



CODE OF ETHICS

ABACO s.p.a.

Files	ABACO-SL-Code of Ethics-EN		
Type	Corporate Policy		
Visibility	<input checked="" type="checkbox"/> Reserved	<input type="checkbox"/> Interior	<input type="checkbox"/> Public
Status	<input type="checkbox"/> In process	<input type="checkbox"/> Draft	<input checked="" type="checkbox"/> Published

Rev.	Date	Random
1	27/10/2010	First draft
2	21/10/2013	Triennial revision
3	12/10/2016	Revision for incorporation of ISO 27001:2014 references
4	23/01/2019	Revision for inclusion of ISO 14001:2015 references
5	20/07/2020	Integration of new company logos
6	08/09/2023	Update following the introduction of Model 231 and adaptation to Confindustria guidelines on the composition of codes of ethics Introduction of Guidelines on Third Party Priority Rights and Antitrust and Whistleblowing

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1. CONTENTS

Abaco Spa (hereinafter referred to as the "Company") has deemed it opportune and necessary to adopt and issue a Code of Ethics (hereinafter referred to as the "code"), which sets out the values to which all Addressees must conform, accepting responsibilities, structures, roles and rules for the violation of which, even if no corporate liability towards third parties derives from it, they assume personal responsibility within and outside the company.

Knowledge of and compliance with the Code of Ethics by all those who work in favour of Abaco Spa are therefore primary conditions for the transparency and reputation of the Company. Abaco Spa also undertakes to disseminate the Code of Ethics among all those with whom it entertains business relations, requiring knowledge of it and compliance with the rules contained therein. As part of the internal control and risk management system, the Code of Ethics constitutes a management tool for ethical conduct in corporate business and an effective element of the corporate strategy and organisation. The responsibility for implementing and updating the Code of Ethics lies with the directors; the Addressees are responsible for reporting any non-compliance or failure to apply it, also pursuant to Legislative Decree 231.

The code of ethics then:

- It sets out all the rights, duties and responsibilities of the Company with respect to all those with whom it enters into relations for the achievement of its corporate purpose (customers, suppliers, employees and/or collaborators, shareholders, institutions); it is therefore a directive whose rules of conduct must be kept in mind in everyday work and which presupposes, first and foremost, compliance with the laws and regulations, including those internal to the Company, in force;
- It aims to set ethical reference 'standards' and behavioural norms to which the company's decision-making processes and conduct are oriented;
- It requires consistent behaviour from management and all those it addresses, i.e. actions that are not, even in spirit, dissonant with the company's ethical principles;
- It contributes to the implementation of the Company's social responsibility policy, as it is aware that taking social and environmental concerns into account helps minimise exposure to compliance and reputational risks, and strengthens the sense of belonging in its stakeholders.
- It contributes to mitigating the risk of offences being committed, the cases of which are contained in the 231 Model adopted in the company (according to Legislative Decree 231/2001).

2. APPLICATION MODALITIES

2.1. ADOPTION AND UPDATING

This adopted Code, far from being considered an unchangeable document, should be read as a tool susceptible to subsequent amendments and additions according to internal and external changes to the Company, as well as the experience acquired by the Company over time. All this in order to ensure full consistency between the guiding values assumed as the Company's fundamental principles and the conduct to be adopted according to the provisions of this Code. This Code of Ethics was written following the Confindustria guidelines on the drafting and minimum contents required in Codes of Ethics and Conduct and on disciplinary systems.

2.2. RECIPIENTS

This Code is binding for shareholders, members of the corporate bodies, top management and employees, as well as for all those who, although external to the Company, work directly or indirectly for it. Moreover, following the introduction of Model 231 in the Company, this code of ethics also applies to the supervisory body appointed by Abaco itself. All the Addressees indicated above are, therefore, bound to observe and, to the extent of their competence, to ensure compliance with 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 conducts in contrast with those set forth in this document. Compliance with the rules of the Code must also be considered an essential part of the contractual obligations of the Company's employees pursuant to and for the purposes of the provisions of Article 2104 et seq. of the Civil Code.

2.3. TRAINING ACTIVITIES

The Company shall include in its annual training plan initiatives aimed at promoting knowledge of the values of the rules of conduct referred to in this Code of Ethics. A training programme on the contents of the Code of Ethics is envisaged for new recruits as part of the company induction courses.

3. GENERAL PRINCIPLES

Actions, operations, transactions, and in general, all conduct of the Addressees in the performance of their duties and responsibilities, must be characterised by the utmost care: integrity, honesty, fairness, loyalty, reliability, objectivity, impartiality, transparency, open communication, duty of care, fairness and responsibility for future scientific generations, as well as respect for the individual and responsibility in the prudent use of corporate, environmental and social assets and resources.

Abaco commits itself to the Charter of Fundamental Rights of the European Union, the European Convention on Human Rights (ECHR) on Human Dignity and Integrity and the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) to

- Ensuring honesty and transparency with regard to research subjects and in particular obtaining free and informed consent (as well as consent whenever relevant)
- Ensuring Protection of Vulnerable Persons
- Ensuring privacy and confidentiality
- Promoting justice and inclusiveness
- Minimising damage and maximising benefits
- Sharing the benefits with disadvantaged populations, especially if research is conducted in developing countries
- Maximising animal welfare, in particular by ensuring replacement, reduction and refinement ('3Rs') in animal research
- Respect and protect the environment and future generations

Everyone, within the scope of the responsibilities related to their role, must provide the highest level of professionalism at their disposal to appropriately meet the needs of customers and internal users. It is necessary that each person performs the assigned activities with commitment, contributing concretely to the achievement of the company's objectives and to the respect of the stated values.

The development of the spirit of belonging to the Company and the improvement of the corporate image are common objectives, which constantly direct the behaviour of each individual

4. PERSONNEL POLICIES AND WORKING ENVIRONMENT

Abaco Spa considers it fundamental that, at work, respect for human rights and the protection of individual dignity is guaranteed, forbidding the company, both in Italy and abroad, any form of exploitation of labour and, in particular, child labour.

It therefore undertakes, with regard to child labour, not to employ workers younger than 15 years of age in accordance with paragraph 1 of Article 2 of the Minimum Age Convention, or, for developing countries in accordance with paragraph 4 of the aforementioned Article, not to employ workers younger than 14 years of age.

Compliance with these guarantees and prohibitions is binding and required by the Company also from all its suppliers, whether they operate in Italy or abroad.

4.1. HUMAN RESOURCES: SAFETY AND HEALTH

Employees and Collaborators are considered an indispensable element for the existence and future development of the Group. The latter is committed to guaranteeing compliance with legal regulations on prevention and safety at work, ensuring workplaces and environments that meet national and international standards on the subject.

The health of Employees and Co-workers is not only to be understood as the absence of illness but also as psychological, physical and social well-being, which can be ensured through the following organisational principles:

- minimise risks;
- assess risks that cannot be eliminated;
- combat risks at source;
- Adapt work to man, particularly with regard to the organisation and design of workplaces, the choice of equipment, working and production methods. Above all, monotonous or repetitive activities must be combated and their negative effects on health reduced. If work is monotonous or repetitive, the organisation of workplaces and the choice of equipment, working and production methods must be optimised in order to relieve workers;
- follow technical developments;
- replace what is dangerous with what is not or less dangerous;
- Planning health protection in such a way that individual, technical, organisational and social aspects and all their interactions are considered as a whole;
- prioritising collective rather than individual health protection;
- Train employees appropriately; this involves instruction on implementation and supervision as well as training at all levels of the hierarchy.

More detail is included in Annexes 1 and 2 concerning health and safety and social responsibility.

Abaco Spa as an Italian company is subject to and complies with the national laws and policies mentioned below.

The main law on occupational health and safety in Italy is Decree Law 81/08. This decree transposes eight European directives issued between 1989 and 1990. This decree has a wide range of application, since it applies to all companies, public and private, regardless of their number of employees. It also applies appropriate health and safety guarantees to all workers, regardless of the type of employment relationship (permanent or fixed-term).

Decree 81/08 covers the health and safety of workers in a broad sense and emphasises prevention as one of the main objectives, focusing on the identification and elimination of risk in the workplace.

The objectives of the law include:

- Establishment and organisation of the company prevention system and management of prevention practices (prevention and protection service);
- Appointment of the safety organisation chart with the required roles (RSPP, RLS, fire-fighting and first aid officers)
- Risk assessment with the drafting of safety documentation
- Design of preventive and protective measures;

- Worker information and training;
- Employee consultation and participation;
- The relationship with suppliers;
- Health surveillance

Among others, the implementation of Legislative Decree 81/08 requires workplaces to be subject to an environmental review, carried out to investigate workers' exposure to physical agents (such as electromagnetic radiation, noise and vibration), biological agents, chemical substances, and to verify the adequacy of lighting, temperature, humidity and ventilation in the workplace.

Legislative Decree 81 of 2008 also stipulates that all workplaces, e.g. offices or industrial buildings, must be subject to a certain amount of environmental controls.

According to Italian law decree 81/08, Abaco maintains its own health and safety analyses of its environment.

4.2. VALORISATION OF RESOURCES

In order that the skills and competences of each employee are enhanced so that they can fulfil their potential, the relevant corporate functions shall

- understand the skills and aptitudes of candidates in the selection phase and be able to assess whether they are a match for the company's needs;
- apply criteria of merit and professional competence to employees;
- selecting, recruiting, training, remunerating and managing employees without favouritism, nepotism or discrimination of any kind, ensuring that everyone is treated fairly and equally, regardless of gender, age, nationality, religion, ethnicity;
- ensure equal opportunities for each employee.

Employees must be aware of the Code of Ethics and the conduct it prescribes; to this end, the Management and the heads of the corporate units and functions will be a point of reference within their organisational structure for any need for clarification.

4.3. USE OF COMPANY ASSETS

Each Employee or Collaborator shall respect, protect and guard the values and assets entrusted to him/her, avoiding any improper use in conflict with the interests of the Group and/or which may cause damage or reduce efficiency.

It is forbidden to use, except for the exclusive benefit of the Group, resources, goods or materials owned by the Group.

As regards the use of IT tools by Employees or Collaborators, they are required to comply with the Company's information security policy adopted in compliance with the principles contained in the ISO 27001 standard, delivered to and signed by each employee/collaborator at the beginning of their working relationship with Abaco Spa and with the specific procedures on IT security, avoiding any behaviour or actions that may damage the security and functionality of the Company IT system.

4.4. INTELLECTUAL PROPERTY RIGHTS OF THE COMPANY

The results of the professional activity (ideas, inventions, programmes, refinement of processes, improvements, etc.) of each Employee and Collaborator are the property of the Company in which he/she works. Therefore, any invention that is part of the present and future activities of the Company must be reported in writing to one's hierarchical superior and in any case to the Management.

In this regard, all employees involved receive appropriate internal 'ABACO Guidelines for the Verification of Priority and Third Party Rights on SW'.

4.5. HARASSMENT AND BULLYING IN THE WORKPLACE

Abaco Spa requires that in internal and external working relations no harassment or attitudes in any way referable to mobbing practices and any form of violence or harassment, whether sexual or referring to personal and cultural diversity, be given rise to.

They are considered as such:

- the creation of an intimidating, hostile, isolating or otherwise discriminatory working environment towards individuals or groups of workers;
- unjustified interference with the performance of others' work;
- the obstruction of the individual job prospects of others for mere reasons of personal competitiveness or that of other employees;
- any unwanted behaviour with sexual connotations or any other type of discrimination based on sex that offends the dignity of women and men in the workplace, including physical, verbal or non-verbal attitudes.

5. CONFLICT OF INTEREST

A relationship of complete trust exists between the company and its directors and employees at any level, within which it is the primary duty of the director and employee to use the company's assets and one's own working skills for the realisation of the corporate interest, in compliance with the principles set forth in the Code of Ethics, which represent the values by which Abaco Spa is inspired. In this perspective, the directors, employees and collaborators in various capacities of Abaco Spa must avoid any situation and refrain from

any activity that could set a personal interest - direct or indirect - against those of the company or that could interfere with and hinder the ability to make impartial and objective decisions in the interest of the company.

The occurrence of situations of conflict of interest, in addition to being contrary to the law and the principles laid down in the Code of Ethics, is detrimental to the image and integrity corporate.

The Addressees, once made aware of the declaration of absence of conflict of interest, therefore exclude any possibility of overlapping or in any case crossing, by instrumentalising their functional position, the economic activities responding to a logic of personal and/or family interest and the duties they perform or hold within the Company.

Any conflict situations, even if potential, must be promptly and thoroughly reported to the Company as provided for in Legislative Decree 231/01.

The person in potential conflict shall refrain from performing or participating in acts that may prejudice the Company or third parties or even compromise its image.

Similarly, consultants and business partners must also undertake specific commitments aimed at avoiding situations of conflict of interest, also refraining from using, in any way and for any reason, the activity performed on behalf of the Company to obtain undue advantages for themselves or others.

6. COMPLIANCE WITH COMPANY PROCEDURES

Recipients, within the scope of their respective competences and functions, are required to strictly observe the company procedures as specified in the quality management model adopted according to ISO 9001:2008, the information management system according to ISO 27001:2017 and the environmental management system according to ISO14001:2015.

The proper implementation of the procedures ensures that it is possible to identify the corporate entities responsible for the process of deciding, authorising and carrying out operations.

Moreover, the traceability of every process relating to the company's activities must be guaranteed, so that it is always possible to reconstruct ex post the motivations behind the choices made, the persons responsible and any relevant data for the purposes of assessing the correctness of operational choices.

7. EXTERNAL RELATIONS

7.1. RELATIONS WITH AUTHORITIES AND PUBLIC ADMINISTRATIONS

Relations pertaining to the Company's business with public officials or public service officers - operating on behalf of the Public Administration, whether central or peripheral, or of legislative bodies, community institutions, international public organisations and any foreign state - with the judiciary with public supervisory authorities and with other independent authorities, as well as with private partners who are concessionaires of a public service, must be undertaken and managed in a spirit of cooperation, in absolute compliance with the laws and regulations in force, with the principles laid down in the Code of Ethics, so as not to compromise the integrity and reputation of both parties.

Attention and care must be taken in relations with the above-mentioned parties, in particular in transactions relating to: tenders, contracts, authorisations, licences, concessions, requests for and/or management and use of funding, however denominated, of public origin (national or EU), relations with supervisory authorities or other independent authorities, representatives of the Government or other Public Administrations, social security bodies, tax collection bodies, bankruptcy proceedings bodies, civil, criminal or administrative proceedings, access to and use of computer or telematic systems or data, as well as electronic documents.

In order not to perform acts in conflict with the law or in any case detrimental to the image and integrity of the company, the aforementioned operations and the related management of financial resources must be undertaken by specifically authorised company structures in due compliance with the laws and principles laid down in the Code of Ethics and in full observance of specific procedures.

In the context of relations with Italian and foreign institutions, the company undertakes to represent its interests and express its needs in a correct and transparent manner, in strict compliance with the principles of independence and impartiality in the choices of the public administration and in such a way as not to mislead it or mislead its decisions. In order to ensure maximum clarity in relations, the contacts with international interlocutors are only made by persons authorised to do so and in such a way as to ensure the correctness and traceability of the contact.

In this regard, all employees involved receive appropriate internal ABACO Antitrust Guidelines'.

7.2. GIFTS, BENEFITS AND PROMISES OF FAVOURS

Abaco Spa prohibits all Addressees from accepting, offering or promising, even indirectly, money, gifts, goods, services or undue favours in relation to relations with public officials, persons in charge of a public service or private persons, in order to influence their decisions, with a view to more favourable treatment or undue benefits or for any other purpose.

In relations with the Italian or foreign Public Administration, the company undertakes not to improperly influence the activity, choices or decisions of the counterparty, through, for example, the offer of undue advantages in the form of sums of money or other benefits, employment opportunities or the awarding of consultancies, aimed at the public entity or its family members or persons (natural or legal) to the itself traceable.

With regard to any requests of any nature coming from the Judicial Authorities and, more in general, to any contact with said Authorities, Abaco Spa undertakes to provide the utmost cooperation and to refrain from any conduct that may cause hindrance or prejudice, in full compliance with the laws and regulations in force and in accordance with the principles of fairness, correctness and transparency.

7.3. RELATIONS WITH CONSULTANTS, SUPPLIERS AND NEGOTIATING COUNTERPARTIES

In its business relations, Abaco Spa is inspired by the principles of loyalty, fairness, transparency, efficiency, respect for the law and for the values expressed in the Code of Ethics, and requires similar conduct from all those with whom it entertains business relations of any nature, paying particular attention to this end in the choice of negotiating counterparties, suppliers, business partners, consultants, etc., just as in the choice of its own employees.

Abaco Spa refrains from entertaining relations of any nature whatsoever, even if indirect or through intermediaries, with persons (natural or legal persons) who are known or have reason to suspect that they are part of or carry out, in Italy or abroad, support activities in any form whatsoever in favour of criminal organisations of any nature whatsoever, including mafia-type organisations, those involved in the trafficking of human beings or the exploitation of child labour or trafficking in weapons, as well as persons or groups operating for the purposes of terrorism.

Abaco Spa also operates, in the context of relations with external parties, refraining from conduct that may in any way compromise the integrity, reliability and security of computer or telematic systems and data.

The selection of negotiating counterparties, business and financial partners, consultants and suppliers of goods, commodities, services and performances must be based on objective, transparent and documentable evaluation criteria, in accordance with the principles of the Code of Ethics, just like the selection of employees.

In commercial transactions, particular care is required and imposed, also in accordance with specific protocols, in receiving and disbursing sums of money, goods or other benefits, as well as in verifying the actuality, appropriateness and completeness of the services provided and received.

Consultants and/or intermediaries are obliged to report to the Company on the activities carried out.

The Company reserves the right to conduct audits in order to verify compliance with contractual obligations.

7.4. GIFTS, DONATIONS AND BENEFITS

In business relations with consultants, suppliers, negotiating counterparties, business and/or financial partners, etc., donations, benefits (both direct and indirect), gifts, acts of courtesy and hospitality are prohibited, unless they are of modest value and such that they do not compromise the company's image and cannot be interpreted as aimed at obtaining favourable treatment.

8. ENVIRONMENTAL PROTECTION

Abaco Spa recognises the environment as a primary value to be safeguarded and, to this end, plans its activities by seeking a balance between economic initiatives and the essential need to protect the environment, also by participating in innovative projects for environmental protection and safeguarding the national and international territory.

In this context, the company, in addition to limiting the environmental impact of its activities, also taking into account the development of scientific research on the subject, decided to adopt an environmental management system according to the international standard ISO14001:2015, certified as of 2018.

In particular, the company is committed to pursuing and disseminating the following principles internally and in all external relations:

- Take measures to limit and, where possible, eliminate the negative impact of economic activity on the environment, not only when the risk of harmful events is proven (principle of preventive action) but also when it is uncertain whether and to what extent the activity of the company itself exposes the environment to risks (precautionary principle).
- Prioritise the adoption of measures to prevent possible damage to the environment, rather than waiting for the time to repair damage that has already occurred
- Plan careful monitoring of scientific and technological advances and regulatory developments in the field of environmental protection
- Promoting through training the sharing of principles within the company so that everyone adheres to the established ethical principles in particular when decisions have to be made and when projects are then implemented.

9. SOCIAL RESPONSIBILITY

Abaco UK LTD, decided to certify its Quality System according to international standards ISO 9001, ISO 27001 and ISO14001, and also decided to follow the SA 8000 standard, also known as 'social responsibility'.

The need to establish an integrated management system is established according to quality by the ISO 9000 certification standards, which are essentially a set of rules aimed at meeting company needs and expectations.

Social responsibility management is an additional step that adds quality with purely economic ends to quality with social ends, being an international code of ethical conduct that the company has decided to follow in order to work in accordance with the human rights established by the countries in which it operates.

As expressed in the legislation, therefore, Abaco UK LTD is committed to *ensuring respect for human rights through international and national labour laws, in order to protect and enhance the awareness of all staff, including both staff employed by it, as well as suppliers, sub-contractors, sub-suppliers etc.*

Through the adherence and sharing of the principles of the SA 8000 standard, Abaco UK LTD will provide evidence of its continuity and its commitment to comply with other national laws and all applicable laws, sector standards and other requirements subscribed to by companies with which it comes into contact. Should any of the above national laws or other laws, industry standards or other directives change its principles and rules, Abaco UK LTD undertakes to apply the law most favourable to its workers.

Abaco UK LTD is committed to the principles of the following international documents in particular:

- ILO Conventions 1 (Hours of work - industrial sector) and Recommendation 116 (Reduction of working time)
- ILO Conventions 29 and 105 (Forced/forced labour)
- ILO Convention 87 (Free Association of Workers)

- ILO Convention 98 (Right to Organise and Collective Bargaining)
- ILO Conventions 100 and 111 (Equal Remuneration for Women and Men Workers; Discrimination)
- ILO Convention 102 (Minimum Social Security)
- ILO Convention 131 (Minimum Wage)
- ILO Convention 135 (Labour Representatives Convention)
- ILO Convention 138 and Recommendation 146 (Minimum Working Age Recommendation)
- ILO Convention 155 and Recommendation 164 (Safety and Health at Work)
- ILO Convention 159 (Vocational Rehabilitation and Employment of Disabled Persons)
- ILO Convention 169 (Indigenous and Tribal Groups)
- ILO Convention 177 (Work from home)
- ILO Convention 182 (Serious Forms of Child Labour)
- ILO Convention 183 (Protection of Maternity)
- ILO code of conduct on HIV/AIDS and the world of work
- Universal Declaration of Human Rights
- International Convention on Economic, Social and Cultural Rights

In order to operationalise the commitment to follow the principles set out in the SA 8000 Social Accountability standard, Abaco UK LTD has also set itself the goal of involving all its suppliers, who play a key role in helping to implement this management system in real time.

As a first step, suppliers of Abaco UK LTD, must give their formal consent and commitment to:

- comply with all the requirements of the standard and require the same of their subcontractors.
- participate in any monitoring activities
- identify the causes and implement corrective and preventive actions to promptly resolve any non-conformities
- Establish a continuous flow of communication on compliance with the above principles.

10. OBLIGATION OF CONFIDENTIALITY

Due to the specific nature of the areas of activity overseen by the company (scientific research, protected technologies, etc.), all Addressees are required to maintain the utmost confidentiality - and therefore not to unduly disclose or request information - on documents, know-how, research projects, company operations and, in general, on all information learnt in the course of their work. In particular, confidential or secret information is information that is subject to specific laws or regulations as it pertains, for example, to protected technologies or new industrial applications, as well as contractually secret information.

Confidential information also constitutes all information learned in the course of work activities, or in any case on the occasion thereof, the dissemination and use of which may cause danger or damage to the company and/or undue profit for the employee.

Violation of confidentiality duties by the Addressees seriously invalidates the fiduciary relationship with the company and may lead to the application of disciplinary or contractual sanctions relating both to the violation of confidentiality duties and to the violation of the Code of Ethics itself.

11. VIOLATIONS OF THE CODE OF ETHICS

With reference to reports of actual, attempted or requested violation of the rules contained in the Code of Ethics, the company shall ensure that no one, in the workplace, may suffer retaliation, unlawful conditioning, discomfort or discrimination of any kind, for having reported to the management the violation of the contents of the Code of Ethics.

Moreover, the company will promptly follow up the report with appropriate checks and sanctions.

Since Abaco has introduced in the company the Model established by Legislative Decree 231/2001, the conduct relevant to 231 and the violations of the code of ethics fall within the types of offences identified by this model. In this regard, for the specific types of offence and the activities deemed "sensitive", please refer to chapter 4 of the document "Special Part - Model 231/01" and chapters 4, 5, 8 and 12.

As regards reporting violations, those who believe they have information have at their disposal, in addition to the official company channels, also the supervisory body that Abaco appointed following the introduction of Model 231.

The communication methods are contained in the document "General Part - Model 231/01".

Furthermore, in application of the Code of Ethics and Model 231, the Company has implemented an internal reporting system in compliance with the Whistleblowing Law (Law 30 November 2017, n. 179 and Legislative Decree 24 of 10 March 2023) and has disseminated the guidelines for the application of this system to all employees/collaborators. This guideline is also available on the company website for all external parties who may need it.

11.1. FUNDAMENTAL PRINCIPLES BASED ON INTENTIONAL OFFENCES

- The company has made it an absolute principle to comply with the laws and regulations in force in all the countries in which it operates. Every employee is committed to compliance with the laws and regulations; this commitment also applies to consultants, suppliers and customers, and to anyone who has dealings with the company. Since widespread knowledge of regulations and laws is necessary, the company is obliged to provide constant information on these issues.
- Every operation or transaction must be recorded, authorised, verifiable, legitimate, consistent and congruous, with a precise process of decision authorisation and execution. The company undertakes for each operation to have documentary evidence to prove the correctness of the process in the event of an audit.
- The company establishes basic principles for relations with its stakeholders, in particular with the public administration, civil servants and public service concessionaires, commercial and private stakeholders. These principles are explained in more detail in Chapter 7 above.

11.2. BASIC PRINCIPLES UNDER CULPABLE OFFENCES

The company makes explicit and makes known the fundamental principles and criteria on the basis of which decisions of all kinds and at all levels are made on the subject of **Health and Safety at Work in accordance with** current legislation, these principles reflect the criteria included in Article 15 of Decree 81/2008. These principles have already been explained in Chapter 4.

In relation to activities of possible **environmental impact**, the company sets out the management's commitments to comply with current legislation and to implement preventive measures to avoid or in any case minimise environmental impact. The sharing of these values must be extended to other subjects linked to the company in various ways and to companies that have negotiated relations with it with specific contractual clauses.

The general principles of conduct and values of the company are set out in Chapter 8.

12. PENALTY SYSTEM: GENERAL PRINCIPLES

Violation of the principles laid down in the Code of Ethics compromises the relationship of trust between Abaco Spa and the Addressees.

Such violations shall therefore be prosecuted by the Company incisively, promptly and immediately, through appropriate and proportionate disciplinary measures, regardless of the possible criminal relevance of such conduct and the institution of criminal proceedings in cases where they constitute a criminal offence.

The effects of violations of the principles set forth in the aforesaid Codes must be taken into serious consideration by all Addressees: to this end, Abaco Spa shall disseminate the Code of Ethics and inform about the sanctions envisaged in the event of violation and the methods and procedures for imposing them.

The company, in order to protect its image and safeguard its resources, does not entertain relations of any kind with persons who do not intend to operate in strict compliance with the regulations in force, and/or who refuse to behave in accordance with the values and principles laid down in the Code of Ethics and comply with company procedures.

The sanctioning system also applies to Whistleblowing violations, but in no way can it be used in retaliatory mode against those who report any offenses falling within the Whistleblowing crimes, as required by law. In this sense, the Whistleblowing Procedure, applied according to ANAC guidelines, can be viewed on the Abaco company website.

12.1. PREVENTIVE FUNCTION OF THE DISCIPLINARY SYSTEM

Failure to comply with the measures provided for by the code of ethics and the organisational model implemented should activate the sanctioning mechanism provided for by the latter, regardless of whether criminal proceedings are instituted for the offence committed. On the contrary, a company is considered to have an effectively implemented organisational model when it successfully intervenes in the blocking of behaviour that is prodromal to the crime, preventing the application of 'external' sanctions by the State.

Thus, the disciplinary system complements and renders effective the organisational model, the purpose of which is to prevent offences from being committed, not to repress them.

12.2. DIRECTORS AND PARTNERS

In the event of a breach of the Code of Ethics by one or more Board Members, the Board of Directors shall proceed to take one of the following initiatives, taking into account the seriousness of the breach and in accordance with the powers provided for by law and/or the Articles of Association:

- statements in the minutes of the meetings;
- formal notice;
- revocation of the assignment/delegation;
- request for the convening or calling of a Shareholders' Meeting with the adoption of appropriate measures against the persons responsible for the violation on the agenda, including the bringing of legal actions aimed at the recognition of the director's liability towards the Company and compensation for the damages suffered.

12.3. SANCTIONS FOR EMPLOYEES

12.3.1 Managers

In the event of violation, by managers, of the prescriptions set out in the Code of Ethics or of the adoption, in the performance of their activities, of a conduct that does not comply with its prescriptions, the most appropriate measures will be applied against those responsible, in accordance with the provisions of the

National Collective Labour Agreement for Managers of companies producing goods and services. In particular:

- where the breach of one or more provisions of the Code of Ethics is so serious as to damage the relationship of trust, not permitting the continuation, even temporary, of the employment relationship, the manager is liable to be DISMISSED WITHOUT NOTICE;
- if the breach is minor but still serious enough to irreparably damage the fiduciary bond, the manager incurs JUSTIFIED DISMISSAL WITH NOTICE.

12.3.2 Clerks and Managers

Conduct by employees in violation of the individual rules of conduct prescribed in the Code of Ethics are defined as 'disciplinary offences'.

The sanctions that can be imposed are among those provided for in the company disciplinary regulations, in compliance with the procedure laid down in Article 7 of the Workers' Statute and the applicable collective source legislation.

In relation to the above, the Code of Ethics refers to the disciplinary apparatus provided for in the collective agreement.

The abstract categories of non-compliance describe the conduct sanctioned, identifying the relevant disciplinary measures according to their severity.

In particular:

- The measures of VERBAL WARNING, WRITTEN REPRIMAND, FINE OR SUSPENSION FROM WORK AND PAY, depending on the seriousness of the violation, shall be applied to any employee who violates the internal procedures laid down in the Code of Ethics or adopts, in the performance of activities in the relevant risk areas, a conduct that does not comply with the provisions of the Code, since such conduct is a violation of the employee's duties identified by the CCNL and is detrimental to the discipline and morale of the company;
- Any worker who, in the performance of activities in areas at risk, commits a significant breach of the provisions of the Code of Ethics, such behaviour being more serious than those identified in the previous point, shall incur the measure of DISMISSAL WITH NOTICE;
- Any worker who adopts, in the performance of activities in areas at risk, a conduct unequivocally aimed at committing an offence sanctioned by the Decree or in violation of the provisions of the Code of Ethics, such as to determine the concrete application against the company of the measures provided for by Legislative Decree 231/01, shall be subject to DISMISSAL WITHOUT NOTICE, since such conduct must be considered a very serious violation that causes serious moral and/or material damage to the company.

This document supplements for all legal purposes the disciplinary code adopted in the company and is subject to the posting obligations pursuant to Article 7 of the Workers' Statute.

12.3.3 Measures against employees, auditors, consultants, partners, counterparties and other external parties

Any conduct by collaborators, auditors, consultants, partners, counterparties and others outside the company in the context of a contractual relationship that is in conflict with the lines of conduct set out in the Code of Ethics results in the unilateral termination of the contractual relationship.