



Code of Conduct

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Be helpful

Be helpful.

Two simple words guiding our behaviour.

Two simple words that suggested the first article of Italian Constitution: Italy is a democratic Republic founded on labor.

Two simple words reminding us of the ancient link that binds people one to the other in every society: the duty of work.

Through their work people contribute to the development of society they live in.

Work allows each individual to develop his own potential and fulfil his ambitions.

At Vianova we are proud of our work, because guaranteeing "the best telecommunication services" for our Customers allows us to be helpful "by doing to others what we would like them to do to us".

This is why our Customers trust us: the quality of our services and the care we have for their time.

Purpose of our Code of Conduct is to help us to bring "Be helpful" behaviour into practice by aiming to achieve the highest ethical and quality standards in our relationships with Colleagues, Partners, Customers, Suppliers, Shareholders and Communities we operate in.

Principles embedded in this document should encourage us to stop inactivity and help us understand how our actions can be helpful in daily practice.

Let's read it carefully and let's share it, because working in a peaceful and productive environment is beneficial for everyone.

If you believe that some of these principles are not being respected or that our quality standards are not being maintained, you should report it.

In order to keep on growing together and to contribute with our actions to make the world we live in a better place, we need everyone's commitment.

Be helpful, do it for yourself.

Stefano Luisotti
Founder & CEO

December 19th, 2018

Code of Conduct

Our Code of Conduct (Code) is inspired by **Respect, Service** and **Excellence** corporate values and it defines the principles underlying all our activities.

The Code helps us make informed decisions and it defines our responsibilities towards Vianova's Stakeholders.

The Code does not establish any prohibition or abstract rule, while it provides the means to guide our actions, helping us distinguish what is "right" from what is "wrong".

"Doing the right thing" means acting with integrity to ensure the trust of Customers, Colleagues, Partners, Suppliers, Shareholders, Group Companies and the Communities where we operate in.

The aim for high standards helps us to hire great people, create excellent services and attract loyal Customers.

Who should follow our Code?

We expect all of our Employees and members of the Board of Directors (BoD) to know and comply with the Code.

We also expect our Partners, Suppliers, Consultants, Group Companies and other individuals, who may be work and provide services to Vianova, to respect the Code. The Purchasing Manager will take care to forward the Code to all new Suppliers before placing orders.

What happens if I do not comply with the Code?

Compliance with the Code is essential.

It is a key element of the Model of Organization, Management and Control pursuant to Legislative Decree no. 231/2001 (Model 231) adopted by Vianova.

In the event of violations, the company may take disciplinary actions in proportion to the seriousness of the violation, including disciplinary termination of work contract.

What does it mean to me?

We expect you to:

- Comply with the Code and any other legal and regulatory obligations.
- Be proud of your actions and decisions.
- Report business practices that you deem unethical, unsafe or non-compliant with the Code.

Are you a team Manager?

If you are a Manager, you must ensure that the Code is well understood and applied by your team.

In particular, we expect you to:

- Lead by example in the workplace (do the right thing).
- Make sure your team knows and understands the Code thoroughly.
- Hold your team members responsible for compliance with the Code.

Always ask yourself if what you are doing...

- Is it helpful for the Customer?
- Is it lawful?
- Does it comply with our Code?
- Is it fair and honest towards Customers, Colleagues, Partners, Suppliers and Shareholders?
- Would it make you proud if you told it to your family?

If you answered "no" or "I do not know" to one or more of these questions, you should speak to your direct Manager or HR Team to get the advice and guidance you need.

Answering questions

- be competent in your job
- answer questions without raising defensive barriers
- provide accurate answers within the agreed time
- always support your opinions with facts

(Leadership Model)

1. Caring our Customers

The Customer comes first

Respect for Customers is fundamental for our success and it is a value that requires our support every day.

Our Customers appreciate us not only because we provide excellent services, but also because we maintain high standards in treating all people who get in contact with our Organization.

Being inspired by the following principles will help us keep this standard high.

Usefulness

Supporting growth of companies by simplifying communications is a mission that we carry out every day, with competence and passion, at the service of a great variety of Customers who nevertheless have the same expectation in common: that we are making ourselves useful to their business.

Integrity

The reputation as an honest company you can trust is our most precious asset.

All our communications and all interactions with our Customers should therefore contribute to increasing their trust in us.

Initiative

A key aspect of being helpful and honest is being responsive.

Whenever you feel that our Customers are not well served, let someone in the company know.

If you notice something not working, talk to your **direct Manager** right away to find the best solution with him.

Continuously improving our services is a matter for everyone and we are proud that our Colleagues take the initiative and stand up for our Customers when their interests are at stake.

Security and Privacy

We ask our Clients to trust us also regarding the processing of their personal information. Maintaining this trust requires each of us to respect and protect Security and Privacy of such information.

Our Security procedures strictly limit the access and use of Customer's personal information and set out that each of us take the necessary measures to protect it from unauthorized access.

It is your responsibility to know these procedures and to collect, use and access Customers' personal information in compliance with our rules on Security and Privacy and with standing Data Protection Laws.

What should I do to assist our Customers well?

1. Respect the value of Customers' time.
2. Write and speak in a simple and understandable way.
3. Speak the truth and keep your promises.
4. Provide accurate information within the agreed time.
5. Work to meet Customer needs.
6. Design useful and easy-to-use services.
7. Remember that Customer trust is the most precious asset for Vianova and for you.
8. Remember that Customers pay your salary.
9. Be competent in your work.
10. Be helpful.

Be useful

- work with passion to simplify the work of Customers, Colleagues and Partners
- always produce valuable results for Customers, Partners and the Company
- get to the bottom of things without stopping at the first difficulties
- never discuss a problem without proposing a solution

(Leadership Model)

2. Working together

We are all committed to maintain a collaborative work environment, where everyone has the opportunity to reach their maximum potential.

We expect everyone to do their best and help create a workplace culture that is free from harassment, intimidation, unfairness and discrimination.

Equal opportunities

New hires and career advancements are exclusively based on individual merit and professional skills. Discrimination based on race, religion, nationality, descent, sex, identity, gender, age, marital status, disability, medical condition, sexual orientation or any other situation recognized and protected by law is prohibited.

Within the limits of available information, Vianova adopts appropriate measures to avoid favoritism, nepotism or forms of cronyism in the selection and recruitment process of personnel.

Harassment and abuse

We do not tolerate harassment and abuse. It is our responsibility to prevent such behaviour and to promote disciplinary or lawful actions against people who harass or abuse others, when necessary.

What does it mean to me?

We expect you to:

- Never be offensive or insult Colleagues, Customers, Partners and Suppliers.
- Verify that all your communications, even informal ones, comply with the Code.
- Report harassment cases to the **HR team**.

Drugs and alcohol

The use, sale or distribution of illegal substances is prohibited.

The use of drugs or alcohol affects the well-being and quality of work. Help your Colleagues and report any Code violations to the **HR team**. We will offer assistance to people with alcohol or drug addiction problems.

What does it mean to me?

We expect you to:

- Do not work under the influence of drugs or alcohol.

- Report to the HR team your doubts about the use of alcohol or drugs by you or a Colleague.

Diversity and inclusion

We pursue the principle of equal opportunities and the inclusion of all employees with the aim of creating an environment where everyone can feel welcomed, accepted, helpful and respected.

We recognize and celebrate the importance of diversity in our workplace.

Our relationships with others are based upon respect of human being and human rights.

What does it mean to me?

We expect you to:

- Comply with our Code.
- Be respectful to others.
- Tackling discrimination.
- Make all your decisions relating to employees based on merit.

Q: I am concerned about the discrimination that some candidates may face in the selection process. Who can I report it to?

A: We encourage you to discuss the selection criteria with **HR Manager**. If the situation does not change, report the problem to the **CEO**. It's good to report your concerns as we do not tolerate any form of discrimination.

Work environment

In Vianova offices we have many shared spaces that require our attention. In fact, our small daily duties make the difference and reveal our commitment towards Colleagues and guests.

What does it mean to me?

We expect you to:

- Always leave the bathroom perfectly clean.
- Leave workstations, offices, meeting rooms and all common areas in order.
- Be an example.

Note: Company lawns are designed to be walked on. Try them with a barefoot meeting.

3. Make your voice heard

If you notice any behaviour at work that appears to violate this Code, the Model 231 or seems to be unlawful, it is your duty to report it.

You have to report any conduct that you deem illegal or criminal, such as corruption, fraud or breach of privacy regulations.

You must also report any unauthorized or abusive access to information systems, violations of processes and company policies, harassment, conflicts of interest, risks to health and safety at work, abuses of human rights or serious environmental issues.

What does it mean to me?

We expect you to report your doubts relating to real or suspicious issues that you think you have identified, to the **HR Team** or to the Supervisory Body appointed pursuant to Legislative Decree no. 231/2001, by means of the appropriate IT tool <https://segnalazioni.vianova.it> dedicated and in compliance with the Whistleblowing Management Procedure adopted by Vianova or at the e-mail address odv@vianova.it.

What should I do if I have a question or concern related to the Code of Conduct or the Model 231?

For any question or concern, get in contact with your **direct Manager** or the **HR Team**. If, on the other hand, you believe that the law has been violated, in addition to reporting your suspicions to the Supervisory Body, you can always report the facts to the Judicial Authority or the Police.

Speak up. We want and need to hear your voice.

What happens if I report something that does not seem correct to me but it is ultimately not a violation?

Expressing and clarifying any doubt helps to act correctly. All reports made in good faith and moved by a genuine collaborative spirit are useful, even if there have been no violations.

However, lies and false declarations are not tolerated.

What happens after my report?

- Depending on the type of suspicious issue reported, the **Supervisory Body** or the **HR Manager** will deal with the reporting and consequent investigations, based on the procedures adopted by Vianova.
- Your identity and the information provided will be treated confidentially and confidentiality will be guaranteed in any case.
- In case of an internal investigation, you will be kept informed.

No retaliation

In accordance with law no. 179 of 30 November 2017 ("Provisions for the protection of the authors of reports of crimes or violations of which they have become aware in the context of a public or private employment"), Vianova prohibits retaliation against any person who reports or participates in an investigation into possible violations of the Model 231 and this Code of Conduct, as well as of regulations, statutes or other applicable provisions. If you believe you have been subjected to retaliation, contact the Supervisory Body.

Authors

If you have any suggestion for improving our Code, please write to **HR Manager**.

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Listening to our Customers

- take care of Customers' feelings
- feel responsible for the quality perceived by Customers
- anticipate the needs of Customers by adopting a long-term approach
- seek feedback from Customers to improve yourself

(Leadership Model)

4. Company Assets safeguard

Intellectual Property Rights

Vianova's Intellectual Property Rights (IPR) (our trademarks, logos, copyrights, trade secrets, know-how and patents) are among our most valuable assets.

Unauthorized use may result in their loss or significant loss of their value.

Our IPRs are valuable assets that differentiate us from the competition. If we fail to protect and register these rights, we will lose the asset.

We obtain patents to protect our ideas, including technological advances, new products and services.

Each of us must ensure the management of our IPRs and protection against their unauthorized use. Likewise, we must respect the intellectual property rights of others.

What does it mean to me?

We expect you to:

- When creating or developing products or services, ensure that new ideas are always protected by patents.
- Do not disclose new ideas or new projects externally before having protected the related intellectual property rights.
- Immediately pass any IPR-related matters to the **Legal Team**.

Q: In my Team we discuss improvements for existing products and services, but we have not found a place to capture our ideas. Is there such a place?

A: Yes, talk to your direct Manager who will show you how to access the applications for sharing an idea, a new concept or a project proposal.

D: I have had an idea, but I am not sure if it is useful. Can I talk to our Suppliers to find out what they think?

A: No. Initially present the idea to your **team** or your **direct Manager**.

Our Brand

Our Brand is a precious asset and we must protect it by using it consistently.

What does it mean to me?

We expect you to:

- Respect the Brand guidelines defined by the **Marketing Team**.
- Report any suspicions of abuse of Vianova's trademarks, logos or other intellectual property rights.
- Do not allow third parties to use the Vianova logo without first asking the **Marketing Team** for their opinion.

Company equipment

Vianova provides the tools and equipment we need to do our job effectively and rely on us so that the things we are provided with are treated with care, avoiding waste.

Do not use Company Assets for personal activities, unless you have been authorized to do so.

If you are unsure whether a certain use of company assets is correct, ask your **direct Manager**.

The Network

Our telecommunication infrastructures are a key element amongst our corporate assets.

If you have reason to believe that our Network has been hacked or you think your network access password may have been compromised, report it immediately to the **Network Manager**.

Safety

Always protect your personal items, even when you are in the premises of Vianova. Do not tamper with or disable the safety and emergency devices.

Always wear your badge clearly visible while you are on site and if you see someone not wearing it, ask them to show it to you.

If necessary, accompany them at the reception for assistance.

Immediately report any suspicious activity to your **direct Manager**.

5. Privacy safeguard

Privacy compliance is crucial for gaining and maintaining trust of Customers, employees, Partners and Suppliers.

We always take into account the impact of our Privacy decisions.

Whenever we design a product or service, launch campaigns, collect or share information with our Partners or others, we observe and adhere to the following Privacy commitments.

Respect

We value Privacy because it is a value for people that goes beyond compliance with the rules. In fact, it is a question of building a culture that respects other people rights and justifies the trust towards ourselves.

We respect diversity and recognize people the right to define their own level of Privacy.

Honesty

We clearly communicate our actions that may impact on Privacy.

We ensure that our actions reflect what we say and welcome suggestions on actions to take.

Privacy by Design and by Default

Respect for Privacy is a prerequisite in the design, development and release of our products and services.

We process personal data only to the extent and for the period strictly necessary for the intended purposes.

What does it mean to me?

We must all live up to our Privacy commitments.

Depending on your business role, some commitments may be particularly important.

For example:

- If you have access to personal or sensitive data of Colleagues, Customers or Candidates to carry out your duties.
- If you are involved in marketing or business development activities.
- If you are involved in product development activities.
- If your role involves collaborating with the Government, Authorities and Law Enforcement.

Q: I work on a project that involves the use of Customer information that is not specifically protected by law. Do I always have to take Privacy into consideration?

A: Yes. Our commitment to respect Customer Privacy is independent of whether or not there is a law on the matter.

Q: I was contacted by the police with a request for access to personal information. What should I do?

R: Contact immediately the **Legal Team**.

D: I am developing a Vianova application that involves the use of personal data. How do I make sure that the Privacy is protected? Should I just add a Privacy Policy to the application?

R: No. Our "Privacy by Design" and "Privacy by Default" commitment means that Privacy is integrated into our products, not just added. If you believe that the Privacy has not been adequately integrated, talk to the project team that is following the development of the application.

Investing in people

- Share knowledge with Colleagues and Partners
- Devote part of their time to personal training
- Seek feedback and advice from Colleagues and Partners
- Be open to new responsibilities and new challenges

(Leadership Model)

6. Ensuring confidentiality

At Vianova, we manage large amounts of information every day. Protecting the Privacy, information and data concerning Customers, Colleagues, Candidates, Partners and Suppliers is our duty.

Some categories of information, if leaked to the press or to competitors, can harm the launch of our new services, eliminate competitive advantages and increase costs.

Our responsibilities go beyond not disclosing Vianova's confidential material.

We also need to:

1. Protect and properly label our confidential material.
2. Safeguard confidential information received under non-disclosure agreements (NDAs).
3. Take steps to safeguard our trade secrets and those relating to our Intellectual Property.

Confidential information

Make sure that information classified as "confidential" and "for internal use" is handled in accordance with company policies.

Sometimes, a particular project or negotiation may require disclosure of confidential information to a third party. Disclosure of such information should only take place as necessary and only under an NDA.

There are of course "gray areas" where you will need to apply your best judgment to make sure you do not reveal any confidential information. For example, just giving advice to third parties on Vianova's operating methods that are not publicly known would certainly violate our Privacy policies.

If you are in a gray area, therefore pay attention to what advice, suggestions or insights you provide to third parties, or better else, ask your **direct Manager** for guidance.

And do not forget the pictures taken by you and your guests at corporate premises - it is your responsibility to make sure those pictures do not reveal any confidential information.

Finally, some of us will find ourselves in family or other personal relationships with people employed by our Competitors or Suppliers. As in most cases, common sense applies.

Do not say anything confidential to your family members and do not ask them for confidential information about their company.

Partners, Suppliers and Companies of the Group

Just as you care not to disclose Vianova's confidential information, it is important not to disclose any confidential information of our Partners, our Suppliers and Group Companies.

Do not accept confidential information from other companies before all parties have signed an NDA approved by the **Legal Team**.

Even after the agreement is signed, try to accept only the information necessary to achieve your business goals.

Competitors and former Employers

We respect our competitors and want to compete with them honestly. For this reason we don't want their confidential information.

The same applies to confidential information belonging to former Employers of Vianova Employees.

If the opportunity arises to exploit a Competitor's or former Employer's confidential information, do not do so.

Should you come into possession of a Competitor's confidential information, please contact the **Legal Team** immediately.

External communication

Always make sure that your external communications (including videos and social media posts) do not violate privacy, do not disclose confidential information or give the impression that you are speaking on behalf of Vianova, unless you have been authorized to do so by the Company.

Only authorized representatives can provide communications to the press.

Always ask **your Manager's** opinion before accepting any assignment as a speaker at events on behalf of Vianova.

7. Ensuring accounting integrity

Accounting integrity and tax liability are fundamental aspects of our professionalism.

Every person at Vianova - not just Administration & Finance Colleagues - has a role to play in making sure that money is spent properly, that our accounting records are complete and accurate, and that internal audits are regularly performed.

Tax liability

At Vianova, we pride ourselves on our reputation as an honest and law-abiding company.

Protecting company assets is important because it helps to support our capacity for growth and development.

It is equally important to comply with the tax regulations through which our company contributes to supporting the growth and development capacity of our Country and the European Union, also through the correct fulfilment of customs duties and border rights in the event of import or export of goods and products.

Signing a contract

Signing a contract on behalf of Vianova is an important thing.

Vianova always requires written contracts, legally binding and with agreed terms and conditions.

Vianova does not allow "collateral agreements", both verbal and written.

What does it mean to me?

We expect you to commit Vianova only if:

- You are authorized to do so in accordance with the relevant approval process.
- You have sought the necessary legal advice and any other relevant advice from the various teams involved.
- You have carefully reviewed the agreement, including the terms and conditions, and determined that such agreement is in the best interest of Vianova.

Spending company money

A core value of Vianova has always been to spend money wisely.

In general, the Company's money must be spent exclusively for legitimate business purposes and on condition that the expense is worth the benefit.

Our Managers have the additional responsibility of ensuring that their Teams spend company money avoiding abuse and waste.

When evaluating a purchase, it is important to always take into account quality, service, reliability, sustainability, compliance with our Code and any other terms or conditions of supply.

What does it mean to me?

We expect you to:

- Try to find the best value when you spend company money.
- Understand when you can and when you cannot commit the Company's money.
- Purchase goods and services only from Suppliers qualified by Vianova.

Selecting new Suppliers

As Vianova grows, we enter into more and more agreements with equipment and service providers.

We should always seek the best possible deal for Vianova.

This almost always requires you to solicit offers from competing companies to make sure you get the best deal.

Price is very important, but it is not the only factor to consider. The quality, service, reliability, respect for the environment, compliance with labor regulations and, in general, the conditions of the proposed agreement could influence the final decision.

Do not hesitate to contact the **Purchasing Manager** if you have any questions on how to procure equipment or services.

Keep promises

- do everything to honor the commitments made
- check the performance ratios of your department
- produce results in line with expectations
- immediately communicate bad news

(Leadership)

8. Avoiding conflicts of interest

When you find yourself in a situation that could lead you to pursue a personal advantage for yourself, your friends or family at the expense of Vianova or our Customers, you may deal with a conflict of interest.

All of us should avoid conflicts of interest and any situations that might suggest a conflict.

Here are some tips and preliminary observations related to areas where conflicts of interest often arise.

1. Avoid accepting engagements or consultancy agreements from Vianova Competitors.
2. Do not start your own business if it will compete with Vianova or if it can take your time and attention away from your work at Vianova.
3. The business opportunities discovered through your work in Vianova belong primarily to Vianova, unless otherwise agreed with the company.
4. Developing or contributing to the development of external inventions could create conflicts of interest and be subject to the confidentiality clauses provided for in your employment contract with Vianova, in particular if:
 - a. they refer to existing or reasonably expected products and services from Vianova,
 - b. they are about your position in Vianova,
 - c. they are developed using the resources of Vianova.
5. Avoid participating in decision-making process relating to relationships among Vianova and your relatives, spouse or friends. To clarify, a conflict of interest is not present just because a relative, spouse or friend works at Vianova or becomes a Competitor or supplier of Vianova. However, if with your work at Vianova and you are involved in a decision-making process that affects a relative, spouse or friend, such matter could then become sensitive.
6. Depending on the job roles and the respective positions of the co-workers involved, romantic relationships between co-workers can create a real or potential conflict of interest. If a romantic relationship creates an actual or potential conflict, it may require changes to employment arrangements or even the termination of the business relationship/collaboration of one or both of the parties involved.

7. Accepting gifts, entertainment and other business courtesies (including discounts or benefits not made available to all Vianova Employees) from a Vianova Competitor, Partner or Supplier can easily create the appearance of a conflict of interest, especially if the value in question is significant.
8. Avoiding potential conflicts of interest also means that you should not use Vianova's products, services, internal tools or information in a way that would benefit you or someone you know.

In each of these situations, the rule is the same: if you are considering taking actions that could create a conflict of interest, do not do it.

If you find yourself in a situation that could create a conflict of interest or even the appearance of a conflict of interest, you must speak to **HR Manager, Legal Manager** or both.

Finally, it is important to understand that when circumstances change, a situation that previously did not lead to a conflict of interest may lead to it later.

Gifts and hospitality

At Vianova we offer and accept reasonable and proportionate gifts and hospitality as part of a normal business relationship.

However, we prohibit the offer or receipt of excessive or improper gifts or benefits. In fact, we must ensure that we are never influenced and never try to influence with gifts or hospitality.

What does it mean to me?

- You must never offer or accept gifts or hospitality of inappropriate value.
- You must never offer or accept gifts or hospitality during an ongoing sale or purchase negotiation.
- You must never offer or accept money or equivalent.
- You must never ask for gifts or hospitality.
- Giving or receiving gifts must be rare.

9. Law compliance

Corruption

The law prohibits bribery in any kind of commercial scenario.

A bribe is a so called "backhander" or "assisted" payment. Giving or accepting gifts and hospitality could also be considered bribery in some situations.

The following rules apply to Vianova Employees and to anyone authorized to act in the name and on behalf of the Company, such as Agents, Partners and Consultants.

What does it mean to me?

We expect you to:

- Be cautious about offering or receiving gifts or entertainment, especially when public officials are involved.
- Verify that any gift or form of entertainment is permitted by law.
- Be aware that Vianova may be held responsible for your actions.
- Be aware that donations to charities can also be viewed as a bribe if payments are made to "assist" a process or secure a business advantage.
- Refuse to make improper or "assisted" payments.
- Contact the **Legal Team** if you have any concerns.

Q: In two weeks I will be going abroad for work and I need to quickly obtain the renewal of a document. The person who processes my request at the public office told me that she could speed up the process if I pay a small fee in cash. Can I do it?

A: No. It would be an improper payment, that is a form of corruption, and therefore illegal.

Irregular employment

Vianova undertakes to comply with current immigration regulations (Legislative Decree no. 286/98) and requires the same compliance with the law from all its Suppliers.

Gangmastering

The recruitment of staff takes place in accordance with regular employment contracts inspired by the provisions of the applicable National Collective Labor Agreement.

Vianova disapproves the use, hiring or employment of manpower through any form of illegal intermediation - including that sanctioned by art. 603 bis c.p. - and requires the same compliance with the law from all its Suppliers.

Xenophobia and racism

Vianova condemns any act of propaganda or incitement to discrimination or violence for racial, ethnic, national or religious reasons, which are based in whole or in part on denial, serious minimization or condemnation of the Shoah or crimes of genocide, crimes against humanity and war crimes as respectively defined by the Statute of the International Criminal Court, ratified by Law 12 July 1999, n. 232.

Political parties

Vianova does not step in political matters and does not make donations or gifts to political parties.

This corporate policy also applies to our Partners when they act in the name and on behalf of Vianova.

What does it mean to me?

We expect you to:

- Never use your position in Vianova to try to convince other people, inside or outside of Vianova, to make contributions to politicians or political parties.
- Do not support political campaigns, political parties, political candidates or any other affiliated organizations using money from a Vianova bank account.

You do not use your position at Vianova to allow others to use resources such as working time, telephones, communications, services or meeting rooms to support political campaigns, political parties, political candidates or any other affiliated organizations.

Lead by example

- take responsibility for your actions
- appreciate the work of colleagues and support their ideas
- be fair with Customers, Colleagues, Partners and the Company

(Leadership Model)

10. Communicating

We openly and transparently communicate with all interested parties within the bounds of commercial confidentiality.

We protect confidential information from unauthorized disclosure and any authorized disclosure of confidential information should be limited to those who need it to do their jobs.

Telling about the Company

We are proud of our Employees and our Partners and we encourage them to become ambassadors of Vianova while inviting them to respect our Code.

What does it mean to me?

We expect you to:

- Ensure that your internal and external communications are professional, accurate and, if necessary, approved.
- Act professionally when representing Vianova, particularly when you wear Vianova clothing (t-shirt, jacket, etc.), use one of our vehicles or participate in events on behalf of the Company.
- You do not make any statements that could negatively impact Vianova's reputation.
- Do not post personal comments on social networks that could be interpreted, even by mistake, as a comment or an official quote from Vianova.
- Do not disclose confidential information.
- Do not release financial information or information about new products or services without prior approval.

Speaking on behalf of Vianova

We must be aware that our actions or words in public tend to represent the Company to those who look at us from outside.

Even if informal, internal communications must always be professional.

Any public statement to media, social or professional networks, industry analysts and other interested parties must be clear, consistent and issued by authorized personnel.

Q: Can I write on my social profile where I work?

A: Yes. You can disclose that you are a Vianova Employee on your "About" page or bio. Describe clearly which part of the company you represent and what your duties include. You can also include a link to the Vianova website.

Q: In the use of social media, what are the guidelines to follow in summary?

A: The general guidelines are: "Be yourself", "Use common sense" and "Obey the law".

D: A local journalist contacted me through mutual friends asking me for information on this year's report. Can I provide an interview?

A: No. Explain that you are not authorized to publicly comment on Vianova's business operations and put the reporter in contact with the Marketing team.

Team up

- Take care of the feelings of Colleagues and Partners
- Openly admit one's mistakes
- Celebrate successes

(Leadership Model)

11. Safety and Environment

Safety

We expect everyone at Vianova to always behave in a safe and responsible manner.

It is only through collective responsibility that we can guarantee our Customers the use of safe products and services.

What does it mean to me?

We expect you to:

- Always respect the Safety Rules.
- Take action immediately if you see someone acting in unsafe manner.
- Be aware of how your decisions and actions can affect the health and safety of others at work.
- Never compromise the your and others' health and safety.

Safety Rules

1. When driving, we always wear seat belts and respect the speed limits.
2. We never use our mobile phones when we drive.
3. We never work under the influence of alcohol or drugs.
4. We never work on electrical equipment unless we are qualified to do so.
5. When we work at height, we attach the safety harness, use anti-fall devices and wear protective goggles.

Q: You are traveling with a new Colleague and take a taxi at the airport. When the taxi leaves, your Colleague does not wear a seat belt. What should you do?

A: You should remind your Colleague how important it is for their safety to buckle up and insist that they do so.

Q: In the office I often see dangerous things being done that could potentially cause injury. I am not sure I have the authority to stop people and tell them that what they are doing is dangerous. Can I do it?

A: Everyone at Vianova has the authority to stop something dangerous. A person may not realize the danger until you point it out. In general, if it looks dangerous, it probably is.

Environment

Environment is the place where we live.

At Vianova we are proud to "manufacture" services that facilitate remote work by helping to reduce the environmental impact of thousands of client companies.

Wherever possible, we limit our use of resources (i.e. water and energy) and reduce the harmful emissions for which we are responsible.

We reuse and recycle telecommunications equipment and other waste.

We comply with all environmental statutes and standards.

We work together with Customers, Suppliers and Partners to develop products, services and solutions that reduce the impact on the environment.

What does it mean to me?

We expect you to:

- To be familiar with environmental laws, regulations and policies.
- Reduce your waste.
- Leverage the recycling chain.
- Avoid unnecessary travel by making use of conference calls or video conferences if possible.
- Walk or use public transport if possible.
- Consider car-sharing with a Colleague when you need to travel by car.
- Keep the Environment in mind when purchasing something.
- Lead by example by collecting waste and throwing it in the appropriate containers.
- Immediately report any nonconformity or anomaly found within our offices to Colleagues who take care of maintenance.
- To know, respect and contribute to enforcing the rules on prevention and protection from risks identified in the Company (Legislative Decree no. 81/2008).