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1 INTRODUCTION

Sacco System is a leading international biotechnology group specializing in the research, development, production, and marketing of natural and innovative biotechnological solutions for the food, nutraceutical, pharmaceutical, and agro-veterinary sectors.

Guided by its purpose, “Nurturing the World,” Sacco System adopts an ambitious strategic approach aimed at sustainable and virtuous growth, with the goal of improving consumers’ quality of life and well-being. Through synergistic collaboration among the group’s companies, it develops ingredients for healthy, natural, and functional products that meet our customers’ needs. This commitment is grounded in three core values that define its identity.

- *Family Company*: We place value on people and human relationships, both within the organization and in our interactions with customers and suppliers, promoting mutual respect, care, and support;
- *Creative Intelligence*: The company invests in talent and in dynamic, creative minds with solid scientific and economic foundations. This creative intelligence is the foundation of its ability to generate innovative ideas and anticipate market trends;
- *Flexibility and Customization*: The Group designs tailor-made solutions for customers, with constant attention to detail and a passion for personalized service, whether on a small or large scale.

The Group is strongly committed to quality; over the years, Sacco System has obtained key certifications—which are constantly updated on its website with reference to the individual Group companies—including ISO 9001, ISO 22000, FSSC 22000, Kosher Products, Halal Products, and GMP Authorization.

This Code applies to the entire Sacco System Group, consisting of the individual companies listed in the updated roster available on the website <https://saccosystem.com/>.

In order to disseminate and share its standards of conduct, this Code sets forth Sacco System’s ethical principles, which are based on the continuous improvement of health and safety conditions, both within the workplace and in relation to the external environment.

1.1 Intended Audience of the Code of Ethics

In line with its policy, Sacco System’s governing bodies have prepared this document to establish the principles of conduct and action that must guide the activities of every director, executive, employee, and contractor.

Adherence to these principles is a prerequisite for membership in the Group.

Sharing the values and principles contained in this document is also an essential prerequisite for establishing partnerships and various forms of collaboration with third parties.

This Code of Ethics constitutes a shared asset of all companies within the Sacco System and is intended for:

- Members of corporate governing bodies, as well as those who perform representative, administrative, or managerial functions within the company;
- Employees (both permanent and temporary);
- Regular and coordinated collaborators;
- External and internal consultants;
- Suppliers of goods and services;
- Any other party who may act in the name and on behalf of the company, either directly or indirectly, wherever they operate—whether in Italy or abroad, on a permanent or temporary basis—or those who establish relationships with Sacco System and work to pursue its objectives.

Those to whom this Code of Ethics applies are required to familiarize themselves with its contents and to comply with its provisions. Company management is responsible for the effective implementation of the Code of Ethics and for disseminating it both internally and externally.

1.2 Purpose of the Code of Ethics

This Code is the official document setting forth the ethical principles that Sacco System upholds and by which all parties with whom it does business must consistently be guided.

It establishes standards of conduct aimed at preventing the commission of crimes related to the company's business or otherwise committed in the company's interest or for its benefit. The Code of Ethics is adopted to ensure compliance, in the conduct of business, not only with applicable laws and regulations but also to guarantee high ethical standards in day-to-day operations, thereby serving as a supplement to regulatory requirements.

Sacco System operates in compliance with the laws and regulations in force in the countries where it operates. The principles and standards contained in this Code serve as the common framework for all Group companies. In the event of any differences between the Group's standards and local regulations or practices, the standard that ensures the highest level of integrity, accountability, and protection of individuals must be adopted, provided it is compatible with applicable law. Appropriate internal control measures and tools have also been identified to monitor effective compliance with the Code itself.

Any violation of the provisions of the adopted Code of Ethics by employees will constitute a disciplinary offense and, as such, will be investigated and sanctioned by the company in accordance with and for the purposes of applicable regulations and may result in compensation for damages caused to the Group.

With regard to collaborators, consultants, and self-employed individuals who provide services to the company, as well as other third parties, the signing of this Code of Ethics and adherence to the provisions and principles set forth herein constitute a *prerequisite* for the execution of contracts of any kind between the companies of the Sacco System Group and such parties. The provisions thus signed or, in any case, approved—including through conclusive acts—constitute an integral part of the contracts themselves.

This Code, approved by the governing bodies of the Sacco System Group companies, is intended to regulate and monitor, from a preventive perspective, the conduct that the recipients of the Code of Ethics are required to observe so that:

- The company's business activities comply with the principles of the law;
- A culture of legality is fostered, including through the promotion of training and awareness programs;
- A culture of gender equality and inclusion is also promoted;
- Every activity is carried out with transparency, loyalty, fairness, integrity, and professional rigor.

2 THE IMPORTANCE OF CONTINUOUS IMPROVEMENT

Sacco System bases its ethical principles on the continuous improvement of health and safety conditions in the workplace, the external environment, sustainability, and social responsibility.

This aspect is fundamental to the systematic management of the company, as it helps reduce the incidence of undesirable events (e.g., near-misses, accidents, injuries, environmental emergencies, process non-conformities), leading to greater work efficiency. The direct consequence of this is evident in day-to-day business operations, where employees can work in a healthy environment, confident that risks are consistently managed, with greater reliability and quality.

Specifically, continuous improvement toward the goal of excellence entails satisfying all stakeholders involved—employees, customers, suppliers, shareholders, and lenders—within a framework of economic, social, and environmental sustainability.

3 PRINCIPLES OF CONDUCT

The principles of conduct listed below are the cornerstone that every Sacco System employee must adhere to in order to ensure the maintenance of a productive and harmonious work environment.

3.1 Professional Commitment

Professional commitment is essential to enable all internal and external collaborators to apply their skills, draw on their experience, improve over time, and fulfill their responsibilities.

Sacco System encourages the continuous improvement of its employees' performance by promoting personalized training programs.

3.2 People-Centric Approach

Sacco System recognizes the centrality of people: corporate success and growth cannot be achieved without the well-being of the people who work here. The organization has always placed professionalism and the individual contribution of each person at the heart of its operations, fostering a collaborative culture that recognizes everyone's work as a fundamental element of both corporate and personal growth. At the same time, the company promotes internal dialogue, active listening, the exchange of information at all levels, the professional development and upskilling of its employees, the establishment of a corporate identity and a sense of belonging, all while respecting the values of diversity and gender equality.

Sacco System expects its employees to act in accordance with these guidelines and, consequently, to carry out their work with transparency and responsibility, fostering and promoting teamwork.

In conducting its activities, Sacco System always strives to uphold, to the highest degree, the principles of protecting the physical integrity and moral well-being of its employees and all individuals affected by the Group's activities, in accordance with the procedures defined in Chapter 4, PRINCIPLES OF ACTION, and to foster a healthy work environment.

3.3 Management of Personal Relationships

Sacco System recognizes that personal relationships may develop between employees and colleagues. Such relationships must be managed with transparency, fairness, and responsibility, avoiding situations that could lead to conflicts of interest, favoritism, or compromise the impartiality of business decisions. Any situations that could affect objectivity in the performance of work duties—particularly in the presence of hierarchical relationships or influence over decision-making processes—must be promptly reported to Sacco System so that they can be evaluated and managed in accordance with confidentiality, meritocracy, and organizational fairness.

3.4 Integrity

The Sacco System Group is committed to promoting a culture of safety, respect for the environment and the local community, business ethics, and health through the implementation of appropriate procedures.

3.5 Loyalty and Fairness

Relationships among companies, with superiors, colleagues, subordinates, and external collaborators are guided by the principles of loyalty and fairness. In all cases, compliance with Sacco System's internal policies and rules is always required.

3.6 Participation

Participation is based on each individual's sense of responsibility within their professional sphere, rejecting individualistic behavior and promoting teamwork and mutual collaboration, thereby contributing positively and constructively to the achievement of established objectives. The Group rejects management or operational practices that prioritize personal satisfaction over the company's overall interests.

4 PRINCIPLES OF CONDUCT

Sacco System has defined the principles of action that govern the activities of all its directors, managers, and employees in the performance of their duties.

The goal is to be competitive in the market, working with professionalism and sound business judgment to offer high-quality services while respecting the law, the environment, health, workplace safety, and the ethical values that define us. To this end, the Group's companies plan their activities and monitor their results in accordance with the principles of transparency in accounting, administrative, and corporate responsibilities.

4.1 Compliance with the Law

Sacco System applies and complies, in every area, with the regulations applicable to its operations, in order to ensure consistency with the ethical objectives the company sets for itself in terms of quality, health and safety protection, environmental protection, and continuous improvement.

The Sacco System Group recognizes that, in some countries, the principles contained in this Code may be more or less restrictive than local regulations or practices. Where local regulations or practices are more restrictive than the provisions of this Code, the local regulations and practices shall apply. Conversely, where local regulations or practices are less restrictive than the provisions of the Code of Ethics, the Code of Ethics shall prevail.

Every employee, regardless of their position, is made aware of and is trained and informed about the implications of laws relevant to their work. Sacco System communicates periodically through its internal channels, as well as through scheduled internal training sessions, to inform employees about the legal implications related to their work or to non-compliance with established rules.

In particular, Sacco System prohibits deliberately taking advantage of any loopholes or shortcomings in laws and regulations if this results in a failure to comply with internal rules.

Group companies provide the necessary means and resources to educate and train their employees regarding legal requirements.

4.2 Occupational Health and Safety

The Sacco System Group implements the necessary practices to ensure the best possible protection of health and safety in the workplace and the prevention of all potential risks, with a focus on continuous improvement.

This policy applies to both its own employees and those of external companies, when the latter are performing work at Group companies or when they are operating on the Group's behalf.

The Organization is committed, in accordance with applicable regulations, to maintaining a safety-conscious work environment and to providing employees—depending on the nature of their work—with all appropriate and necessary equipment to prevent or protect them from any risk or danger to their physical well-being. To develop and monitor compliance with health and safety management, each company employs a structured system based on its own Risk Assessment Document.

All employees, contractors, and third parties are required to strictly comply with all measures mandated by internal procedures and regulations regarding occupational health and safety, which are developed and updated in accordance with current legislation; in particular, everyone is required to report any observations regarding malfunctions or potential improvements to their immediate supervisor.

Any form of retaliation against employees who, in good faith, raise concerns regarding occupational health and safety is strictly prohibited.

4.3 Protection of the Environment and the Community

Sacco System considers the environment a primary asset and is committed to actively promoting its protection; it is committed to preventing risks to people and the environment not only by complying with current environmental regulations but also by taking into account advances in scientific research and best practices in the field.

Sacco System intends to conduct its investments and development in an environmentally sustainable manner, with respect for local communities, committing to optimize its consumption of raw materials, water, and energy, and to reduce its impacts on all environmental sectors.

4.4 Corporate Social Responsibility

The Group's companies are committed to maintaining transparent and fair relationships with their stakeholders: customers, suppliers, institutions, and local communities.

All employees, contractors, and suppliers are required to strictly comply with all measures mandated by the internal procedures and regulations of their respective companies, which are developed and updated

in accordance with current legislation. Sacco System is committed to selecting suppliers who comply with legal requirements, as well as through an objective assessment of the supplier's competitiveness, quality, technical qualifications, cost-effectiveness, integrity, and reliability.

In carrying out its business activities, Sacco System protects and promotes human rights, which are the foundation for building a society based on the principles of equality, solidarity, and the rejection of war, as well as for the protection of civil and political rights, and social, economic, and cultural rights. With a view to social responsibility, it promotes a work-life balance by respecting employees' commitments outside the workplace, in full compliance with the principles of gender equality, diversity, and inclusion.

4.5 Sustainability

The Group promotes the development of a lifestyle that respects the natural cycles of the environment in which it operates, without compromising the local community's ability to enjoy a healthy and prosperous environment.

Aware of the influence—including indirect influence—that Sacco System may have on the context in which it operates, on economic and social development, and on the general well-being of the community, the Organization is committed to fostering a culture of sustainability and social responsibility both within the company and through communications directed at suppliers and business partners, promoting sustainable development in line with the objectives of the United Nations 2030 Agenda. It is also committed to simultaneously creating competitive value for the company and its shareholders, for all stakeholders, and for the local community. From a social sustainability perspective, the company protects individual freedom in all its forms and rejects all forms of discrimination and violence, as well as forced labor and child labor.

Committed to continuous improvement, it works toward an effective and flexible organization of skills, which it constantly nurtures and enhances.

Sacco System's responsibility is demonstrated through a comprehensive, accurate, and truthful reporting process that outlines to stakeholders the company's strategies, policies, and results across various areas of activity related to the pillars of sustainability.

Since 2019, the Group has been preparing and annually updating its Sustainability Report, which is available on the company's website.

4.6 Protection of Freedom of Association and Union Rights

The Organization guarantees its employees and contractors full freedom to join trade unions and other organizations of their choice, in compliance with applicable laws and the principles of this Code of Ethics, without any interference or obstruction.

Company union representatives must not suffer any form of discrimination by reason of the role they perform, and they are guaranteed the time and use of company facilities to carry out

union activities, in accordance with applicable laws and collective bargaining agreements.

4.7 Proper Hiring, Compensation, and Working Hours

All employees must be hired under a valid employment contract in accordance with the procedures established by applicable national laws and collective bargaining agreements.

Workers have the right to freely associate and be represented to improve their working conditions, in accordance with ILO Convention No. 87. Those who hold representative roles must not be subject to retaliation or discrimination.

The use of irregular or undeclared forms of employment is strictly prohibited.

The organization is committed to ensuring that working hours comply with the legal limits established by law and by the collective bargaining agreements in force and applied.

Forced labor is prohibited: all employment must be the result of free choice, as provided for by ILO Convention No. 157. Conditions amounting to slavery, human trafficking, and any form of coercion are categorically prohibited.

The Group condemns and prohibits all forms of modern slavery and human exploitation. All of the Group's activities must be carried out with full respect for the dignity, freedom, and fundamental rights of every individual. The Group is also committed to promoting these principles in its relationships with suppliers, contractors, and business partners, adopting a zero-tolerance approach toward any practice related to modern slavery.

4.8 Child Labor

Sacco System does not use child labor and rejects it.

Furthermore, as a general rule, it does not employ minors; however, should it, in full compliance with international legislation (ILO Conventions on child labor) and national laws, it decides to hire workers under the age of majority who are at least sixteen years old (the age limit established by national law), it will ensure special conditions to protect their health and safety, provide a dedicated path for professional growth and training, and will also prohibit their employment during night shifts.

4.G Respect for the Principle of Non-Discrimination

Sacco System rejects all forms of discrimination based on age, gender, ethnicity, religion, language, political beliefs, sexual orientation, or disability.

Every employee must be hired, trained, promoted, and compensated solely on the basis of work performance.

In particular, no unequal treatment may be applied on the basis of a person's gender, ensuring that female employees also have equal opportunities and conditions for access to senior positions.

4.10 Protection of Physical and Moral Integrity

All employees are guaranteed working conditions that respect individual dignity, in safe and healthy work environments.

In particular, Sacco System does not tolerate and takes action to prevent:

- abuse of power: it constitutes an abuse of one's position of authority to demand—as a matter of course from a superior—personal favors or services, disproportionate workloads, or to adopt attitudes and/or take actions that are detrimental to the employee's human dignity and personal autonomy;
- acts of psychological violence: attitudes or behaviors that are discriminatory or harmful to a person and their personal beliefs;
- sexual harassment: behavior or remarks that may offend an employee's personal sensibilities;
- acts of bullying, which may seriously compromise the employee's mental and physical health;
- operational, horizontal, and vertical workplace bullying, which can lead to psychological conditions with serious consequences for the employee's work performance;
- physical violence, in all its forms.

Any conduct constituting harassment of any kind—including cyberharassment—psychological violence, mobbing, straining, or discrimination constitutes an intolerable violation of personal dignity; it compromises the physical and mental well-being, trust, and motivation at work of the victim and constitutes a disciplinary offense.

Sacco System guarantees every employee and collaborator the right to protection from any act or behavior covered by this Code and takes steps to promote mutual respect for the inviolability of the person through training, information, and prevention.

The perpetrator of the conduct covered by this Code violates a specific duty of office.

Sacco System is committed to promoting organizational well-being and eliminating organizational causes and information gaps that may contribute to the emergence of conflicts and psychological distress, leading to so-called “organizational mobbing,” defined as distress resulting from structural dysfunctions in the organization of work.

4.11 Preventing Conflicts of Interest

Sacco System does not permit its employees and contractors to be involved in relationships that could lead to conflicts of interest with their organizational role. This applies both when an employee or contractor pursues an interest different from the Group's corporate purpose or personally benefits from the Group's business opportunities, and when representatives of customers, suppliers, or the government act in a manner inconsistent with the fiduciary duties associated with their position. Furthermore, employees shall not use their position within the organization or information obtained in the course of their work in a manner that creates a conflict between their personal interests and the interests of the Group or the public interest; furthermore, without prejudice to the provisions of applicable contractual regulations, Sacco System employees must not accept external positions in companies or businesses whose interests are directly or even potentially conflicting with or interfering with those of this Group.

4.12 Gifts, Donations, and Sponsorships

It is not permitted to offer or receive, directly or indirectly, money, gifts, or benefits of any kind for personal gain to or from executives, officers, or employees of customers, suppliers, public administration bodies, public institutions, or other organizations for the purpose of obtaining undue advantages or influencing the recipient's independent judgment. Acts of courtesy, such as gifts and hospitality, are permitted provided they are of modest value (pens, calendars, planners, etc.) and are considered customary for the occasion. In any case, they must not be such as to compromise the recipient's integrity and reputation. In any case, such expenses must always be authorized and properly documented.

Sacco System also commits to sponsoring only events that have cultural, sporting, or charitable value. The Group further commits to making donations exclusively to recognized associations and foundations, as well as to public and *nonprofit* entities, that are duly incorporated in accordance with the provisions of accounting, civil, and tax laws.

4.13 Accounting and Financial Management

Sacco System prohibits its employees from transferring money, goods, or other benefits from illegal activities or from carrying out other transactions related to them in a manner that hinders the identification of their source. To this end, the Group and its employees must never engage in or be involved in activities that involve the laundering (i.e., the acceptance or handling) of proceeds from criminal activities, in any form or manner.

Sacco System complies with all applicable anti-money laundering regulations.

In any case, cash transactions are prohibited, with the exception of payments of modest value, which, in any event, must always be supported by documentation in the Group companies' accounting records.

4.14 Compliance with the Principles of Transparency in Accounting, Administrative, and Corporate Responsibilities

Sacco System adopts appropriate standards for financial planning, control, and accounting systems, operating with the utmost accounting transparency, based on the truth, accuracy, and completeness of the underlying information in the accounting records.

Every operation and transaction carried out must be correctly recorded and supported by adequate documentation, in order to enable the performance of controls that verify the characteristics and reasons for the transaction and identify who authorized, executed, recorded, and verified the transaction.

All employees involved in bookkeeping must ensure full cooperation, the completeness and clarity of the information provided, as well as the accuracy of the data and calculations.

It is prohibited to impede or obstruct the regular conduct of the activities of the corporate bodies; employees must cooperate, when requested, in the performance of any form of control or audit of corporate management required by law. In particular, it is prohibited, through the concealment of documents or the use of other fraudulent means, to engage in conduct that prevents or otherwise hinders the performance of control or audit activities.

Sacco System is committed to:

- adopt a conduct focused on compliance with tax regulations and their correct interpretation in order to minimize the risk of disputes regarding tax non-compliance;
- maintain a cooperative and transparent relationship with the authorities to provide, truthfully and completely, the information necessary for the fulfillment and verification of tax obligations;
- fulfill tax obligations within the timeframes and in the manner defined by the law and the tax authority.

4.15 Corporate Compliance

When preparing and publishing the consolidated and individual company financial statements, as well as all other corporate disclosures required by law, the Group complies with and requires its employees to:

- comply with the relevant statutory provisions and applicable accounting principles;
- accurately and truthfully present the financial position and results of operations.

Furthermore, it is expressly prohibited to:

- make, except in cases of lawful reduction of share capital—including through simulated transactions—repayments of capital contributions made by a shareholder or release the shareholder from the obligation to make such contributions;
- resolve to distribute profits or interim dividends on profits not actually earned or allocated to legal reserves, or to distribute restricted reserves;

- fictitiously forming or increasing the capital of constituent companies by issuing shares at a price below their par value, resolving to mutually subscribe to shares, or significantly overvaluing contributions in kind or receivables, or the assets of companies in the event of a transformation;
- carry out reductions in share capital, mergers, or demergers in violation of legal provisions protecting creditors;
- creating, through simulated or fraudulent acts, fictitious majorities at company shareholders' meetings.

4.16 Protection of Company Information and Assets

Employees must be familiar with and comply with company policies regarding information security—including electronic information—to ensure its integrity, confidentiality, and availability.

Any information obtained by an employee in connection with their work is the property of the individual Group company that comes into possession of it. The company handles this information with full respect for the confidentiality and privacy of the individuals concerned, in accordance with applicable laws.

In particular, Sacco System:

- has established an information processing framework that ensures a clear separation of roles and responsibilities;
- requires third parties involved in the processing of information to sign confidentiality agreements.

Employees who become aware of information not in the public domain must exercise the utmost caution and care in using such information, preventing its disclosure to unauthorized persons, both inside and outside the company. This obligation shall remain in effect even after the termination, for any reason, of the employment relationship.

Work tools, facilities, equipment, and all other assets, whether tangible or intangible (including trademarks), must be used exclusively for the achievement of institutional purposes, in accordance with the procedures and internal regulations. They may not be used by staff for personal purposes, nor may they be transferred or made available to third parties, and they must be used and safeguarded with the same diligence as one's own property. Company assets also include business strategies and plans, customer lists, personnel data, marketing and sales programs, organizational charts, product pricing policies, financial and accounting data, and any other information relating to the business, customers, and employees of the Group companies.

Every employee is required to act diligently to protect the company's assets—both tangible and intangible—through responsible conduct in accordance with the operating procedures established to regulate their use, and to accurately document their use.

With regard to IT applications, every employee is required to strictly adhere to the provisions of the company's security policies in order not to compromise the functionality and protection of the IT systems.

Email is a company tool and is not to be considered private correspondence.

4.17 Privacy

Sacco System is committed to processing personal data and confidential information concerning employees, business partners, customers, consumers, and suppliers within its sphere of influence—and collected in the course of its business operations—in accordance with applicable national laws and the provisions of EU Regulation 679/2016.

4.18 Respect for Free Competition and Anti-Corruption Laws

Sacco System promotes compliance with all applicable commercial regulations in the countries where it conducts business, adopting practices that comply with antitrust and competition laws to ensure fair competition for all market participants and adhering to the best practices that typically govern commercial relationships.

Corruption, money laundering, and any other fraudulent conduct that interferes with maintaining business relationships within a framework of legal and moral integrity are not tolerated under any circumstances. Consistent with the principles of loyalty and integrity, Sacco System is committed to taking all necessary measures to prevent and avoid any type of unlawful conduct.

All relationships with customers and suppliers must be guided by the general principles of business ethics.

4.1 G Combating Self-Laundering, Money Laundering, Terrorist Financing, and Organized Crime

Sacco System is committed to preventing money laundering, self-laundering, terrorist financing, and the use of illicit funds, always operating in compliance with applicable laws. Furthermore, the companies are committed to implementing current anti-mafia legislation and to excluding any form of relationship with any individual convicted of organized crime by the competent judicial authorities or subject to proceedings involving disqualifications that prevent any form of contracting with the Public Administration.

All employees of the Group's companies are required to strictly comply with laws, company procedures, and policies in any financial transaction—including intra-Group transactions—in which they are involved, ensuring full traceability of incoming and outgoing cash flows and full compliance with the law.

4.20 Use of Artificial Intelligence Tools

The design, development, and use of artificial intelligence tools must be guided by full adherence to the ethical principles set forth in this document; in particular, the principles of lawfulness, fairness, transparency, intellectual property, non-discrimination, and data protection must be upheld. The use of artificial intelligence systems must, in any case, never disregard the centrality of the individual, which is considered an indispensable safeguard for recognizing, preventing, and limiting any potential threat arising from the use of artificial intelligence tools.

No sensitive data may be used for processing by artificial intelligence tools unless their use is expressly authorized by the Group's governing bodies and, in any case, only in accordance with the prescribed purposes and limits.

5 PRINCIPLES OF CONDUCT IN RELATIONS WITH EXTERNAL PARTIES

5.1 Relations with the Public Administration

The Group companies' relations with public officials (including public employees—regardless of whether they are entrusted with public service duties or not—and public service concessionaires) are based on transparency, loyalty, and fairness: corporate bodies must always act in such a way as not to create even the slightest suspicion of seeking to unduly influence such individuals to obtain benefits through unlawful means.

Sacco System condemns any conduct that could constitute an act of corruption.

Similarly, employees and contractors must report to their supervisor any attempt at extortion or bribery by a public official that they may be subjected to or become aware of. Employees and representatives of Sacco System must disclose to their supervisor any business relationships or economic activities undertaken for personal gain with public officials.

In light of the foregoing, no employee or contractor may:

- give or promise gifts, money, or other benefits to such individuals in a manner intended to influence the impartiality of their professional judgment; notwithstanding the foregoing, small tokens of appreciation and courtesy gifts are permitted within the bounds of customary practice, provided they do not compromise the company's image;
- submit false or deliberately falsified documents, certify nonexistent requirements, or provide guarantees that are untrue;
- improperly obtaining any other type of benefit (licenses, authorizations, exemptions from charges—including social security contributions, etc.) through deceptive or fraudulent means (for example, by submitting false documents or documents attesting to untrue facts);

- engaging in economic activities, assigning professional tasks, or giving or promising gifts, money, or other benefits to public officials or public employees involved in administrative proceedings that may result in benefits for the Group;
- alter in any way the operation of a computer or telecommunications system belonging to the public administration or a third party, or unlawfully access or modify, in any manner, data, information, or programs contained in any of the aforementioned systems;
- improperly receiving grants, loans, subsidized loans, or other similar disbursements—however named—granted or disbursed by the public administration, through the use or submission of false or misleading documents, or through the omission of required information;
- using grants, subsidies, or loans intended for the execution of public works or the performance of activities in the public interest for purposes other than those for which they were granted;
- illegally exchanging information about bids with participants in any public tenders or competitive bidding procedures.

It constitutes a violation of Sacco System’s institutional policy to engage in conduct that constitutes the crime of corruption, even in foreign countries where such conduct is not punishable or otherwise prohibited.

Finally, to avoid making or receiving improper payments, employees and contractors must, in all their dealings, adhere to the following principles regarding documentation and record-keeping:

- all payments and other currency transfers made by or on behalf of a Group Company must be accurately and fully recorded in the accounting books and required records;
- all payments must be made only to the intended recipients and for activities that have been formally agreed upon in a contract;
- No false, incomplete, or misleading records may be created, and no hidden or unrecorded funds may be established; nor may funds be deposited into personal accounts or accounts not belonging to the company;
- No unauthorized use of the company’s funds or reserves shall be made.

5.2 Judicial and Supervisory Authorities

Sacco System operates in compliance with the law and, within the limits of its authority, promotes the proper administration of justice.

In conducting its business, it operates lawfully and fairly, cooperating with judicial authorities, law enforcement agencies, and any public official with investigative powers who conducts investigations into its activities.

Sacco System requires that all employees and contractors provide the utmost cooperation and assistance to anyone—whether a public official or a supervisory authority—who comes to conduct inspections and audits of the company's operations.

In anticipation of legal proceedings, an investigation, or an inspection by the public administration or supervisory authorities, no one shall destroy or alter records, minutes, accounting documents, or any other type of document, nor shall anyone lie or make false statements to the competent authorities.

No one shall attempt to persuade others to provide false or misleading information to the competent authorities. No one may engage in business activities, award professional contracts, or give or promise gifts, money, or other benefits to those conducting investigations or inspections, or to the competent authorities. It is prohibited to assist anyone who has committed a criminal offense in evading or avoiding investigations by the authorities.

5.3 Relationships with Suppliers

The organization establishes collaborative relationships with its suppliers in compliance with applicable regulations and the principles of this Code of Ethics, with a focus on the highest professional standards, best practices in ethics, health and safety, and respect for the environment.

In the context of ongoing supply relationships, Sacco System commits to and requires adherence to the principles of good faith and transparency, as well as respect for the values of fairness, impartiality, loyalty, and equal opportunity.

The execution of a contract with a supplier must always be based on relationships characterized by the utmost clarity, grounded in the principles of transparency and independence. The selection of suppliers and the procurement of goods and services are carried out based on objective assessments of competitiveness, quality, fulfillment of technical and professional requirements, cost-effectiveness, price, integrity, and the supplier's reliability.

In dealings with suppliers of products and services, employees must comply with contractual terms and legal provisions, as well as maintain relationships consistent with sound business practices. Compliance with national and international laws and regulations is required, without abusing one's position.

The selection of contractors and service providers must be carefully evaluated to ensure compliance with all required health and safety standards in the workplace, with a view to preventing environmental pollution, as well as compliance with tax and social security obligations, particularly with regard to coordination activities.

Sacco System requires suppliers to comply with the ethical and quality standards defined in its *Supplier Code of Conduct* (available online at <https://saccosystem.com/> in its most recent version). This Code is consistent with the Group's commitments outlined in this Code of Ethics, applicable regulations, and best practices in business and sustainable development.

Acceptance of *the Supplier Code of Conduct* is expressly required of the supplier during the qualification and registration process in the company's supplier database.

5.4 Relationships with Customers

The companies of the Sacco System Group ensure that customer orders are executed to the highest standard and are constantly focused on offering increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency, and cost-effectiveness, to fully meet the needs of their customers.

It is mandatory to provide accurate, complete, and truthful information to enable the customer to make a rational and informed decision. The privacy of all Sacco System customers is protected in accordance with applicable laws and regulations, with a commitment not to disclose or disseminate their personal data, except as required by law.

Fairness and respect toward customers play a central role in defining our objectives. Relationships with customers must be based on mutual trust and satisfaction. In particular, the organization guarantees its commitment to providing customers with a high-quality service that meets their highest expectations and stands the test of time.

5.5 Protection of Trademarks, Patents, and Intellectual Property

Sacco System guarantees full compliance with national, EU, and international regulations designed to protect its own and third parties' intellectual property. The Group companies consider the protection of intellectual property to be of primary importance and therefore commit to:

- treat with due confidentiality and protect ideas, models, designs, trademarks, patents, copyrights, know-how, and other forms of intellectual property developed in the course of business or acquired from third parties;
- not manufacture or market products that may infringe upon or misuse third-party intellectual property rights, expressly prohibiting any conduct aimed at counterfeiting or the unlawful or abusive use of intellectual property rights.

Similarly, Sacco System does not tolerate the unauthorized dissemination, use, or exploitation of its intellectual property, trademarks, and products by third parties. The Group requires its shareholders to make a concrete commitment to respect and protect these rights by acting in compliance with the law, taking steps to prevent their infringement, and promptly reporting any irregular conduct.

6 REPORTING VIOLATIONS - WHISTLEBLOWING

The companies of the Sacco System Group adhere to the highest standards of transparency, integrity, and accountability.

Sacco System, where applicable, has developed an internal reporting and recording system that allows individuals who discover or otherwise become aware of possible unlawful conduct or irregularities to report the acts, events, and circumstances that they believe, in good faith and based on reasonable grounds, have led to such violations.

To manage these reports, an internal reporting channel has been established that allows reports to be submitted in written or oral form. The online channel for written reports is accessible via the link <https://saccosystem.parrotwb.app>.

The reporting channels established guarantee—including through the use of encryption tools—the confidentiality of the identity of the reporter, the person involved, and any person mentioned in the report, as well as the content of the report and related documentation.

For further information, please refer to the procedures for anonymous reporting (so-called “whistleblowing”) adopted by the companies. In accordance with current best practices, internal reports shall cover violations relating to:

- Unlawful conduct by the company as defined under Italian law (Legislative Decree 231/2001) or violations of the adopted Organization, Management, and Control Model (including violations of the Code of Ethics);
- Offenses falling within the scope of European Union or national legislation relating to the following sectors: public procurement; services, products, and financial markets; prevention of money laundering and terrorist financing; product safety and compliance; transportation safety; environmental protection; radiation protection and nuclear safety; food and feed safety; animal health and welfare; public health; consumer protection; protection of privacy and personal data, and security of networks and information systems;
- Acts or omissions that harm the financial interests of the European Union, as referred to in Article 325 of the Treaty on the Functioning of the European Union;
- Acts or omissions concerning the internal market, as referred to in Article 26(2) of the Treaty on the Functioning of the European Union;
- Acts or conduct that undermine the object or purpose of the provisions set forth in European Union acts in the aforementioned areas.

In certain situations (detailed in the Whistleblowing Reporting Procedure), it is also possible to use ANAC’s external reporting channel or to make a public disclosure.

With regard to reports of actual or attempted violations of the provisions contained in the Code of Ethics, the Organization shall ensure that no one in the workplace is subjected to retaliation, undue influence, harassment, or discrimination of any kind for reporting a violation of the Code of Ethics or internal procedures.

Therefore, dismissals, demotions, or other changes in job duties; workplace bullying; the imposition of unjustified disciplinary measures; or any other retaliatory or discriminatory action taken against the person who made the report will not be tolerated under any circumstances. Furthermore, following a report, the company will promptly conduct appropriate investigations and, if necessary, impose appropriate sanctions.

6.1 Reporting Violations

All individuals authorized to file an anonymous report may do so through the platform available at the link provided above; every report concerning a violation or suspected violation of the Code of Ethics is received by the Report Manager, who will, within the scope of their authority, analyze the report, consulting with the reporter and the person responsible for the alleged violation as necessary, in accordance with the internal procedures outlined by the Group Companies, which are freely available at <https://saccosystem.com/>.

7 VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS

7.1 Controls

The Code of Ethics is one of the cornerstones of the internal control system.

The internal control system must be geared toward adopting tools and methodologies designed to mitigate potential business risks, in order to provide reasonable assurance of compliance not only with laws but also with internal policies and procedures.

Management must constantly ensure that conduct complies with the provisions of the Code and, if necessary, implement specific audit programs.

7.2 Compliance with the Code of Ethics, Reporting of Violations

Compliance with the provisions of the Code of Ethics must be considered an essential part of the contractual obligations assumed by non-employees and/or parties with business relationships with Sacco System.

The governing bodies of the Group's companies ensure that the commitments set forth in the Code of Ethics are implemented; to guarantee effective enforcement, they establish—while respecting privacy and individual rights—reporting channels through which anyone who becomes aware of any instances of non-compliance with the Code within the organization may report them freely and confidentially. With regard to reports of actual or attempted violations of the provisions contained in the Code of Ethics, the Company shall ensure that no one in the workplace is subject to retaliation, unlawful pressure, harassment, or discrimination of any kind for having reported a violation of the Code of Ethics or internal procedures.

Therefore, dismissals, demotions, or other changes in job duties; workplace bullying; the imposition of unjustified disciplinary measures; or any other retaliatory or discriminatory action taken against the person who made the report will not be tolerated under any circumstances.

Furthermore, following a report, the company will promptly conduct appropriate investigations and, if necessary, impose appropriate sanctions.

7.3 The Sanctioning System

Any violation—where established—of the principles set forth in the Code of Ethics and in the procedures outlined in internal protocols undermines the relationship of trust between the Group and its directors, employees in general, consultants, various types of collaborators, customers, and suppliers.

Violations will be addressed decisively, promptly, and immediately through the adoption—against those responsible for the violations, where deemed necessary to protect the company’s interests and consistent with the provisions of the applicable regulatory framework—of appropriate and proportionate disciplinary and/or punitive measures, regardless of whether such conduct constitutes a criminal offense and regardless of whether criminal proceedings are initiated in cases where it does constitute a crime.

Confirmed violations of the Code of Ethics will result in specific measures adopted by the company’s governing bodies. In accordance with and in compliance with applicable legal and contractual provisions, confirmed violations may also result in the removal of those responsible from the company.

Please refer to the disciplinary provisions set forth in the collective bargaining agreements currently in force and applied, and to the dispute resolution procedures described therein, as well as to the provisions of applicable national laws.

Any form of retaliation against individuals who have reported possible violations of the Code of Ethics, requested clarification on its application, or filed whistleblowing reports also constitutes a violation of the Code of Ethics.

The consequences of violations of the Code of Ethics and internal protocols must be taken seriously by all those who, in any capacity, have dealings with the companies of the Sacco System Group. To this end, the Group ensures the dissemination of the Code of Ethics and internal protocols and/or procedures, as well as provides information on the sanctions provided for in the event of a violation and on the methods and procedures for imposing them.

Sacco System, to protect its reputation and safeguard its resources, will not engage in any kind of relationship with parties who do not intend to operate in strict compliance with applicable laws and regulations, and/or who refuse to act in accordance with the values and principles set forth in the Code of Ethics and to adhere to the procedures and regulations set forth in the accompanying protocols.

8 DISTRIBUTION OF THE CODE OF ETHICS

This Code of Ethics is disseminated in the following ways:

- Publication on the website <https://saccosystem.com/>
- Internally, upon each update, via digital distribution
- Appropriate and specific training modules

9 HISTORY OF REVISIONS

No.	Date	Description
00	11/19/2025	First issue
01	July 13, 2026	Update to the Group Code of Ethics