



**ORGANIZATION, MANAGEMENT, AND CONTROL MODEL
PURSUANT TO LEGISLATIVE DECREE NO. 231/2001
OF
UNIFIBER S.P.A.**

CODE OF ETHICS

Document Approved by the Board of Directors on

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SUMMARY

1	INTRODUCTION	1
2	PURPOSE AND INTENDED AUDIENCE OF THE CODE	3
2.1	Purpose, Content, and Scope of Application.....	3
2.2	Intended Audience and Dissemination of the Code.....	4
2.3	General Principles	4
2.4	Contractual Value of the Code.....	5
2.5	Adoption and Updates to the Code.....	5
3	GENERAL PRINCIPLES AND CORPORATE VALUES	7
3.1	Responsibility.....	7
3.2	Transparency and Integrity.....	7
3.3	Fairness.....	7
3.4	Fair Competition.....	8
3.5	Impartiality	8
3.6	Quality of services	8
3.7	Compliance with laws	8
3.8	Development of human resources.....	9
3.9	Personal integrity	9
3.10	Community Relations and Environmental Protection.....	9
4	GOVERNANCE AND INTERNAL CONTROL SYSTEM	11
4.1	Governance System.....	11
4.2	Corporate Bodies.....	11
4.3	Internal Control System.....	12
4.4	Organizational Model pursuant to Legislative Decree 231/2001	12
5	RELATIONS WITH STAKEHOLDERS	14
5.1	Relationships with Customers	14
5.1.1	Professionalism and Customer Service.....	14
5.1.2	Contracts and Communications	14
5.1.3	Quality and Customer Satisfaction.....	14
5.1.4	Customer Interactions.....	14
5.1.5	Fairness in Business Negotiations.....	15
5.1.6	Relations with the Market.....	15
5.1.7	Protection of Industrial and Intellectual Property.....	15

UNIFIBER SPA – CODE OF

5.2	Relations with Employees	16
5.2.1	Reference values	16
5.2.2	Safety and health	16
5.2.3	Protection of the individual	17
5.2.4	Staff Selection and Hiring	17
5.2.5	Duties of staff	17
5.2.6	Conflict of Interest	17
5.2.7	Company Assets	18
5.2.8	Use of IT Systems	18
5.2.9	Gifts, gratuities, and other benefits	19
5.2.10	Protection of confidentiality	19
5.2.11	Confidentiality and Information Management	19
5.2.12	Disclosure Requirements	19
5.2.13	Employee Obligations	20
5.3	Relations with the Environment	20
5.4	Relationships with Suppliers	20
5.4.1	Supplier Selection	20
5.4.2	Transparency	21
5.4.3	Fairness and diligence in contract performance	21
5.4.4	Environmental Protection and Ethical Standards	22
5.5	Relations with Public Supervisory Authorities and Institutional Bodies	22
5.6	Relations with the Public Administration	22
5.7	Relations with the Press and the Media	23
5.8	Relations with Political Parties, Labor Unions, and Associations	24
5.9	Relations with Members	24
5.10	General Meeting	24
5.11	Board of Directors	25
5.12	Relations with the Board of Statutory Auditors	25
6	ACCOUNTING TRANSPARENCY	26
6.1	Anti-Money Laundering and Integrity of Financial Flows	26
7	COMMUNICATIONS	29
8	CONFIDENTIALITY OF INFORMATION	30
9	INSIDER TRADING AND INTERNAL DEALING	31
10	IMPLEMENTATION AND MONITORING OF THE CODE OF ETHICS	32
10.1	Supervisory Board	32
10.2	Reports	32
10.3	Sanctions	33

UNIFIBER SPA – CODE OF

10.4	Measures for non-compliance by suppliers, consultants, collaborators, and partners	33
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ETHICS

1 INTRODUCTION

UNIFIBER S.p.A. (hereinafter also “UNIFIBER” or “the Company”) has always been committed to the principles of corporate social responsibility, believing that effective and cost-efficient management must be inextricably linked not only to ethical sensitivity but also to social engagement and respect for the environment.

This commitment is reflected in the ability to combine and integrate various objectives in fulfilling the corporate mission, such as attention to the needs of the community and respect for the environment, and the promotion of a work environment inspired by respect, fairness, collaboration, and the development of professional skills—an environment that enables the involvement and empowerment of employees and collaborators in achieving specific objectives and determining how to pursue them.

To confirm the importance attributed to ethical standards, and in particular to underscore the significance of conduct characterized by rigor and integrity—which constitute some of the core values underpinning the company’s cultural model—the Company has adopted this Code of Ethics (hereinafter also referred to as the “Code”).

UNIFIBER bases its internal and external activities on compliance with the principles contained in the Code of Ethics, which represents a foundational component of the company’s overall Internal Control System and a tool for corporate culture, aimed at preventing ambiguous or improper conduct by clearly identifying the main rules to be followed and warning that non-compliant conduct may be sanctioned.

The Code of Ethics clearly defines the set of core values and responsibilities that UNIFIBER recognizes, accepts, and shares. The conduct of all those who, at various levels of responsibility (directors, auditors, managers, employees, consultants, and external collaborators, however designated), work toward the achievement of corporate objectives must be guided by these values.

Furthermore, in an economic context characterized by intense and ever-increasing competition, an ethical approach serves as a tool to enhance the organization’s efficiency in addressing current and future challenges.

**UNIFIBER SPA – CODE OF
ETHICS**

The Code of Ethics was intended to have a value that goes beyond mere exhortation; therefore, the guidelines contained therein are to be considered binding in all respects. UNIFIBER is committed to monitoring compliance with the Code of Ethics, sanctioning conduct that deviates from the general principles and rules set forth therein, and ensures the dissemination of information regarding its content and application to all parties to whom it applies.

This action aims to ensure that employees, directors, and all those working for UNIFIBER carry out their activities and/or duties in strict and constant compliance with the principles and values contained therein.

2 PURPOSE AND INTENDED AUDIENCE OF THE CODE

2.1 Purpose, Content, and Scope of Application

This Code of Ethics sets forth principles of corporate ethics and rules of conduct designed to prevent, in accordance with Italian law, the commission of crimes and all conduct contrary to the values the Company seeks to promote.

Its primary objective is to guide and standardize the conduct of all individuals, at every level, in the performance of their respective duties and responsibilities, both in internal and external company relations, in accordance with the general principles of transparency, good faith, legality, loyalty, fairness, respect, honesty, confidentiality, health and safety in the workplace, and fair competition, as further detailed below.

The Code of Ethics serves as the indispensable framework upon which UNIFIBER's control and monitoring activities regarding its economic, financial, and social relationships are based, with particular attention to external relationships and internal controls.

The company is committed to promoting awareness of the Code among UNIFIBER employees and other *stakeholders*, as well as their constructive input regarding the principles contained therein.

UNIFIBER is committed to considering any suggestions and comments that may arise from *stakeholders*, with the aim of confirming or supplementing the Code.

In any case, it closely monitors compliance with the Code, establishing appropriate tools and procedures for information, prevention, and control, and ensuring the transparency of operations and conduct, taking corrective action where necessary.

The company has adopted and effectively implemented an Organizational, Management, and Control Model pursuant to Legislative Decree 231/01, appointing, in this regard, a Supervisory Body as required by the regulation.

The principles and rules contained in this Code of Ethics supplement the legislative, regulatory, statutory, and contractual provisions governing the functioning of corporate bodies and the rights and duties of the recipients of the Code itself.

**UNIFIBER SPA – CODE OF
ETHICS**

2.2 Recipients and Dissemination of the Code of

The principles and provisions of the Code of Ethics are binding on directors (“Directors”), members of the Board of Statutory Auditors (“Auditors”), all persons in an employment relationship with UNIFIBER (“Employees”), and for all those who work for UNIFIBER, regardless of the type or nature of the relationship, including temporary ones (“Collaborators” in general).

All third parties who receive assignments from UNIFIBER or who have stable or temporary relationships with it (“Third Parties”) are required to comply with the Code. Directors, Auditors, Employees, Collaborators, and Third Parties are hereinafter collectively referred to as “Recipients.”

UNIFIBER ensures to inform all the Recipients about provisions and the application of the Code, recommending compliance with it.

In particular, UNIFIBER, through the corporate functions and channels designated for this purpose, ensures:

- distribute the Code to the Recipients;
- interpreting and clarifying the provisions contained therein;
- verifying effective compliance with the Code;
- the implementation of any updates and their related execution.

The Code is widely disseminated both internally and externally through publication on the company website www.unifiber.it.

2.3 General Principles of the Code of

The Code of Ethics defines a set of values inspired by the following general principles:

- moral integrity and fairness in internal and external relationships;
- transparency toward shareholders and stakeholders;
- respect for employees and a commitment to developing their professional skills;
- social commitment;
- protection of health, safety, and the environment;

UNIFIBER SPA – CODE OF ETHICS

- compliance with laws and regulations in force within the national territory and in all countries where the company operates;
- rejection of any conduct which, even if aimed, in theory or in practice, at achieving interests or advantages for UNIFIBER, involves aspects incompatible with an organizational and management model characterized by absolute compliance with legal provisions and the behavioral and procedural rules in force within the Company.

Compliance by all Recipients with the aforementioned principles is of fundamental importance for the proper functioning, the reliability of management, and the image of UNIFIBER.

These principles apply to all operations, conduct, and relationships, both internal and external.

2.4 Contractual Value of the Code

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of all those acting in the Company's interest.

Serious and persistent violation of the provisions of this Code damages the relationship established with the company and may lead to disciplinary action and claims for damages, without prejudice, for employees, to compliance with the procedures provided for by applicable laws and collective bargaining agreements.

2.5 Adoption and Updates of the Code

The Board of Directors is responsible for the adoption and updates of the Code.

This document, adopted by Unifiber for the first time by resolution of the Board of Directors on March 31, 2021, represents the update of the Code of Ethics and is made available to all Company Representatives, Employees, and all Recipients, including through publication on the company's website (<http://www.unifiber.it>).

**UNIFIBER SPA – CODE OF
ETHICS**

The Company reserves the right to amend and supplement the Code of Ethics, based on guidance from the Supervisory Body indicated below and from all relevant parties, in line with changes in applicable regulations, as well as based on guidance from the trade associations to which the Company belongs.

3 GENERAL PRINCIPLES AND CORPORATE AND SOCIAL VALUES

3.1 Responsibility

In carrying out the corporate mission, all Addressees must perform their work and duties with professional commitment, diligence, efficiency, and fairness, as well as a sense of responsibility, making the best use of the tools and time available, including by seeking optimal cost-effectiveness in the services provided. Contracts and work assignments must be carried out in accordance with what has been knowingly agreed upon by the parties. UNIFIBER undertakes not to exploit the ignorance or incapacity of its counterparties. Recipients are required to comply with applicable laws; under no circumstances is it permissible to pursue or further the Company's interests in violation of the law.

3.2 Transparency, , and Integrity

All recipients are required to provide the necessary information with clarity, truthfulness, completeness, and accuracy, both within and outside the Company. Communication, whether written or verbal, must be easy and immediately understandable to enable autonomous and informed decisions. In particular, when drafting contracts, UNIFIBER takes care to specify to the contracting party the conduct to be observed in all foreseeable circumstances, in a clear and understandable manner.

3.3 Fairness

All actions and operations carried out by each Recipient in the performance of their duties or functions must respect the rights of every person involved in work and professional activities. Such respect must also be understood in terms of propriety, privacy, decorum, and the rejection of any situation that creates arbitrary discrimination, as well as substantial conflicts of interest. In the conduct of any activity, situations that may create arbitrary discrimination against staff, as well as

**UNIFIBER SPA – CODE OF
ETHICS**

of interest between any worker, manager, or employee, and UNIFIBER itself.

3.4 , and fair competition

UNIFIBER recognizes that fair, free, and honest competition is a decisive factor in the company's growth and continuous improvement. All Recipients are required to behave in a manner consistent with this value.

3.5 Impartiality

In decisions affecting relationships with customers, shareholders, personnel management and work organization, supplier selection and management, relations with the surrounding community and the institutions representing it, and generally relations with stakeholders, UNIFIBER avoids all forms of discrimination. All parties entering into a relationship with UNIFIBER are guaranteed equal treatment; the company refrains from preferential treatment or services in all its relationships.

3.6 Quality of Services and s

Each Recipient, in the performance of their duties, must always be committed to sharing the company's mission through conduct inspired by loyalty, trust, and collaboration. UNIFIBER focuses its activities on customer satisfaction and protection by listening to requests that may lead to improvements in the quality of its products and services. For this reason, UNIFIBER directs its research, development, and marketing activities toward high-quality standards for its services and products.

3.7 Compliance with laws

All UNIFIBER employees and collaborators, within the scope of their professional activities, have as principle essential the observance of laws and

**UNIFIBER SPA – CODE OF
ETHICS**

regulations in force in Italy and in all countries where it operates, in accordance with the principles set forth in the Code and the procedures established by internal protocols.

The Company refrains from engaging in unlawful or otherwise improper conduct to achieve its statutory and economic objectives.

3.8 Development of Human Resources

Human resources are a fundamental factor in the company's development. Therefore, the company protects and promotes their professional growth, development, and training with the aim of enhancing their skill set. UNIFIBER encourages collaboration among employees (at all levels and degrees of responsibility) and between them and the company itself, in order to facilitate the best possible performance from each individual, enhance their professional qualities, and promote their effective utilization in the course of their work.

UNIFIBER condemns all forms of discrimination based on age, gender, sexual orientation, health status, race, nationality, and political or religious beliefs.

3.9 Personal Integrity

UNIFIBER guarantees the physical and moral integrity of its employees, working conditions that respect individual dignity, and safe and healthy work environments. Therefore, requests aimed at inducing individuals to act contrary to the law and the Code of Ethics, or to adopt behaviors that violate the moral and personal convictions and preferences of each individual, are not tolerated.

3.10 Relations with the Community and Environmental Protection

UNIFIBER is a company aware of the impact of its activities on the economic and social development and quality of life of the local community.

For this reason, in carrying out its business, the Company is committed to adopting all initiatives aimed at safeguarding the surrounding environment, contributing to the sustainable development of the region, and respecting the community affected by its activities. In particular, within the scope of its core activities, it

**UNIFIBER SPA – CODE OF
ETHICS**

commits to implementing energy-efficient technologies and solutions, such as so-called **green IT**.

4 N GOVERNANCE AND INTERNAL CONTROL SYSTEM

4.1 Governance and Internal System

The governance system adopted by the Company complies with current regulations and is in line with the most authoritative guidelines and best practices in this area; it is designed to ensure the maximum and most balanced collaboration among its components through a harmonious balance of the various roles of management, direction, and control.

This system is designed to ensure responsible management of the Company and transparency toward the outside world, with a view to creating value and pursuing social and environmental objectives.

Given the nature of its activities and organizational complexity, UNIFIBER adopts a system of delegation of powers and functions that explicitly and specifically assigns responsibilities to individuals possessing the appropriate skills and expertise.

4.2 r corporate bodies

Members of corporate bodies must conduct their activities in accordance with the principles of fairness and integrity, refraining from acting in situations of conflict of interest within the scope of their duties.

Members of corporate bodies are also required to conduct themselves in accordance with the principles of autonomy, independence, and adherence to the guidelines provided by the Company in their dealings, on behalf of the Company, with public institutions and any private entity.

They are required to participate actively and knowledgeably in the Company's activities. They are obligated to treat as confidential any information they become aware of in the course of their duties and may not use their position to obtain personal benefits, whether direct or indirect.

Members of the Company's governing bodies are required to comply with applicable laws and the principles contained in this Code.

The obligations of loyalty and confidentiality bind these individuals even after the termination of their relationship with the Company.

4.3 's Internal Control System

In compliance with applicable laws and regulations and with a view to planning and managing business activities aimed at efficiency, fairness, transparency, and quality, UNIFIBER adopts organizational and management measures designed to prevent unlawful conduct or conduct otherwise contrary to the rules of this Code.

Together, these measures constitute a system designed to evaluate and contribute to the improvement of *risk management* and *governance* processes, verifying the effectiveness and efficiency of operations, the safeguarding of company assets, and compliance with laws, regulations, and internal procedures.

The Board of Directors periodically reviews the adequacy and effective functioning of the internal control system and takes the actions deemed necessary or appropriate to ensure its optimal operation.

With regard to the scope of delegated powers, the Company implements organizational, management, and control models that include measures designed to:

- ensure that activities are carried out in compliance with the law and the rules of conduct set forth in this Code;
- promptly identify and eliminate risk situations.

4.4 Organizational Model pursuant to Legislative Decree 231/2001 ()

The Company has adopted an organizational and management model (“Model”) to prevent the risk of committing offenses that could result in the Company’s liability under Legislative Decree 231/2001.

This Model provides for:

- the identification of activities within which offenses may be committed;
- specific protocols designed to plan the development and implementation of the Company’s decisions regarding the crimes to be prevented;
- the identification of financial management procedures suitable for preventing the commission of offenses;
- reporting obligations to the body responsible for monitoring the functioning and compliance with organizational models;

**UNIFIBER SPA – CODE OF
ETHICS**

- the introduction of a disciplinary system designed to sanction non-compliance with the measures set forth in the model;
- the establishment of a Supervisory Body with independent powers to monitor compliance with the Model.

5 RELATIONS WITH R STAKEHOLDERS

5.1 Relations with Customer s

5.1.1 Professionalism and helpfulness toward the customer

UNIFIBER is committed to satisfying customers by establishing a relationship characterized by a high level of professionalism and based on helpfulness, respect, courtesy, and maximum cooperation.

5.1.2 Contracts and Communications

Contracts and communications with the Client must be:

- clear, simple, and written in language as close as possible to everyday speech;
- in compliance with applicable regulations and the guidelines of the relevant authorities.

The Company undertakes to communicate promptly and in the most appropriate manner all information regarding contractual opportunities and any changes in service performance.

5.1.3 Quality and Customer Satisfaction

The Company is committed to ensuring that the contractually agreed quality standards are met and to periodically monitoring the quality of the service provided to the customer.

To this end, it conducts systematic customer feedback, prepares *customer satisfaction* surveys as a source of information to verify service improvement objectives.

5.1.4 Interactions with the Customer

UNIFIBER is committed to fostering interaction with customers through the management and rapid resolution of any issues and/or complaints.

The Company rejects litigation as a means of obtaining undue advantages and resorts to it on its own initiative exclusively when its legitimate claims

UNIFIBER SPA – CODE OF ETHICS

are met by the other party, or to defend itself against unjustified claims by third parties.

The Company protects its Customers' *privacy* in accordance with applicable regulations, committing not to disclose or disseminate their personal, financial, or consumption data, subject to legal obligations.

5.1.5 Fairness in Negotiations and Commerci

The Company avoids discriminatory conduct toward its customers and ensures fairness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as the faithful and diligent fulfillment of such obligations.

5.1.6 Relations with the market

The Company believes in free and fair competition and bases its actions on achieving competitive results that reward ability, experience, and efficiency.

Any action intended to distort the conditions of fair competition is contrary to the Company's policy and is prohibited for anyone acting on its behalf. Under no circumstances may the pursuit of the Company's interests justify conduct by its senior management or employees that does not comply with applicable laws and the rules of this Code.

5.1.7 Protection of Industrial and Intellectual Property

The Company requires all Recipients to act in compliance with the industrial and intellectual property rights legitimately held by third parties, in accordance with the laws, regulations, and conventions—whether at the EU and/or international level—that protect such rights.

All Recipients are required to protect the confidential information in their possession and the industrial property rights related to ideas developed within the organization, as a fundamental part of the company's assets and a primary factor in value creation.

5.2 Relationships with the staff of

5.2.1 's Core Values

UNIFIBER bases its relationship with employees on the following values:

- recognition of the central role of human resources as a key factor in success;
- protection and development of human resources and respect for workers' rights;
- commitment to training its personnel to ensure they understand the principles of the Code and to facilitate compliance with them at all levels;
- hiring of personnel in compliance with labor laws;
- guarantee of physical and moral integrity and assurance of working conditions that respect individual dignity and regulations regarding health protection in the workplace.

The management of employment relationships, pursuing a goal-oriented organization, is geared toward fostering the professional growth and skills of each employee, including through the application of incentive tools.

Any discrimination based on race, gender, nationality, religion, language, union membership, or political affiliation in hiring, compensation, promotions, or termination is prohibited, as is any form of favoritism.

5.2.2 Safety and Health and

UNIFIBER protects the moral and physical well-being of its employees and collaborators, committing to fostering a culture of health and safety at work that aims to raise staff awareness of risks associated with their activities and to promote responsible behavior.

All safety measures required by technological advancements are adopted to ensure a safe and healthy work environment, in full compliance with current regulations regarding prevention and protection.

5.2.3 f the Individual

The Company is committed to ensuring the conditions necessary for a collaborative and non-hostile work environment and to preventing discriminatory behavior of any kind.

Everyone's cooperation is required to maintain a climate of mutual respect for the dignity, honor, and reputation of each individual.

Employees who believe they have been subjected to discrimination may report the incident to their manager, who will proceed to investigate the actual violation of the Code.

5.2.4 tion and Hiring

Without prejudice to the obligations arising from applicable regulations, the selection of personnel is subject to verification that candidates fully meet the required professional profiles, in accordance with equal opportunity principles.

The hiring of staff is based on standard employment contracts; no form of employment relationship that does not comply with or otherwise circumvents applicable regulations is permitted.

5.2.5 Duties of staff with

Staff members undertake to comply with the obligations set forth in the Code and, in the performance of their duties, to act in accordance with the law, basing their conduct on the principles of integrity, fairness, loyalty, and good faith.

Each individual must perform their duties in a spirit of collaboration with other employees and collaborators, and with respect and care in relations with people and institutions outside the Company, in order to ensure the Company's good reputation.

5.2.6 Conflict of interests

Employees must maintain a position of independence and integrity in order to avoid making decisions or engaging in activities in situations—even merely potential ones—that could constitute a conflict of interest with respect to the Company's business.

UNIFIBER SPA – CODE OF ETHICS

Any situation involving a conflict of interest, whether actual or potential, must be reported in advance to the supervisor, who, in accordance with established procedures, will determine whether to inform the Supervisory Board.

By way of example and without limitation, situations that may give rise to conflicts of interest include:

- economic and financial interests of an employee/executive of the Company and/or their family in UNIFIBER's institutional activities;
- use of one's position within or of information/knowledge acquired in the course of one's work to pursue personal interests;
- accepting money, favors, or benefits from individuals or companies seeking to enter into business relationships with UNIFIBER.

5.2.7 r company property

Employees shall use and safeguard the assets made available to them for business purposes with due care. Any misuse of company assets and resources is prohibited. Each employee is directly and personally responsible for the protection and lawful use of the assets and resources entrusted to them for the performance of their duties. The Company, in compliance with applicable laws, adopts appropriate measures and specific regulations to govern the use of company assets.

5.2.8 Use of IT Systems

Each employee is responsible for the security of the IT systems used and is subject to applicable regulations, the terms of license agreements, and internal company procedures.

Except as provided by applicable civil and criminal laws, the use of company assets and resources for purposes other than those related to the employment relationship, or to send offensive messages or messages that may damage the Company's image, constitutes misuse of such assets and resources.

Each employee is also required to make every effort to prevent the possible commission of crimes through the use of IT tools.

**UNIFIBER SPA – CODE OF
ETHICS**

5.2.9 Gifts, Tokens of Appreciation, and Other Benefits

An employee may not solicit, for themselves or others, gifts or other benefits, nor accept such items, except for those of modest value or in accordance with normal commercial and courtesy practices, from anyone who has derived or may otherwise derive benefits from UNIFIBER's business activities.

Employees may also not offer gifts or other benefits to any parties from whom they might receive favorable treatment in the conduct of any activity related to the Company.

5.2.10 Privacy Protection

UNIFIBER protects the *privacy* of its employees in accordance with applicable regulations, committing not to disclose or disseminate their personal data without the prior consent of the individual concerned, except where required by law.

The collection, processing, and storage of such information are carried out in accordance with specific procedures designed to ensure that unauthorized persons cannot gain access to it and to ensure full compliance with *privacy* protection regulations.

5.2.11 Confidentiality and Management of In

The employee is required to keep confidential the information learned in the performance of their duties in accordance with the law, regulations, and circumstances, and to safeguard the documents entrusted to them with care.

The employee must observe this duty of confidentiality even after the termination of the employment relationship, ensuring compliance with the requirements set forth in current *privacy* regulations.

5.2.12 Reporting Obligations

All employees are required to promptly and confidentially report to their department head any information they become aware of in the course of their work regarding violations of legal regulations, the Code, or other company policies.

**UNIFIBER SPA – CODE OF
ETHICS**

Department heads shall evaluate the reports received and, if necessary, inform the Supervisory Board.

5.2.13 Obligations of s and collaborators

The provisions set forth in the preceding sections apply to all contractors, consultants, and agents of the Company.

5.3 Relationships with the Environment and the Community

UNIFIBER's environmental policy stems from an awareness of the strategic role its mission plays in the sustainable development of the region and that the environment represents a competitive advantage in a market increasingly focused on service quality.

Furthermore, the Company is committed to promoting, in the appropriate forums, scientific and technological development aimed at environmental protection and the conservation of resources through the adoption, in its operational management, of advanced criteria for conservation and energy efficiency.

The Company uses its resources responsibly and directs its strategic investment and financial decisions with respect for the environment and public health, aiming for sustainable development with particular regard to the rights of future generations.

UNIFIBER's operations therefore encompass not only the two pillars of economic and social responsibility but also environmental responsibility, aimed, among other things, at reducing consumption, minimizing environmental impacts, and, more generally, promoting sustainable development.

5.4 Relationships with Supplier C s**5.4.1 Selection of Suppliers**

The procedures for selecting suppliers must comply with applicable regulations and the internal procedures established for this purpose.

**UNIFIBER SPA – CODE OF
ETHICS**

The purchase of goods and services of any kind is carried out in accordance with the principles of competition and equal treatment of bidders, and based on objective evaluations regarding the competitiveness, quality, utility, and price of the supply.

In the selection process, the Company adopts objective and transparent criteria established by applicable regulations and internal procedures, and does not preclude any supplier meeting the required qualifications from competing.

In selecting a supplier, UNIFIBER takes into account the supplier's ability to ensure adequate corporate quality systems, where applicable, the availability of organizational resources and structures, and the ability to meet confidentiality obligations.

5.4.2 Transparency

Relationships with suppliers, including financial and consulting contracts, are governed by the provisions of this Code and are subject to constant and careful monitoring by the Company, including with regard to the appropriateness of the services or goods provided in relation to the agreed consideration.

To ensure maximum transparency in relations with suppliers, UNIFIBER provides for a functional separation between the activities of requesting the supply and entering into the contract, and a thorough documentation system for the entire selection and procurement procedure, such that each transaction can be reconstructed retrospectively.

5.4.3 Fairness and diligence in the performance of contracts

The Company and the supplier must work to build a collaborative relationship based on mutual trust.

UNIFIBER undertakes to inform the supplier accurately and promptly regarding the characteristics of the goods/services requested, the agreed payment terms and schedules, and the procedures for implementing the contractual relationship.

The performance of contractual obligations must comply with the principles of fairness, integrity, diligence, and good faith and must be carried out in accordance with applicable laws and regulations.

**UNIFIBER SPA – CODE OF
ETHICS**

5.4.4 Environmental Protection and Ethical- al Standards

The Company is committed to promoting, within the scope of its procurement activities, compliance with contractual terms consistent with its environmental policy and with the ethical principles contained in this Code.

5.5 Relations with Public Supervisory Authorities and Institutional Bodies

In its relations with public supervisory authorities and institutional bodies, the Company is guided by principles of transparency, professionalism, full cooperation, integrity, and professional fairness, avoiding any attempt to influence their decisions or to seek favorable treatment through the promise, offer, or granting of compensation or other benefits.

The Company maintains relationships with the aforementioned entities based on full and active cooperation, promptly providing any information requested by them in the course of their investigative activities and complying with the measures issued.

In order to ensure maximum transparency, the Company also undertakes to avoid deriving any form of undue advantage from any personal or family relationships with officials of the Authorities.

In its dealings with government agencies, which are intended to enable the Company to assess legislative and administrative activities in sectors of interest, the Company shall, in all cases, conduct itself in a proper and transparent manner, avoiding any collusive or coercive behavior.

5.6 Relations with Public Administration and the Public S

Relationships between members of corporate bodies, employees, and collaborators, on the one hand, and the Public Administration—whether Italian or foreign—on the other, must always be guided by the principles of legality, loyalty, fairness, and transparency enshrined in our legal system, with specific regard to the objectives set forth in Legislative Decree No. 231/2001.

**UNIFIBER SPA – CODE OF
ETHICS**

Members of the corporate bodies, employees, and collaborators of the company are prohibited from offering or promising, even indirectly, money or other benefits to officials or employees of the Public Administration, whether Italian or foreign, or from engaging in conduct contrary to the provisions of this Code of Ethics, for the purpose of unduly promoting or favoring the interests of the Company.

In particular, members of corporate bodies, executives, employees, and collaborators are prohibited from:

- (i) promise or grant money, benefits, or other public advantages, or, for the purpose of obtaining the issuance of authorizations, permits, or other measures by the Public Administration, as well as tax, social security, and welfare benefits;
- (ii) submit false statements or engage in fraud or deception aimed at improperly obtaining grants, disbursements, or loans;
- (iii) impeding or obstructing the exercise of inspection functions by the Public Administration, in order to avoid the imposition of a sanction or to negotiate its amount;
- (iv) engaging in fraudulent, deceptive, or unfair conduct that may mislead the Public Administration during and as a result of public tender procedures.

5.7 Relations with the Press and Mass-

Any sponsorship or patronage activities promoted by the Company may relate to sporting events, performances, the restoration of artistic and archaeological heritage, cultural events, and initiatives linked to social, humanitarian, and environmental issues, provided they offer a guarantee of quality and to whose success the Company can contribute.

Participation, in the name of or on behalf of the Company, in committees, associations, or events of any kind must be expressly authorized. In any case, when entering into sponsorship or patronage agreements, the Company shall conduct itself in a proper and transparent manner, avoiding any pressure on the parties involved.

UNIFIBER SPA – CODE OF ETHICS

Without prejudice to obligations regarding inside information and confidential information, as well as any other disclosure obligations that may be imposed on the Company by laws and regulations, relations with the press and other *media*, and participation, in the name of or on behalf of the Company, in conferences and other events, are managed solely by the relevant corporate departments; In any case, the Company ensures that the information disseminated is truthful, transparent, and consistent with corporate policies.

5.8 Relations with Political Parties, Trade Unions, and Other Political and Social Organizations

The Company does not contribute in any way to the financing of political parties, movements, committees, and political and trade union organizations, or their representatives and candidates, except in cases provided for by specific regulations.

5.9 Relations with Shareholders and Investors

The Company ensures that the rights of shareholders—including individual rights—are respected and, in particular, guarantees at all times the proper exercise of shareholders' rights of access and oversight. Furthermore, the Company ensures the exercise of shareholders' administrative and property rights by providing adequate information and upholding the principle of equal treatment.

The Company monitors the proper fulfillment of the disclosure obligations required by law and compliance with statutory and bylaw provisions regarding the functioning of corporate bodies.

5.10 Shareholders' Meeting

The Company ensures the orderly conduct of Shareholders' Meeting proceedings and the ability of those entitled to participate to exercise their rights to information, oversight, proposal, and voting in an informed and constructive manner.

The Company ensures that information is provided in advance of and during Shareholders' Meetings, including through the

**UNIFIBER SPA – CODE OF
ETHICS**

regular participation of the Directors in the meetings themselves, and that the proper formation of the shareholders' will is guaranteed.

5.11 t Board

The Board of Directors performs its duties with diligence and integrity and ensures that all its members receive adequate information regarding the items on the agenda. The Board of Directors ensures adequate disclosure at the Shareholders' Meeting, in compliance with legal and statutory limits.

The Board deliberates on the Company's Organizational Model pursuant to Legislative Decree No. 231/2001 in compliance with applicable laws and the Articles of Association, ensuring, in particular, that the Supervisory Body overseeing the Model possesses the necessary independence, autonomy, professionalism, and continuity of action, and proposing, if deemed useful or necessary, any amendments to the Articles of Association.

All directors are required to keep confidential any information and documents obtained in the performance of their duties.

Directors shall exercise their functions with independent judgment, dedicating the necessary time and effort and paying particular attention to understanding the duties and responsibilities inherent in their office.

5.12 Relations with the Board of Statutory Auditors ()

In its dealings with the Board of Statutory Auditors, each department or function of the Company, as well as each Recipient, shall comply with the provisions of this Code, in accordance with their respective institutional roles.

Requests for compliance and documentation must be processed promptly, with clear acceptance of responsibility for the truthfulness, completeness, and accuracy of the information provided.

The requested data and documents shall be made available in a timely and comprehensive manner; the information provided must be accurate, complete, faithful, and truthful, avoiding and, in any case, reporting, in the appropriate form and manner, situations of conflict of interest.

6 TRANSPARENCY AND ACCOUNTING

In maintaining documentation and accounting records, the principles of truthfulness, correctness, clarity, and completeness of information must be strictly adhered to.

Consequently, employees must:

- report management facts in a complete, transparent, truthful, accurate, and timely manner, also to facilitate the accounting process as a whole and in compliance with established procedures;
- correctly record every economic operation and financial transaction without any omissions;
- maintain adequate documentation of every transaction and operation, so as to facilitate the verification/reconstruction of the decision-making and authorization process, the latter based on appropriate levels of responsibility;
- file such documentation in a logically organized manner, so as to ensure it can be easily retrieved;
- allow for the performance of controls that verify the characteristics and rationale of the transaction;
- provide auditors and other internal control bodies with the necessary information in a truthful and complete manner.

Employees who become aware of omissions, falsifications, or negligence regarding the accounting records or the documentation on which such records are based are required to report the facts to their supervisor and to the Supervisory Body established pursuant to Legislative Decree 231/2001.

6.1 Anti-Money Laundering and Integrity of Financial and C I Transactions

UNIFIBER conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the relevant authorities.

UNIFIBER SPA – CODE OF ETHICS

Any transaction that could entail even the slightest possibility of the company's involvement, even indirectly, in cases of receiving stolen goods, money laundering, or self-laundering, or the use of assets or funds of illicit origin, is prohibited.

To this end, the Recipients undertake to refuse to carry out transactions that are suspect in terms of fairness and transparency.

Recipients are required to:

- verify in advance—that is, before establishing business relationships—the available information on commercial counterparties, suppliers, partners, collaborators, and consultants, in order to ascertain the legitimacy of their activities;
- avoid any involvement in transactions that could, even potentially, facilitate the laundering of money derived from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering regulations and internal control procedures.

UNIFIBER condemns all forms of crime, whether organized or not, and therefore requires all recipients to act with due diligence to prevent the risk of criminal infiltration.

UNIFIBER manages financial flows by ensuring the complete traceability of transactions, maintaining adequate documentation, and always acting within the limits of the delegations and powers assigned to each individual with appropriate authority.

In particular, every operation and transaction must be:

- legitimate, consistent, appropriate, authorized, and verifiable;
- correctly and adequately recorded;
- documented so as to allow, at any time, verification of the related decision-making, authorization, and execution processes.

All Recipients of the Code of Ethics are required to cooperate to ensure that every activity is correctly and promptly recorded in the accounting records so that management events are accurately and timely reflected.

UNIFIBER SPA – CODE OF

ETHICS

The Company established specific procedures and methods for managing financial resources, including to prevent the commission of crimes.

**UNIFIBER SPA – CODE OF
ETHICS**

Financial resources are managed in accordance with the aforementioned procedures and in line with each individual's managerial authority and organizational responsibilities.

7 COMMUNICATIONS

External communication is guided by the principles of truthfulness, fairness, transparency, and respect for the right to information; the disclosure of false or misleading information or data is prohibited.

Particular attention is paid to the external communication of documents, news, and information concerning UNIFIBER's sphere of activity that are not in the public domain.

All communications must be clear and timely, ensuring the accurate transmission of information, particularly price-sensitive information.

Relations with the press and with the media and news outlets must be handled only by those expressly delegated to do so, in accordance with the procedures adopted by the company.

Any request for information from the press or media must be reported to the departments specifically designated for this purpose before responding or making any commitment to respond to the request.

8 CONFIDENTIALITY OF PRIVILEGED AND OTHER INFORMATION

Anyone who, in the course of their duties, becomes aware of privileged or confidential information is bound by confidentiality.

“Confidential information” includes all information pertaining to a project, proposal, initiative, negotiation, understanding, commitment, agreement, a fact, or an event—even if future and uncertain—pertaining to the activities of UNIFIBER and/or its parent company, which is not in the public domain and which, if made public, could be detrimental to the Company or constitute a “material fact” pursuant to the Consolidated Law on Finance and related Consob regulations.

The projected and final accounting data, including consolidated data, of UNIFIBER or its parent company are also considered “confidential” until they are disclosed to the public following a communication made in accordance with the rules specified below, in compliance with the procedure set forth in the aforementioned Consob resolution.

Such data or information may not be disclosed externally, and in any case not without the approval of the expressly authorized persons, in accordance with the procedures adopted by the company.

9 INSIDER TRADING AND INTERNAL- -DEALING

Recipients are required to comply with applicable laws regarding “insider trading”: in particular, Recipients are prohibited from using or disclosing to others, without just cause, any confidential and/or price-sensitive information concerning financial instruments listed in Italy or abroad of the parent company that is in their possession.

Recipients are required to comply with any internal or external disclosure obligations, or prohibitions or restrictions, relating to transactions in financial instruments, as established by the competent corporate bodies.

10 IMPLEMENTATION AND MONITORING OF THE AND ETHICAL CODE

10.1 e and Supervisory Body

As part of the Organization and Management Model pursuant to Legislative Decree 231/2001, the Board of Directors of UNIFIBER appoints a dedicated Supervisory Body endowed with independence, full autonomy of action and control, and positioned at the top of the corporate hierarchy and in direct relationship with the Board of Directors.

It is also responsible for overseeing the implementation of and compliance with this Code, as well as the organizational and management models, their effectiveness, adequacy, and ability to maintain over time the requirements of functionality and soundness mandated by law.

10.2 Reports

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations applicable to the Company's employees, pursuant to Articles 2104, 2105, and 2106 of the Civil Code.

Without prejudice to any protections provided by applicable laws or collective bargaining agreements and subject to legal obligations, the Supervisory Body established pursuant to Legislative Decree 231/2001 is authorized to receive requests for clarification regarding this Code.

Any violation of the principles and provisions contained in this Code by the Recipients must be promptly reported to the Supervisory Body. Reports to the Supervisory Body may be made via email or letter.

In order to ensure responsible communication management and compliance with legal requirements, UNIFIBER has implemented an alternative reporting system that guarantees the protection of the whistleblower and the anonymity of the report itself: the so-called whistleblowing system, establishing a dedicated reporting channel to be used in accordance with the relevant procedure.

UNIFIBER SPA – CODE OF ETHICS

The whistleblowing procedure, along with useful references for using the methods described above, is published on the company's intranet.

Following the reports received, the Supervisory Body conducts the relevant investigations, also involving, if it deems it appropriate, the relevant company departments. The Supervisory Body then informs the competent bodies regarding the imposition of disciplinary sanctions in relation to the violations found.

All reports received by the Supervisory Body are handled with the utmost confidentiality, under penalty of revocation of the mandate of the members of the Supervisory Body. Whistleblowers acting in good faith must be protected against any form of retaliation, discrimination, or penalization; in any case, the confidentiality of the whistleblower's identity will be ensured, subject to legal obligations and the protection of the rights of the Company or of persons accused erroneously or in bad faith.

With regard to monitoring compliance with and implementation of this Code, the Supervisory Body has the powers, tasks, and duties set forth in the Company's Organizational Model

10.3 Sanctions

Through the bodies and functions specifically designated for this purpose, the Company shall impose, with consistency, impartiality, and uniformity, sanctions proportionate to the respective violations of the Code and in compliance with current regulations governing employment relationships.

The measures taken against employees, executives, directors, and auditors resulting from violations of the provisions of this Code (e.g., failure to comply with prescribed company rules, failure to exercise due diligence, etc.) are those provided for by the National Collective Labor Agreements (CCNL) and the "Organizational, Management, and Control pursuant to Legislative Decree No. 231 of June 8, 2001."

10.4 Measures for non-compliance by on the part by suppliers, consultants, collaborators,

**UNIFIBER SPA – CODE OF
ETHICS**

Any violation of the provisions set forth in this Code by the Company's Suppliers, Consultants, Collaborators, and Partners shall result in the application, including pursuant to the provisions of Model 231, of the penalties specified in the contract, without prejudice, in any case, to any claim for compensation for damages suffered.