



CODE OF ETHICS

Approved by the Board of Directors
18/05/23

INDEX

PREMISE

1. TOOL AND PURPOSE.....	3
2. SCOPE OF APPLICATION	3
3. ADDRESSEES	4

MISSION, VALUES AND PRINCIPLES OF REFERENCE

4. IDENTITY AND MISSION.....	5
5. VALUES AND PRINCIPLES OF REFERENCE.....	5
6. GENERAL ADDRESSES	7

RESPONSIBILITY TOWARDS STAKEHOLDERS

7. RELATIONS WITH THE PEOPLE	11
8. RELATIONS WITH CLIENTS	14
9. RELATIONS WITH STAKEHOLDERS, BONDHOLDERS AND FINANCIAL MARKET PARTICIPANTS	15
10. RELATIONS WITH SUPPLIERS AND PARTNERS.....	16
11. RELATIONS WITH THE COMMUNITY AND TERRITORY	17
12. RELATIONS WITH POLITICAL ORGANIZATIONS AND TRADE UNIONS.....	18
13. RELATIONS WITH INSTITUTIONS.....	18
14. RELATIONS WITH SURVEILLANCE AUTHORITIES AND CONTROL BODIES.....	19
15. RELATIONS WITH THE MASS MEDIA.....	19

GOVERNANCE AND IMPLEMENTATION

16. ETHICS COMMITTEE: PROCEDURES AND COMPETENCY LIMITS	20
17. REPORTS.....	21
18. VIOLATIONS AND SANCTIONING SYSTEM.....	21
19. ADOPTION AND DIVULGENCE, AMENDMENTS AND UPDATES.....	22

PREMISE

1. TOOL AND PURPOSE

The following Code of Ethics defines the values and principles that guide the actions of Rekeep Group, its people and those who contribute to the achievement of its objectives. This document is inspired by an ideal of collaboration between people and represents a tool of universal guidance in behavioural processes, decision-making and in the choice of methods adopted for various activities, in line with the values expressed by the Group and to favor sustainable development.

The Code of Ethics is one of the key tools for creating and managing trust between the organization and its stakeholders.

The principles and values expressed in this Code guide the Group towards achieving its mission, while at the same time allowing it to increase internal cohesion, maximize the efficiency of activities and consolidate the image of a unitary, honest and reliable Group.

The Code of Ethics is a valid tool in the decision-making process both in terms of recognition and resolution of the main and recurring ethical dilemmas the organization faces.

2. SCOPE OF APPLICATION

This Code of Ethics, approved by the Board of Directors of Rekeep S.p.A as parent company, sets forth the principles and values to which the Rekeep Group¹ adheres to in carrying out its business activities. It also provides the rights, duties, rules of conduct and responsibilities of any subject who enters into business relations with the Company.

This Code of Ethics is made available to any and all parties with whom the Group enters into business relations, both in Italy and abroad.

The application and sharing of the Code are designed to ensure that higher interests are protected and that the company's activities are performed correctly.

Rekeep Group, therefore:

- commits itself to always act with the utmost diligence, fairness, loyalty, spirit of collaboration, moral and professional discipline;
- encourages the best use of resources and safety in the performance of work activities, always bearing in mind social responsibilities and environmental protection;
- commits itself to adhere to principles of truth, transparency, accuracy, completeness and conformity to governing legislation for the treatment of

¹ "Rekeep Group" means Rekeep S.p.A and its wholly-owned direct and indirect subsidiaries.

accounting data and to put efficient and effective internal control systems into place;

- ensures the utmost availability and awareness of the Code of Ethics, both within its corporate organization, and among all those with whom it holds relations, namely, with stakeholders;
- verifies that the Code of Ethics is constantly and correctly respected, implementing appropriate sanctions, should infringements take place.

3. ADDRESSEES

The Code of Ethics applies to all Rekeep Group personnel, members of company bodies and boards and anyone, regardless of their job title, who provides labour or professional services to the Company. The addressees, each within the scope of their functions and responsibilities and regardless of the role held, are obliged to comply with the principles and provisions laid out in the following Code.

Rekeep Group ensures the highest level of distribution of this Code of Ethics among all stakeholders with whom it holds relations.

The rules and principles expressed in this Code of Ethics are consistent and compatible with all internal documents and regulations.

MISSION, VALUES AND PRINCIPLES OF REFERENCE

4. IDENTITY AND MISSION

Rekeep SpA is head of the main Italian Group operating in Integrated Facility Management and through its controlled companies, deals with plant management, environmental health, conservation of greenery, property management and specialised services for hospitals.

In order to consolidate its leadership in Italy and to become a major player abroad in the facility management services market, Rekeep Group commits itself to:

- offering quality services, to public and private clients, capable of improving the well-being and safety of the environment and generating positive impacts on clients' performance;
- making the most of the human resources which are the backbone of its competitive advantage, by developing skills, offering opportunities for growth and training and facilitating professional and personal achievement on the one hand, and the well-being of people in the workplace on the other;
- contributing to the innovation of services and processes, by proposing new solutions designed to improve performance and to establish relations based on trust which lead to added value with clients, partners, suppliers and the community in general;
- ensuring rigorous and efficient economic management so as to maintain and consolidate a sound financial and capital standing;
- contributing to the improvement of the environment and people's lives in general, by encouraging sustainable development from an economic-financial, social and environmental viewpoint.

5. VALUES AND PRINCIPLES OF REFERENCE

In order to achieve its mission, Rekeep Group is committed to a shared-value development system, both inside and outside the company, and to contributing to the achievement of the United Nations Sustainable Development Goals.

The Group, therefore, implements and adheres to a series of fundamental principles that guide its culture, behaviour and way of carrying out its business. All stakeholders, within the scope of their role and the specific responsibilities they hold, are called to act in compliance with the principles and contents of this Code of Ethics.

This Code of Ethics presents the core values which guide and form the Group's identity (stated in public documents such as the Sustainability Report), and principles that govern and qualify the actions and behaviour of the Group and those who interact with it.

Value references

Rekeep Group assumes the following values as its own, as considered to be essential elements for the daily execution of its business. These values represent the cornerstones on which to build constructive, solid and long-lasting relations with the Group's both internal and external stakeholders.

Commitment and Transparency

Rekeep Group pursues its business objectives with the utmost commitment, precision and dedication, to ultimately increase the value created for all those who place their trust in the company. Rekeep Group is committed to regularly releasing clear, accurate, complete and transparent information regarding the company's activities so that its stakeholders can make informed decisions regarding business relations with the Company and can verify the Company's coherence between its declared objectives and the results achieved.

Responsibility and Solidarity

All Rekeep Group employees carry out their professional services with the utmost diligence and sense of responsibility, operating in the interests of the Group while striving for their own goals of effectiveness and efficiency. The Group builds solid and lasting relations on the value of solidarity and principles of mutual interest, working to achieve its mission and increase its value and that of the entire community.

Fairness and Legality

Rekeep Group's relations with stakeholders are based on principles of honesty, fairness, collaboration, loyalty and mutual respect.

Rekeep Group considers the law and all regulatory provisions of any level as fundamental principles and is, therefore, committed to promoting their knowledge and updating.

Principles of operation

Rekeep Group implements and adheres to a series of fundamental principles – listed below – that inspire the culture, behavior and way of carrying out the organization's business.

Respect and Protection of Human Rights

Rekeep Group operates obeying human rights and guarantees a working environment in which human dignity, justice, equality and inclusion are assured and respected.

People Development and Involvement

Rekeep Group encourages a motivational working environment by developing and enhancing different experiences and collaborations, allowing for work to be a source of personal satisfaction for all employees, as well as a success factor for the company.

Sustainability and Development

In order to meet the expectations of all the Group's stakeholders and protect the needs of future generations, it is important for Rekeep Group to combine the production of economic value with the aim of preserving the natural and social resources available.

The company considers the improvement – through work – of the material, moral and civil conditions of humanity to be its ultimate goal. It is committed to fostering an inclusive development capable of generating lasting social and economic value.

Efficiency of Services

Rekeep Group is committed to offering operational excellence on a daily basis, guaranteeing the efficiency, safety and optimization of its services and creating growth opportunities along the entire value chain.

Innovation

Rekeep Group considers innovation as key for the growth of the company and that of each person. The Group is constantly committed to improving its activities, through the acquisition of cutting-edge technological, digital and management skills while at the same time contributing to the progress of the entire community.

6. GENERAL ADDRESSES

In conducting its business activities, Rekeep Group is guided by principles of honesty, good faith, integrity, mutual respect and fair use of company assets and resources, honest management, thoroughness and transparency of information, formal and substantial legitimacy, clarity and accuracy in accounting feedback and open to the market.

Diligence in the use of assets, goods and company information

Rekeep Group guarantees to preserve and protect its physical assets and ensures the safeguard of its intellectual assets by training company members and

collaborators, each in their own role, in the correct use of entrusted assets, resources and information necessary for carrying out business activities.

Each Group employee is required to work with diligence and efficiency and to protect and enhance company resources, ensuring their use is consistent with the company's interest. Employees and collaborators are responsible for preventing the fraudulent or improper use of these assets, also considering the growing level of IT and technological risks.

Rekeep Group guarantees the proper management of company information as, if improperly disclosed, it could weaken the company's competitiveness and damage its reputation. To this end, a series of tools are available, according to current legislation, to regulate and protect the internal and external management process of information and communications.

All company information, unless previously approved to be disclosed publicly, must be considered confidential and is, therefore, classified and protected. All recipients of the Code of Ethics are responsible for acknowledging, protecting and safeguarding the intellectual property of the Rekeep Group and respecting that of third parties.

Prevention and management of conflicts of interest

Any situation and/or activity in which the subjects involved are, or may even only appear to be, in a conflict of interest must be avoided when conducting the Company's business activities.

This, therefore, includes any situation whereby a Company associate takes personal advantage of company business opportunities or seeks interests which are not part of the company's objectives. It also refers to any situation in which representatives of clients, suppliers or of the Public Administration act in conflict with the duty of trust connected to their position.

The addressees of the Code of Ethics are also prohibited from resorting to illegitimate favoritism, collusive practices, corruption or solicitation of personal advantages, for themselves or for others. They hold the obligation of reporting to their direct superiors any potential conflicts of interest in which they may be involved.

Actions against corruption

Rekeep Group prohibits and acts against all forms of corruption. Such illegal phenomenon can, in fact, slow down economic development, undermine legitimate commercial activities, distort fair competition, destroy the reputation of the organization and expose Group Companies and individuals to a high risk. In order to prevent and avert the risk of corruption, the company adopts strict rules and supervision.

It is not permitted to exchange gifts of any kind with clients, suppliers or third parties in general, this includes special offers or concessions, either direct or indirect, gifts or money in a personal capacity that are aimed at obtaining undue advantages (eg. promises of economic advantages, promises of work both subordinate and in the form of advice, provision of services, recommendations, favors, travel, etc.) or in any way linked to obtaining or reserving preferential treatment in the execution of any activity related to the Company.

It is, however, permitted to offer gifts provided that they are of modest value, comply with any applicable legislation and in no way influence the integrity and reputation and the autonomous judgment of the recipient.

Correctness of information and management of accounting records

Rekeep Group holds the duty to give an account of its objectives and results, disclosing the value and economic, social and environmental impacts generated by its activities.

Every operation and transaction carried out by employees and/or addressees of the Code of Ethics must be traceable, verifiable, correctly authorized and recorded. Furthermore, every operation and/or transaction, in compliance with existing procedures, must be accompanied by adequate documentation which allows checks to be carried out attesting to its type, motivation, authorizations and registrations.

All employees and/or addressees of the Code, upon becoming aware of them, are required to report omissions, fabrication of facts, alterations, incompleteness or negligence in information or documentation to their direct superiors or to the Ethics Committee.

Protection of privacy and confidentiality of personal data

Rekeep Group commits to protecting and preventing the improper use of all information related to its people and third parties, generated or acquired internally and/or in business relations. Rekeep Group guarantees that the processing of personal data carried out within its structures takes place in full compliance with fundamental rights and freedoms, as required by current regulations.

Rekeep Group guarantees respect for people's privacy.

Only adequate, relevant, exact and necessary personal data are collected and processed in compliance with the cardinal principles of processing based on lawfulness, correctness and transparency.

Environment protection and preservation

Rekeep Group recognizes the need to safeguard the ecosystem, in particular, the importance of fighting against climate change and supporting the preservation of water and biodiversity. The Group's commitment is to design solutions aimed at reducing and limiting the direct and indirect impacts of its activities, as well as preventing possible risks for the community and the ecosystem. This is done while

considering current legislation, the development of scientific research and best practices in the field.

In order to ensure environmental protection and the optimization of resources used, the Group commits itself to:

- complying with environmental regulations applicable to its company and adopting the highest international standards on the subject;
- defining specific improvement programs aimed at minimizing the significant environmental impacts generated by its activities, in line with the provisions of the European Taxonomy;
- defining and achieving corporate objectives of energy efficiency, reducing its emissions and promoting energy saving practices and use of sustainable sources;
- promoting development models based on the efficient use of resources with a consequent reduction of waste produced;
- operating for the prevention of environmental risks and instability;
- promoting environmental awareness and training activities within and along the value chain;
- promoting the advancement of eco-efficient technologies;
- accounting for actions aimed at reducing its environmental impact;
- spreading the culture of respect for the environment throughout the territory also through dedicated initiatives and specific customer services.
- Each employee and/or recipient of the Code is required, wherever he operates, to act sustainably, minimizing environmental impacts and optimizing the use of energy and natural resources.

Each individual, within the scope of his duties, must commit himself to actively participate in the process of risk prevention and environmental protection. A process based on principles of precaution, prevention, protection and continuous improvement.

RESPONSIBILITY TOWARDS STAKEHOLDERS

Rekeep Group is committed to developing in a sustainable manner, focusing on the constructive and fiduciary relations with its stakeholders² in a medium and long-term perspective.

The Company is committed to its economic and legal obligations, and at the same time acts in accordance with the economic, social and environmental expectations of the numerous subjects that influence and are influenced by the Group's activities. Rekeep Group aims to integrate principles such as social, environmental and human rights into its corporate strategies, combining economic growth with positive social and environmental impact.

In carrying out its activities, Rekeep Group undertakes to consider its impact on the environment and society, as well as the impact of its governance on the Group's value, progressively consolidating and expanding the ESG (Environment, Social & Governance) approach, through:

- accurate reporting of ESG performance in the Sustainability Report, in line with European standards and regulations for the disclosure of non-financial information;
- the systematic involvement of stakeholders to focus on the relevant issues and priorities on which to act.

The Group intends to incorporate corporate sustainability as an intrinsic element of its modus operandi, promoting the integration of sustainability at all organizational levels.

7. RELATIONS WITH THE PEOPLE

Rekeep Group has always regarded its people as a fundamental and indispensable part of its mission. It therefore makes every effort to encourage a healthy and safe working environment, free from any form of discrimination or violation detrimental to individual dignity, inclusion and diversity.

The enhancement of its people is considered a distinctive element of its competitive advantage. For this reason, the Group strongly encourages the employees' skills development so that the abilities and legitimate aspirations of each individual are fully satisfied when working towards company goals, in accordance with the principles of equality and inclusion.

Knowing that dedication, passion and team spirit are fundamental to achieve operational excellence, Rekeep Group seeks the satisfaction of its people also

² Stakeholders are all those subjects who are directly or indirectly interested in the company's activity

through the promotion of organizational well-being initiatives and through welfare programs able to respond to the needs of its employees.

The same applies to those who act on behalf of the Group and are, therefore, required to maintain an ethical and responsible conduct, be respectful of the laws and pursue maximum transparency, fairness, effectiveness, efficiency and sharing ...

Health and Safety

Rekeep Group ensures that all activities be carried out safely, respecting the highest safety standards and all applicable laws and regulations. The Group invests in training at all levels of the company in order to guarantee a management based on principles of risk prevention and protection.

The Group is committed to reducing the number of accidents and injuries and their consequences, by exploiting technological innovations and through the education and training of personnel.

All personnel of the Company, in line with their specific roles and tasks is expected to be part of the process aimed at preventing risks, safeguarding the environment and protecting the health and safety of themselves, their colleagues and third parties.

Enhancement of people's professionalism

Rekeep Group considers the skills of its employees as a fundamental and indispensable part of the progress and success of the company. For this reason, it undertakes to provide training and updating courses to its employees, based on personal needs and characteristics and to encourage professional growth based on merit and specific skills.

The Group promotes and supports a work culture based on the sharing of knowledge and equal opportunities.

Diversity

Rekeep Group encourages a work environment based on respect and mutual support and where any form of discrimination or abuse is prohibited. The Company's main objective is to develop a diverse human capital in all its forms and expressions - language, race, religious belief, sexual orientation, gender identity, etc. For this reason, it cultivates an open and welcoming work environment, which respects the dignity of every person, honors the contributions of each individual and recognizes the strength of diversity.

The Group does not tolerate the practice of any form of discrimination and is committed to countering the clichés that produce it. In particular, it works to ensure that every employee behaves according to this principle and works to develop a culture oriented towards inclusion and diversity.

Promotion of individual well-being

Rekeep Group emphasizes listening to its people. For this reason, the company strives to create a working environment that combines organizational needs with legitimate personal and family needs. The Group works towards achieving an adequate work-life balance and providing diversified corporate welfare measures. In order to preserve the individual well-being of each employee, working times and rest periods are provided in full compliance with the applicable legislation and international standards.

Protection of the integrity of individuals

Rekeep Group is committed to adopting an inclusive approach and improving the company's well-being.

The Group instructs that all internal and external corporate relations avoid giving rise to any form of harassment or violence (physical, psychological and / or sexual), prohibiting all behaviours attributable to such mobbing practices. Examples of such practices include:

- creating a work environment that is intimidating, hostile, isolating or otherwise discriminatory towards individuals or groups of employees;
- engaging in unjustified interference with the performance of the work of others;
- creating obstacles to the professional prospects of others.

Any form of violence (physical or psychological), sexual molestation or harassment related to personal and cultural diversity is prohibited. These include the following examples:

- physical and/or verbal aggression and/or intimidation
- attitudes of discredit, offense, mockery, disrespect
- bullying and cyber bullying
- mobbing
- blackmail and sexual advances by leveraging the role and/or requests for sexual favors to which subordinate decisions relevant to working life
- comments of a sexual nature, disparaging comments about the sex of the person, innuendos, exhibition of sexual material, etc.
- private interpersonal relations despite an expressed or manifested dislike
- remarks on physical or mental disabilities or on forms of cultural, religious or sexual orientation diversity.

Corporate image and reputation protection

The company's corporate image and reputation represent a valuable asset that Rekeep Group commits itself to protecting. The Company recognizes the evolutions of new digital tools and media channels, including social networks and how they may impact the corporate image. Every employee is expected to behave and act as to not damage the reputation and image of the Group in any way.

8. RELATIONS WITH CLIENTS

The Company pays special attention and is firmly committed to safeguarding and improving the quality of relations with its clients, whether they are public or private. For this reason, the primary objectives of the Company are the full and continuous satisfaction of its clients and the creation of sound relations based on effective communication and the generation of shared value, while maintaining professional, competent and cooperative behaviour towards the client.

Transparent communication and information

The Group's commitment is to provide customers with information which is:

- complete and truthful, so as to allow the customer to reach an informed choice, having all the necessary information available;
- exhaustive and accurate, in order to ensure that the quality of the services provided is correctly explained in the information provided;
- clear and simple, for a complete understanding of the communications and documents issued by the Group.

Rekeep Group guarantees the utmost confidentiality and compliance with all rules and provisions regulating the protection of personal data (privacy).

Fairness in business relations

In all commercial relations with its clients, Rekeep Group acts according to values of honesty and reliability, throughout both the contracting phase and the management and maintenance phase.

Whoever acts on behalf of the Company when dealing with clients must never accept nor offer remuneration of any type or kind, nor gifts that are not of modest value or favourable treatment for the purpose of illegally benefiting the interests of Rekeep Group.

Quality and safety of service

Rekeep Group offers services which meet the highest standards of quality and safety and are capable of producing positive impacts on clients' performances. The Company commits itself to constantly improving and innovating the services offered, as well as expanding in the markets in which it operates.

In order to pursue utter customer satisfaction and continuously improve its performance, the Group is also committed to monitoring the quality and timeliness in responding to the various needs of its clients.

9. RELATIONS WITH STAKEHOLDERS, BONDHOLDERS AND FINANCIAL MARKET PARTICIPANTS

Rekeep Group places great emphasis on creating value and benefitting its shareholders, bondholders and financial market participants. For this reason, it is committed to guaranteeing and promoting sustainable growth and to building a relation of trust and collaboration, in a long-term perspective.

Rekeep Group keeps in constant touch with its shareholders and bondholders, in accordance with the regulations and laws that provide for equal access to company information for every single investor or potential investor, protecting the interests of the Group and the shareholders as a whole rather than the specific interest of individual shareholders or shareholder groups.

Rekeep Group guarantees shareholders, financial analysts and lenders have access to the necessary information to ensure that their decisions are based on complete knowledge of the company's strategic lines and operating results, also with regard to environmental, social and corporate governance aspects. Rekeep Group adopts internal controls and a management system aimed at guaranteeing the truthfulness and correctness of corporate communications in order to prevent corporate crimes that harm the interests of shareholders and lenders. The disclosure of information is carried out in compliance with the regulations and rules applicable to price sensitive information and in compliance with internal procedures on the subject.

Market impact

With respect to its shareholders and the financial market, Rekeep Group undertakes to communicate with the utmost transparency, the impact created by the company both in financial and non-financial terms. The company discloses and reports on its ESG strategy and results according to the latest applicable regulations, and on how its financial performance contributes to the generation of value and positively effects the environment and society as a whole.

Inside information

The directors, employees and collaborators of the Rekeep Group who, depending on their role, have access to price-sensitive information, will refrain from exploiting or disclosing it inside and outside the Group.

Rekeep Group also adopts all the procedures required by law on internal dealing to ensure maximum transparency on the transactions carried out.

10. RELATIONS WITH SUPPLIERS AND PARTNERS

In order to guarantee transparency and encourage responsible behaviour throughout the value chain, Rekeep Group shares its values and principles with all suppliers and partners with whom it has business relations. The Group's conduct, both in the procurement and evaluation phases of goods, services and works, is based on criteria of quality, equal access and opportunities for each supplier as well as economic, social and environmental sustainability.

Selection and qualification of suppliers

The selection of suppliers of goods and services must be made in accordance with objective and documentable criteria. Relations with suppliers must follow strict selection and monitoring processes based on principles of transparency, integrity and sustainability. When selecting suppliers, in addition to the price and quality of the product or service, the Company, also verifies their ESG approach, paying close attention to compliance with social, environmental and governance criteria as well as the financial, organizational and methodological resources offered.

In all cases, suppliers and partners must be identified among subjects of proven integrity, moral and professional honesty, competence and commercial solidity. The signed acceptance of this Code of Ethics on behalf of the supplier is one of the necessary qualification criteria and becomes an integral part of the commercial relation.

Relation with suppliers

In compliance with its corporate principles and values, Rekeep Group commits to acting with fairness and integrity with suppliers and partners, avoiding and condemning any practice of a collusive nature. Suppliers and partners are, in turn, required to comply with competition laws, both national and of the EU, refraining from anti-competitive or otherwise unethical behavior which violates rules in force to protect fair competition.

Relations with partners must abide maximum transparency and fairness and be in full compliance with current regulations and principles of this Code of Ethics.

Any shared information must be accurate and complete, and the documents received or exchanged in all phases of the collaboration must respect confidentiality regulations.

In accordance with its values, principles and mission, Rekeep Group demands social and environmental requirements be included in its contracts in order to fully respect human rights and the protection of the environment. The Group aims to establish profitable and long-term relations with suppliers, based on the sharing of values, principles, approaches, risks and opportunities.

The Group undertakes to stipulate contracts that include specific clauses including a declaration of knowledge and an obligation to comply with the principles contained in the Code of Ethics. In addition, a clause relative to the Group's entitlement of carrying out inspections to verify compliance with the Code and the prohibition of transfers of contract without the Company's consent.

Selection of suppliers and partners

When selecting suppliers and partners, Rekeep Group commits to adopting criteria that evaluate the quality of service, skills and other specific characteristics, but also take into account the following aspects: the impact on the environment; the respect of health and safety at work and general working conditions; the commitment to innovation and continuous improvement of practices; the capacity of the supplier/partner to share essential information and those concerning ESG factors to allow Rekeep Group to report factors relative to its supply chain.

Gifts, gifts and other benefits

It is not allowed to accept nor offer remuneration of any type or kind, nor gifts that are not of modest value or favourable treatment for the purpose of illegally benefiting the interests of Rekeep Group.

Those who receive gifts and/or other benefits outside those of modest value must inform their managers who will return them or donate them to charity.

11. RELATIONS WITH THE COMMUNITY AND TERRITORY

Rekeep Group recognizes the value and importance of its relations with the community and territory. It strives to promote initiatives aimed at enhancing the relation with the community and increasing the production of shared value.

Support for territorial development

Rekeep Group recognizes the importance of the well-being of the community and, to this end, is committed to paying close attention to their needs. The Group, therefore, aims to:

- plan targeted consultation, dialogue and involvement initiatives;
- develop projects in partnership with the territory capable of generating tangible and measurable environmental, social and cultural impacts, consistent with its mission and values and selected in line with the most current European standards (including the European Taxonomy);
- promote the Group's mission and values within the community, including principles of diversity and inclusion;
- collaborate with local organizations to pursue a common goal of development and continuous and sustainable growth.

Transparency in the management of initiatives

Rekeep Group can contribute to non-profit organizations and high cultural or charitable associations, always with maximum transparency, through contributions or collaborations.

Sponsorships may concern social, environmental, sport, entertainment, art and culture issues.

Under no circumstances may donations be made to individuals and/or organisations whose purposes violate this Code of Ethics or the fundamental principles which apply to the context in which the Group operates or whose pursuit is in any case detrimental to the Group.

12. RELATIONS WITH POLITICAL ORGANIZATIONS AND TRADE UNIONS

Rekeep Group does not make any direct or indirect contributions, of any form, to political parties, movements, committees and political and trade union organizations, to their representatives and candidates, except those specifically considered mandatory by applicable laws and regulations.

Rekeep Group maintains relations with trade union organisations in compliance with governing laws, with a view to respect, transparency and spirit of collaboration. Any form of discrimination or favouritism based on membership to trade union organisations, to associations or to political parties is not permitted. Every individual has the right to freely choose which trade union organisation or political party to adhere to, on the sole basis of personal needs, beliefs and ideology, in accordance with legislation in force.

13. RELATIONS WITH INSTITUTIONS

Relations with institutions are based on principles of transparency, clarity and correctness. Rekeep Group's goal is to establish relations of collaboration while sharing its behavior to comply with the law and applicable regulations to protect its integrity and reputation.

Rekeep Group's directors, employees and collaborators act with integrity and fairness towards institutions. In particular, the Group undertakes to:

- establish stable channels of communication, without any form of discrimination, with all institutional interlocutors at national, international, community and territorial level;
- provide the national and local control authorities with all the information requested in a complete, correct, adequate and timely manner;

- represent their interests and positions in a fair, transparent, rigorous and consistent manner.

Transparency of relations

The Parent Company Rekeep and its subsidiaries each adopt their own organizational models which abide the Legislative Decree Law 231/01, for the prevention of crimes against the Public Administration. Contracts with institutional interlocutors are, therefore, made exclusively through individuals who have received an explicit mandate, ensuring maximum clarity in relations.

14. RELATIONS WITH SURVEILLANCE AUTHORITIES AND CONTROL BODIES

The Company undertakes to comply with regulations provided by Surveillance Authorities and Control Bodies, in full respect of governing legislation.

All relations with these institutions are conducted with the utmost cooperation, respect for the institutional role of the authorities and a commitment to implementing their provisions.

15. RELATIONS WITH THE MASS MEDIA

Relations between the Company and the mass media are assigned to specifically appointed officers and must be coherent with the policy and means of communication which have been defined by the company, as well as with the laws, regulations and practices of professional conduct.

Any information communicated externally must adhere to the principles of truth and transparency, and therefore, it is forbidden to circulate fake news. Furthermore, it is forbidden to provide information to the mass media without the authorization of the competent officers.

GOVERNANCE AND IMPLEMENTATION

16. ETHICS COMMITTEE: PROCEDURES AND COMPETENCY LIMITS

The Rekeep Group Ethics Committee is the governance body that carries out supervisory and control functions regarding the functioning, effectiveness and compliance with this Code of Ethics.

The Committee is a collegial body composed of three members, who can be internal and external, chosen and appointed unanimously by the Board of Directors of the Parent Company and identified among individuals with autonomy, independence and professionalism. The Chairman will be nominated by majority by members of the Committee and who will be responsible for carrying out coordination functions. The Committee remains in office for three financial years and its members may be re-elected.

The Ethics Committee has the following tasks:

- review the contents of the Code of Ethics regularly so that it always matches the various company situations and any new internal organisational needs and to put forward any requests for changes or updates to the Board of Directors;
- regularly verify reports relating to violations of the Code of Ethics;
- conduct inquiries and interview witnesses in order to reach a motivated judgement on reports. The Chairman or members of the Committee delegated by the Chairman, either jointly or severally, have the right to collect information and call in witnesses directly and confidentially;
- protect the confidentiality of the identity of the whistleblower, without prejudice to legal obligations, and use any information relating to the investigation responsibly. Retaliatory or discriminatory acts, direct or indirect, against the whistleblower for reasons related, directly or indirectly, to the report are prohibited;
- raise awareness of the Code of Ethics through training and informational sessions;
- the Committee has no power to express an opinion on the interpretation of legislative provisions nor on contractual clauses;
- the Committee shall meet whenever the Chairman considers it necessary, or when a member makes a reasoned request to convene a meeting;
- during meetings, the Chairman of the Ethics Committee may invite any subject deemed suitable to promote a correct monitoring and knowledge of

the company context and anyone who may have relevance with the agenda of the meeting itself.

All notifications and reports foreseen by the Code of Ethics must be addressed to the Ethics Committee at the following address:

Comitato Etico di Gruppo Rekeep

Via U. Poli n° 4

40069 ZOLA PREDOSA (BO)

E-mail: comitatoetico@rekeep.com

17. REPORTS

All addressees and recipients of the Code of Ethics have the right to request an infringement of the document when encountering a violation of one of the values, principles or responsibilities set out in the Code. This must be done by appropriately reporting it to the Ethics Committee. The latter will promptly handle the report by carrying out a preliminary analysis of the involvement of the contact person in charge and, where necessary, with the managers of the concerned departments.

The Committee acts at its own discretion when assessing the reports received and the circumstances in which it is necessary to act. It ensures compliance with the measures in place to protect the whistleblower only and exclusively in cases where the channels set up for communications and reports have been used correctly (sending emails to the address indicated above), both at the time of receipt of the report and subsequently, during its assessment. If, at the end of the investigation, the Committee identifies a violation of the Code of Ethics, it must report it to Management for the adequate evaluation of sanctioning measures. The Ethics Committee must not act with prejudice towards decisions of the competent bodies who must abide to employment contracts or supply contracts, or to any criminal findings of the ascertained violation.

Rekeep Group undertakes to protect the whistleblower from any form of retaliation or discrimination.

In order to maintain the highest level of effectiveness, the Ethics Committee will prepare and present on at least an annual basis, a written report on the activity carried out, indicating, in particular, the reports received, the violations ascertained, and the respective sanctions imposed.

18. VIOLATIONS AND SANCTIONING SYSTEM

Compliance with the rules of the Code of Ethics must be considered an essential part of the employees' contractual obligations. Sanctions arising from any violation of the Code can, therefore, be considered applicable to each recipient of the Code,

both internal and external, in accordance with the provisions of the law. Sanctions are applied whenever violations of the principles, values and responsibilities expressed in the Code of Ethics are ascertained. These sanctions are determined on the principle of gradualness, on the respective responsibilities of the various subjects involved and are consistent with internal regulations and the corporate codes of ethics and regulations drawn up for each national collective bargaining agreement applied by the Group to its employees.

During the period of verification of possible violations, the individual's right to be heard is always guaranteed and maximum confidentiality is ensured.

For proceedings relating to employees, the Ethics Committee avails itself, through the internal contact person in charge, of the Company's Personnel Department.

19. ADOPTION AND DIVULGENCE, AMENDMENTS AND UPDATES

The Code of Ethics and any future amendments are approved by the Board of Directors of Rekeep Spa.

The Parent Company and its wholly-owned subsidiaries undertake to share knowledge of the principles contained in this Code of Ethics following appropriate means.

The Code is released with suitable prominence and may be consulted by visiting the Parent Company's website <http://www.rekeep.com> and the websites of the respective Companies to which the Code applies.

A copy of the Code of Ethics is made available to every employee, manager and third party who enters into a contractual relation with the company, including one-off/casual relations, through the company's information and communication channels.

During training and updating programs, space is allocated for sharing and deepening the knowledge of employees concerning the Code of Ethics. Training activities are differentiated according to the role and responsibilities of the recipients.

Rekeep Group periodically updates the Code so that it is always in line with current legislation and company developments. Any employee or member of a company body or office may propose updates or changes to the Code either directly to the Board of Directors or to the Ethics Committee. The Board of Directors is obliged to assess every proposal received.

No one, except for specifically appointed officers, may make modifications or additions to the Code of Ethics, nor issue instructions or guidelines which conflict with its contents.

The Ethics Committee is entrusted with the task of proposing updates or modifications to the Code as well as to its interpretation and application.