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# ***ETHICAL CODE***

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Intercom Srl

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## **1. INTRODUCTION**

The INTERCOM SRL company operates on the market with the aim of promoting employment, encouraging opportunities for professional growth, equal opportunities, creating value for members, satisfying customers and enhancing all the people who work there also in compliance with the principle of gender equality. This code expresses the commitments and ethical responsibilities in the conduct of business and corporate activities assumed by managers and employees and by all those who directly or indirectly establish relationships in the name or in the interest of the group and the individual companies that are part of it.

## **2. ETHICAL VALUES**

The company conducts its activities inspired by the principles of correctness, transparency, legality, clarity and respect for people's identity and gender equality. All company activities must be carried out with the utmost care, honesty, loyalty and professional commitment, in compliance with the laws, procedures and company regulations and in compliance with this Code of Ethics. In particular, management and company function managers must behave exemplarily towards collaborators, promote compliance with the rules of this Code of Ethics and undertake to ensure that compliance with the rules dictated by this Code of Ethics is perceived as a substantial part of the contractual relationship.

## **3. CRITERIA OF CONDUCT**

### **3.1 Creating value for members**

Communications to shareholders must be truthful, clear, and complete. Behaviors contrary to these principles will be subject to sanctions. The information and communications addressed to the shareholders are disclosed by the top management or by expressly delegated persons.

### **3.2 Relations with external interlocutors**

Employees who do business with third parties must conduct the relationship fairly and fairly. These principles are valid for customers, suppliers, consultants and individuals who carry out any activity directly or on behalf of the company.

#### **3.2.1 Relations with suppliers**

The selection of suppliers and the formulation of the conditions for the purchase of goods and services are carried out on the basis of criteria based on economy, quality and transparency, granting equal opportunities to each supplier. In the event that the supplier, in carrying out its activity, adopts behaviors that are not in line with the general principles of this code, the company is entitled to take adequate measures until the conclusion of the collaboration relationship. In the choice of suppliers, pressure such as to favor one supplier over another is not permitted. It is forbidden to give or receive in any form, direct or indirect, offers of money or gifts for the purpose of obtaining personal advantages of any kind.

### **3.2.2 Relationships with Customers**

The company pursues the objective of fully satisfying customer expectations and considers it essential that its customers are always treated fairly and honestly and undertakes to guarantee its customers a service that meets an identical quality standard and to periodically monitor the quality perceived.

### **3.2.3 Relations with institutions.**

Relations with the Institutions, necessary for the development of company programs, are reserved exclusively for the company functions delegated for this purpose. They are based on maximum transparency, clarity and fairness.

### **3.2.4 Commercial relations with the Public Administration**

Relations with the Public Administration are managed with the utmost correctness, transparency and rigor. Behaviors that lead to false or ambiguous interpretations are not tolerated.

### **3.2.5 Relations with political organizations and trade unions**

The company does not make direct or indirect contributions to political parties, movements, political and trade union organizations, their representatives and candidates, except those due by current laws and regulations.

### **3.2.6 External relations**

The company recognizes the primary role of clear and effective communication in external relations. Employees in charge of divulging company information externally, in the form of speeches, participation in conferences, publications or any other form of presentation, must comply with company provisions and receive the prior authorization of company management or a delegated person.

### **3.2.7 Relations with the mass media**

External communication is based on respect for the right to information. Communications must be truthful, clear, transparent, unambiguous or instrumental, compliant with corporate policies and programs. Relations with the mass media are reserved exclusively for top management and/or the competent corporate function. Employees must refrain from issuing formal or informal communications to the outside world in any way and take care to communicate any question posed by the media to the authorized persons and/or the competent function.

### **3.2.8 Presents and Gifts**

Employees may not, directly or indirectly, offer or receive presents, gifts, money, payments, gifts of any kind. The gifts have the exclusive purpose of promoting the corporate image. No form of gift is permitted which goes beyond normal commercial practices, or in any case aimed at acquiring preferential treatment in the conduct of any activity connected or connectable to the company. In particular, any form of gift to public officials, auditors, advisers, statutory auditors or their families, which could influence their independence of judgement, is prohibited.

### **3.3 Employee Relations.**

The company protects and promotes the value of human resources in order to improve and increase the skills possessed by each collaborator.

#### **3.3.1 Selection of personnel**

The company is committed to attracting and hiring people with different backgrounds and abilities, pursuing gender equality in the selection and hiring phase through the identification of a list of candidates that tends to be equal between men and women, for which it evaluates the personnel to be hired on the basis the correspondence between the characteristics of the candidates and the profiles necessary for the company needs, in full respect of equal opportunities. Adopt adequate measures to avoid favoritism, nepotism, or forms of clientelism.

#### **3.3.2 Establishment of the employment relationship**

The company hires staff with a regular employment contract. No form of irregular work is permitted. Upon establishment of the employment relationship, each collaborator receives accurate information on:

- characteristics of the function and tasks to be performed;
- regulatory and remuneration elements based on current legislation;
- rules and procedures regarding safety in the workplace;

- training and information on the company's Code of Ethics and Anti-Corruption Code;

### **3.3.3 Personnel management**

The company rejects any form of discrimination against its collaborators. Access to roles and assignments is established, considering skills and abilities. Compatibly with the efficiency of the company, those forms of flexibility in the organization of work are favored, which facilitate the management of maternity leave and childcare in general.

The annual performance assessment system, linked to the corporate welfare plan, encourages constant dialogue between Managers and Collaborators, reinforcing everyone's commitment to the company's objectives and challenges. During the process, the creation of Development Plans without any gender discrimination is also promoted, favoring a constructive discussion aimed at accountability, thanks to the use of feedback understood as continuous improvement. The company undertakes to include the Diversity and Inclusion dimension within the Leadership Model and consequently in the Performance Management system.

### **3.3.4 Training, professional development and communication**

The company undertakes to offer equal development opportunities without any gender discrimination, defining transparent and consistent standards with the Performance Management and Talent Development processes. Training sessions are provided for all employees aimed at making the organization aware of the issue of valuing differences, gender equality, inclusion and the impact these issues have on business. Lastly, the company undertakes to involve both women and men equally in all initiatives and training courses in the training courses that will be held during the year.

### **3.3.5 Enhancement of potential and career paths**

The company promotes a culture based on meritocracy and respect for people regardless of gender. Ensures that an adequate selection of candidates of the less represented gender takes place in the Talent Development and Succession Planning processes, with the aim of achieving gender balance in managerial positions. The company therefore undertakes those women and men, to an equal extent compatibly with the average size of the company, are represented in the internal appointment processes and, therefore, that the short lists of candidates for managerial positions are equally represented by both genders.

### **3.3.6 Definition of short and medium-long term remuneration policies**

The company's remuneration policy contributes to the achievement of the company's mission, values and strategies, through the promotion of actions and behaviors that respond to the company's culture, in compliance with the principles of plurality, equal opportunities, valorization of people's knowledge and professionalism, fairness and non-discrimination as set out in this Code of Ethics. The periodic remuneration interventions, the processes and the short and long-term incentive systems are anchored to principles of recognition of the responsibilities assigned, the results achieved and the quality of the profuse professional contribution, taking into account the context and market references applicable for positions similar or for roles of a similar level in terms of responsibility and complexity.

### **3.3.7 Management aspects related to work organization**

The company is committed to improving the work-life balance of its employees at all stages of the person's personal and professional life. It also supports employees during and after periods of long absence from work, avoiding any discrimination during and after the leave, allowing them to stay in contact with the Company during the same and favoring reintegration at the end. Lastly, the company is committed to preventing sexual harassment in the workplace through a dedicated awareness-raising process on gender-based harassment that creates awareness in people and guides them in their daily behavior.

## **4. CONDUCT IN THE WORKPLACE**

### **4.1 Conduct**

Every employee is expected to perform their duties responsibly, honestly, diligently and in accordance with company policies, procedures and company directives.

### **4.2 Mutual respect**

The company promotes an internal climate in which employees interact with full mutual respect.

Employees must act in the performance of their work and in interaction with colleagues in a respectful manner, avoiding any form of harassment, vexatious conduct in the workplace and direct and indirect discrimination based on gender, nationality, ethnic origin, genetic characteristics, language, religion or belief, personal or political beliefs, membership of a national minority, disability, social or health condition, age and sexual orientation.

### **4.3 Safety and Health**

The company undertakes to manage its activities in full compliance with current legislation on occupational safety and prevention and strives to guarantee a healthy and safe work environment, by adopting all the necessary measures.

## **5. CONFLICT OF INTEREST**

### **5.1 General principles**

The company bases relations with its employees on mutual trust and loyalty. Employees must pursue, in the performance of their work, the corporate objectives and interests, avoiding in any way to place themselves in situations of conflict with the corporate interest.

### **5.2 External work activity**

Employees, collaborators, must avoid all those activities that are in conflict of interest with the company, with particular reference to personal or family interests that could influence the independence in carrying out the activities assigned to them with risks on the achievement of the best corporate interest. It is therefore an obligation for each employee and collaborator to report situations of conflict of interest.

### **5.3 Use of Inside Information**

Employees who, in the normal performance of their business activities, become aware of confidential information relating to the Company cannot use it for personal, private or economic purposes. Such uses, as well as constituting a moral and ethical issue, are legally punishable.

## **6. VIOLATIONS**

In the face of ascertained violations of the provisions of the Code of Ethics, adequate sanctions will be adopted in line with the provisions of the national collective labor agreements. Each employee must report any news relating to violations of the Code to their direct superior. If, for justifiable reasons or opportunities, direct reference to one's immediate superior is deemed inadvisable, it will be the responsibility and responsibility of the employee to communicate directly with the Chief Executive Officer and/or the Board of Directors. All requests will be answered promptly without there being any risk for the employee of suffering any form, even indirect, of retaliation. Anyone who reports alleged violations of the Code of Ethics not in good faith will be sanctioned in accordance with the same.

## **7. ENTRY INTO FORCE. COMMUNICATION and PUBLICATION.**



This Code of Ethics enters into force upon its approval by the Board of Directors. Any subsequent changes or additions must be approved by the Board of Directors.

This Code entered into force on January 2023, following approval by the Board of Directors and appropriate training carried out to the company's employees.

This Code will also be published on the company's institutional website.