

Code of Ethics

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THE CORPORATE CODE OF ETHICS

INTRODUCTION

For years, GPM Consulting has worked in the consultancy business offering high quality services. The company policy is guided by the principle of social and environmental sustainability; on the one hand, this is based on corporate social responsibility, and on the other hand, on the correct use of environmental resources. Specifically, regarding the latter, GPM Consulting is committed to enhancing training as an instrument to favor continuous staff awareness upgrading on environmental sustainability practices.

THE CODE OF ETHICS

This Code defines the values, principles and rules of conduct that inspires the company in pursuing its mission, and the company works with those who strive for the same. In relations, both internally with the staff and collaborators and externally with customers, suppliers, contractors, competitors and institutions, GPM Consulting has always recognized and guaranteed respect for the highest ethical and moral values based on equality, fairness, honesty, transparency, correctness, integrity, and respect for constitutional principles, the rules of our legal system and principles enshrined in international labor conventions. The Code of Ethics is binding upon the Recipients identified below, which must abide by it in all its parts.

RECIPIENTS

The Code of Ethics is binding for administrators, employees and anyone working in the name and on behalf of GPM Consulting, as well as for third parties who have contractual relationships with the company.

VALIDITY

This Code of Ethics was adopted on 02 September 2020. Updates, which may be made at any time upon the proposal of the Board of Directors, the Supervisory Board or the Board of Auditors, are approved by a resolution passed by the Board of Directors.

DISSEMINATION

Since the Code represents the fundamental principles that guides GPM Consulting, it must be circulated as much as possible, both internally and externally. The Code of Ethics is published on the GPM Consulting website. On the other hand, externally it will be brought to the knowledge of third parties as the company's business principles, and

will be published on the website www.gruppodani.it, recalled in the orders issued and in the contracts stipulated.

STRUCTURE

First of all, this code consists of a first section dedicated to the fundamental principles. There is also a second section regarding GPM Consulting's rules of conduct with regard to the recipients of the Code, and this is then divided into type of relations.

FUNDAMENTAL PRINCIPLES

LEGALITY

Legality is the fundamental principle that governs the Code. All of GPM Consulting's operations must respect national, EU and international rules and laws in force. Conduct inconsistent therewith will not be tolerated.

HONESTY

The principle of honesty underlies the reliability and credibility of the company. This principle also includes the need to always keep the company's ideals of fairness and impartiality firm when dealing with the particular interests of individual employees, shareholders and third parties. Corollaries of this principle are the resulting values of transparency and accuracy of information.

TRANSPARENCY

Transparency is a central element of corporate reliability and requires that both the internal management of GPM Consulting and external communications are carried out in a transparent and verifiable manner. Moreover, communications must be as prompt and as clear as possible in addition to being true.

CORRECTNESS

The principle of fairness requires all recipients of the Code of Ethics to avoid getting into any situation of conflict of interests, and, if this happens, to refrain from any action and informing the immediate superior of this conflict of interest in writing. GPM Consulting considers conflict of interest as the gap between the interest of the individual and that of the company, which could lead to an advantage to the person fulfilling it - either for him/ herself or a third party close to him/her - and, at the same time, could harm the interests of the company. With reference to the specific case of gifts, this is allowed

only for commercial or courtesy relations. In compliance with this principle, GPM Consulting expects that presents given to external third parties do not exceed normal commercial or courtesy practices.

CORPORATE INTEGRITY AND LOYALTY

All Code recipients must behave diligently according to loyalty while respecting their corporate positions, the objectives set, and procedures provided. Loyalty towards GPM Consulting is expressed by performing work activities the best way possible and also respecting corporate assets. Corporate assets must be respected and used as foreseen. Improper use of corporate assets and any waste in the use of the same is prohibited. Each individual is required to respect and look after the goods entrusted to him/her, avoid damage to the same and protect them from theft or deterioration by third parties.

RESPONSIBILITY

The ideal of responsibility requires that GPM Consulting is always aware of the consequences of each action taken, with particular emphasis on the impact the action can have on the outside world, and projected over time. This principle applies to several areas, but must be considered with greater sensitivity when applied to the environment and sustainability.

PROTECTING INDIVIDUALS

This principle is a fundamental prerequisite and must be understood as respect for the physical and moral integrity of the individual as well as the enhancement and development of every internal resource.

ENVIRONMENTAL PROTECTION

As already mentioned, regarding responsibility, GPM Consulting pays particular attention to the external environment given the specific production activity the company carries out. Consequentially, the company acts in compliance with environmental regulations.

CONFIDENTIALITY

All information and data held by GPM Consulting, and of which the recipients of the Code of Ethics gain knowledge of in the performance of their work must be treated in compliance with the principle of confidentiality. Authorized individuals who become aware of confidential information are prohibited from disseminating this information to

others, whether they are individual working for GPM Consulting or other. Regarding information technology, every individual is responsible for the use thereof and must comply with corporate policies in force regarding privacy and use of these systems.

RULES OF CONDUCT

1. RELATIONS WITH EMPLOYEES

HUMAN DIGNITY

Pursuant to the principle of protection of the individual, GPM Consulting undertakes to respect all human resources and prevent any kind of age, sex, health, religion, nationality, political and sexual orientation discrimination. As such, the company abstains from investigating the orientation of employees. The company also undertakes to take action to stop and prevent discriminatory behavior between employees, or that otherwise lead to the isolation of some of these. GPM Consulting condemns any sexual harassment that disrupts the perception of its employees.

TRADE UNION RIGHTS

The company respects the freedom of all workers to form and join freely chosen trade union associations and to carry out trade union activities within the workplace without engaging in discriminatory behavior. Therefore, GPM Consulting undertakes to respect the activities of the trade unions and to deal with them.

HEALTH AND SAFETY

GPM Consulting undertakes to disseminate a culture of health and safety at work by carrying out increasingly more efficient actions to prevent accidents and occupational diseases. All health and safety at work regulations are respected and all protocols provided for this purpose by the Organizational Model must be applied. Therefore, as provided for, GPM Consulting undertakes to supervise the application of procedures and compliance of its tasks in this matter. The company strives to ensure that all workers have a safe, healthy and decent work environment.

EMPLOYMENT RELATIONSHIP

GPM Consulting selects its human resources based on skills and ability. The company trains and educates each worker in order to ensure professional development, protection of health and safety in the workplace, compliance with the law and with

the corporate quality standards. The employment relationship must be founded on the professionalism, and professional growth must be based on merit. GPM Consulting constantly ensures adequate training with the intent of always maintaining the corporate reality to date with the most advanced knowledge. GPM Consulting undertakes to respect all worker rights and to comply with the provisions of law. Employment relationships that go against legal regulations, the applied national collective bargaining agreement and the individual employment contract are not allowed. All social security, fiscal and insurance regulations are also applied. Roles and positions are assigned by taking into account the skills and abilities of the individual, as well as the correspondence between expected profile and owned profile. The personnel to be hired shall be assessed in compliance with equal opportunity for all candidates.

Human resources are managed according to principles of care, confidentiality and promptness. Each employee is given an activity in line with his/ her responsibilities. Work must be planned as needed, but also - where possible - by meeting the needs of the personnel and by permitting active involvement in learning activities, compliance with rest periods and enjoyment of vacation days required by law. Misuse of job position to obtain personal favors from employees is prohibited.

COMPLIANCE WITH THE UNION NATIONS GLOBAL COMPACT PRINCIPLES

GPM Consulting acknowledges and respects the universal UN Global Compact principles as key principles of an "ethical" company. The ten principles related to human rights, labor, the environment and combating corruption are derived from:

- the Universal Declaration of Human Rights;
- the International Labor Organization Declaration on Fundamental Principles and Rights at Work;
- the Rio Declaration on Environment and Development;
- the United Nations Convention against Corruption.

HUMAN RIGHTS

PRINCIPLE 1

Company is required to promote and respect human rights within their respective spheres of influence;

PRINCIPLE 2

and not to be, directly nor indirectly, complicit in the abuse of human rights.

LABOUR

PRINCIPLE 3

Companies are required to support worker's freedom of association and to acknowledge their right to collective bargaining;

PRINCIPLE 4

abolish all forms of forced and mandatory work;

PRINCIPLE 5

effectively abolish child labor;

PRINCIPLE 6

abolish any form of discrimination with respect to employment and occupation.

ENVIRONMENT

PRINCIPLE 7

Company is required support a precautionary approach towards environmental challenges;

PRINCIPLE 8

to undertake initiatives to promote greater environmental responsibility;

PRINCIPLE 9

and to encourage the development and dissemination of technologies that respect the environment;

COMBATING CORRUPTION

PRINCIPLE 10

Company undertake to combat corruption in all its forms, including extortion and bribery.

2. RELATIONS WITH EXTERNAL COLLABORATORS

Contracts with external collaborators must be written in the form prescribed by corporate procedures and in any case in writing. The remuneration to be paid should be proportional to the actual activities and professional skills of the employee.

3. RELATIONS WITH SHAREHOLDERS, BANKS, ETC.

GPM Consulting is committed to providing corporate communications that mirror the principles of transparency, fairness and truthfulness, and to prevent corporate crimes in full compliance with the procedures required by law, regulations and the Organization Model. All budgeting activities are carried out in compliance with legal rules and principles of truthfulness and correctness of the data. All accounting records and transactions must be regularly found, solid and documented. GPM Consulting undertakes to ensure that shareholders can have accurate, truthful, timely and transparent information. The company also strives to ensure and improve the participation of shareholders in company decisions.

4. RELATIONS WITH SUPPLIERS

GPM Consulting adopts a principle of uniformity in relations with its suppliers and complies with the principle of free competition by allowing everyone to submit offers. The company also undertakes to comply with all provisions of contracts it signs, including the established payment terms. To guarantee this, the conclusion of contracts is carried out only by the company functions expressly delegated and endowed with spending powers. Relations with suppliers must be founded on mutual loyalty and transparency. GPM Consulting will establish relations only with suppliers who pursue their activities in a lawful way and with the legitimate source of capital, who are not involved in organized criminal activities, money laundering or any other illegal activity. The procurement process must comply with the procedures provided and the Organizational Model to ensure maximum transparency, traceability, record-keeping and verification of compliance with the procedure. In particular, the selection of

suppliers includes the verification of compliance with tax and social security obligations, the correct management of invoicing flows and the filing of company financial statements, as well as the regular payment of taxes. Contracts with suppliers must be written in the form prescribed by corporate procedures and in any case in writing. The remuneration to be paid must be adequate to the service provided. Contracts must also provide for an express clause alluding to GPM Consulting adoption of the Organizational and Control model as well as this Code of Ethics. If the supplier conducts its activities contrary to the provisions of the Code of Ethics, it may be precluded from entering into future contracts with GPM Consulting.

5. RELATIONS WITH CUSTOMERS

The company continuously undertakes to ensure maximum quality standards of the services, efficiency of the service and the agreed timing of delivery and will work to ensure the needs of its customers is given the maximum attention. The company is committed to managing all customer claims and resolve all problems. In agreement with the privacy policy, GPM Consulting protects the data of its customers and is committed to not disseminating or communicating this information. Contracts with customers are drafted in as clear, simple and transparent way as possible and the discount policies are managed in a uniform manner, exclusively by the delegated functions.

6. RELATIONS WITH AUTHORITIES

In relations with both national and international Administrations and Authorities, the company undertakes to observe the principle of legality. These relations are entertained by formally delegated corporate functions who report the contents of communications, meetings and interviews to the General Management and the Administrative Body. GPM Consulting avoids any conduct against public officials aimed at obtaining an advantage and condemns any form of corruption. Access to forms of concessions, credits and/or public finance takes place under strict observance of existing company procedures and every instance, request and procedure is managed only by the delegated functions, in the context of initiatives shared with the General Management and the Administrative Body. GPM Consulting is committed to the correct and timely management of tax obligations and values relationships based on good faith and transparency with the tax authorities. Any gifts that are not considered a courtesy gift and of modest value is prohibited, this also includes any forms of benefit for them, their relatives or their friends. The company does not contribute to the financing of political parties, committees, political organizations or unions, or their representatives or agents, except in cases and manner provided by law.

7. RELATIONS WITH THE MASS MEDIA

In general, relations between GPM Consulting and the media are exclusively reserved for the relevant corporate functions. Employees may not provide information to the media without the authorization of the competent functions. In any case, the information or communications to be given externally must be truthful, complete, transparent, in line with the GPM Consulting policies and consistent.

8. RELATIONS WITH THE TERRITORY

GPM Consulting is aware of the company's social role with the territory and community. For this reason, one of the objectives is to focus on the environment, landscape and interests of the local community at all times, while reducing impacts on the territory to a minimum.