



CODE OF ETHICS

LABOR PROJECT S.R.L.

CHRONOLGY OF REVISIONS

DATE	DESCRIPTION
14th September 2010	First approval with resolution of Labor Project's Board of Directors
20th September 2012	Company logo update and graphic arrangement
6th November 2019	Code of Ethics update with resolution of Labor Project's Board of Directors
4th December 2023	Code of Ethics update with resolution of Labor Project's Board of Directors

GENERAL PRINCIPLES

Article 1 | Nature and purpose of the Code

The Code of Ethics (hereinafter: "Code") is an official document of LABOR PROJECT S.R.L. (hereinafter sometimes abbreviated as "LABOR PROJECT" or "Society") approved by the Board of Directors, which collects the principles and behavioural rules which all those who operate in the corporate context – and, in any case, maintain relations with the Society – must comply with. These subjects are, for instance, stakeholders (such as Public Administration; all those who, being eligible, mean to avail themselves of the funding from the Lombardy Region; employees; suppliers; external collaborators; associations and local community).

The purpose of this Code is to declare and propagate the values and behavioural rules which the Society means to abide by when performing its entrepreneurial activity.

Article 2 | Recipients

This Code is binding, and it must be respected by all the personnel of the Society, i.e. by every subject who carries out activities in the name and on behalf of the Society, including those who act as representatives, administrators, or directors of the Society, as well as external collaborators and consultants, anywhere they may be operating, both in Italy and abroad.

Article 3 | Guarantors of the Code fulfilment

Supervision of the Code compliance is entrusted to the Supervisory Body (O.d.V) provided for in the Organisational Model pursuant to Legislative Decree no. 231/2001 (hereinafter "Model") which will take care of proposing to the Board of Directors any possible necessity or opportunity to update or adapt it according to the evolution of the laws and corporate activities.

Article 4 | Entry into force, update, and advertisement of the Code

This Code was adopted – with resolution of the Board of Directors of the Society – on the 14th of September 2010 with immediate efficacy.

This Code is available on the website of the Society, and it is affixed on the notice board located in the real estate where the Society is headquartered.

Article 5 | Essential principles of the Society

The Society, in the performance of its activity, operates according to the following principles:

Honesty: honesty represents the essential principle for every activity of LABOR PROJECT, for its initiatives, and it constitutes a crucial value for the organisational management. Relations with stakeholders, at every level, must be characterised by criteria and behaviours of correctness, collaboration, loyalty, and mutual respect.

Legality: the Society undertakes to respect all national and international rules, laws, directives, and regulations, as well as all the generally acknowledged customs. Besides, its decisions and behaviours are inspired by the care of the public interest it is entrusted with.

Transparency: the Society undertakes to operate in a clear and transparent manner, without favouring any group of interest or single individual.

Responsibility towards the community: LABOR PROJECT, being aware of its social role on the reference territory, on the economic and social development and on the general wellness of the community; in relation to the activity of professional education and information, means to operate in compliance with national and local communities, sustaining cultural and social initiatives to improve its reputation and legitimacy to operate.

Article 6 | Rules of behaviour

To favour the respect of the above-mentioned corporate principles on the part of every recipient of this Code of Ethics, LABOR PROJECT arranged specific rules of behaviour:

Combating unlawful behaviours: the Society, in coherence with its values of honesty and transparency, undertakes to adopt every necessary measure to prevent and avoid the commission of unlawful acts. In particular, it forbids pecuniary corruption, or the performance of other forms of corruption with the purpose of gaining direct or indirect economic benefits for the company. It also forbids the acceptance, on the part of third parties, of gifts or favours which surpass the normal rules of hospitality and courtesy.

Combating conflicts of interest: the Society does not allow that its employees and collaborators get involved in relationships which can lead to conflicts of interest with their organisational role. This applies to the case in which an employee or collaborator pursues an interest other than the social object pursued by LABOR PROJECT, or profits personally from business opportunities of the Society. This also applies to the case in which the representatives of customers or suppliers, or of the Public Administration, behave in opposition with the fiduciary duties connected to their position. Moreover, the personnel must not use their professional position in the company and the information acquired there so as to create conflict between their personal interests and the interests of the company. Lastly, without prejudice to the relevant contractual provisions in force concerning the matter, the personnel of the Society must not take upon themselves external charges in societies or enterprises whose interests are directly or even just potentially conflicting or interfering with those of LABOR PROJECT.

Free gifts, gratuities, and other forms of benefits: it is not allowed to offer/receive personally – directly or indirectly – money, presents, or benefits of any nature to/from managers, officials, or office workers of customers, suppliers, Public Administration bodies, Public Institutions or other Organizations with the purpose of taking unfair advantages affecting the recipient's independent judgement. Acts of courtesy, like free gifts and forms of hospitality towards representatives of the Public Administration or public officials are allowed as long as they are of modest value, and can be considered customary in relation to the frequency. Besides, they must not compromise the integrity and reputation of the recipient, nor affect their independence of judgement. In any case, these expenses must always be authorized according to specific corporate procedures, and they must be properly documented.

Rules of behaviour towards the Public Administration: relations with the Public Administration must be characterised by the utmost transparency and correctness. In particular, it is required to keep the necessary relationships in compliance with the roles and functions attributed based on the law, and in a spirit of utmost collaboration with the administration of the government, in Italy or in other countries. Relationships with officials of public institutions must be limited to subjects authorized by the Society, according to the powers conferred by the Board of Directors, regularly authorized and regulatory in compliance with the utmost respect of the provisions of the law, so that the integrity and reputation of the Society will not be compromised.

To this purpose, the body must:

- Operate with interlocutors of the Public Administration on a national and international level, as well as within the reference community and territory, through specific communication channels. This dialogue must not imply any kind of discrimination.
- Represent the interests and positions of the Society in a transparent, meticulous, and coherent manner, avoiding collusive behaviours.

Furthermore, it is forbidden to counterfeit, modify or omit data and/or information to obtain an illicit advantage or any other benefit for the Society.

Article 7 | Staff management

In compliance with the Conventions of the International Labour Organization and the current legislation for the protection of work conditions, the Society undertakes to respect the essential human rights. Specifically, the Society:

- Avoids any form of discrimination towards its personnel, and it offers to every worker the same opportunities, so that everyone can benefit from an equal treatment – based on merit criteria – without any discrimination at all.
- Looks after the selection and hiring of the staff, assuring respect of the values of equal opportunities and equality, in coherence with law provisions relating to the matter.
- Creates a working environment where the personal characteristics of the single worker shall not bring about discriminations;
- Assures the protection of the staff's privacy and their rights to work without suffering illicit conditioning;
- Ensures that, in both internal and external work relationships, no one will give rise to reduction or maintenance in a state of subjection through violence, threat, deceit, authority abuse, profiting from a situation of physical or psychological inferiority, or a situation of necessity; through promise, or offering money or other benefits to whom has authority on the person;
- Undertakes not to establish any working relationship with subjects deprived of residence permit and does not carry out any activity aimed at favouring illegal immigrants' entrance in Italy.
- Undertakes not to establish any working relationship with subjects who figure in the reference lists (so-called blacklists);
- Undertakes to promote the culture of safety at work – also through informative and education meetings addressed to the staff – and the respect of environment.

Article 8 | Work environment

The Society considers the following instances to be immoral and offensive:

- Working under the influence of abuse of alcoholic or narcotic substances; or substances which have analogous effects on the psyche or the body;
- Consuming or giving, in any capacity, narcotic substances while working;
- Holding in any place ascribable to the Society, or exchanging via e-mail or any other means, pornographic and child pornographic material, or even virtual images realized using images of minors who have less than 18 years.

Article 9 | Use of the corporate assets

Documents, personal data, information, work tools, installations, equipment and any other benefit, material and immaterial (including the intellectual property rights and trademarks) belonging to the Society must be used exclusively for the accomplishment of institutional purposes, according to the methods established by the Society; these benefits cannot be used by the staff for personal purposes, neither can they be transferred or made available for third parties, and they must be used and kept with as much diligence as if they were a personal possession, applying the provisions of the internal regulations and procedures, as well as those of Regulation (EU) 2016/679.

The corporate assets also include the entrepreneurial strategies and plans, the charts of customers, data concerning the staff, marketing and sales programs, organograms, policies concerning the prices of products, financial and accounting data and any other information related to the activity, customers, and employees of the Society.

Article 10 | Accounting and financial management

The Society prohibits its employees from replacing or transferring money, possessions or other benefits stemming from illicit activity; or accomplishing other operations related to them, so as to hinder the identification of their origin.

For this purpose, the Society and its employees must never be involved in activities which might imply the recycling (i.e. acceptance or usage) of incomings from criminal activities, in any form or manner.

The Society requires its personnel to verify, as a precautionary measure, the available information (including financial information) concerning commercial counterparts and suppliers with the purpose of ascertaining the reliability and legality of their activities before establishing with them business relationships (it is necessary to ascertain that these subjects do not figure in the blacklists. It is also indispensable to verify that transactions always occur using authorized intermediaries, equipped with anti-money laundering, automatic and manual controls, and that they are not carried out on encrypted accounts.)

Therefore, the Society abides by all the rules concerning the matter of anti-money laundering applicable to the Society.

In any case, it is forbidden to perform transactions with cash, except for modest payments which, in any case, must always be justified by the accountable documents of the Society.

Article 11 | Safety

The Society is particularly devoted to the matter of health and safety on work, in order to avoid risks connected to the performance of the company activity. Therefore, it requires its personnel to respect all the legal obligations demanded by the reference legislation. In particular, the Society:

- Properly educates its personnel with regard to safety and health;
- Provides for the implementation of devices that signal danger promptly and efficiently; moreover, it looks after the arrangement of the evacuation plan;
- Periodically organises simulation tests for the management of emergencies, with the purpose of illustrating to the personnel behaviours to be adopted in case of serious and imminent danger;
- Adopts first-aid plans and emergency medical assistance;

- Periodically verifies the suitability of the offices assuring the correct adjustment of the working places according to the legal provisions concerning the safety and health of workers; moreover, it requires its personnel to respect all regulations to this effect.

Also, the Society requires its personnel and collaborators to provide their utmost availability and collaboration towards the Prevention and Protection Service Manager (RSPP) or towards anyone who carries out inspections and controls on behalf of the appointed Bodies. Therefore, if a member of the Society detects related anomalies or irregularities, they will have to timely inform the above-mentioned Manager about the risks.

The personnel of the Society must not expose other employees to useless risks which could provoke damages to their health or physical safety.

All those who work for the Society are responsible for the correct management and respect of the procedures adopted concerning safety and healthiness of the work environment.

Article 12 | Relationships with the Public Administration

In every relationship with the Public Administration, Public Authorities and Public Institutions, the Society undertakes to implement the legislation and the applicable regulatory protocol fully and scrupulously; also, it prohibits its employees from:

- Making or offering – directly or indirectly – payments or material benefits to public employees or public officials; to influence or compensate for an act of their office and assuring advantages of any kind to the body;
- Giving, offering or promising money or other benefits; exerting illicit pressure towards public officials, persons in charge of a public service, managing, officials, Public Administration employees, or their relatives or cohabitants, to induce them to accomplish any act compliant or contrary to its professional duties;
- Granting other advantages – of any nature – to public employees/officers;
- Using the hiring or remunerative system to grant direct or indirect advantages to public employees/officers;
- Submitting untrue declarations in front of the Public Administration;
- Dispatching sums of money received from the Public Administration by way of supplies, contributions, or loans, with purposes different than those for which they were granted.

If the Society needs to avail itself of professional performances on the part of Public Administration employees, as a consultant, the law in force must be respected.

Article 13 | External relationships

Relationships with customers: the main objective of the Society is to increase the degree of satisfaction and appreciation of its services/products, with a particular attention towards the demands of the customers – even potential ones – and providing them with truthful, precise, complete and correct information.

Therefore, these relationships are managed according to principles of utmost collaboration, availability, professionalism, and transparency, in compliance with the confidentiality and protection of *privacy* with the purpose of creating the foundation for a grounded and long-lasting relationship, based on mutual trust.

Relationships with suppliers and consultants: the Society chooses its suppliers and consultants according to a careful technical-economic assessment, in consideration of the

following parameters: analysis of products, offer, affordability, technical and professional suitability, competence and reliability.

In the context of ongoing supply relationships, the Society maintains engaged relationships based on the principles of good faith and transparency, and with respect for the values of fairness, impartiality, loyalty and equal opportunities.

The Society adheres to the same principles and selection criteria outlined in the previous articles towards all parties it engages with; and requests that these principles are shared and observed by all entities with which it conducts business, whether commercial or otherwise (suppliers, external consultants, collaborators and agents).

In any case, it is positively forbidden to:

- Issue purchase requests that do not correspond to a specific and justifiable need of the organization and that are not authorized based on delegated authority.
- Recognizing fees to consultants and suppliers that are not justified in relation to the type of assignment to be performed and market prices.

Article 14 | Sponsoring and free gifts

The Society undertakes to exclusively sponsoring events that have a cultural, sporting, or charitable value.

Also, The Society undertakes to donate exclusively to acknowledged associations and foundations as well as to public, no profit bodies. These associations must be regularly acknowledged, in compliance with the provisions of the accountable, civil and fiscal law.

Article 15 | Company compliance

The Society, in drafting financial statements and all other social communications required by law, observes and asks its employees to:

- Respect the laws and relevant accounting principles;
- Represent correctly and truthfully the assets and financial situation of the Society.

Furthermore, the Society forbids to:

- Carry out, outside of cases of legitimate reduction of the share capital, also through simulated conduct, returns of contributions made by the shareholder or release them from the obligation to execute them;
- Decide on distributions of profits or advances on profits not actually earned or destined for legal reserves, or distribute unavailable reserves;
- Fictitiously form or increase the capital of the companies by attributing shares for an amount lower than their nominal value, to deliberate the mutual subscription of shares, to significantly overvalue contributions of assets in kind or credits, or of the assets of the companies in case of transformation;
- Carry out reductions of the share capital, mergers or splits which violate the legal provisions for the protection of the creditors;
- Determine, with simulated or fraudulent acts, fictitious majorities when assemblies of the Society occur.

Article 16 | Fulfilment and Control on the Compliance with the Code of Ethics

Supervisory Body

LABOR PROJECT appointed a Supervisory Body (O.d.V) which performs, among others, the following tasks:

- Monitoring the compliance with the Organisational Model and the Code of Ethics, with a view to reducing the danger of committing the crimes provided for in the Decree 231/2001;
- Providing to interested parties all the explanations and clarifications asked for, including those concerning the legitimacy of a concrete behaviour or conduct; or the correct interpretation of the provisions of the Model and the Code of Ethics;
- Following and coordinating the update of the Model and the Code of Ethics, also through one's own proposals;
- Promoting and monitoring the implementation, on the part of the Society, of the activities concerning communication and education based on the Model and, particularly, on the Code of Ethics.
- Signalling to the competent corporate bodies any violation of the Model or Code of Ethics, suggesting which penalty should be imposed, and verifying the actual implementation of the penalties imposed.

The Society established the e-mail address dedicated to the Supervisory Body: odv@laborproject.it

Reporting violations in compliance with the Legislative Decree 24/2023

The Society has established a whistleblowing management system pursuant to Legislative Decree 24/2023.

Through these channels it is possible to signal the relevant violations in accordance with the Legislative Decree 231/2001, and the violations of the Organisational Model adopted by the Society.

The reporting manager is the Supervisory Body (O.d.V).

The above-mentioned violations will have to be signalled using the following **internal, alternative channels of reporting**:

Written report:

Digital platform

<https://laborproject.parrotwb.app/>

OR

Oral report:

Direct meeting with the Supervisory Body (O.d.V), to be requested using the link

<https://laborproject.parrotwb.app/>

Provisions

Any violation of this Code might result in the implementation of a disciplinary provision, to be determined according to the seriousness of the violation, as specified in the Model.

The Board of Directors, in the most significant cases, will establish the most suitable measures to be taken if a violation should ever occur.

These actions will have to be aimed at discouraging transgressions – in a responsible manner – and at promoting the responsibility and compliance with this Code.

In order to establish the actions to be taken in each individual case, the Board of Directors will have to consider all the available information, including the nature and seriousness of the violation; whether it is related to an isolated episode or it occurred several times; whether the violation seems intentional or voluntary; whether the subject was previously informed about the correct behaviour to maintain, and whether the same person committed other violations in the past.

With regard to the typology of sanctions that may be imposed, it should be noted that both for the employees and the executive, any sanction must respect the procedures provided for in the Article 7 of the Statute of Workers and/or in special laws and/or in the reference national contract, also in consideration of the provisions of the disciplinary system, which constitutes an integral part of the Organisational Model adopted by LABOR PROJECT in compliance with the Legislative Decree n. 231/01.

Violation of the provisions of this Code on the part of suppliers, external collaborators and consultants are considered as a serious nonfulfillment on their part.

Knowledge and diffusion

Knowledge of the Code of Ethics on the part of internal and external interested parties is spread through specific activities of communication and diffusion; in particular, it is allocated to every employee and available for third parties on the website.

Adequate knowledge and comprehension of the Code of Ethics on the part of the personnel is assured through information and education programs defined by the Society.

Each employee is responsible for the consultation of their direct manager for any clarification concerning the interpretation or implementation of the behavioural rules exposed in this Code.