

Code of Ethics

The principles and values that guide
the corporate culture and conduct



webgenesys[®]

a TXT Group Company

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1. MISSION

Webgenesys is a Digital Enabler with specific cross-functional skills in various sectors of the ICT fields, and is part of the TXT e-solutions S.p.A. group.

The company stands out for its flexible approach, which is capable of effectively responding to the project needs of end customers.

For each project, depending on requirements, it brings into play specialized professional skills in different areas such as telecommunications, telephony, software development, application delivery, communication and marketing, IT systems, artificial intelligence solutions, data protection and privacy, as well as project management professionals.

2. THE COMPANY CODE OF ETHICS

This Code of Ethics is aligned with and derives from the TXT Group Code of Ethics. Under no circumstances may the belief that one is acting for the benefit of any TXT Group company justify conduct that is inconsistent with these principles. For this reason, acceptance of the Webgenesys Code of Ethics also entails acceptance of the Code of Ethics of the TXT Group (<https://www.txtgroup.com/investors/corporate-governance>), compliance with which by the recipients is essential to ensure the proper functioning, reliability and reputation of the TXT Group, which represent a key asset for the success of the company itself.

By adopting the Webgenesys Code of Ethics, the following commitments will be guaranteed without distinction or exception: the commitment to observe and enforce the principles of the TXT Group's Code of Ethics, according to which all activities are carried out in compliance with the law, in a framework of fair competition with honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, employees, shareholders, commercial and financial partners and the community in which the company operates.

The Webgenesys Code of Ethics also aims to introduce and make binding, for the Company and its Recipients, the principles and rules of conduct established by Webgenesys for the prevention of offences referred to Italian Legislative Decree no. 231/01 and subsequent amendments and additions, and contributes to the effective functioning and improvement of the Company's reliability, taking as a reference point the specific documents coordinating with the Organisation, Management and Control Model, the Company Regulations and Disciplinary Code, the Procedures, Protocols and Operating Instructions of the Integrated Management System.

3. RECIPIENTS

The Code of Ethics is addressed to all members of the Board of Directors, shareholders, auditors, proxies, area managers, employees, suppliers, collaborators, consultants, customers, business partners, and to all those who establish direct or indirect, permanent or temporary relationships with Webgenesys, or in any case act in the name and on behalf of the company, both in Italy and abroad. They are hereinafter referred to as "Recipients."

Compliance with the provisions and principles set out in this document is a *conditio sine qua non* for initiating any type of relationship between the company and the aforementioned parties. The provisions signed or, in any event, approved (even by conclusive actions) form an integral part of the corresponding contracts.

All Recipients are required to become familiar with the Code of Ethics, to help implement it, contribute to its improvement, and promote its dissemination, while operating in accordance with its provisions. Webgenesys undertakes to disseminate its contents and objectives as broadly as possible, including by publishing them on the company website.

Violation of the principles and rules expressed in this Document may be identified in advance as grounds for automatic termination of the contract pursuant to Article 1456 of the Italian Civil Code (express termination clause) and may entitle Webgenesys S.p.A. to terminate the contractual relationships in force with the Recipients.

4. ETHICAL PRINCIPLES

The principles outlined below guide the company's actions and define its identity.

4.1 – RESPONSIBILITY, COMPLIANCE WITH LAWS AND REGULATIONS

Webgenesys operates in accordance with the law and requires the Recipients of this Code to act in compliance with applicable laws. It is forbidden to pursue or achieve the Company's interest by violating the laws of the State or any other country.

The Company rejects any illegal practice that, even indirectly, involves forms of collaboration or links with criminal organisations, however named.

All forms of corrupt activities, under any guise, are expressly prohibited.

4.2 – FAIRNESS

The principle of fairness entails respecting the rights of everyone involved in the Company's business.

Recipients must act correctly in order to avoid conflicts of interest, i.e., any situation in which pursuing their own interests might conflict with the Company's interests and mission. Additionally, Recipients must avoid any situation in which an employee, a manager, or any other Recipient could derive unjust advantage and/or profit—either for themselves or for the Company—by exploiting opportunities acquired during or due to their work activities.

4.3 – ANTI-CORRUPTION AND REGULATION OF GIFTS

Webgenesys S.p.A. doesn't tolerate any form of corruption. It disapproves of and condemns corruption or any form of inducement, rejecting all corrupt acts—direct or indirect—toward public officials, public service officers, and private parties. It is committed to complying with applicable anti-corruption laws and requires all Recipients to act with integrity.

The rejection of any corrupt practice is set forth in the anti-corruption policy of Webgenesys S.p.A., adopted in compliance with the applicable regulatory framework, Italian Legislative Decree 231/2001, the Italian Criminal Code (Articles 317 et seq.), the Italian Civil Code (particularly Articles 2535 and 2635-bis), the U.S. Foreign Corrupt Practices Act (1977), the UK Bribery Act (2010), the 2003 United Nations Convention Against Corruption (the so-called Merida Convention), the Council of Europe Conventions on the subject (Civil and Criminal Law Conventions on Corruption – 1999), the various Guidance documents, best practices, and international standards (ISO 37001) related to the prevention and combating of corruption.

Webgenesys S.p.A. has formally adopted an organisation, Management, and Control Model. Accordingly, it declares that it is aware of the requirements and provisions set forth in Italian Legislative Decree 231/2001 and that it carries out its activities in compliance with the laws in force, good business conduct, rules, and the principles of good faith and professional fairness. All Recipients of this Code of Ethics are expected to comply with the provisions of Italian Legislative Decree 231/2001.

The Company promotes a culture of rejecting corruption by ensuring supervision over compliance with anti-corruption measures and internal controls, developing suitable training programs, and implementing measures to prevent, identify, and report potential violations. This is done via specific anti-corruption procedures that form part of the Integrated Management System—implemented, for the anti-corruption component, in accordance with the UNI ISO 37001:2016 international standard. To effectively pursue this goal, Webgenesys S.p.A. has adopted a whistleblowing system (available on the company website), inviting Recipients to report any violation or potential violation. In compliance with applicable laws and to protect whistleblowers, this system ensures confidentiality for those who report illegal conduct. Additionally, any breaches of mandatory regulations can be reported to the Supervisory Body established pursuant to Italian Legislative Decree 231/2001.

Furthermore, Webgenesys S.p.A. has adopted a specific procedure governing gifts, favours, sponsorships and

benefits, which may only be accepted or offered if they constitute acts of legitimate 'commercial courtesy' and only if they are of "modest value" or of such a nature that they cannot be construed as intending to gain improper advantages for themselves or for the Company. Employees and/or collaborators who receive or offer gifts that cannot be ascribed to normal, proper business relations must inform their immediate manager.

4.4 – HONESTY AND INTEGRITY

Recipients must be aware of the ethical significance of their actions and must not pursue personal or corporate gain in violation of applicable laws and this Code.

Contracts with customers and suppliers must contain clear and understandable terms, ensuring equal conditions for the parties.

Webgenesys S.p.A. does not approve or justify any act of violence or threats aimed at obtaining conduct in breach of current regulations or its Code of Ethics.

4.5 – TRANSPARENCY AND TRACEABILITY

The principle of transparency is based on the truthfulness, accuracy, and completeness of information—both within and outside the Company.

In accordance with this principle, Webgenesys S.p.A.'s decision-making processes and activities are recorded via suitable documentary evidence (including digital formats) clearly showing the authorisation, verification, execution, and registration processes for the transactions. This is done to enable, for the sake of transparency and corruption prevention, monitoring and verification of compliance with the implemented procedures.

All activities are documented to provide a truthful and correct representation of the economic, asset, and financial information, in accordance with legal or regulatory requirements and accounting principles.

Recipients involved in preparing financial statements or similar documents must ensure completeness and clarity of the information provided, as well as data accuracy. They must also cooperate to achieve these objectives.

Recipients involved in managing financial transactions must ensure full traceability of financial flows and compliance with the relevant laws.

4.6 – FAIR COMPETITION

Fair competition is an essential prerequisite for building corporate success. Webgenesys recognises the principles of a market economy and fair competition, operating in accordance with the regulations that govern it. Any agreements violating these principles are prohibited.

Webgenesys is committed to avoiding any action that may harm the reputation of its competitors and the products and/or services they provide, repudiating any conduct that could lead to fraud in commerce or disrupt legitimate business operations.

5. ETHICAL CONDUCT IN RELATIONS

5.1 – RELATIONS WITH SHAREHOLDERS AND MEMBERS OF CORPORATE BODIES

Webgenesys S.p.A. aims to foster productive dialogue and ensure the smooth functioning of its governance bodies by enabling the effective participation of all shareholders, Board members, and corporate bodies, including timely information regarding agenda items.

The Company is committed to ensuring maximum transparency in both corporate communications and personal relations.

5.2 – RELATIONS WITH CUSTOMERS

The Company's primary objective is to fully meet its customers' needs. Therefore, Webgenesys ensures the highest quality of services and tasks entrusted to it and consistently strives to propose ever more advanced and innovative solutions, acting with the utmost fairness, transparency, and collaboration, fully respecting current laws and regulations.

5.3 – RELATIONS WITH SUPPLIERS AND CONSULTANTS

Webgenesys establishes, in accordance with applicable regulations, collaborative relationships with its suppliers and consultants guided by impartiality, fairness, transparency, and free competition.

The selection of suppliers and consultants is governed by a qualification process that evaluates the integrity, morality, professionalism, reputation, and reliability of candidates, as well as their ability to promptly supply goods and services at an adequate level to meet the Company's needs.

The relationship with consultants is based on transparent contractual agreements and constructive dialogue aimed at achieving shared objectives, in line with the rules and principles set out in this document. Each contract contains a clause under which the supplier, external collaborator, or self-employed worker undertakes to respect all the principles set out in this Code of Ethics and in the organisation and Management Model pursuant to Italian Legislative Decree 231/2001.

5.4 – RELATIONS WITH PUBLIC ADMINISTRATION, AUTHORITIES, SUPERVISORY AND CONTROL BODIES

Webgenesys S.p.A.'s dealings with Public Administration, institutions, other authorities, and supervisory/control bodies are characterized by maximum transparency, fairness, and loyal cooperation.

- In these relationships, it is strictly forbidden, either directly or indirectly, to:
- Influence the decisions of the counterparties;
- Offer or accept any object, service, or benefit;
- Discuss or propose professional or commercial opportunities that may benefit employees of Public Administration, institutions, authorities, or supervisory and control bodies;
- Request or obtain confidential information, except in cases provided for by law;
- Rely on consultants or individuals who may have a conflict of interest.

5.5 – SUBSIDIES AND FUNDING

Contributions, subsidies, or funding from the European Union, the State, or other public bodies—even of modest value or amount—must be used for the purposes for which they have been requested and granted.

Webgenesys S.p.A. prohibits the Recipients of this Code of Ethics from using funds for purposes other than those for which they were issued, and requires them to operate in compliance with the law, expressly forbidding the deception of Public Administration, institutions, or authorities with the aim of obtaining a benefit for the Company.

It is forbidden to resort to false statements or documents, omissions of information, or deceptive acts designed to obtain grants, licenses, authorisations, or loans from the European Union, the State, or other public authorities.

5.6 – RELATIONS WITH POLITICAL AND TRADE UNION ORGANISATIONS

Relations with political and trade union organisations are conducted with the utmost transparency and independence.

No benefits of any kind—direct or indirect—are permitted to parties, movements, committees, political or trade union organisations, or to their representatives, if such benefits could be seen as intended to obtain favours or

advantages.

5.7 – RELATIONS WITH MEDIA OUTLETS

Relations with the press and the media are managed exclusively by individuals authorised by Webgenesys and are conducted in accordance with the Company's communication policy. The information and statements provided externally must be truthful, complete, accurate, transparent, and consistent.

Employees and collaborators must refrain from making statements or giving interviews about the Company to media representatives or any third party without authorisation from the competent managers.

It is forbidden to circulate, via social networks or any other means, information about the Company or images of its offices and workplaces (or any location where the Company conducts its activities).

Recipients may share only the information disclosed by the Company through its official channels (website, official social media profile).

Recipients must refrain from posting on social media or other communication channels any false information about their relationship with Webgenesys S.p.A.

6. PRIVACY PROTECTION AND GDPR COMPLIANCE

6.1 – PRIVACY PROTECTION

In its capacity as both Data Controller and Data Processor, Webgenesys S.p.A. is committed to protecting privacy and, more generally, the personal data of data subjects, in accordance with applicable regulations, to prevent the communication or disclosure of personal data without the consent of the data subject.

Collecting, processing, and storing personnel data and information, along with data relating to other parties within Webgenesys's sphere, must comply with specific procedures aimed at safeguarding the confidentiality, integrity, and availability of the personal data, and preventing access by unauthorised persons or entities. These procedures are continually updated to reflect evolving regulations. Recipients are obliged to respect privacy rules and refrain from disclosing any information they learn in connection with their work.

Webgenesys adopts appropriate measures for processing personal data within its facilities, as well as their filing and storage, in accordance with security measures designed to prevent unlawful use, destruction, loss, unauthorised access, or unauthorised processing.

6.2 – CONFIDENTIALITY

All Recipients of this Code must maintain the utmost confidentiality regarding any news, data, or information they acquire and/or use in the performance of their duties.

"Information" includes all data, documents, knowledge, and records of any nature, form, or medium relating or attributable to Webgenesys, its Directors, Shareholders, Managers, Employees, or the Company's business in any capacity.

"Confidential Information" means all information that, in addition to meeting the above definition, is not publicly available and/or is specifically labeled as such.

As a general rule, all information and Confidential Information must be accessible solely to individuals who are specifically authorised, in compliance with binding regulations, procedures, and applicable corporate policies.

Recipients must not use confidential information for purposes unrelated to their work duties; they must ensure the confidentiality of any personal data or information acquired in the course of their relationship with the Company.

In the context of mutual relations, the parties undertake to comply with the applicable data protection laws, particularly Regulation (EU) 2016/679 (GDPR) and Italian Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.

6.3 – CONFIDENTIAL INFORMATION REGARDING THIRD PARTIES

It is forbidden to use unlawful means to acquire confidential information about other organisations and entities.

Those who, in carrying out their activities, become aware of confidential information about others must only use it as permitted under the relevant contracts.

Without authorisation, individuals may not request, receive, or use confidential information about third parties. If information is obtained that is not covered by a non-disclosure agreement or other protective arrangement, the individual must contact their immediate manager for guidance on handling it.

6.4 – INTELLECTUAL PROPERTY

Within the scope of their roles and responsibilities, each Recipient must actively contribute to the safeguarding and management of intellectual property, to ensure its development, protection, and enhancement. All Recipients must refrain from altering or counterfeiting any software, patents, or projects in any manner. It is strictly prohibited to use counterfeit software, patents, or altered or counterfeit designs.

7. PEOPLE

7.1 – THE VALUE OF PEOPLE

Webgenesys S.p.A. promotes the professional growth and development of its employees, thereby enhancing the collective pool of expertise, in full compliance with the laws protecting individual rights—especially the moral and physical integrity of its personnel.

Staff members are employed solely under lawful employment contracts, as no form of irregular work is tolerated.

In establishing the employment relationship, the applicable provisions of Italian law, national collective bargaining agreements, and decentralized labour agreements are strictly observed. These rules encompass universal values and form the foundation of the relationship between the Company and its employees.

The personnel selection process checks the ethical and moral qualifications of candidates, who must sign this Code of Ethics upon hiring and each time it is updated, undertaking to comply with its provisions.

Webgenesys S.p.A. does not establish any employment relationship with individuals involved in criminal or terrorist activities, including organised crime.

During recruitment, Webgenesys provides detailed information about the employment relationship.

Salary increases, incentives, and access to higher positions and roles are governed by applicable laws and collective labour agreements, as well as the individual merits of employees—among them, the ability to demonstrate attitudes and competencies consistent with the Company's ethical principles.

Webgenesys is committed to ensuring equal access to employment, structures, services, and programs, regardless of personal characteristics or conditions unrelated to performance, competence, knowledge, or qualifications.

7.2 – REJECTION OF ALL FORMS OF DISCRIMINATION

In decisions affecting relations with individuals—such as personnel management, work organisation, the selection and management of suppliers and collaborators, and relations with the surrounding community and its institutions—Webgenesys S.p.A. rejects all discrimination based on age, gender, sexuality, health status, race, nationality,

geographic origin, political opinions, or religious beliefs. To ensure the principles of equality, anti-discrimination measures, gender equality, diversity, and inclusion, Webgenesys has implemented a Gender Equality, Diversity, and Inclusion Management System in compliance with UNI PDR 125:2022. These guiding principles are detailed in the Corporate Policy for Social Responsibility, Gender Equality, Diversity, and Inclusion, and the Company has obtained certification from an accredited third-party body.

8. HEALTH, SAFETY, AND ENVIRONMENT

8.1 – HEALTH AND SAFETY

Webgenesys is deeply committed to ensuring health and safety in the workplace and to preventing workplace injuries and occupational illnesses, fostering awareness among workers of the health and safety risks they face on the job and promoting responsible behaviours among all personnel.

All employees are required to comply with applicable mandatory regulations on occupational health and safety, follow specific company procedures on occupational health and safety (which form part of the Integrated Management System implemented, for the Health and Safety portion, in compliance with the international standard UNI EN ISO 45001:2023), and promptly report any shortcomings or legal violations to the Company's Prevention and Protection Service, the manager responsible for the Health and Safety Management System, and—if necessary or appropriate—the Supervisory Body established under Legislative Decree 231/2001.

Webgenesys adopts the general measures prescribed by law for protecting health and safety in the workplace, particularly the provisions of Legislative Decree 81/08, while constantly monitoring legislative developments and striving to implement them by ensuring information and training of personnel, an efficient organisational structure, and the necessary resources.

8.2 – SOCIAL RESPONSIBILITY

To provide clear evidence of its respect for workers' rights and its commitment to combating all forms of discrimination, Webgenesys has implemented a social responsibility management system in accordance with SA 8000:2014. It therefore pledges to uphold the following principles inherent in the SA 8000:2014 standard:

1. Rejection of Child Labour
2. Rejection of Forced Labour
3. Respect for Health and Safety in the Workplace
4. Respect for Freedom of Association and Right to Collective Bargaining
5. Commitment to Non-Discrimination
6. Commitment to Disciplinary Procedures that treat all staff with dignity and respect
7. Respect for appropriate Working Hours
8. Respect for adequate Remuneration

These same principles, also set out in the Corporate Policy for Social Responsibility, Gender Equality, Diversity, and Inclusion, must be followed by those wishing to establish a business relationship with the Company.

All employees must comply with these principles and with the specific corporate procedures on social and ethical responsibility that form part of the Integrated Management System implemented, for the Social Responsibility and Ethics component, in accordance with the international standard SA 8000:2014. They must promptly notify the Social Performance Team, Senior Management, or the Health and Safety Committee, as appropriate, and—if necessary or appropriate—the Supervisory Body established under Legislative Decree 231/2001, of any shortcomings or failure to adhere to corporate procedures or the documents making up the Integrated Management System.

8.3 – ENVIRONMENTAL PROTECTION

Webgenesys recognises environmental protection as vital for ensuring consistent and balanced growth. The Company is committed to safeguarding the environment and contributing to the sustainable development of local areas by carefully and correctly managing key environmental issues (waste management, reduced consumption of electricity and diesel, reduced water usage, management of ozone-depleting substances/greenhouse gases, fire prevention). It is committed to complying with applicable environmental laws and contributing to the territory's sustainable development. It actively promotes sustainable and responsible development that goes beyond mere legal compliance, supporting the integration of environmental best practices into all business decisions.

All corporate departments must adopt behaviours aimed at reducing environmental impact. Particular attention is paid to implementing and continuously developing technologies that allow for energy and water savings, the reduction of emissions—including greenhouse gases—and the adoption of waste recycling strategies.

Where relevant, employees must comply with the applicable mandatory environmental legislation and the specific environmental procedures forming part of the Integrated Management System, implemented in accordance with the international standard UNI EN ISO 14001:2015 for the environmental component. Employees must also promptly report any shortcomings or breaches of applicable environmental regulations to the Environmental Management System Manager and—if necessary or appropriate—to the Supervisory Body established under Legislative Decree 231/2001.

9. CONDUCT CRITERIA

9.1 – COMPLIANCE WITH THE CODE OF ETHICS AND EMPLOYEE DUTIES

Employees must act loyally in order to honour the obligations set out in their employment contracts, Company Regulations and Disciplinary Code, this Code of Ethics, the organisation and Management Model pursuant to Legislative Decree 231/2001, and the procedures of the Integrated Management System adopted by Webgenesys S.p.A.

Each functional and area manager is responsible for ensuring that those under their direct or indirect supervision comply with the principles and rules expressed in this document. They must also set an example for their employees and/or collaborators, ensure the latter understand the provisions herein, and promptly notify the relevant departments of any violations.

Employees, collaborators, and consultants are required to be knowledgeable about the principles, rules, and provisions expressed in this document. Any suspected unlawful conduct must be reported to senior management in accordance with the procedures laid out in the organisation and Management Model pursuant to Legislative Decree 231/2001 and the procedures of the Integrated Management System.

Staff must cooperate with the corporate organisation in the event of any investigations intended to detect and, if necessary, punish possible violations.

Management implements suitable monitoring systems to verify the actual dissemination and understanding of the mandatory legal documents among employees, collaborators, and consultants, and undertakes all appropriate measures to continuously improve awareness and comprehension of their contents.

The duty of verifying the implementation and enforcement of this Code of Ethics lies, within their respective remits, with the Recipients themselves, the various functional or area managers, the Head of Human Resources, and the Supervisory Body. Specifically, in addition to monitoring compliance with the Code of Ethics, these entities—given their access to Webgenesys's information—may propose appropriate updates based on any reports received.

9.2 – PROTECTION OF CORPORATE ASSETS

Each Recipient must act diligently to safeguard corporate assets, preventing improper or incorrect use.

Recipients must be aware of and follow internal security policies regarding information security, ensuring data integrity, confidentiality, and availability.

Information and know-how must be kept strictly confidential. The most significant data acquired or developed by Webgenesys in the course of its business are to be regarded as confidential information and protected by appropriate measures, in compliance with the GDPR and the UNI CEI ISO/IEC 27001:2017 standard, extended to ISO/IEC 27017:2014 and ISO/IEC 27018:2019 Guidelines.

Anyone who, in the course of their duties or under contractual obligations to Webgenesys, becomes aware of confidential information, materials, or documents must immediately inform their manager.

During the course of employment, employees may only use or process data if strictly necessary and expressly authorised, and solely for legitimate company purposes, never for personal and/or third-party gain.

Upon termination or conclusion of the employment relationship, the Recipient must return all data in their possession for which they were authorised to process, following the procedures set out in corporate rules. The Recipient is required to destroy any copies in their possession.

9.3 – USE OF CORPORATE ASSETS

Recipients must use corporate assets responsibly and in accordance with Webgenesys's operating procedures. Specifically:

- Use the assigned assets diligently (i.e., with the care of a prudent person);
- Avoid improper use of corporate assets that could cause damage or reduced efficiency or otherwise conflict with the Company's interests;
- Properly safeguard the resources entrusted to them;
- Promptly notify the relevant departments of any threats or harmful events that may affect the Company.

Regarding IT and software applications, each individual must:

- Carefully comply with corporate information security policies to avoid compromising the functionality and protection of IT systems and telematic devices;
- Refrain from visiting websites containing indecent or offensive content, or sites unrelated to the professional activities performed;
- Refrain from undertaking any actions or adopting conduct that might harm the Company's image.

9.4 – USE OF THE CORPORATE EMAIL ACCOUNT

Each person's personal corporate email account is a tool intended for work-related activities. Therefore, it must be used in accordance with the principles of diligence and fairness, corporate policies, and this Code of Ethics. The account must be used solely for work-related purposes; all other use, particularly personal or private use, is prohibited.

All Recipients are required to adhere to the above directives.

9.5 – CONFLICTS OF INTEREST

All Recipients must ensure that their decisions are made in compliance with the principles outlined in this Code of Ethics and in the exclusive interest of Webgenesys. They must therefore avoid any activity or situation of personal interest that may represent or potentially represent a conflict with the Company's interests. In any case, they must

abide by the specific procedures adopted by the Company in this area.

All Recipients of this document must refrain from taking advantage of their relationship with Webgenesys to favour themselves or third parties to the detriment or disadvantage of the Company.

Employees are strictly forbidden from directly or indirectly engaging in any commercial activity that competes with the Company. In the event that potential internal or external conflicts of interest are identified within Webgenesys S.p.A.'s scope of operations, each affected individual must abstain from involvement and promptly notify their manager and the Supervisory Body, which will assess case by case any incompatibility or harm arising therefrom.

10. CONTROLS AND SANCTIONS FOR BREACHES OF THE CODE OF ETHICS

Webgenesys ensures the dissemination of this Code, including by publishing it on the corporate website, and promotes relevant training and updating initiatives for its personnel.

The internal control system consists of all the tools necessary and useful for directing, managing, and verifying activities, orienting them toward achieving defined objectives. Overall, the control system aims to provide reasonable assurance of compliance with State laws, internal procedures, the achievement of preset objectives, the safeguarding of the Company's assets and resources, corporate management in line with efficiency and effectiveness criteria, and the reliability of the accounting and management information used both internally and externally by Webgenesys.

10.1 WEBGENESYS'S SANCTIONS SYSTEM

Failure to comply with the Corporate Policies (Integrated Management System Policy, Specific Information Security Policies, Corporate Policy on Social Responsibility, Gender Equality, Diversity, and Inclusion, Corporate Policy on Anti-Corruption), the duties described in this Code of Ethics and in the Company Regulations and Disciplinary Code, the rules of conduct established by the organisation and Management Model pursuant to Legislative Decree 231/2001, and in general the internal procedures established by the Company Regulations and by the Integrated Management System, will subject employees to the following measures:

1. Verbal reprimand for minor breaches;
2. Written reprimand in cases of repeated minor breaches;
3. A fine amount not exceeding four (4) hours of pay;
4. Suspension from pay and service for up to ten (10) days;
5. Disciplinary dismissal for justified subjective reason;
6. Immediate disciplinary dismissal (for just cause) without notice, in accordance with law (summary dismissal).

Imposing disciplinary measures must comply with Article 7 of Law 300 dated May 20, 1970.

Disciplinary sanctions, as well as any requests for damages, will be proportionate to the level of responsibility, the role, and the degree of trust inherent in the assigned position.

In the event of violations pertaining to the organisation and Management Model pursuant to Legislative Decree 231/2001, the Supervisory Body must be involved in the procedure for ascertaining violations and imposing penalties for infringements of the Model.

Any employee subjected to a disciplinary measure who wishes to dispute its legitimacy may use the conciliation procedures provided for in Article 7 of Law 300 dated May 20, 1970.

Failure to comply with this Code of Ethics or with the rules of conduct established by the organisation and Management Model pursuant to Legislative Decree 231/2001, or with corporate policies, on the part of suppliers, collaborators, consultants, or anyone having commercial or other relationships with Webgenesys, will result in the immediate termination of the contract.



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