

CODE OF ETHICS

Emission and Modifications

REV.	DATE	DESCRIPTION	ISSUED	VERIFIED	APPROVED
6	March 30, 2026	Update to include principles related to the use of Artificial Intelligence (AI).	VO	President	BOD
5	April 23, 2024	Update to include principles related to confidentiality and security of data and information, information technology tools, and conflict of interest	VO	President	BOD
4	February 05, 2024	Update for adjustment of policy reports to legislative decree 24/2023, membership to a global compact, uni/pdr 125.2022 certification, integration of principles on respect for competition	VO	President	BOD
3	February 05, 2021	Update to comply with new predicate offenses	VO	President	BOD
2	2019	Update to comply with new predicate offenses and whistleblowing management	Rivieri	VO	BOD
1	October 29, 2013	Update to comply with ancpl 2013 guidelines	Rivieri	VO	BOD
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01. INTRODUCTION

POLITECNICA – Ingegneria ed Architettura Cooperative Company is aware that unethical behaviour in the conduct of business compromises the reputation of the same Company and hinders the pursuit of its mission, identified in the continuity and safety of the work of its members, employees and collaborators, in the satisfaction of Clients and all legitimate stakeholders, in a market in which the principles of capacity, legitimacy and fairness prevail.

This Code of Ethics, approved by the Board of Directors and ratified by the Shareholders' Meeting, expresses the commitments and ethical responsibilities to which the conduct of Politecnica directors, partners, managers, and all employees and collaborators are bound.

02. CONTENTS

Politecnica Code of Ethics:

- Enunciates the set of rights, duties and responsibilities of the Company with respect to all parties with whom it enters into relations for the achievement of its corporate purpose (customers, suppliers, employees and/or collaborators, partners, institutions, municipalities); it is therefore a directive whose rules of conduct must be kept in mind in daily work and which presupposes, first and foremost, compliance with the laws and regulations, including those internal to the Company itself, in force;
- Aims to set ethical “standards” of reference and behavioural norms to which the Company’s business decision-making processes and conduct should be oriented;
- Requires consistent behaviour from management and all those addressed, that is, actions that are not, even in spirit, dissonant with the company’s ethical principles;
- Contributes to the implementation of the Company’s social responsibility policy, as Politecnica is aware that consideration of social and environmental concerns helps minimize exposure to compliance and reputational risks, strengthening the sense of belonging in its stakeholders.

03. RECIPIENTS

The recipients of this Code of Ethics are directors, auditors, shareholders, managers, employees, consultants and collaborators, proxies and in general third parties who, regardless of the legal qualification of the relationship, act in the name of or on behalf of and in the interest or advantage of the Company. These individuals are required to comply with the corporate rules and ethical principles contained in this document.

In addition, members of the Board of Directors and top management are called upon to be the first to set an example of strict adherence to the principles of this Code in their daily activities, are required to be guided by the principles of the Code of Ethics in setting the Company’s goals, in proposing investments and implementing projects, and in any decision or action related to the management of the Company’s business, both within the Company and with third parties who come into contact with the Company.



04. THE PRINCIPLES OF THE CODE OF ETHICS

a. GENERAL PRINCIPLES

- 1. Politecnica bases its activities on the principles contained in this Code and intends not to enter into or continue any relationship with anyone who demonstrates that he or she does not share its content and spirit or violates its principles and rules of conduct.
- 2. Il 2. This Code is binding on all Recipients, as identified in Section 3. These individuals are, therefore, obliged to observe and, to the extent of their competence, enforce the principles contained in the Code of Ethics. Under no circumstances does the claim of acting in the interest of the Company justify the adoption of conduct contrary to those set forth in this document. Compliance with the rules of the Code must, moreover, be considered an essential part of the contractual obligations of the Company’s employees pursuant to, and in accordance with, the provisions of Article 2104 et seq. of the Civil Code.

b. ADHERENCE TO THE CHARTER OF VALUES OF THE NATIONAL LEAGUE OF COOPERATIVES AND MUTUAL SOCIETIES

- 3. Politecnica embraces the values and principles of cooperation that are based on the “Declaration of Cooperative Identity,” endorsed by the International Cooperative Alliance at the 31st Congress in Manchester and listed below:
 - The member is the original core of all forms of mutuality and is the first concrete reference of cooperative action.
 - Cooperative enterprises fulfil their economic role for the benefit of cooperators, future generations, and the social community. They offer their participants security, benefits and recognition in proportion to each person's individual contribution.
 - The main resource of cooperation is the individuals who are part of it. Every coop-

erative must value their work, stimulate, and recognize their creativity, professionalism, and ability to work together to achieve common goals.

- The cooperator is manifested first and foremost by respect for people.
- The cooperator is required to be frank, fair and responsible, whatever her / his role or position.
- Cooperative enterprises are characterized by the quality of the work they do, transparency, honesty and fairness of behaviour.
- Cooperation always considers pluralism a good aspect. In its relations with other economic, political, and social forces, it respects their nature, opinion, culture and acts according to its own originality, autonomy, and ability to propose.
- The existence of cooperation, its hallmark, and its rule are founded on the principle of solidarity. Every interaction or transaction between business operators is based on human relations.
- Cooperation interprets the market as a place of wealth production, respect for health and the environment, and development of the social economy. It acts in the market not only in compliance with the law, but according to the principles of justice and utility for its members and the community.
- Cooperation contributes to market development by improving existing enterprises and creating new ones; organizing demand, responding to community needs. In these terms it understands cooperative promotion.
- Cooperation regards the right, and the risk, of doing business as manifestations of freedom.
- Cooperation regulates internal relations based on the principle of democracy. Cooperative enterprises fully realize their purposes by associating in the cooperative movement, which promotes relations among them, enhances their collective

assets, and ensures appropriate forms of control.

- Cooperative mutuality, as defined by the principles of the International Cooperative Alliance, is not only a way of producing and distributing wealth best suited to the interests of the participants, but a human relations concept.
- Cooperation places social responsibility to-

ward people, the community, and the environment at the core of its actions.

- Cooperation works to ensure development not only in the present by ensuring the indivisibility of assets, reuse of profits and stable employment, pays special attention to the future and thus, to the youth and young people.

That is why Politecnica is an intergenerational enterprise.



c. ACCESSION TO UN GLOBAL COMPACT (UNGC)

4. Politecnica recognizes and is committed to the ten principles of the United Nations Global Compact, the highest values that the United Nations recommends to businesses, as a synthesis of the most important internationally shared documents on human and workers' rights, respect for the environment, and anti-corruption¹.

d. PRINCIPLE OF LEGALITY

5. Politecnica's fundamental principle is the compliance with the laws and regulations in force in all the Countries in which it operates. All activities must therefore be marked and carried out in compliance with the legislation and all regulations in force, as well as with the principles and procedures established for this purpose.
6. Politecnica requires its directors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on its behalf to comply with the legislation and all applicable regulations, as well as with the principles and procedures established for this purpose.
7. Politecnica undertakes to adopt useful and appropriate measures so that the obligation to comply with legislation and all applicable regulations, as well as with the principles and procedures established for this purpose, is made its own and practiced by directors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on its behalf, by clients, suppliers and any person with whom it has relations.
8. Politecnica does not contribute to the funding of political parties, committees, organizations, or political candidates.

¹The Global Compact is an international initiative in support of ten universal principles related to human rights, labour and the environment, and anti-corruption, which has united businesses, United Nations agencies, labour and civil society organizations. They are shared universally as they are derived from: The Universal Declaration of Human Rights; the International Labor Organization's Declaration on Fundamental Principles and Rights at Work; the Rio Declaration on Environment and Development; and the United Nations Convention Against Corruption. The ten UN Global Compact principles are given in full on page 22 of this Code of Ethics.



e. RELATIONS WITH THE PUBLIC ADMINISTRATION

9. Directors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica in relations with the Public Administration, whether Italian, of the European Union or of third countries, shall inspire and adapt their conduct so as not to induce the Public Administration to violate the principles of impartiality and good performance to which it is bound. Contacts with the Public Administration, Italian, European Union and/or third countries, are limited to those who are specifically and formally appointed by the Company to deal with, or have contact with, such administrations, public officials, bodies, organizations and/or institutions.
10. In dealings with personnel of the Italian Public Administration, the European Union or third countries, directors, auditors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica, it is prohibited to give or promise money or other benefits, including through intermediaries, in any form whatsoever for the purpose of gaining an undue advantage or, in any case, such as to be interpreted by an impartial observer, as aimed at the attainment of an advantage, including a non-economic one, contrary to mandatory rules of law, regulations and the principles of this Code of Ethics, whether the conduct is carried out in the exclusive interest of the person acting, or for the benefit or in the interest of the Company.
11. In dealings with personnel of the Italian Public Administration, the European Union or third countries, directors, auditors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica are prohibited from promising or granting donations to non-

profit organizations, charitable associations, non-profit organizations, foundations, and the like, except by virtue of express authorization from the Board of Directors.

12. In relations with personnel of the Italian Public Administration, the European Union or third countries, directors, auditors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica, it is forbidden to ask for or solicit money or other benefits in any form whatsoever, for the purpose of gaining undue advantage or, in any case, such as to be interpreted by an impartial observer, as aimed at obtaining an advantage, including a non-economic one, contrary to mandatory rules of law, regulations and the principles of this Code of Ethics, whether the conduct is carried out in the exclusive interest of the person acting, or for the benefit or interest of the Company.
13. Persons entrusted by Politecnica to follow up any business negotiation, request or relationship with the Public Administration of Italy, the European Union and/or third countries, may not for any reason engage in conduct aimed at illegitimately influencing the decisions of Public Officials or Persons in Charge of a Public Service who make decisions on behalf of the Italian Public Admin., the European Union and/or third countries, in order to obtain an undue or illicit profit or advantage for Politecnica.
14. It is forbidden to allocate to purposes other than those for which they were granted, any contributions, grants or financing obtained from the State or other public body or the European Communities, even of small value and/or amount.
15. Politecnica condemns conduct aimed at obtaining, from the State, the European Communities or any other public body, any type of contribution, financing, subsidized loan

or other disbursement of the same type, by means of declarations and/or documents for the purpose altered or falsified, or by means of omitted information or, more generally, by means of artifice or deception, including those carried out by means of a computer or telematic system, aimed at misleading the disbursing body.

16. Politecnica may not be represented in relations with the Public Administration, whether Italian, European Union or third countries, by third parties when, based on available information, a conflict of interest may arise.

f. ORGANIZATION

17. Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorized, consistent, congruent, documented, recorded and always verifiable.
18. Members, managers, employees, and individuals who make any purchase of goods and/or services, including external consultancy, on behalf of Politecnica, must act in accordance with the principles of fairness, economy, quality, and lawfulness and operate with the diligence of a good family man.
19. The evaluation of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles and their specific competencies with what is expected and with the company's needs, as they result from the request made by the requesting function and, always, in compliance with equal opportunities for all stakeholders. The information requested is strictly related to the verification of the aspects provided by the professional and psycho-aptitude profile, while respecting the privacy and opinions of the candidate.

20. Politecnica is committed to ensuring that in its business organization, the set annual objectives, both general and individual of members, managers and employees or collaborators working for Politecnica, are focused on a possible, specific, concrete, measurable result and related to the expected time for its achievement.
21. Each corporate function is responsible for the truthfulness, authenticity and originality of the documentation and information rendered in the performance of the activity under its responsibility.
22. Politecnica ensures the confidentiality of information in its possession acquired directly from its clients or while providing integrated engineering services, except for communications required by law, and refrains from seeking confidential information and data through illegal means. In this regard, the Company has adopted appropriate policies, procedures, rules, and tools aimed at achieving an adequate level of security in the management of corporate information assets, in terms of:
- Confidentiality (access to information allowed only to authorized persons);
 - Integrity (ensuring the accuracy and completeness of information and information handling/treatment processes);
 - availability (accessibility of information, by only interested and authorized persons, at the time they need it).
23. Directors, auditors, partners, managers, employees, consultants and collaborators, proxies and in general to third parties acting on behalf of Politecnica are bound by confidentiality in relation to the information and data of which they become aware in the performance of the activities entrusted to them; inappropriate external disclosure of such information and data

could cause, among other things, irreparable damage to the Company's image. Therefore, the dissemination of information and data pertaining to the Company or its clients to persons outside or other than the personnel authorized to process them is prohibited.

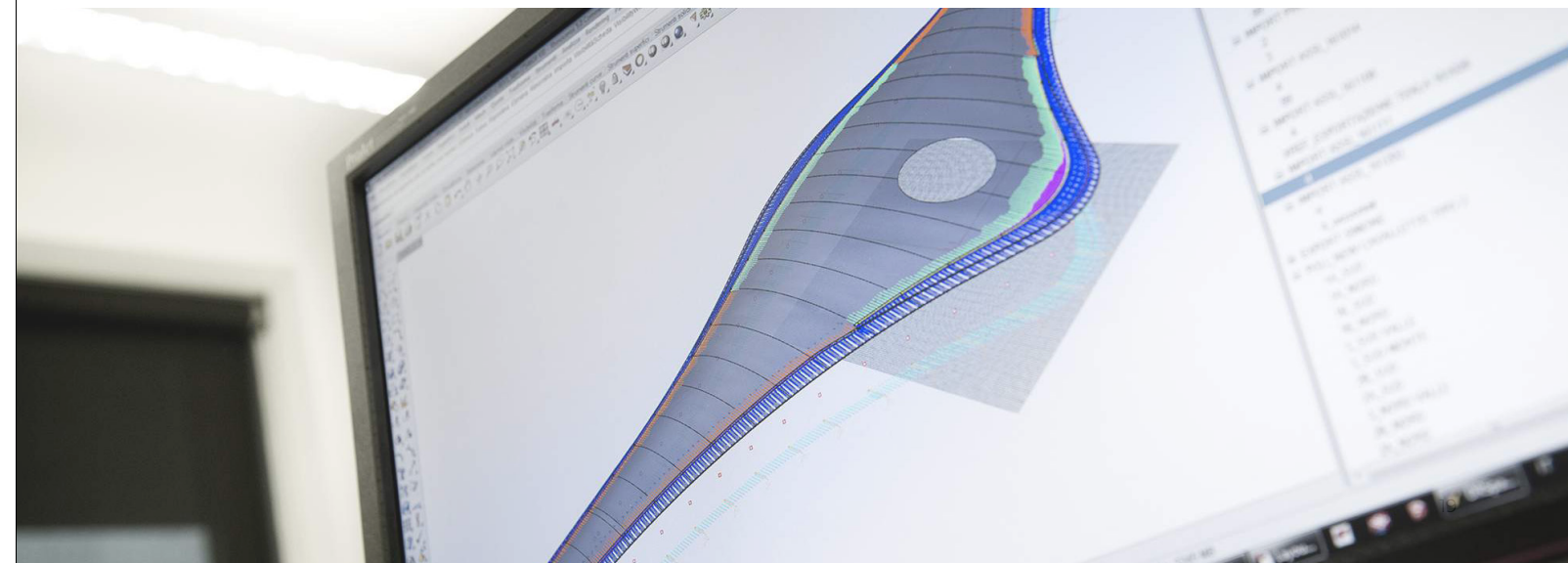
24. Directors, statutory auditors, partners, managers, employees, consultants and collaborators, proxies and in general to third parties acting on behalf of Politecnica must strictly adhere to the Company's procedures and policies on computer security, as well as internal regulations, and must use the Company's resources - such as personal computers, telephone equipment and other business tools - in accordance with the aforementioned procedures and policies, avoiding any conduct that could compromise the functionality and protection of the Company's computer system. It is prohibited to engage in conduct that in any way may damage, alter, deteriorate, or destroy the Company's or third parties' computer systems, telematics, computer programs and data. Each user is directly responsible for the protection of IT tools by avoiding fraudulent or improper use of them, as well as giving away, including to colleagues, their access privileges.

25. The use of the computer system must be exclusively for the performance of company business or for the purposes authorized by the heads of the relevant company functions. Politecnica promotes an ethical and sustainable approach to the use of artificial intelligence (AI), based on the principles of transparency, human oversight and risk prevention. The adoption of AI-based tools must take place in compliance with applicable regulations, including Law 132/2025, as well as with the Company's policies regarding security, privacy and administrative responsibility.

26. Politecnica, through its directors, statutory auditors, partners, managers, employees and collaborators, is committed to:

- Ensuring transparency in AI systems, making the decision-making logic and adopted algorithmic criteria understandable;
- Maintaining human oversight over every automated process, avoiding full delegation to automated systems and ensuring active supervision;
- Preventing ethical and legal risks through prior impact assessment and the integration of AI-related risks into the Company's risk management framework;
- Protecting personal and sensitive data, in compliance with the GDPR and internal policies;
- Promoting continuous training on the responsible use of AI and on the evolution of regulatory and technological frameworks.

Politecnica also undertakes to continuously monitor legislative and doctrinal developments, updating its governance protocols and tools in order to ensure that the use of AI remains consistent with the principles of fairness, inclusion and the protection of fundamental rights.



g. PROPER ADMINISTRATION

27. Politecnica pursues its corporate purpose in compliance with the law, the Articles of Association, and corporate regulations, ensuring the proper functioning of the corporate bodies and the protection of the equity and participatory rights of the members, safeguarding the integrity of the share capital and assets.
28. Politecnica condemns any conduct, by anyone engaged in, aimed at altering the accuracy and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law directed to members and the public.
29. Politecnica requires that directors, partners, managers, and employees, conduct themselves fairly and transparently in the performance of their duties, especially in relation to any request made by the Board of Directors,

other corporate bodies, and the auditing firm, if any, in the exercise of their respective institutional functions.

30. It is prohibited to engage in any wilful conduct by Politecnica directors intended at causing damage to the integrity of the company's assets.
31. Directors shall not engage in any type of corporate transaction likely to cause damage to creditors.
32. It is forbidden to perform any act, simulated or fraudulent, aimed at influencing the will of the members of the shareholders' meeting to obtain the irregular formation of a majority and/or a resolution different from that which would have been produced.
33. It is forbidden to intentionally spread false news both inside and outside the Company, concerning Politecnica itself, its members, managers, employees, collaborators and third parties working for it, with full knowledge and awareness of their falsity.
34. Directors, auditors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica, in the event of audits and inspections by the competent public authorities, must maintain an attitude of maximum helpfulness and cooperation without hindering in any way the functions of the Inspection and Control Bodies and the Judicial Authority.
35. Politecnica believes that truthfulness and transparency in the preparation of financial statements and the correct and punctual fulfilment of all obligations of a contributory and tax nature are a fundamental civil duty of every economic entity, also for the purpose of protecting fair competition in the market; directors, auditors, shareholders, managers, employees, consultants and collaborators, proxies

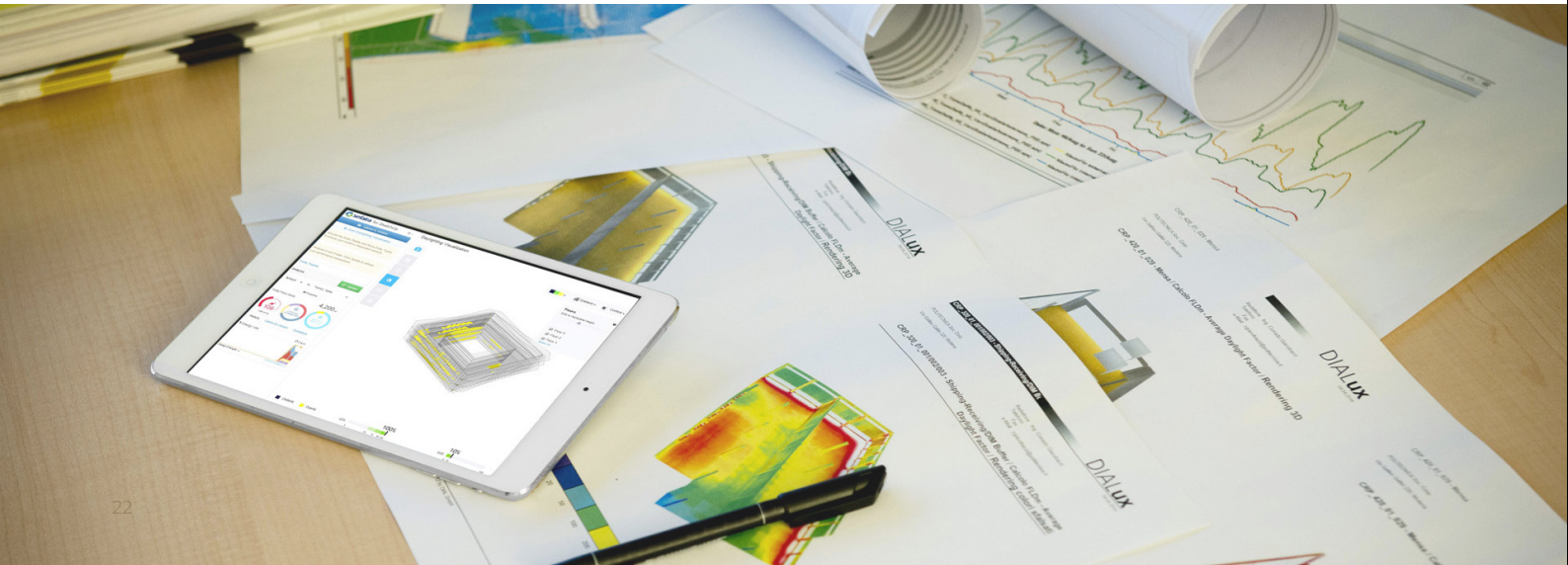


and in general third parties who act no on behalf of Politecnica, must therefore operate in full compliance with the legitimacy, correctness and traceability of data of an economic nature pertaining to them, guaranteeing the correct and punctual fulfilment of all obligations of a contributory and fiscal nature.

h. DIRITTI UMANI E DIRITTI DEL LAVORO²

- 36. Politecnica condemns any behaviour detrimental to the individual personality, physical, cultural, and moral integrity of the people with whom it deals and is committed to opposing any behaviour of this nature, including the use of irregular labour and/or exploitation of workers' situations of need.
- 37. Politecnica firmly believes in the values of inclusivity, gender equality and non-discrimination and inclusion within both business and social contexts and is committed to setting up and maintaining a certified management system for gender equality according to the UNI/PdR.125:2022 reference practice.
- 38. Politecnica condemns the use of child and juvenile labour and therefore pledges not to use or support this form of labour.

2 - The principles from 36 to 43 are taken from the SA 8000 standard, in compliance with applicable national legislation, ILO Conventions and Recommendations (No. 29, 87, 98, 100, 105, 111, 135, 138, 146, 155, 164, 182), the Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, and the United Nations Declaration to Eliminate All Forms of Discrimination Against Women.



- 39. Politecnica condemns the use of “forced labour” and therefore commits not to use or support this form of labour.
- 40. Politecnica is committed to ensuring a safe and healthy workplace.
- 41. Politecnica is committed to respecting workers’ right to join unions.
- 42. Politecnica is committed to non-discrimination of any kind, including discrimination based on gender, religion, sexual orientation, racism, and xenophobia.
- 43. Politecnica agrees not to use or support disciplinary practices such as corporal punishment, physical and mental coercion, verbal abuse.
- 44. Politecnica agrees to comply with the timetable required by law and national and local agreements.
- 45. Politecnica is committed to paying employees by complying with the national collective labour agreement and the company’s supplementary agreement.
- 46. Politecnica pays the utmost attention to the security and confidentiality of personal data in the conduct of its business and the protection of the privacy and confidentiality of business information. The processing of personal data by Politecnica is in fact carried out in accordance with the laws on the protection of personal data, and in particular the General Data Protection Regulation 2016/679 (GDPR) and the Legislative Decree of 30 June 2003 No. 196 (Privacy Code). In this regard, Politecnica has had a privacy compliance model in place since the GDPR came into force, subject to periodic reviews and updates, which defines the rules and security measures used to process and protect the personal data of each individual whose data it collects and processes. Recipients under the Code shall protect information

acquired or processed while performing their duties in compliance not only with applicable laws and regulations but also with relevant internal procedures.

I. SAFETY AND ENVIRONMENT (SUSTAINABILITY)

47. Politecnica is committed to meeting the legitimate expectations of all its stakeholders, with whom it intends to promote a dialogue aimed at better understanding their needs.

48. Politecnica is committed to environmental protection, having as its goal the continuous improvement of its environmental performance. To this end, commitments include:

- The compliance with national and EU environmental legislation and regulations;
- The establishment and maintenance of an ISO 14001-certified environmental management system for the control and improvement of direct and indirect activities that have a potential impact on the environment;
- The prevention of soil, air, and water pollution;
- The proper management of waste;
- The respect for natural habitats, with specific reference to protected sites;
- The respect for endangered or otherwise protected animal and plant species;
- Raising awareness of environmental issues among members, employees, and collaborators;
- An approach to design activity aimed at minimizing the environmental impacts that could result from the design choices made.

49. Politecnica is committed to promoting occupational safety and health, having as its goal the continuous improvement of its safety performance. To this end, commitments include:

- The compliance with national and EU occupational health and safety legislation and regulations;
- The establishment and maintenance of an ISO 45001-certified safety management system to control and improve direct activities that present a potential risk to worker health and safety;
- Awareness-raising and training of members, employees, and collaborators so that, in the performance of their activities, they guarantee in all cases compliance with national and Community legislation and regulations on occupational health and safety and take the most appropriate measures to minimize the risks associated with such activities.

In particular, the Company, in making its decisions at any operational level, refers to the fundamental principles inferred from European Directive No. 89/391 on occupational health and safety, identified as follows:

- a. Avoid risks;
- b. Assess risks that cannot be avoided;
- c. Combat risks at source;
- d. Adapt work to man, particularly with regard to the design of workplaces and the choice of work equipment, and methods of work and production;
- e. Consider the degree to which the technique has evolved;
- f. Replace what is dangerous with what is less dangerous;
- g. Plan prevention, aiming for a coherent whole that integrates in the same technique, work organization, working conditions, social relations, and the influence of factors in the work environment;
- h. Give collective protective measures priority over individual protective measures;
- i. Give appropriate instructions to workers.

j. TRANSPARENCY AND FAIRNESS TO THE MARKET AND PROTECTION OF COMPETITION

50. Politecnica is committed to complying with antitrust and competition laws and the directives of the Competition Authority.

Therefore, it undertakes not to enter into arrangements with any competitor to:

- fixing or controlling prices, whether through direct agreements with a competitor or otherwise, including through the use of third parties;
- forming or organizing bids aimed at directing a contract to a particular competitor (bid-rigging), such as refraining from competing in tenders or submitting non-competitive or so-called "courtesy" bids;
- boycotting suppliers or customers;
- dividing or apportioning markets or customers.

51. Politecnica, consistently with the values of honesty, fairness, diligence, and loyalty, is committed to implementing the necessary measures to prevent and avoid conflict of interest phenomena. This applies, among others, in cases where directors, auditors, partners, managers, employees, consultants and collaborators, attorneys and generally third parties acting on behalf of Politecnica:

- Pursue an interest other than the mission of the Society;
- Take personal advantage of the Company's business opportunities;
- Act contrary to the fiduciary duties associated with their position.

Such individuals are required:

- To avoid all situations and all activities in which a conflict with the interests of the Company may manifest itself or which may interfere with its ability to make, in an impartial manner, decisions in the best inter-

ests of the Company itself and in full compliance with the rules of the Code of Ethics, the Model of Organization, Management and Control of the Company and more generally with all applicable directives and procedures;

- To refrain from taking personal advantage of business opportunities of which they have become aware while performing their duties and/or functions;
- To refrain from activities, behaviours and acts that are in any way incompatible with the obligations related to their relationship with the Company and to avoid conflicts of interest between personal and family economic activities and those of the Company.

Any situation that may constitute or result in a conflict of interest must be promptly reported to one's supervisor, and the inherent activity must be suspended.





52. Politecnica competes fairly in the market by respecting the rules of competition and freedom of industry and commerce. In particular, the Company, its directors, members, and employees must counteract any form of fraud in trade and respect industrial property rights and copyrights.

53. Politecnica operates with the aim of fully complying with all contractual commitments entered into with public (Italian, European Union or third countries) and/or private clients.

54. Directors, auditors, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica are prohibited, including through intermediaries, from giving or promising, in any form whatsoever, gifts, gratuities, or granting donations or other benefits to employees, managers or directors of companies with which Politecnica has business and/or entrepreneurial relations, for the purpose of gaining an undue advantage or, in any case, such as to be interpreted by an impartial observer, as aimed at the attainment of an advantage, including a non-economic one, contrary to mandatory rules of law, regulations and the principles of this Code of Ethics, whether the conduct is carried out in the exclusive interest of the agent, or for the benefit or interest of the Company.

Acts of business courtesy, such as gifts, gratuities, or forms of hospitality, are permitted if and when they are of modest value and otherwise such as not to compromise the integrity or reputation of the parties.

For the purposes of this article, gifts or other benefits of modest value means those of a value not exceeding, as a guideline, 150 euros, including in the form of a discount. In any case, the director, auditor, partner, manager or employee of Politecnica, before offering gifts, gratuities or benefits that exceed the modest value as considered above, must request express authorization from the Board of Direc-

tors; if the person in question is a consultant or collaborator or proxy or in general a third party acting on behalf of Politecnica, she or he must report to the head of the office and/or organizational unit with which she or he collaborates, so that the conduct to be adopted may be agreed upon.

55. Directors, auditors, partners, managers, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica, who by reason of the activity performed for the Company receive gifts, gratuities or benefits in any form from employees, managers or directors of companies with which Politecnica has business and/or entrepreneurial relations, except in the case of acts of business courtesy, are required to notify the Board of Directors (or the head of the office and/or organizational unit with which they collaborate, if consultants/collaborators/proxies), who, in relation to the entity of the gifts, gratuities or benefits, will agree on the conduct to be adopted.

For the purposes of this article, acts of business courtesy are defined as gifts, presents, or forms of hospitality, if and when they are of modest value (not exceeding, as a general rule, 150 euros, including in the form of a discount) and in any case such as not to compromise the integrity or reputation of the parties.

56. Politecnica, its directors, auditors, members, managers and employees must, upon legitimate request, provide complete, correct, adequate and timely information both outside and within the Company, if possible in a written form.
57. Directors, auditors, executives, employees, consultants and collaborators, proxies and in general third parties acting on behalf of Politecnica who, by virtue of their role, have access to information not available to the public and capable of influencing the value of listed financial instruments (price-sensitive informa-

tion), shall not use such information in their own interest and must not foster insider trading (abuse of privileged information and/or market manipulation) by disseminating such information inside or outside Politecnica without reason.



k. COUNTERING TERRORISM AND CRIME

58. Politecnica condemns any activity involving forgery, counterfeiting, alteration and/or spending of coins, public credit cards, revenue stamps and instruments or signs of recognition. To this end, its directors, auditors, members, managers, employees, consultants and collaborators, proxies and in general third parties acting on its behalf are obliged to respect and apply the legislation, both Italian and EU, and to be vigilant to prevent even the possession and use or spending in good faith, with an invitation to report to the competent Authority any situation that may be attributable to crimes of this nature.

59. Politecnica condemns any activity involving the laundering (i.e., acceptance or processing) of income from criminal activities in any form or manner, strictly observing the laws on anti-money laundering.

To this end directors, auditors, members, managers, employees, consultants and collaborators, proxies and in general third parties who act on behalf of Politecnica, each by reason of his or her role, must actively collaborate in preventing and combating the phenomena of money laundering and financing of terrorism, including international terrorism, using the necessary diligence in the identification of potentially anomalous situations and ensure compliance with the principles of fairness and transparency in the adoption of the procedure for choosing business counterparties, which must be based on objective and documentable criteria, requesting from business counterparties all necessary information to assess their reliability, economic soundness, and professional trustworthiness.

These individuals are therefore obliged to strictly comply with the laws, policies and corporate procedures in any economic transaction involving them, ensuring full traceability of incoming and outgoing financial flows and full

compliance with anti-money laundering laws; they must, in addition, verify in advance available information (including financial information) on business counterparties, Consultants and Suppliers, in order to ascertain their moral integrity, their ethicality and respectability, and the legitimacy of their activities before establishing business relationships with them.

60. Politecnica believes deeply in democratic values and condemns any activity that may have the purpose of terrorism or subversion of the democratic order. To this end, its directors, auditors, members, managers, employees, consultants and collaborators, proxies and in general third parties acting on its behalf are obliged to respect and apply the anti-terrorism laws, both Italian and EU, with an invitation to report to the competent Authority any situation that may constitute an offense of this nature.

61. Politecnica condemns any activity of organized crime. To this end, its directors, auditors, members, managers, employees, consultants and collaborators, proxies and in general third parties acting on its behalf are obliged to respect and apply the legislation, both Italian and EU, with an invitation to promptly report to the competent Authority any situations in which Politecnica itself is a victim of this type of crime.

62. Politecnica condemns any activity aimed at abusive access to computer or telematic systems, public or private, for the purpose of damaging or acquiring information, data, and computer programs.

m. CONDUCT WHEN POLITECNICA IS ENTRUSTED WITH PUBLIC SERVICE

63. The directors, auditors, members, managers, employees, consultants and collaborators, proxies and in general third parties who act on behalf of Politecnica by performing a public function, inspire and adapt their conduct in order to comply with the principles of impartiality and good performance to which the Public Administration is bound.
64. Politecnica condemns any behaviour, by anyone on its behalf, consisting in being promised and/or directly or indirectly accepting benefits, money or other benefits from third parties interested in the results of the public function exercised by its directors, auditors, members, managers, employees, consultants and collaborators, proxies and more generally third parties acting on its behalf.
65. Persons entrusted by Politecnica to carry out a public function on behalf of the Italian Public Administration, the European Union and/or on behalf of third countries, may not for any reason accept conduct aimed at illegitimately influencing decisions within their competence.
66. Politecnica may not entrust the performance of a public function on behalf of the Italian Public Administration, the European Union or third countries, to its own personnel or to third parties when, based on available information, this may constitute a conflict of interest.

05. DISSEMINATION AND COMMUNICATION OF THE CODE OF ETHICS, REPORTING AND SANCTIONS

a. DIFFUSION AND COMMUNICATION OF THE CODE OF ETHICS

Politecnica considers proper communication and dissemination of the values and principles contained in the Code of Ethics to be fundamental.

To this end, the Code of Ethics is published on the institutional website (<http://www.politecnica.it>), as well as being present within the corporate intranet. Suppliers and collaborators, in their contracts, expressly adhere to the Code of Ethics.

This Code of Ethics is also explicitly accepted by employees upon hiring.

b. MANAGEMENT OF REPORTS

Politecnica has established a reporting management system that complies with the regulatory requirements on Whistleblowing (Legislative Decree 24/2023).

Recipients of the Code of Ethics (as defined in § 3) may make Reports in written or oral form concerning unlawful conduct relevant under Legislative Decree 231/2001, or violations of the Model of organization, management and control of which they have become aware within the work context; in addition to these are Reports concerning any act or behaviour that takes the form of discrimination or social exclusion (by race, sex, culture, religion, disability, ...) or harassment or violence in the workplace.

Reports are concerned with information, including well-founded suspicions, regarding violations committed or that, based on concrete evidence, could be committed in Politecnica's work environment, as well as conduct aimed at concealing such violations.

Whistleblowers who wish to avail themselves of the legal protections provided by Legislative Decree 24/2023 shall transmit this information using the internal channels specifically establi-

shed for Whistleblowers.

The institutional website and the corporate intranet indicate the channels for Reports and describe how to use them and the policy for handling Reports. All channels assure the confidentiality of the identity of the Whistleblower, the Person Involved, the Facilitator, the person otherwise mentioned in the Report, as well as the content of the Report and related documentation.

c. REACTIONS TO VIOLATIONS OF THE CODE OF ETHICS

Violations carried out by directors, auditors, members, managers, employees, consultants and collaborators, proxies and more generally of third parties acting on behalf of Politecnica are subject to the Disciplinary System provided for in the Organization, Management and Control Model ex Legislative Decree 231/2001 approved by the Board of Directors.



06. THE TEN PRINCIPLES OF THE GLOBAL COMPACT OF THE UNITED NATIONS

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: The Elimination of all forms of forced and compulsory labour.

Principle 5: The effective abolition of child labour.

Principle 6: The Elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

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