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# Code of Ethics and Conduct

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Code of Ethics and Conduct of Archiva S.r.l.

# Code of Ethics and Conduct

This Code of Ethics and Conduct (hereinafter also referred to as the "Code") defines the set of values and principles of conduct that Archiva recognizes, adopts and shares with every employee, collaborator, supplier or customer (hereinafter also referred to as "Partner").

## Preamble

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By signing the Code, the Partner approves the principles and rules and undertakes to comply with the relevant provisions.

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## Work, respect for human rights and non-discrimination

Archiva recognizes the central importance of human resources and believes that the professional contribution of its employees is an essential factor in the success and development of the company.

Archiva and its Partner are committed to ensuring respect for human rights and fair working practices in compliance with current legislation, and reject any form of discrimination based on gender, nationality, race, language, orientation, identity, personal and social conditions, religious and political beliefs, philosophical convictions, age or health.

## Sustainability and ESG (Environmental, Social, Governance) principles

Archiva's research and innovation are dedicated to promoting products, services, tools, processes and behaviours that are increasingly conducive to energy efficiency, reducing environmental impact and the sustainability of business activities.

Archiva and its Partner recognise the fundamental importance of socially responsible business practices geared towards compliance with the pillars of environmental, social and governance sustainability as defined by the European Union and adopt measures to promote sustainability and ESG principles, including in the selection of their business partners.

## Health and safety in the workplace

All activities of Archiva and the Partner are conducted in accordance with agreements, laws and regulations relating to the protection of workers' health and safety.

## Protection of tangible and intangible assets

Archiva and its Partners undertake to respect the tangible and intangible assets, and therefore the intellectual property and know-how, of all those with whom they collaborate.

## Conflict of interest and prohibition of corruption

The Partner must refrain from activities, conduct and acts that are incompatible with the commitments related to the relationship with Archiva, behaving in accordance with the principles of good faith and transparency.

Corrupt practices, illegal favours, collusive behaviour, solicitation, directly and/or through third parties of personal and career advantages for oneself or others, are strictly prohibited at Archiva and the Partner.

Archiva has adopted an Anti-bribery Management System and appointed an Anti-bribery Compliance Function with the task of supervising the implementation of the management system itself. The anti-corruption policy adopted by Archiva, which the Partner undertakes to comply with, is available at the following address:

<https://www.archivagroup.com/images/document/Anti-Corruption%20Policy.pdf>

The Partner undertakes to implement appropriate measures to prevent the risk of corruption, including, but not limited to, the adoption of specific rules of conduct and the provision of adequate training.

## Reporting of alleged violations - “Whistleblowing”

Archiva and the Partner undertake to comply with the provisions of current legislation on the protection of persons who report illegal activities.

To this end, Archiva has adopted anonymous reporting systems, details of which can be found in the “Whistleblowing Procedure” published at the following web address:

[https://www.archivagroup.com/images/politiche/NEW\\_Politica\\_anticorruzione\\_ISO37001.pdf](https://www.archivagroup.com/images/politiche/NEW_Politica_anticorruzione_ISO37001.pdf)

## Relationships with suppliers, collaborators and customers

Archiva and its Partners undertake to seek out suppliers and collaborators who demonstrate the appropriate professionalism and commitment to sharing the principles and contents of the Code, and to encourage the development of relationships for the progressive improvement of performance in protecting and promoting the principles and contents of the Code.

## Accounting and financial reporting

Archiva and the Partner undertake to maintain regular financial accounting and accurate reporting in accordance with the principles of accounting transparency.

Where applicable, the Partner assumes the obligations of traceability of financial flows referred to in Law 136/2010 and subsequent amendments.

## Confidentiality and Data protection

Archiva and the Partner shall ensure the utmost confidentiality of the information acquired and/or processed in the course of performing their duties and shall actively contribute to maintaining optimal corporate security standards, refraining from unlawful or otherwise dangerous behaviour and reporting, without undue delay, any activities carried out by third parties to the detriment of the company's assets or human resources.

The processing of personal data, carried out in the course of the activities covered by the contractual relationship between Archiva and the Partner, must be in accordance with the provisions of current national and European legislation on the protection of individuals with regard to personal data (EU Regulation 2016/679 and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018).

## Certifications

Archiva has obtained the certifications available at the following address:

<https://www.archivagroup.com/en/about/security-and-privacy>

The certifications obtained by the Partner are evaluated by Archiva as a preferential element in the selection of its commercial partners.

## Compliance with current legislation, the Code and consequences in the event of violation

Archiva and the Partner shall act in full compliance with applicable regulations, including, by way of example, Legislative Decree 231/2001 and subsequent amendments and additions.

Archiva and the Partner undertake to promote and maintain an adequate internal control system, understood as a set of all the tools necessary or useful for directing, managing and verifying business activities with the aim of ensuring compliance with laws and company procedures, protecting company assets, managing activities efficiently and providing accurate and complete accounting and financial data.

Archiva and Partner personnel, within the scope of their duties and responsibilities, are committed to defining and actively participating in the proper functioning of the internal control system.

If requested, the Partner shall provide, in a timely, complete and prompt manner, the information necessary to enable Archiva to verify compliance with this Code and, in general, with applicable regulations.

The Partner must ensure that its subcontractors also implement the principles of this Code and inform Archiva of any violation, even if only alleged, of the same.

In the event of a breach, Archiva reserves the right to terminate the contract without incurring any liability and, in the event of breaches by Archiva employees, to initiate disciplinary proceedings for the possible imposition of sanctions.

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For review and acceptance.

**The Partner**

**Place and Date**

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Name (for companies) / first and last name (for employees) in block letters

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Signature

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