



CODE OF BUSINESS ETHICS



This Code of Business Ethics has been adopted by Aeonvis with the Resolution of the Board of Directors on 06/10/2023.

The Code expresses the commitments and ethical responsibilities in the conduct of business and business activities to which each Addressee must conform in the performance of its own work.

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1. PREMISES

1.1. Mission of the Code of Business Ethics

Aeonvis' Code of Business Ethics, which the Board of Statutory Auditors has reviewed and provided a positive response to, is intended to demonstrate the Company's commitment to act in accordance with fundamental ethical standards, with the aim of adopting a positive and unique approach to conducting business.

The Document is intended to help Aeonvis personnel make ethical behaviour an integral part of their work, by defining specific rules of conduct relating, for example, to the promotion of proper business behaviour, inclusion in the face of diversity, to the handling of personal information and privacy, enshrining the right to be treated without discrimination.

The protection of health and safety at work, as well as respect for the dignity and rights of each individual, mirror the personality and management of Aeonvis, as well as being fundamental elements for the company's efficiency, reliability and corporate reputation, on which the success and improvement of the social context in which the Company operates depend. Acting with integrity and in accordance with the law at all times is not simply the right thing to do but is the way forward to improve performance and reflect the personality of Aeonvis, enabling it to attract the best talent.

The Code therefore aims to bring together those values that the Company accepts and shares as well as the responsibilities it assumes both in terms of internal organisation, and regarding relations with external stakeholders.

The Code is intended to help staff make higher ethical models an integral part of their own conduct, so that it is possible to act with integrity and respect for the law in both in dealing with colleagues as well as customers. This requires observance of the Aeonvis Code of Ethics by all company employees as well as stakeholders, each within their own functions and responsibilities.

1.2. Addressees and scope

The Aeonvis Code of Business Ethics binds the conduct of all employees and collaborators, as well as of those who, directly or indirectly, act in the name and on behalf of the company. All of them are required to be familiar with the Code and to abide by it.

The Addressees of this Code of Business Ethics are:

- the Board of Directors of Aeonvis;
- employees with a fixed-term or permanent contract of employment;



- all collaborators, consultants and workers who provide their services within or on behalf of Aeonvis;
- customers;
- suppliers;
- all third parties with whom the Company has contractual relationships.

In respect of the aforesaid Addressees, Aeonvis undertakes to disseminate the document, promoting awareness programs on its contents in order to provide the tools for a correct interpretation of the same. It is also the responsibility of Aeonvis to periodically check compliance with the Code, as well as to ensure it is reviewed and updated in the event of any changes in the Company's structure.

Aeonvis reserves the right to adopt sanctioning tools in the event of proven breach of the Code of Conduct.

The Addressees are therefore obliged to:

- avoid any conduct contrary to the provisions of the Code of Business Ethics;
- cooperate to verify violations.

2. GENERAL PRINCIPLES

2.0. Core values

The culture and practices of Aeonvis are inspired by certain fundamental values. These principles point the way to be an ethically correct and responsible company.

RESPECT: Respect is par excellence the attitude that fosters appropriate and satisfactory relationships.

For this reason, Aeonvis believes that treating others fairly and respectfully is a rule of fundamental importance. The Company distances itself from any behaviour that undermines a person's physical and cultural integrity.

By disrespectful attitudes, we allude to those behaviours that are the origin of a hostile, offensive and intimidating working environment. Aeonvis considers any kind of discrimination based on race, gender, sexual orientation, political, religious and trade union views to be deplorable.

Diversity is not simply something to be protected and accepted, but a characteristic that enables innovation and development through the exchange of different ideas, opinions and experiences. Aeonvis believes that the inclusion of worlds, cultures and identities is an incredible opportunity.

CUSTOMER INTEREST: Regardless of one's role within Aeonvis, everyone is personally at the service of all clients.

What characterises Aeonvis' relationship with its clients are values such as competence, trust, fairness and professionalism, as well as the constant commitment to guarantee satisfaction and collaboration.

HONESTY AND LEGALITY: Honesty is that value thanks to which it is possible to operate with moral integrity, behaving loyally and respecting the law, social norms and universally recognised moral principles.

Growth and profit lose all value if they are not pursued in full respect of honesty and rectitude.

For this reason, Aeonvis refrains from using any illicit and dishonest means to obtain advantages of any kind. The agreements concluded between Aeonvis and its customers comply with rules of fairness, loyalty and respect.

Any behaviour that could be considered a crime is therefore prohibited. Aeonvis refuses assignments that may involve the violation and compliance with the law.

TRANSPARENCY: Transparency is the basic premise for building the spirit of trust that enables individuals to express themselves and groups to function as synergetic entities.

Aeonvis believes that transparency is the path to take to create an organization that shares ideas, policies and strategies without subterfuge. To be transparent is to be able to play openly, freely and frankly.

The actions, operations and all activities carried out by the Addressees of the Aeonvis Code must comply with the principle of transparency. They are, therefore, adequately recorded, with the

possibility of verifying the process of decision, authorisation and execution. For each operation there is also an appropriate documentary support to allow, at any time, the performance of controls attesting to the characteristics and motivations of the operation and identifying the persons in charge of its authorisation, performance, registration and verification.

EQUITY: Granting everyone equal opportunities means avoiding any kind of discriminatory obstacle to the participation of individuals in economic, social, political and working life. For this reason, towards employees and all stakeholders, Aeonvis applies the principle of meritocracy and non-discrimination. This means adopting an impartial attitude towards everyone.

Decisions with respect to personnel shall be based solely on the individual's competence with respect to the business needs of Aeonvis. Any decisions regarding promotion, recruitment or compensation will be made solely on the basis of each individual's contribution and merit.

Aeonvis takes responsibility for promoting this principle of fairness so that everyone can feel part of an inclusive and honest working environment.

SPIRIT OF INITIATIVE: It is the desire to face daily challenges with passion and dedication, demonstrating commitment and determination.

Aeonvis believes that sometimes it is necessary to question one's own convictions as well as the maintenance of the status quo. However, so that initiative does not become imprudence, each action is always guided by caution and prudence.

TEAM SPIRIT: Working within a company means facing every challenge with the team spirit necessary to achieve the set goals, through collaboration, respect and mutual trust.

Acting together means working together to achieve common goals. The coaching of experienced people and the mentoring of junior resources guarantee both horizontal and vertical growth. Aeonvis believes that reciprocal exchange within a team is a fundamental aspect, so that even criticism can become a cue for continued growth.

Working together is the best ingredient to stimulate creativity through the exchange of opinions in an inclusive and safe working environment.

SOCIAL RESPONSIBILITY: Being socially responsible means contributing voluntarily to a fairer society, with full respect for the environment.

Aeonvis steers clients in the direction of sustainable solutions from a financial, environmental and social point of view. It is in the company's interest to ensure that all advisory activities are socially responsible.

2.1. Responsibility, ethics and fairness

Everyone within Aeonvis is required to act ethically, respecting the law and the Code of Business Ethics, operating in accordance with the principles of loyalty, fairness, transparency and efficiency.



Aeonvis expects people within it to be genuinely free to report actions that are incompatible with the law, the Code of Business Ethics or other internal rules.

The Company therefore invites people to speak up if something appears improper, showing the courage to do the right thing.

Speaking up is indispensable to avoid misconduct and to promote improvement within the company. It demonstrates the importance and ability to take care of each other and one's activities, living up to one's responsibilities and ability to achieve high quality results.

Everyone, regardless of their role or level within Aeonvis, has the right and the duty to speak out when faced with a situation that appears unfair. Each issue will be treated with the importance it deserves.

Aeonvis' objective is to protect its employees from retaliation. For this reason, every report will be treated with appropriate confidentiality and discussed with others only if necessary. Retaliation refers to any form of hostile reaction manifested as a result of reports made in good faith, concerning actual or suspected matters.

Violations undermine the relationship of trust with the Company and may therefore lead to disciplinary action, including dismissal or possible legal liability.

If Aeonvis detects that Third Parties violate the principles of this Document the Company will consider any activation/prosecution of the relationship.

2.2. Health and safety

The Company promotes all appropriate measures to protect the health and safety of its personnel, in compliance with current regulations on the protection of health and safety in the workplace. Aeonvis takes into account possible work risks, encouraging only responsible and correct behaviour, in full compliance with all the principles of Article 15 of Legislative Decree 81/2008. It is the Company's objective to refrain from any behaviour that is dangerous to one's own health and the health of others.

Regarding health and safety at work, Aeonvis is committed to:

- inform employees and collaborators on safety at work and risk awareness;
- adopt behaviour that can avoid damage as much as possible, or at least reduce it
- assess risks and dangers in advance
- give priority to collective protection measures, without forgetting the importance of individual ones;

- respect the principles of safety in the workplace, in the choice of equipment and working methods, with the aim of reducing the possible risks arising from monotonous and repetitive work.

The Company invites all those concerned to comply with the relevant regulations, and above all to adequately take care of their own health and safety, as well as that of other persons present in the same workplace.

Should the Addressees of the Code find irregularities, they shall be responsible for informing the employer or its delegates.

3. STANDARDS OF CONDUCT

3.1. Employees and external collaborators

Staff selection

With regard to the recruitment and selection of personnel at Aeonvis, criteria of transparency and fairness are adopted. On the basis of the company's needs, profiles suitable for the objectives of the moment are sought. These operations respect the equal opportunities of all those involved, prohibiting any sexual or racial discrimination. The sole purpose of the information requested at interview is to understand whether the profile may be in line with the Company's objectives, while respecting the private sphere and personal opinions of the candidate in question.

Aeonvis is committed to avoiding favouritism in the selection and recruitment stages.

Aeonvis personnel are hired through regular employment contracts; no irregular forms of employment are allowed under any circumstances.

Consistent with the principle of transparency, Aeonvis is responsible for communicating as clearly as possible all information about the job opportunity.

To ensure that the acceptance of the job is based on an adequate understanding of all the necessary information, during the interview the selected candidate receives information regarding:

- peculiarities of the position and characteristics of the activities to be performed;
- remuneration and regulatory aspects, based on the reference employment contract;
- behaviour to be adopted to avoid or reduce possible health risks caused by the work activity.

For proper personnel management

Aeonvis prohibits any form of discrimination against employees and collaborators. As regards personnel management and recruitment, any decision will depend on the match between the profiles sought and those selected.

The Company adopts the same premises as regards access to roles and positions.

- The Company is responsible for making the most of all the resources present within the context, fostering the development and success of its employees and collaborators.
- In the context of possible company reorganizations, in order to safeguard the human resources within the company, Aeonvis takes all necessary means to train personnel.
- In the face of legal issues, full cooperation in providing truthful information is required.

Safeguarding employee privacy

Aeonvis protects the privacy of those who work within it by every means at its disposal. For this reason, it does not conduct any investigation into the ideas, personal tastes, sexual orientation or preferences of employees and collaborators.

The Company does not grant the dissemination of personal data, unless it is granted and authorised by the person concerned or required by the judicial authorities.

3.2. Standards of conduct with customers

Professionalism, competence, transparency and helpfulness are the guiding principles that all Addressees of the Aeonvis Code of Business Ethics are required to respect in their relations with customers, with a view to continuous collaboration and assistance.

To protect the Company's image, it is important that relations are characterized by:

IMPARTIALITY: Aeonvis undertakes to maintain a fair relationship with all its customers. The Addressees of the Code may not treat clients unequally, differentiating them by economic importance or the scope of the project. Each one, within the Company, will endeavour to offer a service consistent with the agreed standards.

Aeonvis does not discriminate against clients on the basis of religion, politics or sexual orientation, and does not entertain any type of relationship, whether direct or indirect, with organizations operating outside the law.

CORRECTNESS: The Company's relationship with customers is based on fairness and respect, with the aim of establishing a collaborative and professional relationship.

COMMUNICATION: Aeonvis is committed to maintaining communication that is as transparent, clear and complete as possible, so that no relevant information is overlooked.

FAIRNESS: The definition of the conditions of sale of the Company's services shall be based exclusively on the assessments of the quality and soundness of the same, in full compliance with Aeonvis' corporate procedures.

In order for the customer to make an informed decision, the Company shall provide accurate and complete information about the services on sale.

QUALITY OF SERVICES AND SATISFACTION: Aeonvis intends to maintain and guarantee adequate quality standards for the services it provides, constantly monitoring the quality of the same also by means of surveys.

The Addressees of the Code of Business Ethics are required to observe rules of conduct such as fairness, courtesy and helpfulness in their relations with customers, with the aim of ensuring their full satisfaction in terms of cooperation and continuous assistance.

The consultancy services that Aeonvis offers its clients shall be those for which the Company is able to provide the necessary expertise, refusing any assignment that could harm the company and/or clients.

Assessing the risks associated with the project is a fundamental point. This implies:

- an analysis of the possible economic, financial, technical and strategic problems that may arise;
- an assessment of the availability of resources;
- the consideration of potential technical or organisational problems related to project implementation (if any).

The Company undertakes to ensure clarity in commercial negotiations and absolute commitment to the fulfilment of contractual obligations.

During the commercial offer phase with the client, Aeonvis communicates in a clear and precise manner the aspects relating to the service, such as:

- methodology;
- responsibility and commitment;
- expected results;
- timeframes necessary to carry out the project;
- necessary resources.

All clients will be empowered to make free, informed and responsible decisions. Aeonvis focuses on meeting on the client's objectives and interests.

3.3. Relations with suppliers and external collaborators

Aeonvis requires from all suppliers and external collaborators a constant commitment to sharing the principles contained in the Code of Business Ethics, with the aim of establishing a lasting relationship of trust for the achievement of the objectives, in compliance with the principles and rules contained in the Code.

In the relations of procurement, supply of goods and services and external collaboration (including consultants, agents, etc.) Aeonvis requires the Addressees to make their own choices by complying with the values of conduct indicated in the Document.

3.4. Respect for free competition

For Aeonvis free competition is a factor to be protected. The Company believes that fair competition can qualitatively affect reputation, service and integrity as a functional aspect of the sustainable development of the Company and of the market in which it operates.

All Addressees are therefore required to avoid conduct that may favour business that is advantageous to the Company in an unfair, anti-competitive manner or in violation of the laws and regulations in force, distancing themselves from any violation of the rules that protect competition, even more so through the use of violence and/or threats.

3.5. Gifts and gratuities

In accordance with the principles listed in this Code of Business Ethics, with particular reference to fairness and transparency, any form of gift that exceeds normal business practices and is aimed at acquiring favourable treatment in the conduct of activities connected to Aeonvis is prohibited.

Gifts offered or received, with the exception of those of modest value, must be communicated to and authorised by the Supervisory Body, and must be adequately documented to allow the appropriate checks.

Allowed gifts and gratuities are those of modest value and that, in any case, cannot in any way become a tool for receiving illegitimate favours, in full compliance with the pre-established internal provisions.

Aeonvis prohibits gifts and gratuities such as

- cash or cash equivalents (cheques, vouchers, loans and similar instruments);
- inappropriate gifts that may call into question the Company's reputation;
- gifts and gratuities that violate the law and/or regulations in force.

3.6. Conflict of Interest

Aeonvis undertakes not to undertake actions that may generate conflict with the interests of the Company or damage its reputation.

LOYALTY: Each Addressee is bound by the duty of loyalty, always acting in good faith.

CONFLICT OF INTEREST: A conflict of interest refers to any potential situation in which conflicting interests occur simultaneously. Any personal interest that contradicts the interests of the Company violates the duty of loyalty. This occurs in those contexts where direct or indirect personal gain influences or could influence decisions related to Aeonvis' activities. All Addressees are, therefore, bound to avoid their personal interest coming into conflict with that of the Company.

Each Addressee of this Document is bound to

- not undertake external activities that may compete with Aeonvis, nor procure information or assistance to competitors of the Company;
- report any potential conflict of interest to the Supervisory Body;
- allocate activities only on the basis of merit and not of possible personal gain;
- not disclose or use information for personal gain;
- refer to the Supervisory Board in the event of any potential conflict of interest.

It is also required to report, to the Supervisory Body, the case in which a customer, a supplier or any external collaborator employ a member of the same household or a first/second degree relative of an Aeonvis employee.

3.7. Anti-money laundering rules

Every level of the organisational structure has the task of contributing to the establishment of an effective and efficient internal control system.

Every operation or transaction must be authorised, verifiable, legitimate, congruous, consistent and correctly and promptly detected and recorded in the corporate accounting system, in accordance with the criteria indicated by the law and on the basis of the applicable accounting principles.

The Addressees are required to cooperate as much as possible with the holders of control powers. Activities obstructing the control function, carried out by institutional control bodies, are therefore prohibited.

Addressees who become aware of omissions, falsifications or negligence in the management of accounts are required to report the facts to the superior body, or to the body to which they belong. No employee or collaborator may make payments in the interest and on behalf of Aeonvis without adequate supporting documentation and formal authorisation, proxy or power of attorney.



Aeonvis shall also ensure that its activity does not become a tool to favour, even potentially, illegal activities and criminal and terrorist organizations. To this end, the Company always applies national and international anti-money laundering regulations.

3.8. Relations with the Public Administration

At the date of drafting the Code of Business Ethics, Aeonvis does not have any business relations with the Public Administration. Should the Company enter into such relations, all the above guidelines would also be applied to the Public Administration.

4. RESOURCES OF THE ORGANISATION AND THIRD PARTIES

4.1. Intellectual Property

Aeonvis considers intellectual property a valuable asset for the Company. In this regard, confidentiality and commercial secrecy are the elements through which it is possible to ensure the validity and integrity of any intellectual property rights, with reference to employees, customers, competitors, business partners and suppliers.

Any intellectual property produced by Aeonvis' employees for the Company or its clients, remains the property of Aeonvis or its clients (depending on the terms signed with the client concerned) and is legally protected.

4.2. Management of the Company's computers, media and assets

In order to protect Aeonvis' data, the Company requires its employees to exercise what is known as diligence of a good family man, i.e. to take the utmost care of their devices and company assets in order to avoid losses and theft.

The use of resources such as computers, cloud resources or any means of communication used to send e-mails or access the Internet, must always comply with company policy. Only the respective addressees of these tools will have access to the access credentials of the company's information systems.

No resources will be used for illegal purposes or to cause harm to others. All technological resources made available by the Company shall be used in compliance with procedural and operational rules.

4.3. Privacy and confidentiality

Aeonvis undertakes to protect all the information it collects and processes, taking privacy laws seriously. The Company's objective is to guarantee the protection of data and information relating to employees, customers, suppliers, collaborators or third parties it comes into possession of.

All Addressees are required to treat all information acquired as confidential and, therefore, not to disseminate it except in accordance with established activities. No information may be used to gain personal advantage in unlawful ways.

The Addressees are obliged to respect and safeguard the confidential nature of the information they come into possession of, even if such information is not specifically recognised as confidential or



does not directly concern the Company, but customers, suppliers or competitors with whom Aeonvis comes into contact.

The Company prohibits all Addressees from disclosing or communicating such confidential information to third parties.

In reference, Aeonvis applies the regulations of the GDPR: L.D. 679/2016.

4.4. Relationship with social media

Remaining consistent with the principle of transparency, Aeonvis' communication to the outside world respects and promotes the right to information.

In order to safeguard the confidentiality of information, Addressees who have relations with the media are bound not to divulge news about the Company or about their relations or professional activities with stakeholders in general.

Aeonvis respects freedom of expression but, in order to protect its reputation, invites all Addressees of the Document not to publish false or inappropriate comments.

External communication, including that aimed at disseminating the image of Aeonvis, respects responsible business conduct, consistent with the ethical principles of this Document.

5. PRESERVATION OF THE ENVIRONMENT

Aeonvis is constantly committed to ensuring full compliance with current environmental protection regulations. This implies full respect for the law as a fundamental requirement.

The impact of the activities fully respects the principles of sustainable development, with particular attention to constantly ensuring that the work complies with national and international directives. The company takes all necessary precautions to avoid or reduce as much as possible the environmental impact of its activities.

In favor of environmental protection, Aeonvis chooses Treedom, a non-profit company that allows to plant trees at a distance with the aim of creating sustainable ecosystems.

Treedom plants trees in various countries around the world, contributing to the production of business, social and economic benefits. In order to reduce the ecological impact of the activities, Aeonvis has the opportunity to involve customers and employees by giving them a tree.

Its projects respect three fundamental principles:

- ensuring long life for trees, include different local communities in the implementation of projects;
- choose to plant the right trees in the right place and with a precise purpose;
- monitor and support the growth of each tree.

6. INSTRUMENTS FOR THE DISSEMINATION OF THE CODE OF BUSINESS ETHICS

It is the responsibility of Aeonvis that the Document is brought to the attention of all internal and external Addressees, through its publication on the company intranet, on the Aeonvis website and on social communication channels.

In order to allow a correct interpretation of the Document and an adequate understanding of it, the Company undertakes to implement communication initiatives aimed at promoting the dissemination of the principles and ethical norms contained herein, constantly monitoring compliance with the Code.

Aeonvis informs all Addressees about the provisions and the application of the Document, recommending compliance. The Company interprets and clarifies, where necessary, the provisions contained within it.

For the correct implementation of the Code, Aeonvis provides for:

- carry out actions aimed at encouraging compliance with the Code by all Addressees;
- verify compliance;
- update the Document according to the needs that may arise from time to time.

7. THE COERCIVE NATURE OF THE CODE OF BUSINESS ETHICS

The Document must be considered an integral part of the employment contract. Any violation of the Code of Business Ethics is a disciplinary offence, as well as a breach of contract with regard to the Stakeholders with whom the Company cooperates.

To ensure compliance, Aeonvis decides to:

- establish appropriate procedures for compliance with the Code of Business Ethics;
- disseminate its contents so that the Document can be disseminated and understood;
- regularly check compliance with the Code;
- examine and evaluate possible violations.

All Addressees are obliged to report non-compliance with the Code. Aeonvis guarantees full confidentiality in the management of each report.

The violation of the Code, the observance of which is the obligation of all Addressees, will involve the adoption of appropriate sanctions.

Any report made in good faith will not suffer any kind of negative repercussions to the detriment of the signaller, even if the same are unfounded.

Each employee and collaborator is responsible for:

- respect the Code and refrain from any type of activity that may violate the provisions and rules of the Document;
- contact your superiors in case of any doubts regarding the application of the Code;
- cooperate with investigations carried out to verify possible violations.

Faced with the report of an alleged offence, Aeonvis abides by its obligations regarding whistleblowing, a system for preventing corruption. In order to ensure the confidentiality of the submitter, the Company activates reporting channels, in which the processing of personal data and the documentation related to the reports will be managed in compliance with the rules and principles contained in the GDPR.

7.1. Internal control procedures

Through specific internal procedures, the Company undertakes to ensure that what is indicated in the Code is effectively respected.

The procedures for selecting employees, customers and external suppliers require compliance with the values and criteria included in the Document.

All that concerns the management of Aeonvis, provides for a path of authorization that reflects and respects the Code of Business Ethics, as well as the validation of the same by the external body composed of statutory auditors.

7.2. Measures for those who do not respect the Code of Business Ethics

Aeonvis considers compliance with this Document as an integral part of the obligations relating to the relationship that the Addressees undertake with the Company.

For this reason, compliance with all the principles listed above is an integral part of contractual obligations and, therefore, any breach of these principles may represent a breach of the contractual obligations assumed, with all possible consequences arising therefrom.

Therefore, in the event of a proven violation of the provisions contained herein, Aeonvis reserves the right to take appropriate measures against the Addressees responsible for such violations to protect the interests of the Company.

7.3. Reporting violations of the Code of Business Ethics

All Addressees of the Document may report any violation or suspected violation of the Code of Business Ethics to the Supervisory Board of Aeonvis, composed of an internal member, namely the Company's Chief Executive Officer, the Chairman of the Board of Statutory Auditors and the legal office. To do so, they can contact by e-mail the address of the following that they deem most appropriate:

- odv.interno@aeonvis.com → read only by the CEO
- odv.sindaco@aeonvis.com → read only by the Chairman of the Board of Statutory Auditors
- odv.legale@aeonvis.com → read only by the lawyer

The Company undertakes to protect the reporting agent from any form of discrimination or retaliation, in compliance with confidentiality, except for obligations imposed by law. Aeonvis will deal with the reports and their consequences, and will provide the appropriate feedback on the outcome of the investigation to anyone who reports a violation of the Code of Business Ethics.

8. FINAL PROVISIONS

The Code of Business Ethics was approved by the Aeonvis Board of Directors on 06/10/2023. Possible future updates, resulting for example from regulatory adjustments or the



evolution/modification of Aeonvis' activities, will be brought to the attention and approval of the same Board of Directors, as well as disseminated to all Addressees.