

## CODE OF ETHICS

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## **Premise**

Rewave Srl, having adopted this code of ethics (the "Code"), in the context of its activities and business conduct, adopts as guiding principles the respect for laws and regulations of reference countries, as well as internal norms, within a framework of integrity, correctness, and confidentiality. It also aims to reconcile the pursuit of market competitiveness with respect for competition regulations and to promote, from a perspective of social responsibility and environmental protection, the correct and functional use of resources.

The Company is committed to disseminating the Code, periodically updating it, and making available every possible instrument that favors its full application.

This Code of Ethics is brought to the attention of all those with whom Rewave maintains relationships.

## **Recipients and Scope of Application**

The Code's provisions apply, without any exception, to all Company employees and to all those who, directly or indirectly, permanently or temporarily, establish relationships or work to pursue its objectives (hereinafter the "Recipients").

Recipients must adequately inform third parties about the obligations imposed by the Code, demand their compliance, and adopt appropriate initiatives in case of non-fulfillment.

## Ethical and Behavioral Principles

### General Principle

Relationships and behaviors at all levels must be based on the principles of honesty, correctness, integrity, transparency, and mutual respect, and must be open to verification and based on correct and complete information.

Every employee must commit to respecting the laws and regulations in force in all countries where Rewave operates.

### Principle of Loyalty and Faithfulness

Rewave maintains a relationship of trust and mutual loyalty with each of its employees.

In this sense, the obligation of loyalty involves for each employee the prohibition of:

- 1) Taking up employment under a work relationship with third parties, consulting assignments, or other responsibilities on behalf of third parties, without prior written authorization from the company;
- 2) Carrying out activities contrary to the company's interests or incompatible with office duties.

Finally, all employees must consider compliance with the Code of Ethics as an essential part of contractual obligations within the context of trust and loyalty.

### Principles of Impartiality and Conflicts of Interest

Recipients must avoid situations and/or activities that could lead to conflicts of interest with those of the Company or that could interfere with their ability to make impartial decisions, safeguarding the best interests of the company.

In relationships between the Company and third parties, Recipients must act according to ethical and legal standards. Relationships must be managed without resorting to illicit means. Practices of corruption, illegitimate favors, collusive behaviors, and solicitations of personal advantages for oneself or others are explicitly prohibited.

It is mandatory to report to one's superior, if an employee, or to the internal reference point if a third party, any information that could suggest a potential conflict with the company's interests.

### **Confidential Information and Privacy Protection**

Information of a confidential nature, relating to data or knowledge belonging to the Company, must not be acquired, used, or communicated except by authorized persons, generally or specifically.

By way of purely illustrative and non-exhaustive example, the following are considered confidential information: work projects, including commercial, industrial, and strategic plans, information regarding know-how and technological processes, financial operations, operational strategies, investment and disinvestment strategies, operating results, personal data of employees, and lists of clients, suppliers, and collaborators.

Moreover, in compliance with privacy legislation, Recipients must commit to protecting information generated or acquired and to avoiding any improper or unauthorized use.

## Human Resources Development

People are an indispensable element for the existence of the company. The dedication and professionalism of management and employees are values and determining conditions for achieving Rewave Srl's objectives.

Rewave Srl commits to developing the capabilities and competencies of management and employees so that, within the work performance, the energy and creativity of individuals find full expression for realizing their potential, and to protecting working conditions both in protecting the worker's psycho-physical integrity and in respecting their dignity. Illicit conditioning or undue discomfort are not permitted, and working conditions that allow the development of the person's personality and professionalism are promoted.

Rewave Srl commits to offering, in compliance with legal and contractual regulations, equal work opportunities to all workers, ensuring that everyone can enjoy fair regulatory and economic treatment based solely on merit and competence criteria, without any discrimination.

Rewave guarantees freedom of trade union association.

## Personal Protection

Rewave Srl carries out its activities in harmony with current legislation protecting working conditions. All Recipients, within their duties, commit to conducting their activities based on risk prevention and protection of the health and safety of themselves, colleagues, and third parties.

Relationships between company employees must be based on the principles of civil coexistence and must take place with mutual respect for the rights and freedoms of individuals. In particular, no discrimination or retaliation shall be made for reasons of nationality, religious belief, political and trade union membership, language, and gender. In this sense, each Recipient must actively collaborate to maintain an atmosphere of mutual respect for the dignity and reputation of each individual.

Relationships between different levels of responsibility must take place with loyalty and correctness, respecting professional confidentiality. Heads of organizational units must exercise the powers associated with their received delegation with objectivity and balance, adequately caring for the well-being and professional growth of their collaborators. In turn, all employees must provide maximum collaboration to their superiors, diligently observing the work instructions given to them.

All Rewave Srl personnel must personally contribute to promoting and maintaining an atmosphere of mutual respect in the workplace; particular attention is paid to conditions of respect and sensitivity towards others.

Being or finding oneself under the influence of alcoholic substances, narcotic substances, or substances of similar effect during work performance and in workplace environments will be considered a conscious assumption of risk of prejudicing such environmental characteristics.

## **Child Labor**

Rewave does not employ workers below the minimum age of 16 years, or who are not yet free from school obligations. Rewave respects current regulations, particularly Law No. 977/1967, modified by Art. 5 of Legislative Decree No. 345/1999 and Legislative Decree 262/2000.

### **Forced Labor**

Rewave, in compliance with current legislation, does not use forced or compulsory labor (Convention 29 on Forced Labor, 1930; ratified on 18/06/1934 with Law 29/01/1934, n. 274)

### **Environmental Protection**

Recipients, in carrying out their functions, commit to respecting current regulations on environmental protection and promote a conduct of their activities focused on the correct use of resources and respect for the environment.

### **Protection of Company Assets**

Each Recipient is directly and personally responsible for the protection and conservation of physical and intangible assets and resources, whether human, material, or immaterial, entrusted to them to carry out their tasks, as well as their use in a proper manner consistent with social interests.

No assets or resources owned by Rewave Srl may be used for purposes other than those indicated by the company itself.

To protect company assets, the company's external perimeter is constantly monitored through cameras and security systems.

### **Control Processes**

Recipients must be aware of the existence of control procedures and conscious of their

contribution to achieving corporate objectives and efficiency.

The responsibility for creating an effective internal control system is common to every operational level; consequently, all employees, within the functions performed, are responsible for defining, implementing, and ensuring the correct functioning of controls inherent to the operational areas entrusted to them.

Control processes are articulated in a set of actions, procedures, and instructions that give rise to the Control System structured as follows:

- Code of Ethics
- Organizational Model
- Formalized and clear organizational system, particularly regarding the assignment of responsibilities, hierarchical lines of dependence, and job descriptions
- Procedures, manuals, and operational and computer instructions
- Control systems provided by the Integrated Management Manual
- Personnel training and instruction: each worker will receive sufficient and adequate training with particular reference to their workplace and specific duties
- Monitoring system: verification of maintaining the effectiveness of adopted measures

### **Accounting and Management Reporting**

- Every act or operation, of any type, carried out by Recipients must be correctly registered, authorized, verifiable, legitimate, coherent, and congruous.
- Information that flows into periodic "reports" and/or accounting, both general and analytical, must adhere to the principles of transparency, correctness, completeness, and accuracy.



- All actions and operations of Rewave Srl must have adequate registration and it must be possible to verify decision, authorization of execution.
- For each operation, there must be adequate documentary support to enable, at any time, the performance of controls that attest to the characteristics and motivations of the operation and identify who authorized, carried out, registered, and verified the operation itself.
- Recipients who become aware of omissions, falsifications, or negligence of information and supporting documentation are required to report the facts to their superior, if an employee, or to the internal reference point, if a third party.

## Ethical Standards towards Third Parties

### Clients

- Each Recipient, within the management of client relationships and in compliance with internal procedures, must promote maximum client satisfaction by providing, among other things, exhaustive and accurate information about products and services provided, to facilitate informed choices.
- Rewave Srl pursues its business success in markets through the offer of quality products at competitive conditions and in compliance with all regulations protecting fair competition.

Recipients must not promise or offer payments or goods to promote or favor Rewave Srl's interests. Gifts or acts of hospitality are permitted only when, by nature and value, they cannot be interpreted as aimed at obtaining preferential treatment.

### Suppliers

Rewave Srl commits to seeking from suppliers suitable professionalism and commitment

to sharing the principles and contents of this Code and promotes the construction of lasting relationships for the progressive improvement of performance in protecting and promoting the principles and contents of the Code of Ethics.

Supplier selection and determination of purchasing conditions must be carried out based on an objective and transparent evaluation that takes into account, among other things, price, ability to provide and guarantee services of adequate level, and also the honesty and integrity of the supplier.

Recipients cannot accept gifts, presents, and similar, unless directly attributable to normal courtesy relations and provided they are of modest value.

If a Recipient receives proposals for benefits from a supplier, they must immediately report to their superior.

## **Relations with Public Administration and Public Institutions**

Assuming commitments with Public Administration and Public Institutions is reserved exclusively for designated and authorized company functions.

Recipients must not promise or offer to Public Officials or employees of Public Administration or Public Institutions payments or goods to promote or favor the Company's interests.

Any Recipient receiving requests or proposals for benefits from public officials must immediately report to their superior, if an employee, or to the internal reference point, if a third party.

Recipients who, within their functions, legitimately have relations with Public Administration and Public Institutions have the responsibility to preventively verify, with due diligence, that what is declared and/or attested in the interest of Rewave Srl is truthful and correct.

## **Political and Trade Union Organizations**

The company does not, in principle, provide contributions to parties, committees, and political and trade union organizations.

When a contribution is deemed appropriate for public interest, the interested company determines whether it is admissible in light of current laws.

All contributions must, in any case, be disbursed strictly in compliance with current laws and adequately recorded.

Recipients must recognize that any form of involvement in political activities occurs on a personal basis, in their free time, at their own expense, and in compliance with current laws.

## **Information Bodies**

Relations between companies and mass media are the responsibility of specifically designated company functions and must be carried out in coherence with the communication policy defined by Rewave Srl. Participation, in the name of the company or on its behalf, in committees and associations of any type, whether scientific, cultural, or category-based, must be regularly authorized and formalized in writing, in compliance

with procedures.

The information and communications provided must be truthful, complete, accurate, transparent, and consistent with each other.

### **Verification and Control of the Code of Ethics**

The Company commits to periodically carrying out checks on the correct application of the Code of Ethics.

The Company commits to:

- Promote the implementation of the Code and the issuance of reference procedures;
- Promote communication and specific training programs for Rewave Srl management and employees;
- Examine reports of possible Code violations, promoting the most appropriate verifications; intervene, including upon notification by Rewave Srl Personnel, in cases of reports of possible Code violations not properly addressed or of retaliation suffered by the Person following the reporting of information;
- Communicate to the competent structures the results of verifications relevant to the adoption of any sanctioning measures: inform the competent line/area structures of the verification results relevant to the adoption of appropriate measures.

### **Violations of the Code**

Violation of the Code's provisions breaches the trust relationship established with Rewave Srl and may lead to disciplinary, legal, or criminal actions. Among the disciplinary actions available to the Company is the power to adopt measures such as transferring the employee to another company area.

In the most serious cases, violation may entail:

- Termination of the employment contract, if carried out by the employee, in compliance with the procedures provided by Art. 7 of the Workers' Statute, or
- Interruption of the relationship, if carried out by a third party. In this regard, supply and collaboration contracts will explicitly refer to the provisions of this code.

S. Maria Hoè, 19.02.24

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