the commitment to comply with the provisions contained in the Code of Ethics itself, including informing the relevant delegates and body.

35 Conflict of Interest

All recipients of the Code of Ethics must ensure that every decision taken in the context of business activities is taken in the interest of Assist Digital.

All recipients are required to avoid any activity or situation of personal interest that constitutes or may constitute, even if only potentially, a conflict between one's own interests and those of the organization. They will have to comply with the specific procedures adopted by the company on the matter.

All recipients of the Code of Ethics must refrain from taking advantage of their relationship with the company in order to favor themselves or third parties to the detriment or disadvantage of the organization itself.

Each employee is prohibited from taking part, directly or indirectly, for any reason whatsoever, in any commercial initiatives that place themselves in a situation of direct competition with the company unless such participation has not been previously communicated to and approved by the Board of Directors.

In the event that both internal and external situations of conflict of interest (even potential), are identified, each person involved is required to refrain from engaging in the conduct of conflict by giving timely notice to the Board of Directors.

36 Competitive practices

For Assist Digital it is of primary importance that the market is based on fair and fair competition. The company is committed to scrupulously observing the relevant laws and collaborating with the relevant authorities.

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In particular:

- It is committed to carry out activities in compliance with the rationale of the law for assignments to supply goods and services that are entrusted through express agreements with public bodies, including economic ones and joint-stock companies with public participation.
- Compete fairly on the market respecting the rules of competition
- Commitment to provide correct information about its business both internally and externally or in the face of legitimate requests.
- Ensures the truthfulness and correctness of company data relating to financial statements, reports and other official documents.

37 Application mechanisms and organizational principles of the Code of Ethics

Assist Digital ensures that the organizational system is based on the criterion of separation between who decides, who executes and who controls. In particular, the organization makes all operations verifiable because they are registered.

The company binds those who carry out the auditing function to the truthfulness and correctness of the data and information.

Each operation and / or activity must be lawful, authorized, consistent, documented, verifiable, in compliance with the principle of traceability as well as company procedures according to the criteria of prudence and the protection of business interests.

Company procedures must allow for the carrying out of controls on operations, authorization processes and on the execution of the same operations.

Any collaborator who carries out transactions involving sums of money, goods or other benefits determined as belonging to the company must provide the appropriate evidence in order to allow the verification of the aforementioned operations.

38 Transparency of accounting

Assist Digital's accounting responds to generally accepted principles of truth, accuracy, completeness and transparency of the data recorded.

The recipients of this Code of Ethics are committed to refrain from any conduct (active or omissive) which directly or indirectly violates the regulatory principles and / or internal procedures concerning the formation of accounting documents and their external representation.

For each operation or transaction carried out, the recipients of this Code of Ethics are also required to keep and provide on request adequate supporting documentation to allow:

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- Accurate accounting registration
- Immediate identification of the underlying characteristics and motivations
- Easy formal and chronological reconstruction
- Verification of the decision, authorization and implementation process, in terms of legitimacy, coherence and congruity as well as the identification of the various levels of responsibility.

The recipients of this Code of Ethics who become aware of cases of omission, falsification or carelessness in accounting records or supporting documentation are required to report promptly to their superior, the Board of Directors or relevant designated personnel.

The company promotes regular training in order to inform the recipients of this Code of Ethics with regards to the rules (laws or regulations, internal codes of conduct, disposition of associations etc) which oversee the training and management of accounting documentation.

39 Checks and verifications

Assist Digital guarantees the availability, through competent people, to provide all information and the and fulfill necessary requests to the relevant auditing and control bodies.

The company guarantees access to all information and documents to those entitled to it and provides, through the availability of its directors and employees responsible for their function, all information that favors the exercise of supervisory functions.

The organization prohibits its directors and employees and / or collaborators from making false statements, the presentation of false documents or documents certifying untrue situations (also through IT systems), with the aim of unduly receiving public funds and / or obtaining and maintaining any concessions.

40 Supervision of the implementation of the Code of Ethics

The task of verifying the implementation and application of the Code of Ethics falls on:

- Board of Directors
- Managers of Company Services / Processes
- Supervisory Body: this body, in particular, in addition to monitoring compliance with the Code of Ethics, having for this purpose access to all sources of information of the company, will also be committed to suggesting appropriate updates of the Code itself on the basis of reports received from staff

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The Supervisory Body is responsible for the following tasks:

- Communicating reports on the subject of the above to the Board of Directors in order to undertake appropriate measures in the event of violation of the code of ethics.
- Express binding opinions on the review of the most relevant policies and procedures for the purpose of ensuring compliance with the Code of Ethics
- Contribution to the periodic review of the Code of Ethics: to this end, the Supervisory Body will formulate the appropriate proposals to the Board of Directors who evaluates them and, if necessary, approves and formalizes them.

The Supervisory Board maintains the requirements of autonomy and independence, assumes powers of investigation and control as well as powers of initiative for the performance of the assigned functions.

Violations of the Code of Ethics, possibly carried out by the recipients, are subject to the disciplinary system provided for by the 231 Corporate Model.

It should be noted that in the event of violations of the Code of Ethics, where deemed necessary for the protection of the interests of the organization, disciplinary measures can go as far as the removal of the relevant managers in addition to compensation requests for any damage resulting from violations.

Violations of the rules of the Code of Ethics by employees constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences. This also included their relevance as a disciplinary offense.

Violations committed by suppliers and external collaborators will be punishable in accordance with the provisions in the related contractual assignments, except for more significant violations of the law.

Particular attention is given to the processing of computer data through internal systems: any problem and suspected violation must be immediately communicated to the IT services manager and / or to the Board of Directors for the appropriate action.

41 Disciplinary measures resulting from violations

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by the personnel as well as by subjects having business relationships with Assist Digital

The violation of the principles and behaviors indicated in the Code of Ethics compromises the relationship of trust between the company and the perpetrators of the violation, whether they are directors, employees, consultants, collaborators, customers or suppliers.

For details of the disciplinary system and sanction mechanisms, refer to Model 231 adopted by Assist Digital.

In general, violations will be prosecuted under the following terms:

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- With regard to employees (including members of corporate bodies and the Supervisory Board itself), through adequate disciplinary measures, regardless of the possible criminal relevance of the conduct and the establishment of criminal proceedings in cases where the conduct constitutes a crime. Sanctions in particular will comply with the rules and logic of the employment contract applied. Disciplinary measures range from warning or reprimand to suspension without salary and in the most serious cases, dismissal. Before a disciplinary measure, the interested party is given the opportunity to justify his behavior pursuant to current legislation.
- Regarding consultants, collaborators, customers, suppliers and other subjects with contractual relationships with the company, specific methods for terminating the contractual relationship will be activated.

Furthermore, compensation for damages that Assist Digital should suffer as a result of the violation by the aforementioned subjects of the provisions contained in the Code of Ethics will be sought.

42 Public service assignment

Assist Digital, in the event of public service activities, applies the following behaviors:

- Respect for the principles of impartiality, typical of the Public Administration service
- Non-acceptance of benefits, money and utilities
- Non-acceptance of illegitimate influences from third parties
- Avoid conflicts of interest of representatives

43 Confidentiality

Recipients are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, known for the services performed.

Assist Digital implements measures to protect the information managed and prevent it from being accessible to unauthorized personnel.

44 Dissemination, communication and training

This Code of Ethics forms an integral part and constitutes implementation of the 231 Model adopted by Assist Digital in order to prevent crimes committed in the interest or for the benefit of the organization itself by part of the subjects indicated by Legislative Decree 231/01.

In order to prevent violations of current regulations, as well as the Code of Ethics itself, the company provides the adoption of specific procedures by all those involved in the operational process, aimed at identification of the persons responsible for the decision-making, authorization and carrying out business processes for the company.

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This Code of Ethics is brought to the attention of all interested internal and external subjects involved in the company's mission through specific communication and training activities.

45 System of proxies

Assist Digital makes use of a system of proxies on the basis of which certain activities can be placed, only by subjects expressly authorized to do so because they have the power attributed by means of appropriate official delegation and / or notarial power of attorney.

It is in fact necessary that the single operations are carried out in the various phases by different subjects, whose competences are clearly defined and known within the organization in order to avoid them being attributed unlimited or excessive powers to individual subjects.