



Group Code of Ethics

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**Approved by the Board of Directors of Objectway S.p.A
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1 COMPANY PROFILE

The Objectway Group (hereinafter also referred to broadly as '**Objectway**') is a pan-European wealth & asset management software and services company, listed among the Top 100 global FinTech providers.

For over 30 years, the Objectway Group has built partnerships with retail and private banks, wealth managers and asset managers of all sizes in more than 15 countries in Europe and around the world. Building on its extensive experience, technology solutions and services, the Group supports them in implementing digital transformation programmes designed to optimise their performance.

2 CONTENTS AND OBJECTIVES OF THE DOCUMENT

The Code of Ethics is a document that outlines, lays down and shares the set of ethical values that inspire the Objectway Group and the standards of conduct to be observed. The Code is an essential instrument of corporate ethics and its observance by Recipients is crucial to ensure the proper operation, reliability and reputation of the Group.

The drafting of a Code of Ethics contributes to the effective prevention, detection and countering of the breach of laws, regulations and internal provisions.

Limited to the company Objectway S.p.A. (hereinafter also referred to as the 'Company'), the Code is also an integral part of the Organisation, Management and Control Model (hereinafter also referred to as the 'Model' or '231 Model') and is designed to prevent criminal conduct pursuant to Italian Leg. Decree 231/2001 and related rules. Its effective implementation may contribute to exempting the Company from liability for the perpetration of offences.

The Group's aim in drafting and disseminating the Code of Ethics, therefore, is to share its values with the entire corporate population of every Group company and with the third parties interacting with them for various reasons. This allows standards of conduct to be identified and disseminated as a point of reference and of debate for every action implemented and every decision made by those working within the Group, regardless of their role and hierarchical position. Objectway undertakes to comply with the Code and enforce its compliance within the organisation, requiring its suppliers to share the values contained therein.

2.1 Recipients

The principles and contents of the Group's Code of Ethics must guide the conduct of employees, including executives, contract workers (regardless of their contractual relationship with the Group companies), directors and auditors, suppliers, contractors, customers and, in general, all other stakeholders of the Group companies (hereinafter collectively referred to as the 'Recipients') in order to ensure the proper operation, reliability and integrity of the Group and its business model.

Each Recipient is personally required to comply with the provisions of the Code, but is also accountable for checking that their staff comply with the Code's principles, in view of their role within the corporate structure.

Compliance with these provisions is essential for the proper performance of work and professional services. The provisions are imperative obligations of diligence, loyalty and impartiality that are required from all Recipients: their violation is a breach of contract, which may give rise to all envisaged sanctions, as set out in Chapter 9.3 below.

2.2 Territorial Scope

The Code is valid both in Italy and abroad, subject to any adjustments that may be necessary or appropriate in the countries in which the Group's companies are based and in the countries in which the Objectway Group will directly operate. In the event that even one of the provisions of

the Code should conflict with provisions set out in the internal regulations or procedures of individual subsidiaries, the former shall prevail over the latter.

2.3 Reviews

Rev.	Changes	Date
1.0	First Edition	29/09/2017
2.0	Update	08/03/2023

3 OUR VALUES

With a view to guaranteeing the responsible and transparent conduct of its activities and ensuring the operation of its corporate governance system, any action taken by Objectway in its relations with all the Recipients must comply with the following fundamental values:

- ❖ Legality and integrity
- ❖ Transparency
- ❖ Innovation and digitisation
- ❖ Environmental protection
- ❖ Respect for the Person

3.1 Legality and Integrity

Objectway considers the compliance with Italian, foreign and supranational regulations applicable to each Group company to be essential. Accordingly, it is committed to ensuring that its employees and contract workers comply with legal provisions, demanding the same guarantees from its external stakeholders.

Furthermore, Objectway believes that the pursuit of its own interest can under no circumstance justify conduct that is contrary to the principles of fairness and honesty. For this reason, it requires all its employees and contract workers to act loyally and in good faith, basing their conduct on respect, cooperation and collaboration with its stakeholders.

3.2 Transparency

Objectway believes it is essential to ensure transparent dialogue with all its stakeholders. In support of this commitment, it makes every effort to ensure that all the activities, actions, transactions and operations relating to each Group company are adequately traced and documented, and that all information on the performance of the Group - on which it is appropriate to report - is provided to the interested parties in a clear, complete and accurate manner, in order to build and maintain relationships of trust with its stakeholders.

3.3 Innovation and Digitisation

Building on over 30 years' experience in helping financial operators modernise and digitalise their technology platforms and operations, Objectway's vision is to steer and promote technological innovation in the banking and wealth & asset management sector, by developing and delivering to European and international financial operators high quality, cutting-edge software products and IT services to accelerate their digital transformation process and optimise their performance.

3.4 Environmental Protection

Aware of the role that a business organisation plays in helping to protect the planet and preserve the environment for future generations, Objectway constantly strives to promote environmental sustainability initiatives aimed at containing energy consumption and reducing waste.

3.5 Respect for the Person

The protection of individuals and respect for human dignity are primary values: for this reason, Objectway condemns any behaviour that may cause or contribute to cause injury to an individual's physical or moral integrity.

Objectway particularly promotes a culture aimed at inclusion and the value of diversity, condemning any discriminatory attitude based on social, cultural, ethnic, religious, psychological, gender-based, sexual orientation or other reasons.

On the contrary, Objectway believes that the diversity that distinguishes its human resources is an added value and that an inclusive and happy working environment is a success factor for achieving excellence.

4 RULES GOVERNING RELATIONS

The conduct of all parties who hold relations with the Group, whether internal or external to the corporate structure, must be based on compliance with the fundamental values and the principles set out in this Code of Ethics. While some values and principles may be applied to all Group stakeholders, others are more targeted to ensuring the proper management of relations between Group companies and a specific category of Recipients. The purpose of the following paragraphs is to define, firstly, the absolute principles that Objectway applies to all stakeholders and at the same time requires from all Recipients. Then, the duties and prohibitions of relevance for specific categories of stakeholders are detailed.

4.1 Management of Confidential Information

Objectway guarantees that the confidential and privileged information that it will come into possession of in the course of its business will be treated with utmost confidentiality. Employees, including senior management, members of corporate bodies and external staff, are contractually bound to keep the information they have acquired and processed during their employment or work relationship with the Group company they belong to strictly confidential, and have received adequate training in this regard.

Confidential information that is in Objectway Group's possession shall not be used for purposes unrelated to Objectway's business or in a way that exceeds the agreed limits. It is prohibited, therefore, to disclose and disseminate confidential information both inside and outside the Objectway Group, unless in compliance with applicable regulations and corporate procedures, and with contractually agreed terms.

4.2 Personal Data Processing

In line with the requirements for handling confidential information, Objectway also guarantees the confidentiality of the personal data in its possession, including data relating to its employees, in compliance with the provisions of law and the contractual provisions with data subjects and customers. All personnel, especially the persons responsible for processing personal data, are contractually bound to keep the data acquired and processed during their employment or work relationship with the Group companies strictly confidential.

The personal data in Objectway's possession shall under no circumstance be used for purposes other than those defined. For this reason, it is prohibited to disclose and disseminate personal data, both inside and outside each Objectway Group company, unless in compliance with applicable regulations and corporate procedures and with contractually agreed terms.

4.3 Information Security

The Group companies guarantee high security levels when selecting and using their information technology systems for the processing of personal data and handling of confidential information. They also implement all the most appropriate security measures to ensure that data are fully protected, in compliance with applicable regulations and in accordance with the

best international standards. Objectway believes that this is essential to protect the information in its possession and crucial for the effective development of the company's policies and business strategies.

4.4 Conflict of Interest Prevention and Management

Objectway considers integrity and professional diligence to be key factors for its reputation. For this reason, the Objectway Group and its companies strive to prevent any situation of conflict of interest¹, whether real or merely potential², from arising in the performance of its activities, ensuring the separation of decision-making, accounting and control roles, and conducting preliminary checks on the eligibility of the persons expected to hold specific positions.

It is possible however that such conflict may nevertheless arise: in such cases, whoever finds themselves in such a situation (whether the conflict arises as a result of personal interests of an economic or financial nature, or interests of other nature, such as, by way of example, close interpersonal relations) shall promptly inform the Legal Department and refrain from taking any decisions.

This makes it possible to assess the degree of severity and the impact on the performance of activities, in accordance with the corporate operating procedures in force, thus avoiding to take impartial decisions or potentially detrimental decisions for the Group, its member companies and their stakeholders.

4.5 Competition, Free Competition and Prohibition of Corrupt Practices

Objectway recognises the crucial importance of a competitive market and does not engage in conduct or enter into agreements with other companies that could adversely affect the system of competition between the various operators in the reference market, in compliance with national and EU antitrust regulations, guidelines and directives issued by the Antitrust Authority.

More specifically, the Group's companies and the Recipients shall avoid practices (creation of cartels, market sharing, limitations on production or sales, conditional agreements, etc.) resulting in the violation of competition laws. They shall also avoid engaging in other types of conduct that may lead to a distortion of competition in the acquisition of goods and services, for example, by bribing public and private contractual counterparties.

Objectway adopts principles of conduct inspired by the fight against any type of bribery in the interaction with its stakeholders, whether parties belonging to the Public Administration or

¹A 'conflict of interest' arises when an employee has a personal secondary interest (financial or other) that interferes with the primary public interest that the employee, by virtue of his/her official duties, is required to pursue. The existence and intensity of this interference depends on the position/role of the person bearing the secondary interest and the relevance of that interest.

Secondary interests that may occur include:

- both economic-financial interests, subject to asset evaluation, and interests of a different nature, provided they are able to lead to actual advantages or benefits for the persons covered by the regulation;
- not only the employee's direct personal interests, but also the interests of persons related to the employee by family ties and connections, such as to assume that the employee is inclined to protect them as his/her own.

² Understood as a circumstance whereby the personal interest of an employee or contract worker may affect the fairness and impartiality of the decisions and activities to be performed for reasons of office or may simply raise doubts in third parties in this respect.

private parties: this is reflected, in operational terms and merely by way of example, in the prohibition to accept or offer any benefit or gift, in whatever form, that may be construed as a bribe to influence the independence of judgement and conduct of the parties involved. These requirements cannot be circumvented by using other forms of contributions - such as sponsorships, appointments, consulting, advertising or other forms - having the same illegal purposes.

Exceptions to this prohibition are gifts and entertainment expenses, provided they are customary within the company, of modest value, adequately documented and justified, and do not compromise the integrity and the ethical and professional reliability of the parties involved.

Finally, all Recipients shall refrain from using undue pressure, threats, acts of violence, fictitious devices, fraudulent means or conduct that may however prevent or disrupt the performance of the commercial and business activities of other parties or the free exercise of competition on the market.

4.6 Anti-Money Laundering

Objectway undertakes to comply with all national and international anti-money laundering rules and provisions.

Managers, employees, contract workers and other third parties who hold relations with Objectway shall in no way and under no circumstance engage in conduct that entails the risk of involvement in money laundering from illegal or criminal activities. To this end, all cash payments are strictly forbidden in the Objectway Group except for payments that are customary within the company, of modest value, and adequately documented and justified.

4.7 Rejection of all Forms of Terrorism and Subversion of the Democratic Order

Objectway rejects all forms of terrorism and takes appropriate measures in the course of its business to prevent the danger of involvement in acts of terrorism, contributing to the promotion of the principles of democratic order. For this purpose, Objectway undertakes not to establish any work or business relationship with persons, whether natural or legal persons, at risk of involvement in acts of terrorism, and not to finance or however facilitate any of their activities.

4.8 Fighting Organised Crime

In performing activities, it is forbidden to take advantage in any manner whatsoever of situations of environmental subjugation leading to unequal negotiation conditions.

It is forbidden to hold relations in any capacity whatsoever with persons who may belong or be closely related to mafia-type associations and/or organised crime in general.

4.9 Copyright Protection

In carrying out its business, Objectway avoids any third-party copyright infringement, condemning all possible forms of counterfeiting or piracy of instruments or signs of

authentication, certification or recognition, trademarks, distinctive signs, patents, designs or models, and requiring whoever works in the interest of the Group's companies to comply with all applicable regulations protecting them.

The Group companies also condemn the reproduction of software, photos, images, music or audio-visual compositions, or works however protected by the copyrights of others apart from whatever authorised in the licence agreements previously obtained.

4.10 Environmental Sustainability

Objectway establishes corporate policies to promote environmental sustainability. In this regard, it raises awareness in staff on the responsible use of all the resources they need to perform their activities and on the reduction of consumption and waste, encouraging the use of recyclable materials and recommending the moderate use of printed paper, also with the aim to limit the production of special waste (e.g. toner); it encourages its employees to use alternative transport instead of cars and has signed special agreements with local transport companies; it promotes the reduction of plastic consumption, providing its staff with reusable eco-friendly water bottles.

In addition, Objectway uses equipment with lower energy consumption: replacement of desktop PCs with notebooks; enabling of energy-saving stand-by functions for monitors and PCs after a short period of inactivity; use of certified printers and photocopiers that guarantee low consumption and respect for the environment and are shared over a network serving several users and with active 'energy-saving' functions; and the installation of presence detectors that allow lighting to be switched off automatically.

4.11 Occupational Health and Safety

Objectway is committed to ensuring that the company environments in which its employees work are suitable for safeguarding their health, safety and integrity, in accordance with national and supranational laws and regulations in force for each Group company. To this end, Objectway ensures that functions are identified and set up that have the necessary technical expertise and powers for verifying, assessing, managing and controlling risk.

In support of this policy, all Recipients are required to comply with all occupational health and safety rules and procedures.

The principles and criteria on which the occupational safety management system is based are specified below:

- a) avoid risks;
- b) assess risks that cannot be avoided;
- c) mitigate risks at source;
- d) adapt work to man, especially as regards designing workstations and choosing work equipment and work methods;
- e) take into account the level of technological developments;

f) give appropriate instructions to workers.

Under no circumstance shall compliance with safety measures be subordinated to the interest in accomplishing the work and delivering it on time.

5 RULES GOVERNING STAFF RELATIONS

5.1 What We Provide to our Staff Members

At every stage of its relationship with human resources, from their recruitment to the end of their contract, each Group company ensures compliance with the fundamental principles listed below.

5.1.1 Non-discrimination and Respect for Diversity

Objectway recognises the value of its human resources and the key role they play in achieving the Group's objectives. In order to ensure the best possible working conditions, each Group company undertakes to ensure that its employees and contract workers enjoy a healthy professional environment, and to contrast and condemn every kind of discrimination, physical or psychological violence, harassment and, in general, any conduct detrimental to personal dignity.

This aim is pursued in its relations with staff right from the recruitment and selection phase. The Group companies conduct a fair recruiting process: they exclusively assess the applicants' professional background, their previous experience and their suitability for the open position, and do not make any discrimination related to their ethnic or racial origin, gender, sexual orientation, religious beliefs or any other personal aspect that does not affect the requirements needed to fill the position being offered. Companies shall also take all appropriate measures to ensure that favouritism, nepotism or other forms of patronage are avoided during personnel recruitment and selection.

5.1.2 Formalisation of Employment Relationship and Remuneration

Group companies offer their employees and contract workers regular employment contracts, refusing any form of undeclared work or work circumventing existing provisions, including the employment of personnel who do not fulfil the requirements of immigration regulations. They provide their staff with adequate remuneration; career advancement within the Group is ensured in accordance with the principle of meritocracy and rewards the excellence of our people through target-based incentive plans.

5.1.3 Training and Engagement

Throughout the term of employment or contract work, each Group company undertakes to support the wellbeing of all staff, through team building initiatives aimed at building a healthy and inclusive working environment and staff engagement.

Objectway firmly believes in the need to invest in the professional and skills growth of its staff: for this reason, it intensively invests in organised training activities.

5.1.4 Work-life Balance

The Group believes that fostering respect for the personal lives of its staff is a crucial aspect and is committed to providing the means to guarantee a balance between private and family life and

work. To achieve this, it has adopted remote working and flexibility policies that allow the company to balance its needs with those of the employee.

5.2 What We Ask from our Resources

The Objectway Group requires all staff, regardless of the nature of their professional relationship, to comply with the obligations set out in the Code of Ethics - which are essential for properly conducting their work. The conduct of employees and contract workers must therefore be based on compliance with the law and the Group's values. Specifically, their conduct must be inspired by the following principles, avoiding behaviour that may create an intimidating environment and maintaining a work environment that respects the dignity of all staff.

5.2.1 Compliance with Internal Policies

The Group's companies have set up procedures and policies which may be applied in some cases to all staff and in others only to staff belonging to specific areas. Each employee and contract worker undertakes to comply with those applicable to his/her own professional role and those applicable to the entire company population.

5.2.2 Prohibition of Competition and Negative Advertising

It is forbidden for all employees and contract workers to hold relations with or provide information to other companies which may damage or harm the Objectway Group or one or more of its member companies. Employment contracts also include a non-competition clause that prohibits staff from providing consultancy, studies and collaboration services to sector operators - including activities carried out free of charge - unless expressly authorised by the Group's reference company.

6 RULES GOVERNING CUSTOMER RELATIONS

Objectway manages its relations with customers and potential customers according to principles of cooperation, helpfulness, professionalism and transparency, with due respect for the confidentiality of information and the protection of personal data, in order to lay the foundations for a solid and lasting relationship based on mutual trust.

All Group companies share extensive, truthful and accurate information about their services with customers and potential customers, and provide such information according to proposed standards of excellence, in order to ensure that customers and end-users make informed choices and are fully satisfied with the services.

Each Group company ensures that the agreements it concludes with customers shall comply with legal and regulatory provisions, whether general or sector-specific, national or supranational, and be based on criteria of simplicity, clarity and completeness. Each Group company ensures the traceability of both completed and ongoing activities during the performance of the agreements, making it possible to constantly monitor their progress.

In order to ensure compliance with the proposed standards, the Objectway Group assesses the quality of its services and their full compliance with the standards and with its commercial communications. The Group also gives timely feedback to any suggestions or requests from its customers.

7 RULES GOVERNING RELATIONS WITH SUPPLIERS

7.1 Selection of Suppliers

The selection of suppliers and the definition of the purchase conditions for goods and services for the Group's companies are driven by values and parameters of competition, objectivity, fairness, integrity, ethics, respectability and reputation, impartiality, fairness of price, quality of the good and/or service, and by accurate assessment of the guarantees provided by the potential suppliers and the general range of offers.

The meeting of these requirements is checked both prior to establishing the contractual relationship with suppliers and subsequently, during the contractual relationship.

Supplier selection processes are geared towards seeking the maximum competitive advantage for the Group and its member companies, and are conducted impartially towards all suppliers meeting the necessary requirements. Objectway only uses suppliers that, in accordance with the provisions and regulations adopted by the Group companies, comply with current occupational health and safety provisions, and whose personnel fulfils the requirements of local immigration regulations.

A further essential condition when assessing a potential supplier is the supplier's willingness to adhere to the contents of the Code of Ethics and to comply with current regulations. Objectway requires potential suppliers to act according to principles of transparency, fairness and good faith when conducting negotiations prior to the conclusion of commercial agreements. The companies reserve the right to conduct all appropriate checks on the truthfulness and completeness of the information shared by the supplier during the negotiations.

7.2 Contractual Relationship with Suppliers

The stipulation of agreements with suppliers shall always be based on transparency, professionalism and utmost cooperation, avoiding, where possible, undertaking contractual obligations that involve forms of mutual dependency. The products and/or services provided must result from actual business needs and be justified and detailed in writing by the persons in charge of making the expenditure commitment, within the limits of the available budget.

By entering into the agreement, suppliers undertake to adhere to the principles set out in this Code of Ethics and to comply with its provisions in performing their services, with particular but not exclusive reference to compliance with the laws on intellectual property protection, consumer protection, free competition and the market, and with the laws against corruption, money laundering and organised crime. Breach of the contents of the Code shall constitute breach of contract and may lead to all appropriate consequences, including compensation for any damages suffered by the Group and/or its member companies.

On conclusion of the relationship and in all cases before payment of the relevant invoice, Objectway shall check the quality, adequacy and promptness of the service received and the

fulfilment of all the obligations assumed by the supplier, ensuring that the supplier has also complied with the requirements of tax regulations.

8 Rules governing Relations with the Public Administration

In order to guarantee utmost fairness and transparency towards the Public Administration, relations with it will be held exclusively through identified persons who are not in a situation of conflict of interest with the representatives of the Public Administration and who guarantee the highest diligence and professionalism.

Objectway ensures that the documentation to be sent to Public Bodies shall be drafted so as to provide clear, accurate, complete, faithful and truthful information. It also ensures that its relations with public officials are based on utmost transparency, cooperation and helpfulness, with full respect for their institutional role and avoiding any behaviour that has the purpose, or even merely the effect, of hindering the exercise of the Public Administration's duties.

In addition to ensuring full compliance with the principles outlined above, Objectway condemns any conduct seeking to benefit from any type of contribution, funding or other disbursement (from the State, the European Community or any other national or foreign Public Body) by means of altered or falsified statements and/or documents or, by means of omitted information or, more generally, by means of artifice or deception, including through use of a computer or data transmission system, aimed at misleading the disbursing Body. All Group companies also undertake to correctly manage all loans, grants and subsidies that have been granted and ensure transparent reporting on the activities carried out.

9 Implementation of the Code of Ethics: Control and Sanctions

9.1 Checking Correct Application of the Code

The Board of Directors of the parent company Objectway S.p.A. has assigned the Group's Compliance Department with the task of supervising the proper operation and updating of the Code of Ethics.

To ensure that the Compliance Department performs its tasks properly, it shall have free access to data and information on the relevant Group companies. It is the duty of all Recipients to provide their utmost assistance and support for the performance of these tasks, so that the Group Compliance Department can effectively promote the dissemination and knowledge of the Code and contribute to the prevention or suppression of any breaches thereof.

Interested parties may contact the Group Compliance Department to request clarification on the contents and application of the Code, by e-mail at compliance@objectway.com.

9.2 Reporting Breaches

Persons who become aware of a breach by another person of the principles and contents of this Code are invited to promptly report the breach using the channels set up by Objectway for reporting potential wrongdoing (whistleblowing).

9.3 Disciplinary Sanctions and Contractual Remedies

Compliance with the rules of this Code of Ethics is an essential part of the contractual obligations of each Group company, as regards both internal and external parties, due to the specific standard clauses provided for by the Objectway Group in all existing contracts.

Any breaches of this Code shall therefore be subject to the sanctions provided for by the law, the relevant National Collective Labour Agreement and any Disciplinary System adopted by each of the companies.

Any conduct by staff and suppliers contrary to the rules of this Code may give rise to suitable contractual remedies, including immediate termination of the contractual relationship, in addition to any compensation for the damages suffered.

9.4 Dissemination of the Code of Ethics

This Code of Ethics is brought to the attention of all Recipients by means of publication on Objectway's corporate website www.objectway.com and sharing on the company intranet.

Objectway reminds all Recipients that under no circumstance shall acting for the benefit of Objectway Group or its member companies justify conduct that goes against the Code.

It is therefore the duty of all Recipients to operate in application and respect of the provisions of the Code of Ethics, refraining from any conduct contrary to its contents.

9.5 Amendments and Updates to the Code of Ethics

Objectway ensures that its Code of Ethics is periodically updated to bring it into line with any regulatory, corporate or organisational changes that may require amendments or supplements. Should such amendments or supplements be necessary, they shall be made using the same method for their initial approval, i.e. by resolution of the Board of Directors of the parent company, and shall be implemented by the executive bodies of each subsidiary.