

CODE OF ETHICS



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1 INTRODUCTION AND SCOPE OF APPLICATION

This Code of Ethics (hereinafter the "Code") sets out the values, principles and rules of conduct that the ORANGE1 Group recognises as its own and adopts as the foundation of its activities. It constitutes the body of rights, duties and responsibilities that the Group expressly assumes towards its stakeholders, such as shareholders, customers, suppliers, business partners, creditors, personnel, Public Authorities and the communities in whose territories the Group operates.

The Code is adopted by the parent company Orange1 Holding Sarl. and is formally endorsed by each company of the Group by means of a specific resolution of its administrative body. Upon endorsement, each company displays its own corporate name on the cover, without prejudice to the unity of the values and principles set out herein for the entire Group.

1.1 Recipients

The Recipients of the Code, who are required to comply with its provisions, are all those who, on any basis, act on behalf of or in the name of the ORANGE1 Group: the members of the corporate bodies (directors and control bodies), managers, employees, trainees and apprentices, as well as persons treated as such. Collaborators, consultants, agents, suppliers and business partners are likewise required to comply with the Code, being bound by it through the inclusion of specific contractual clauses requiring its observance. Recipients are required to be familiar with the Code, to abide by its contents and to refrain from any conduct contrary to it.

1.2 Relationship with internal procedures and policies

The Code constitutes the ethical framework of reference for the Group's internal procedures, policies and prescriptions, with which it integrates and of which it forms the underlying set of values. The ORANGE1 Group promotes a widespread culture of legality and integrity and entrusts oversight of compliance with, and updating of, the Code to a specifically designated internal function or body, in accordance with the provisions of Section 8, without prejudice to the competences of the other corporate bodies and functions.

1.3 Territorial scope and updating

The Code is valid both in Italy and abroad, in all the countries in which the ORANGE1 Group operates, taking into account the regulatory, social and economic differences of the various contexts. Any amendment or supplement to the Code, validated by the Chief Executive Officer, is approved by the Board of Directors, having heard the control body, and is brought to the attention of the Recipients through appropriate means of dissemination.

1.4 Mission and values

The ORANGE1 Group puts its soul, heart and mind into always giving its utmost to its customers and to all those who work within it, with the ambition expressed by the motto "Cavalcare il Tempo" ("Dominate Time"). This aspiration is nourished by passion, loyalty, optimism, tenacity and initiative, and is realised through teamwork, continuous training and development, product quality and innovation. It is the spirit that the Group summarises in its own identity rallying cry, #WEAREPASSION.

With passion and loyalty, in the spirit of #WEAREPASSION and of "Cavalcare il Tempo", the ORANGE1 Group invests in the continuous training of its people, enhances their technical and ethical skills and makes teamwork the driver of quality and innovation.

2 DEFINITIONS

For the purposes of this Code, the terms indicated below shall have the meanings specified herein.

ORANGE1 Group (or the "Group"): the body constituted by the parent company Orange1 Holding Sarl r.l. and the companies controlled by and associated with it.

Company: each of the companies belonging to the Group that endorses and applies this Code.

Recipients: the persons required to comply with the Code, as identified in paragraph 1.1.

Collaborators: the persons who provide their services in favour of the Group on the basis of relationships other than subordinate employment, such as consultants, agents, self-employed workers and external collaborators.

Stakeholders: the interested parties who maintain relationships with the Group or are affected by it, including shareholders, customers, suppliers, business partners, creditors, personnel, institutions and reference communities.

Code of Ethics (or the "Code"): this document and its annexes and updates.

Personal data: any information relating to an identified or identifiable natural person, processed in compliance with Regulation (EU) 2016/679 (GDPR) and applicable legislation.

Confidential information: the non-public information relating to the Group, its stakeholders or its activities, including information of a technical, commercial, industrial, financial and organisational nature.

Conflict of interest: the situation in which a personal interest, whether direct or indirect, of the Recipient interferes, or may appear to interfere, with the interests of the Group or with the impartiality of its conduct.

Public Authorities / Public official: the entities and persons, whether Italian or foreign, that exercise public functions or public services, including persons entrusted with a public service.

Reporting person (whistleblower): the person who reports, in accordance with internal procedures and applicable legislation, unlawful conduct or breaches of the Code, with a guarantee of protection against retaliatory acts.

Suppliers: the persons who supply goods, services or works to the Group on the basis of contractual relationships.

3 GENERAL PRINCIPLES

In carrying out their activities, the ORANGE1 Group and the Recipients are guided by the following principles, which must inform all conduct and decisions.

3.1 Impartiality and non-discrimination

The Group avoids any discrimination based on age, sex, sexual orientation, state of health, ethnicity, nationality, political opinions, religious beliefs or personal and social circumstances, in accordance with the dignity of each individual and applicable legislation.

3.2 Honesty and legality

Compliance with the laws and regulations in force in all the countries in which the Group operates is an indispensable principle. Recipients act with honesty and in no case pursue profit in breach of the applicable rules.

3.3 Fairness

Recipients act with loyalty and good faith, honouring the commitments undertaken and the legitimate interests of stakeholders, and do not take advantage of the relationships established to the detriment of the Group or of third parties.

3.4 Transparency

The information disclosed by the Group is complete, truthful, accurate and comprehensible, so as to enable stakeholders to make informed and well-founded decisions.

3.5 Confidentiality

The Group ensures the confidentiality of the information and data in its possession and guarantees their processing in compliance with the GDPR (Reg. (EU) 2016/679) and applicable legislation, refraining from any improper use.

3.6 Value of human resources

People are a fundamental resource of the Group: their physical and moral integrity, professional development and the enhancement of their skills are protected, in a safe, healthy and respectful working environment. The ORANGE1 Group is committed to enhancing the value of its collaborators by training them on an ongoing basis and increasing their technical and ethical skills, in the conviction that professionalism and integrity are inseparable dimensions of the growth of each individual and of the entire organisation.

3.7 Fairness of authority

Those who exercise powers of direction and coordination act with fairness, avoiding abuses and ensuring that authority is exercised with objectivity and in the interest of the Group.

3.8 Responsibility

Each Recipient is accountable for their own actions and acts with diligence and professionalism, aware of the consequences of their conduct for the Group and for stakeholders.

3.9 Communication

The Group promotes clear, timely and transparent communication, both internally and externally, as an instrument of relationship and trust.

3.10 Internal control

The Group promotes a culture of control, adopting suitable tools and procedures to oversee corporate processes, to ensure the reliability of information and to prevent irregularities.

3.11 Sustainability and social responsibility

The Group pursues sustainable development, reconciling the needs of its business activity with the protection of the environment, the responsible use of resources and attention to the communities and territories in which it operates.

3.12 Protection of human rights

The Group recognises and respects fundamental human rights, repudiates any form of forced, child or irregular labour and promotes decent working conditions throughout the entire value chain.

3.13 Prevention of unlawful conduct and culture of compliance

The Group adopts measures aimed at preventing any form of unlawful conduct, including corruption and money laundering, promoting a widespread culture of compliance and encouraging the responsible reporting of breaches for the protection of the reporting person.

4 STANDARDS OF CONDUCT IN RELATIONS WITH PERSONNEL

The ORANGE1 Group recognises the people who work within it as its essential asset and the principal source of its competitive advantage. Fairness, loyalty and mutual respect constitute the indispensable prerequisites of every employment relationship. The principles set out in this section are binding upon all Recipients, with particular responsibility resting upon those who hold management and coordination roles.

4.1 Personnel selection

Personnel selection is governed by criteria of merit, competence and professionalism, in compliance with equal opportunity and the prohibition of any form of discrimination. The ORANGE1 Group assesses candidates solely on the basis of the correspondence between the expected profiles and those actually possessed, excluding any consideration founded on factors unrelated to professional requirements. The information requested during the selection process is strictly connected to the verification of aptitudinal and professional requisites, with due regard for the candidate's private sphere.

4.2 Personnel management

The ORANGE1 Group ensures equal opportunity in professional development and in access to training, valuing the skills of each individual. Any abuse of authority is prohibited: managers exercise the powers connected with the delegation they have received in an objective and balanced manner, fostering the involvement of their collaborators, professional growth and a climate of mutual trust. Every decision affecting the employment relationship is taken according to transparent and verifiable criteria.

4.3 Training and development of technical and ethical skills

The ORANGE1 Group recognises the training of its people as one of the distinctive traits of its identity and one of its most tangible commitments to the future. Consistent with the spirit of #WEAREPASSION and the aspiration to "Cavalcare il Tempo" (Dominate Time), the Group invests continuously in the development of its collaborators' skills, designing and delivering training programmes in every field: technical and professional, occupational safety, quality, digital and new technologies, with particular attention to the emerging themes of cybersecurity and artificial intelligence literacy, as well as the linguistic and managerial areas. This commitment does not respond to a mere formality, but to the conviction that the growth of people is the true driver of the Group's innovation and competitiveness.

With equal emphasis, the ORANGE1 Group devotes energy and resources to the ethical and behavioural training of its collaborators: the knowledge and sharing of the values of this Code, the culture of legality and integrity, sustainability and the proper protection of personal data, in accordance with the applicable

privacy legislation. Technical competence and high ethical standards are regarded as two inseparable dimensions of a single, authentic professionalism: the Group aims at the growth of the person in their entirety, not at a partial preparation.

Training is continuous and calibrated to roles and to real needs, and its results are monitored to ensure its effectiveness. It is addressed to all levels of the organisation, from new hires — accompanied by specific onboarding programmes — through to senior figures. In this way, training also becomes an instrument of prevention, fostering in each collaborator a full understanding of the risks, of their own duties and of the rules of conduct, and nurturing that shared culture of responsibility and quality which the ORANGE1 Group places at the centre of its way of working and of growing together.

4.4 Occupational health and safety

The protection of occupational health and safety constitutes a priority commitment and a non-negotiable value of the ORANGE1 Group, which operates in full compliance with the applicable legislation on the matter (D.Lgs. 81/2008) and disseminates a culture of prevention at every level of the organisation. The Group pursues the constant improvement of working conditions by applying the principles of the hierarchy of prevention measures: elimination of the risk at source, reduction where elimination is not possible, adoption of collective protection measures before individual ones, and the information and training of workers. Each Recipient is required to comply with safety procedures, to promptly report situations of danger and to refrain from conduct that may endanger their own safety or that of others. The Group's attention extends to the entire chain of contracts and subcontracts, requiring contracting undertakings to comply with safety standards and to ensure the regularity of employment relationships.

4.5 Gender equality, diversity and inclusion

The ORANGE1 Group promotes an inclusive working environment, founded on respect for diversity and on the combating of any form of discrimination based on gender, age, orientation, personal, social, ethnic, religious conditions or disability. The Group ensures equal pay for equal duties and responsibilities and pursues the elimination of any disparity in access, career progression and professional development, consistent with the principles of L. 162/2021 and with good practices on gender equality (reference practice UNI/PdR 125:2022). The Group firmly combats harassment and abusive and discriminatory conduct and undertakes to ensure transparency in remuneration criteria, in line with the evolving European legislation on pay transparency (Directive (EU) 2023/970).

4.6 Integrity and protection of the individual

The ORANGE1 Group protects the moral integrity of individuals and guarantees them working conditions respectful of individual dignity. Physical or psychological violence, persecutory conduct, sexual harassment or behaviour attributable to practices of mobbing are in no way tolerated. Any form of discrimination or prejudice against collaborators is prohibited. The Group provides adequate channels so that anyone may report violations without fear of retaliation.

4.7 Lawfulness of labour and combating illegal labour exploitation

The ORANGE1 Group governs every employment relationship in full compliance with the law and condemns any form of unlawful labour intermediation and exploitation. The Group guarantees remuneration, working hours and treatment in conformity with the law and with the applicable collective bargaining, and requires compliance with the same principles from suppliers, contractors and third parties involved in its production processes, reserving the right to verify the regularity of working conditions along its supply chain.

4.8 Confidentiality of company information

Recipients are bound to the utmost confidentiality regarding information acquired in the performance of their activities. Regarded as confidential, by way of example, are strategic and industrial plans, investment projects, economic and financial information, personnel data, technical and production know-how, processes and formulas, and commercial information on customers and suppliers. Such information may not be used, communicated or disclosed except in compliance with internal procedures and for purposes connected with work activity, including after the termination of the relationship.

4.9 Protection of personal data

Distinctly from the confidentiality of company information, the ORANGE1 Group attributes specific importance to the protection of personal data as a fundamental right of the individual. Processing is carried out in compliance with Reg. (EU) 2016/679 (GDPR) and with D.Lgs. 196/2003, as amended by D.Lgs. 101/2018, in accordance with the principles of lawfulness, fairness and transparency, data minimisation, storage limitation, accuracy, integrity and accountability. The Group clearly defines the roles envisaged by the legislation — controller, processor and, where designated, Data Protection Officer (DPO) — and adopts

technical and organisational measures adequate to ensure the security of data. In the event of a personal data breach, the Group activates the prescribed procedures, including notification to the supervisory authority within the legal time limits, as a rule seventy-two hours. Particular care is devoted to the processing of the data of employees and collaborators, carried out with respect for the dignity and private sphere of individuals.

4.10 Recording and dissemination of information

Every operation and transaction must be properly recorded, authorised, verifiable and documented. Accounting records are governed by principles of truthfulness, accuracy, completeness and timeliness, so as to allow a faithful representation of the balance-sheet, economic and financial situation. Each Recipient cooperates so that management events are represented correctly and in conformity with the applicable legislation.

4.11 Conflict of interest

Recipients avoid any situation in which personal interests may conflict, even only potentially, with those of the ORANGE1 Group. A conflict of interest arises, by way of example, from the holding of economic interests in suppliers, customers or competitors by those who occupy senior or significant operational functions, as well as from the existence of relationships of kinship or affinity, up to the fourth degree, with third parties with whom the Group maintains business relations. Anyone finding themselves in a situation of conflict, even apparent, is required to promptly notify their manager and to refrain from the related decisions.

4.12 Protection of company assets and proper use of property and information systems

Each Recipient is required to safeguard and use company assets with diligence, employing them exclusively for purposes connected with work activity. With specific regard to information systems, the sending of offensive or inappropriate messages, unauthorised access to systems or data, the use of software lacking a proper licence and any conduct liable to compromise the integrity of IT resources are prohibited. Recipients carefully safeguard access credentials and passwords, which may not be transferred to third parties, and comply with the IT policies adopted by the Group.

5 STANDARDS OF CONDUCT IN THE CONDUCT OF BUSINESS

The ORANGE1 Group conducts its business activity in compliance with the law, fair competition and the principles of integrity and transparency. Relations with all external counterparts are governed by fairness and good faith.

5.1 General provisions

In the conduct of business, Recipients maintain conduct that is ethically correct and compliant with the law. Any form of corruption, active and passive, in relations with public and private parties, any collusive practice, the payment or promise of undue sums or benefits, as well as any conduct liable to procure improper advantages for the Group or for third parties, are prohibited. The ORANGE1 Group repudiates any practice contrary to free competition.

5.2 Gifts and benefits

No form of gift, hospitality or benefit that exceeds the limits of normal commercial courtesy, or that may appear intended to improperly influence decisions or conduct, is permitted. In any event, the giving or promise of money, gifts or benefits to public officials or persons entrusted with a public service is prohibited. Likewise, Recipients neither solicit nor accept benefits that may compromise their independence of judgment.

5.3 Relations with customers and product quality

The ORANGE1 Group places customer satisfaction at the centre of its activity, guaranteeing the quality, safety and conformity of its products with the applicable standards and with the commitments undertaken. Relations with customers are governed by fairness, transparency and reliability, avoiding misleading communications and ensuring the punctual fulfilment of contractual obligations.

5.4 Relations with suppliers

The selection of suppliers takes place in compliance with equal opportunity and according to objective criteria of quality, price, reliability and ethical conformity. The exercise of undue pressure and any conduct that alters the fairness of the relationship are prohibited. The ORANGE1 Group requires its suppliers to comply with the principles set out in this Code.

5.5 Human rights and the supply chain

The ORANGE1 Group respects internationally recognised human rights and promotes respect for them along the entire value chain, drawing inspiration from the UN Guiding Principles on Business and Human Rights and from the OECD Guidelines for Multinational Enterprises. The Group adopts due diligence processes proportionate to its size and its risk profile, aimed at preventing and mitigating adverse impacts on people and communities. To this end, the Group equips itself with a Supplier Code of Conduct containing binding clauses on human rights, working conditions, the environment and integrity, with powers of verification and audit and consequences in the event of non-compliance.

5.6 Relations with institutions

Relations with public institutions, supervisory authorities and the public administration are governed by fairness, transparency and cooperation, with respect for the respective roles. Every relationship is managed by duly authorised persons, avoiding conduct that may be interpreted as an attempt to improperly influence decisions.

5.7 Fiscal and tax compliance

The ORANGE1 Group assumes full fiscal and tax compliance as a priority commitment. Tax returns, invoicing and accounting are governed by truthfulness, completeness and conformity with the applicable legislation. The issuance or use of invoices or other documents for non-existent transactions is strictly prohibited, as is the carrying out of transactions devoid of real economic substance aimed at obtaining undue tax advantages. The Group adopts safeguards aimed at ensuring the correctness and timeliness of tax obligations.

5.8 Customs and excise legislation

The ORANGE1 Group, operating in international production and commercial contexts, ensures full compliance with customs and excise legislation. Customs declarations are truthful and complete, with correct indication of the origin, classification and value of goods. Any form of smuggling or evasion of customs duties is prohibited.

5.9 Anti-money laundering and means of payment

The ORANGE1 Group does not maintain relationships and does not carry out transactions that may, even indirectly, facilitate the laundering of money or the use of the proceeds of unlawful activities. Financial flows are traceable and supported by adequate documentation. Company means of payment are used exclusively for purposes connected with business activity and in a proper manner; any conduct that compromises the integrity of payment systems and instruments is prohibited.

5.10 Environmental protection and ESG responsibility

The ORANGE1 Group considers the protection of the environment a fundamental value and assumes a strengthened and voluntary commitment to sustainability, consistent with the European reporting principles (ESRS). The Group pursues energy efficiency, the proper management of waste and the reduction of the environmental impacts of its processes, with particular attention to foundry activities and to those of greater energy intensity. Environmental, social and governance responsibility is integrated into strategic and operational choices.

5.11 Information security and cyber resilience

The ORANGE1 Group protects the integrity, availability and confidentiality of its IT systems and data. Recipients use IT resources in a lawful manner and in compliance with internal policies, promptly report security incidents and anomalies and contribute to the overall resilience of the organisation, consistent with the regulatory framework on the security of network and information systems (Directive (EU) 2022/2555 (NIS2) and D.Lgs. 138/2024).

5.12 Responsible use of Artificial Intelligence

The ORANGE1 Group adopts Artificial Intelligence systems in a responsible manner, drawing inspiration from the principles of human oversight, transparency, non-discrimination, robustness and security. The use of AI practices prohibited by law is forbidden. Particular precautions are observed in the use of AI solutions in the HR field, where decisions affecting individuals remain subject to human oversight. The entry of confidential or personal data into AI services not approved by the Group is prohibited. These principles are consistent with Reg. (EU) 2024/1689 (AI Act), including the obligations of AI literacy.

5.13 Intellectual property

The ORANGE1 Group protects and respects intellectual property rights, both its own and those of others, including patents, trademarks, designs and copyright. The unauthorised reproduction or use of software and of protected works of intellect is prohibited. Recipients safeguard the Group's know-how and trade secrets and avoid any improper use or disclosure of them.

5.14 Relations with political parties, trade unions and associations

The ORANGE1 Group does not provide contributions, direct or indirect, to political parties, movements or their representatives. Relations with trade unions and with trade associations are governed by fairness, transparency and independence, with respect for the respective roles.

5.15 Public grants and funding

Public contributions, grants and funding are requested and used exclusively for the purposes for which they are granted and in compliance with the prescribed conditions. Any conduct aimed at obtaining such disbursements by means of untruthful declarations or documents, or at allocating them to purposes other than those declared, is prohibited.

5.16 Relations with the mass media

External communication and relations with the news media are governed by truthfulness, clarity, transparency and consistency and are managed exclusively by the duly authorised functions. Recipients neither release confidential information nor make statements liable to be attributed to the Group without prior authorisation.

5.17 Combating organised crime

The ORANGE1 Group combats with the utmost determination any form of organised crime and refrains from maintaining relationships with parties attributable to it. The Group adopts precautions in the selection of counterparts and cooperates with the competent authorities in the prevention of phenomena of criminal infiltration into economic activity.

6 REPORTS OF UNLAWFUL CONDUCT (WHISTLEBLOWING)

The ORANGE1 Group regards the reporting of unlawful conduct and of breaches of this Code as a shared value and an essential instrument for safeguarding legality, transparency and integrity. Facilitating the timely emergence of non-compliant conduct means protecting the Group, the people who work within it and all stakeholders, and strengthening the trust that underpins both internal and external relationships.

Anyone operating within the context of the ORANGE1 Group may report, in good faith, facts and conduct believed to be unlawful or contrary to the Code, with full assurance of confidentiality and subject to a prohibition of any form of retaliation. To this end, the ORANGE1 Group has established dedicated reporting channels, in compliance with the applicable whistleblowing legislation (D.Lgs. 24/2023, implementing Directive (EU) 2019/1937), structured so as to ensure the protection of the reporting person and the proper and impartial handling of the reports received.

The operating arrangements governing the functioning of the channels, the protected persons, the procedures for handling and assessing reports, the relevant timeframes and the protective measures are set out in detail in a dedicated Whistleblowing Procedure, to which this Code refers in its entirety.

7 DISCIPLINARY SYSTEM AND SANCTIONS

7.1 General principle

Compliance with the provisions of this Code of Ethics forms an integral part of the obligations undertaken by the Recipients within the scope of their relationship with the ORANGE1 Group. A breach of the Code's provisions therefore constitutes a failure to perform the obligations arising from that relationship and, in the case of employees, a disciplinary offence, with all consequences provided by law and by contract, including as regards the continuation of the relationship, and entails the obligation to compensate for any damage caused. For employees, the provisions of Articles 2104 and 2105 of the Italian Civil Code concerning diligence and the duty of loyalty remain applicable. The measures resulting from breaches of the Code are those set out in this Section and in the internal procedures of the ORANGE1 Group, applied in compliance with statutory law and the applicable collective bargaining agreements.

7.2 Graduated and proportionate system

Sanctions are commensurate with the seriousness of the breach according to criteria of gradation and proportionality, taking into account the circumstances of the specific case, and are differentiated according to the category to which the responsible person belongs, as set out below.

a) Employees. With respect to employees, sanctions are adopted in compliance with the procedures laid down by art. 7 of Law No. 300/1970 (Workers' Statute) and with the provisions of the applicable National Collective Bargaining Agreements, including the rules on the disciplinary code and the right to be heard. The type and severity of the sanction are determined in relation to the seriousness of the conduct, the degree of fault, any recidivism and the duties of the employee.

b) Managers. With respect to managers who breach the provisions of this Code, the measures deemed most appropriate are adopted in accordance with the law and with the Collective Bargaining Agreement applicable to that category, taking into account the particular fiduciary nature of the relationship and the position held.

c) Directors and statutory auditors. In the event of a breach of this Code by persons holding administrative or supervisory functions, the administrative body and the Board of Statutory Auditors are promptly informed and shall each, within their respective remit, take the most appropriate measures in accordance with the law, including removal from office for just cause and the exercise of liability actions.

d) Collaborators, consultants, suppliers and other third parties. With respect to collaborators, consultants, suppliers and other third parties bound to the ORANGE1 Group by a contractual relationship, the breach of the provisions of this Code is sanctioned in accordance with the specific clauses included in the relevant contracts, including express termination clauses, with the possible termination of the relationship and without prejudice to the compensation of damages.

Under no circumstances may sanctions be imposed in breach of statutory provisions or of the provisions of the applicable collective bargaining agreements.

8 IMPLEMENTATION AND GOVERNANCE OF THE CODE

8.1 Dissemination and awareness

The ORANGE1 Group ensures the widest possible dissemination and awareness of this Code of Ethics among all Recipients. To this end, the Code is published on the corporate website and made available on the company intranet, is delivered to new hires upon the establishment of the employment relationship, and is brought to the attention of third parties who have dealings with the Group through the inclusion of specific contractual clauses of adherence and compliance. Awareness-raising and training activities on the contents of the Code fall within the scope of the training commitments referred to in paragraph 4.3, to which reference is made.

8.2 Oversight of compliance and control functions

The ORANGE1 Group entrusts oversight of compliance with, and the updating of, this Code to a specifically designated internal function or body, which operates in coordination with the Data Protection Officer (DPO) and with the Group's other control and compliance functions. The function so designated is responsible, in particular, for monitoring the application of the Code, receiving reports concerning breaches thereof, formulating proposals for updates and promoting a culture of legality and integrity. The ORANGE1 Group is committed to progressively strengthening its internal control and risk management system, with a view to the continuous improvement of its safeguards for prevention, transparency and accountability.

8.3 Conflicts of interest

Recipients who hold sensitive positions or who operate in areas exposed to potential conflict situations shall make a periodic declaration as to the existence or non-existence of situations, including potential ones, of conflict of interest, in accordance with the arrangements and frequency established by the internal procedures. Any conflict situation, even merely potential, must be promptly reported to the competent function, which shall adopt the measures necessary to ensure its proper handling.

8.4 Documentary governance and updating

This Code of Ethics is adopted and updated by resolution of the Board of Directors of the parent company Orange1 Holding Sarl, after consulting the Board of Statutory Auditors. Each Group company shall formally adopt the Code by means of a specific resolution of its own administrative body, so as to ensure its uniform application throughout the entire Group. The Code is subject to periodic review and whenever the need

arises as a result of regulatory, organizational or operational changes. Each version is identified by a revision number and a date of adoption, with the history of previous versions being retained.

9 COMPLIANCE AND ENTRY INTO FORCE

9.1 Compliance with the Code

Compliance with this Code constitutes an essential and integral part of the contractual obligations of the Recipients - employees, managers, directors, statutory auditors, collaborators, consultants and suppliers - and is in addition to the duties of loyalty, fairness, diligence and good faith set out in Articles 2104 and 2105 of the Italian Civil Code and to the general principles of the legal system. A breach of the provisions of the Code constitutes a failure to perform the obligations undertaken, with the consequences provided for in Section 7 and by law.

9.2 Entry into force

This Code of Ethics, in its Revision #6, enters into force on the date of its approval by the Board of Directors and entirely replaces Revision #5 of 18/10/2019.