

## **CODE OF ETHICS**

### **Introduction**

Sissa Medialab believes that business ethics arise from the morally positive and personal commitment of individuals who work within it and with it according to principles of fairness, loyalty, reliability and honesty, also with a view to assuming responsibility towards third parties and colleagues.

Sissa Medialab views these moral values as “intangible assets” of its capital assets, believing that compliance with these principles constitutes not only a morally positive commitment, but an asset for the company itself, a primary and essential value.

To this end, Sissa Medialab has decided to adopt a Code of Ethics which, in line with the principles of loyalty and honesty, aims to regulate the company’s activities through rules of conduct, setting out the general principles.

### **Scope of the Code of Ethics**

This Code of Ethics shall be observed by all Employees, Independent Contractors and Third Parties working on behalf of Sissa Medialab and shall serve as a reference for all procedures, policies, guidelines, contractual relationships adopted by the Company.

Each employee and independent contractor shall inform customers, suppliers and other stakeholders with whom they interact of the adoption of the Code of Ethics.

Particular attention is required of Heads of Department, who are called upon to ensure that the principles set out therein are constantly applied and to set an example for their employees.

### **Background**

#### *Unethical behaviour*

Behavior by one or more people or organizations working on behalf of Sissa medialab is considered unethical if it violates the rules of civil coexistence and proper social and business relationships, as provided for and regulated by laws and regulation

Unethical conduct compromises the relationship between Sissa Medialab and its Shareholders and between Sissa Medialab and its employees and independent contractors, as well as between Sissa Medialab and its public and private institutional, entrepreneurial and financial stakeholders.

The ethical principles set out in this Code of Ethics are relevant to the prevention of offences under Legislative Decree no. 231/2001 and constitute an essential element of the pre-emptive control system.

## General principles

- Non-discrimination

In decisions affecting relationships with its external and internal stakeholders, Sissa Medialab avoids any discrimination on the basis of age, sex, sexual preference, health, ethnicity, nationality, political opinions, religious beliefs.

- Compliance with standards

As part of their professional activities, Sissa Medialab's employees, directors and independent contractors are required to diligently comply with the laws in force, this Code of Ethics, company procedures, internal regulations and, where applicable, the rules of professional ethics. Under no circumstances may the pursuit of the Company's interest justify conduct in breach of these rules.

- Conflicts of interest

Conflicts of interest between people involved in any activity in the interest of the Company must always be avoided and promptly resolved. A conflict of interest is deemed to exist when an employee, independent contractor or director pursues an objective other than that pursued by Sissa Medialab, or voluntarily obtains or attempts to obtain a personal advantage when carrying out activities in the interest of the Company, or procures it for third parties. Violation of these principles will be sanctioned.

- Confidentiality

Sissa Medialab ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and informed authorisation and in full compliance with the regulations in force. The behaviour of the Company's employees, directors and independent contractors must conform to the utmost confidentiality even outside working hours, in order to safeguard technical, financial, legal, administrative and staff management know-how. All those who, as a result of the performance of their management, control and service duties, come into possession of confidential and relevant information, are required not to abuse this information privilege.

- Value of human resources

Sissa Medialab's employees and independent contractors are an indispensable factor in the company's success. For this reason, Sissa Medialab protects and promotes the value of human resources in order to improve and increase the expertise and knowledge of each employee and independent contractor.

Maintaining a serene, stimulating working environment that respects everyone's needs is one of Sissa Medialab's principles, as is promoting a policy of personal and professional growth to ensure career development based on skills, professionalism and merit.

Sissa Medialab ensures an appropriate training and awareness programme on issues related to the Code of Ethics.

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- Fairness in dealing with employees

Sissa Medialab guarantees that, in hierarchical relationships with employees, under no circumstances the exercise of the principle of authority shall be detrimental to the dignity and professionalism of the employee.

The Company makes its organisational choices by safeguarding the professional value of its employees.

- Integrity of the person

Sissa Medialab undertakes to protect the physical and moral integrity of its employees and independent contractors, ensures working conditions that respect individual dignity and takes care of the safety and hygiene of the working environment.

### **Ethics in the activities of corporate bodies and in company organisation**

#### *Activities of corporate bodies*

The activities of Sissa Medialab's corporate bodies are based on full compliance with the rules set out in the Articles of Association and in current legislation.

#### *Supervisory Board pursuant to Legislative Decree 231/01*

Sissa Medialab has set up a Supervisory Board in accordance with the provisions of Legislative Decree 231/01. This Body shall have the task of verifying the uniform application of this Code of Ethics, as well as compliance, by each Employee, Independent Contractor and all those who cooperate in the pursuit of the Company's aims, with the "Organisational, Management and Control Model" pursuant to Legislative Decree no. 231/01.

The Supervisory Board shall report directly to the Board of Directors on the results of its activity and on any critical issue and suggest corrective and improvement measures.

### **Ethics in dealing with third parties**

#### *Gifts, presents and benefits*

In dealing with officials of public institutions, public officials and persons in charge of public services, directors, auditors, employees and independent contractors of the Company, it is forbidden to give or promise money or any benefit (for example: gifts, presents, benefits) of significant value in any form (except in the case where these are of modest value and fall within ordinary practices and customs). This prohibition applies whether the conduct is carried out in the exclusive interest of the person involved or with the intention of unlawfully benefiting the Company.

The directors, the auditor, employees and independent contractors must not accept gifts, services, gratuities or benefits in any form (except where these are of modest value and fall within ordinary

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practice and custom), which may influence the actions to be taken in the performance of their work duties.

This cannot be circumvented by resorting to third parties.

### *Donations for charitable or philanthropic purposes*

Any donations for charitable or philanthropic purposes shall be made to organisations and Entities that are independent and entitled to receive them in accordance with the laws in force, offering a guarantee of quality, a correct use of the funds and for which any possible conflict of interest of a personal or corporate nature can be excluded.

All donations shall be properly documented.

### *Financial relationships with political parties and trade union organisations*

Any funding to political parties in Italy and abroad shall be carried out by Sissa Medialab in compliance with current legislation.

Sissa Medialab refrains from taking any initiative that may directly or indirectly constitute undue solicitation of political or trade union representatives or of political or trade union organisations.

### *Relationships with suppliers*

Purchases of goods and services must be carried out with the aim of maximising competitive advantage for Sissa Medialab, but also considering equal opportunities for suppliers and ensuring maximum transparency in the supplier selection process.

When choosing its suppliers, the technical/financial capacity of its counterparties shall be taken into account in addition to their cost-effectiveness, by assessing their overall reliability with reference to the specific nature of the services to be rendered.

Sissa Medialab and its employees and independent contractors undertake to put in place all the necessary procedures and actions to ensure maximum efficiency and transparency in the purchasing process.

### *Contributions and other sponsorships*

Sissa Medialab may accept requests for contributions, limited to proposals from non-profit organisations and associations.

Sponsorship activities, which must have aims that are congruent with those of Sissa Medialab, i.e. environmental, are only intended for events or organisations offering a guarantee of quality, a correct use of funds and for which any possible conflict of interest of a personal or corporate nature can be excluded.

*Competition and antitrust*

Sissa Medialab and its independent contractors must comply with the principles and rules of free competition and must not violate competition and antitrust law.

**Ethics in dealing with employees**

*Staff selection*

The assessment of staff to be recruited shall be carried out, in accordance with specific company regulations, on the basis of the suitability of the candidates' profiles to the company's needs, safeguarding equal opportunities for all those concerned. The information requested shall be strictly related to verifying the professional and psycho-aptitude profile, respecting the candidate's privacy and opinions.

Within the limits of the information available, Sissa Medialab shall adopt appropriate measures to avoid favouritism, nepotism, or forms of patronage in the staff selection and recruitment.

*Establishment of the employment relationship*

Staff are employed under employment contracts in accordance with current legislation and collective bargaining. No illegal or undeclared work is allowed. Before the employment relationship is established, each employee receives adequate information on the regulatory and salary content of the relationship, so that the acceptance of the assignment is based on actual knowledge of it.

*Staff management*

Sissa Medialab avoids any form of discrimination against its employees. Within the framework of staff management processes, decisions made are based on the suitability of the employees profiles to the needs of the Company, as well as on merit.

*Health and safety*

Sissa Medialab is committed to preserving the health and safety of workers, especially through pre-emptive action, in compliance with the regulations in force.

*Privacy Protection*

Employee privacy is protected through the adoption of all measures and safeguards for the processing and storage of information provided for by current legislation. Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees is prohibited.

*Integrity and protection of the person*

Sissa Medialab undertakes to protect the physical and moral integrity of its employees and to ensure the right to working conditions that respect personal dignity. For this reason, it safeguards workers from psychological violence and counters any attitude or behaviour that is vexatious or harmful to the individual, his beliefs and preferences; sexual harassment is not tolerated.

**Ethics in relationships between employees and independent contractors and the company**

Without prejudice to the obligations and provisions of the regulations and of the individual and collective bargaining agreements in force, each employee and each independent contractor shall avoid any behaviour contrary to the corporate ethics, as identified in this Code of Ethics, that reflects on the reputation and on the Company.

*Information management*

Sissa Medialab's information is accessible only to authorised persons and is protected from undue disclosure; only persons expressly authorised by the Company may have access to internal information and are required to comply with company operating instructions.

*Conflict of interest*

All employees and independent contractors are required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of business opportunities of which they become aware in the course of their work.

**Ways of implementing the code of ethics**

*Dissemination and communication of the Code of Ethics*

Sissa Medialab undertakes to disseminate the Code of Ethics, using all available means of communication and opportunities such as company information and training meetings.

Employees, directors, the auditor and independent contractors must have access to the Code, be familiar with its contents and comply with its provisions.

It is the responsibility of everyone, and in particular of management, to include the contents of the Code in training programmes and to refer to it in all procedures and policies.

*Updating the Code of Ethics*

Sissa Medialab's Supervisory Board may provide support for the revision and updating of the Code of Ethics where necessary.

*Supervision of compliance with the Code of Ethics*

The Supervisory Board shall be responsible for ensuring that the rules laid down in the Code of Ethics contained in Sissa Medialab's organisational model are complied with by the persons to whom the Code of Ethics is addressed. This body must also be an important reference point for employees and for all those who find themselves in a situation where non-compliance has occurred. The Supervisory Board has the task of meeting periodically to verify compliance with the internal rules.

*Reports of violations of the Code of Ethics*

All persons involved are required to promptly and confidentially report any violation of the Code to their supervisors and to the Supervisory Board.

Reports must be made in detail and will be treated confidentially so as not to give rise to any form of retaliation.

*Sanctions*

Sissa Medialab may take disciplinary measures against any person whose behaviour does not comply with the Code of Ethics, in accordance with the provisions of the industry's CCNL (Italian collective bargaining agreement), including, in the most serious cases, termination of the contract, as detailed in the attached disciplinary code.

Any violation by the main suppliers of the information principles of this Code of Ethics shall be challenged by the Company and shall allow the Company not to avail itself of the supplier's services or to terminate any existing contracts/relationships according to the contractual clauses provided for.