
INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

INDICAM

CODE OF ETHICS

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

This Code of Ethics was adopted by INDICAM by resolution of its Governing Board on 6 May 2024.

The Code sets out the ethical obligations and responsibilities in the conduct of business and the pursuit of the Association's object that all concerned are required to comply with in their dealings with the Association.

CONTENTS

MESSAGE FROM THE PRESIDENT

I PRINCIPLES AND VALUES

II WHO THE CODE OF ETHICS IS ADDRESSED TO

III RULES OF CONDUCT FOR DAY-TO-DAY BUSINESS

i *Employee relations*

ii *Protection of industrial and intellectual property and combating counterfeiting*

iii *Protection of confidential information and privacy*

iv *Administrative management and financial statements*

v *Relations with suppliers*

vi *Relations with clients*

vii *Relations with the public administration*

viii *Combatting corruption*

ix *Grants and sponsorships*

x *Conflicts of interest*

xi *Respect for the environment*

xii *Use of the Association's assets*

IV GOVERNANCE OF THE CODE OF ETHICS

i *Ways of learning about the Code of Ethics*

ii *Consequences of non-compliance with the Code of Ethics*

iii *Reporting of violations of the Code*

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

MESSAGE FROM THE PRESIDENT



3

It is with pride that I present to you our Code of Ethics, which sets out the principles and guidelines that inspire our work and serves as a guide to conduct not only for all of us, but also for all those who have dealings with INDICAM. Our belief is that acting ethically and responsibly forms the basis for our Association's success.

Mario Peserico

I - PRINCIPLES AND VALUES

The Code of Ethics outlines the principles and values of INDICAM (hereinafter INDICAM and/or the Association) and the commitments it makes to the stakeholders that it interacts with on a daily basis. These principles and values are then translated into rules of conduct to be followed by all those who, in various capacities and with various responsibilities, contribute to the achievement of the Association's goals.

The Code of Ethics has been designed to serve as a guide to the conduct and actions expected of all INDICAM stakeholders in accordance with the principles established in this document.

The Code of Ethics is inspired by the main national and international legislative provisions, guidelines and documents on Corporate Social Responsibility, Corporate Governance, Human Rights and the Environment such as, for example, the United Nations Charter of Rights, the Charter of Fundamental Rights of the European Union, and the standards for decent work enshrined in ILO (International Labour Organization) conventions. The Code also includes the principles enunciated in policies adopted by the Association, including its Gender Equality Policy.

The Code of Ethics also introduces and establishes obligations in relation to principles and rules of conduct relevant to the prevention of the offences indicated in Italian Legislative Decree No. 231 of 8 June 2001, involving the administrative liability of entities.

INDICAM does not enter into business relationships with those that do not base their conduct on the principles of this Code in pursuit of its core objectives, which are: (i) the creation of value through the optimisation of available resources and the enhancement of competitiveness and financial solidity, by means of sound and prudent management of the association; (ii) the development of human resources, promoting the professional growth of employees and contractors.

II - WHO THE CODE OF ETHICS IS ADDRESSED TO

The Code of Ethics applies to the bodies of the Association and their members, and to all employees of INDICAM, including executives and temporary personnel. INDICAM expects its suppliers, contractors, consultants, and all external partners and contract staff of INDICAM, understood as those who act in the name and/or on behalf of INDICAM or in its interest regardless of the legal classification of the relationship, to abide by the ethical principles set out in this Code. The persons concerned are required to adopt the principles of this Code of Ethics in performing their duties, drawing inspiration from its values of impartiality, probity, lawfulness, diligence and efficiency and conducting themselves on the basis of cooperation and mutual collaboration in compliance with internal procedures and professional rigour, to preserve the integrity of INDICAM's assets and to safeguard its standing and reputation, in accordance with applicable legislation.

Accordingly, the Code of Ethics is understood as addressed to:

- Contractors: all contractors of works or services pursuant to the Italian Civil Code, together with subcontractors, purveyors and self-employed persons who have entered into a contract with the Association;
- Contract staff: contract personnel of the Association, including project workers, interns and temporary agency workers;
- Consultants: persons acting in the name and/or on behalf of the Association on the basis of a mandate or other advisory, technical, or professional relationship;
- Employees: for the purposes of this Code, employees and executives of the Association;
- Suppliers: providers of materials and products, as well as service providers (excluding consultancy) of which the Association avails itself;
- Corporate bodies and their members: all members of the corporate bodies of the Association;
- Partners: third parties with whom the Association, for various reasons, maintains relations of partnership or co-marketing etc.

III - RULES OF CONDUCT FOR DAY-TO-DAY BUSINESS

i - *Employee Relations*

INDICAM recognises the value of human resources and seeks to safeguard their physical and moral integrity by promoting ongoing development of technical and professional skills in a positive and stimulating working environment. INDICAM is committed to fostering a working environment that ensures:

- respect for human rights;
- the protection of health, safety and well-being;
- the prevention of all types of discrimination;
- equal opportunities and meritocracy - gender equality.

Respect for human rights

INDICAM recognises the importance of maintaining and promoting human rights and respecting the rights of workers throughout the value chain. INDICAM rejects forced and child labour and any type of physical, verbal, sexual or psychological harassment, abuse, threats or intimidation in the workplace, and therefore seeks to ensure respectful and favourable working conditions, including in terms of working hours and the determination of remuneration.

6

Protection of health, safety and well-being

INDICAM operates in full compliance with health and safety legislation applicable in Italy. INDICAM is committed to safeguarding the health and safety of employees, suppliers, clients, visitors, consultants and anyone who comes within INDICAM's sphere of operations.

Safety is everyone's responsibility. Employees receive adequate training on health and safety regulations. INDICAM supports the development of the skills necessary to carry out professional duties, providing training to promote safe practices. It is important that everyone is called upon to comply with applicable health and safety regulations and to adopt the relevant preventive measures to protect themselves and others.

INDICAM is conscious of health in all its aspects and is committed to assessing and preventing work-related stress.

This commitment is detailed in the Association's Gender Equality Policy.

Prevention of all forms of discrimination

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

INDICAM is committed to preventing and avoiding any form of discrimination based on age, gender, skin colour, sexual orientation, marital status, religious belief, language, ethnic or national affiliation, state of health and different physical or mental ability, state of pregnancy, maternity or paternity including adoption, personal beliefs and opinions, political opinions, trade union affiliation or activity and any other form of diversity. INDICAM also aims to create an inclusive working environment that accommodates differences and appreciates them in the belief that diversity is an advantage for the development of the entire Association, as it enables it to better meet the challenges of the market.

To this end, INDICAM undertakes:

- to take care to avoid any diversity-related discrimination in all decisions on recruitment, promotion, transfers and disciplinary measures;
- to act with diligence, thoroughness, impartiality and honesty, avoiding any discrimination not only in the performance of its duties, but more generally with respect to all stakeholders;
- not to tolerate harassment, abuse, racism and discrimination of any kind;
- to avoid any conduct that may offend personal dignity;
- not to engage in acts of propaganda, instigation or incitement to hatred or violence on racial, ethnic, national or religious grounds.

Equal opportunities and meritocracy - gender equality

7

In March 2024, INDICAM achieved UNI/PdR 125:2022 certification, recognising the commitment of all personnel to the following principles.

INDICAM recognises the importance of gender equality and is actively committed to promoting it within the Association and throughout its sphere of influence.

Gender equality encompasses not only the equal presence of men and women at the various levels of the organisation, but also the elimination of gender-based discrimination and the promotion of an inclusive working environment.

INDICAM undertakes to:

- Ensure equality, opportunity and meritocracy:
- In its selection, promotion, training and professional development policies, INDICAM ensures that decisions are based solely on competence and merit, without gender discrimination.
- Prevent all forms of discrimination: INDICAM is committed to preventing and combating all forms of gender-based discrimination, including gender stereotyping and sexist behaviour, by promoting a respectful and inclusive working environment.
- Ensure respectful working conditions: INDICAM is committed to providing respectful working conditions for both genders, preventing sexual harassment, wage discrimination and any form of unfair treatment based on gender.
- Support work-life balance:

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

- INDICAM promotes policies and practices that enable better work-life balance for both genders, for example through work flexibility, paid parental leave and childcare services.
- Raise awareness and provide training:
- INDICAM promotes awareness-raising and staff training on gender equality issues in order to create awareness and promote cultural change within the organisation.
- Monitor and evaluate:
- INDICAM regularly monitors progress towards gender equality by means of specific indicators and periodic assessments designed to identify any areas for improvement, in order to take the necessary corrective measures.
- Gender Equality Policy:
- INDICAM has adopted a Gender Equality Policy that establishes the objectives, strategies and concrete actions to be taken to promote gender equality within the Association.

Gender equality is not only an ethical principle; it is also a competitive advantage and a fundamental requirement for the success and sustainability of the Association. Accordingly, INDICAM is committed to integrating gender equality into all its activities and decisions, thereby contributing to building a fair, inclusive and diverse working environment.

8

ii - Protection of industrial property and intellectual property and combating counterfeiting

INDICAM acts in full compliance with the industrial and intellectual property rights legitimately held by the Association itself and by third parties, and with laws, regulations and conventions, including at the Community and/or international level, protecting such rights. Intellectual property, patents, trademarks, logos, copyrighted materials, inventions, trade secrets and other confidential internal information – including business plans and strategic projects, marketing, pricing and sales data, commercial and organisational details - together constitute extremely valuable assets on which INDICAM's competitive strength is based.

iii - Protection of confidential information and privacy

INDICAM undertakes to protect any sensitive, confidential or confidential information concerning the Association and its members. Purely by way of non-exhaustive example, the following are considered to be confidential information: the strategic plan (commercial, marketing, operational, training plans, etc.), prices, investments, data concerning Employees, information on know-how and processes, databases of suppliers, clients and contractors, technologically innovative initiatives, and in general economic and financial information concerning the Association that has not yet been disclosed to the community.

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

In the course of its business, INDICAM collects a significant amount of confidential information and personal data, which it undertakes to process in compliance with all applicable laws and best practices.

In compliance with the subjective right to protection of the personal data of those concerned, whether they are employees, contract staff, clients, suppliers, contractors, consultants or partners, INDICAM provides them with complete and up-to-date information on the processing of data, including sensitive data, obtained and/or processed by the Association in the course of its business. INDICAM shall seek the informed consent of data subjects whenever necessary, exclusively for the purposes for which the data processing is intended.

iv - Administrative management and financial statements

In preparing its financial statements and any other type of accounting documentation, INDICAM complies with applicable laws and regulations, adopts generally accepted accounting practices and principles, and is inspired by the principle of transparency of relations with stakeholders, faithfully representing the affairs of the Association according to criteria of clarity, truthfulness and propriety in compliance with internal procedures.

v - Relations with suppliers

INDICAM considers its suppliers as partners. For this reason, in dealings with them, all personnel are required to always demonstrate the utmost propriety and professionalism, encouraging ongoing collaboration and mutual growth, thereby building solid and lasting relationships of trust in compliance with laws and regulations.

When selecting suppliers and formulating of the conditions of purchase of goods and services, INDICAM is inspired by principles of objectivity, competence, cost-effectiveness, transparency, propriety, the quality of the good or service, and compliance with the relevant internal procedures, carefully evaluating the guarantees of assistance and the panorama of offers in general.

vi - Relations with clients

Relations with clients are based on fully satisfying their needs with a view to creating a solid relationship inspired by the general values of propriety, honesty, integrity, professionalism, transparency, legality and impartiality.

vii - Relations with the public administration

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

The public administration is understood as all entities, of a private and public law nature, Italian or foreign, that perform a "public function" or a "public service". The term "public function" refers to activities governed by public law and concerning legislative, administrative and judicial functions. The term "public service" refers to the production of goods and services of general interest and subject to the supervision of a public authority, and to activities designed to guarantee the rights of the individual to life, health, freedom of communication, including under a concession and/or convention regime.

INDICAM operates according to principles that are oriented towards the utmost transparency, clarity, propriety and impartiality of relations, in order to avoid generating partial, distorted, ambiguous or misleading interpretations in the public institutions with which it interacts in various capacities. It establishes relationships of the utmost cooperation with the public administration, public officials, or persons in charge of a public service, inspiring its conduct on the strictest compliance with the applicable provisions of law and regulations and protecting its integrity and reputation.

The assumption of commitments and the management of relations with such persons are reserved exclusively for the Association bodies responsible and its authorised personnel, in compliance with internal procedures.

viii - *Combatting corruption*

10

INDICAM is strongly committed to combating all forms of corruption.

In recent years, the fight against corruption has expanded and intensified, partly due to changes in international treaties and national legislation. The new provisions aim to prevent and punish corruption in international professional relations as well as private relations. They concern:

- active bribery, in which an undue benefit (money, gifts or services) is offered or promised with the aim of inducing another person to perform or not perform a certain activity, or to facilitate such an act, as part of his or her professional role;
- passive bribery, in which another person requests or obtains the offer or promise of money, gifts, services or benefits in order to perform or not perform a certain activity, or to facilitate such an act, as part of his or her professional role.

In order to counter any form of corruption, INDICAM calls on all its employees, contract staff, suppliers, contractors, consultants and partners to:

- ensure that no bribery of public officials takes place in the management of relations with public authorities in matters concerning, for example, customs, taxes and/or authorisations where the services of agents, local consultants or third party intermediaries are engaged;
- refrain from offering or accepting, directly or indirectly, to and/or from public officials, representatives or political parties, clients, suppliers, consultants, agents, business

partners or any other person or organisation: money, gifts, services or gratuities, unless of modest value, and other types of service, respecting the autonomy of their decision-making processes;

- refrain from incurring entertainment expenses that could give rise to suspicions of impropriety or give the impression of intending to influence the actions of public officials, political representatives or parties, clients, suppliers, consultants, agents, business partners or any other person or organisation;
- avoid seeking to influence the outcome of inspections, ensuring that they are conducted properly and providing full information and documentation as requested;
- ensure utmost transparency and propriety in the preparation of documentation in applications for public grants or funding and in the management of relations with officials of the public disbursing bodies;
- ensure that the autonomy of regulators and public institutions is respected in the course of normal dealings with representatives of institutions or political parties.

ix - *Grants and sponsorships*

INDICAM may accept requests for funding only from non-profit organisations or associations or those of cultural and social value, in accordance with its internal procedures. When adhering to such initiatives, INDICAM undertakes to pay particular attention to possible situations of personal or corporate conflict of interest. Sponsorships may be granted subject to appropriate agreements and verification of the integrity of the beneficiary and the event or initiative to be promoted.

x - *Conflicts of interest*

In accordance with the values of honesty and propriety, INDICAM undertakes to adopt all measures necessary to prevent and avoid conflicts of interest.

All Association activities are intended for the furtherance of INDICAM's interests. Accordingly, any situations of conflict between personal interest and the interest of the Association must be avoided, i.e. communicated in advance to the control bodies identified in internal procedures.

By way of non-exhaustive example, the following situations could constitute a conflict of interest:

- having economic or financial interests, including through family members, with suppliers, clients or partners;

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

- using one's position in INDICAM, or information obtained in one's usual professional activity, for one's own benefit or for the benefit of third parties contrary to the interests of the Association;
- performing work of any kind (labour and intellectual services) for clients, suppliers, competitors and/or third parties that is contrary to the interests of INDICAM;
- concluding or initiating negotiations and/or contracts - in the name of and/or on behalf of INDICAM - that have as counterparties family members, associates, or legal entities which the person concerned owns or is an interested party;
- accepting money, gifts or favours from natural persons or legal entities that are or intend to enter into business relationships with INDICAM.

xi - Respect for the environment

INDICAM is committed to disseminating a culture of respect for the environment by promoting responsible conduct by all and contributing to its protection. The Association is aware of the importance of protecting the environment, which is understood as a common resource to be safeguarded for the benefit of the community and future generations with a view to sustainable development.

INDICAM seeks to continuously improve its environmental performance by minimising the impact of its facilities (offices), its activities and the services it provides by reducing energy and water consumption, as well as its use of raw materials and potentially hazardous substances.

12

xii - Use of the Association's assets

INDICAM provides each employee and member of contract staff with various company assets and equipment for the performance of their duties. INDICAM trusts that such items will be safeguarded by responsible conduct that is consistent with established operating procedures, avoiding misuse and any use for personal purposes that could cause them damage.

In order to fulfil this objective, personnel are required to:

- refrain from using computer systems in violation of applicable laws;
- refrain from any form of or attempt at undue intrusion or damage to the Association's or other information technology systems;
- be responsible for the custody, protection and conservation of physical and intangible assets and resources entrusted to them for the performance of their duties, and to use them in accordance with the Association's interests;

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

- refrain from using the Association's property, such as premises and equipment, for personal interests of any kind.

IV - GOVERNANCE OF THE CODE OF ETHICS

This Code of Ethics and any future updates to it shall be approved by the Governing Board of INDICAM. Additional specific rules of conduct and policies deriving from local practice or regulations may be adopted in addition to this Code of Ethics.

i - Ways of learning about the Code of Ethics

The principles, values and rules of conduct contained in the Code of Ethics are disseminated within INDICAM and are accessible at any time, either online or offline. The Code of Ethics is available and accessible to all employees, persons who collaborate with INDICAM, and its stakeholders, on the Association's website.

External persons that collaborate with INDICAM (external contractors, consultants, clients, suppliers, etc.) are made aware of the adoption of the Code of Ethics through specific contractual clauses.

ii - Consequences of non-compliance with the Code of Ethics

Failure to comply with the rules of conduct established in the Code of Ethics constitutes a violation of the Code and a gross breach of contract.

Accordingly, failure to comply with the principles of the Code of Ethics may result in the imposition of disciplinary measures and/or sanctions, or the termination of an existing employment or commercial contract.

In particular:

- for employees and contract staff of INDICAM, such a violation constitutes a breach of obligations arising from their employment and/or a disciplinary offence that may jeopardise the continuity of their employment and also lead to actions for damages;
- for temporary employees who are required to comply with its precepts, such violations are sanctioned by disciplinary measures imposed on them by their employment agency;
- for directors and arbitrators, any such violation of the rules of the Code may result in the adoption, respectively by the Governing Board and the Board of Arbitrators, of measures commensurate with the gravity, recidivism or the degree of negligence of the violation, up to and including a proposal to the General Meeting for the revocation of their mandate for just cause;
- for persons concerned who are not employees, compliance with the Code is a prerequisite for the continuation of a professional/collaborative relationship with INDICAM. Accordingly, a violation of the rules of the Code may constitute a breach

INDICAM

— PER LA TUTELA DELLA PROPRIETÀ INTELLETTUALE

of contractual obligations, with all legal consequences, including the termination of the contract and/or assignment, and may result in compensation for damages suffered by INDICAM.

iii - Reporting of violations of the Code of Ethics

Reports of any violations of this Code may be communicated to INDICAM, anonymously or otherwise, by a report made through the website www.indicam.it/parita-di-genere/invio-segnalazioni or, for employees only, may be sent in paper form to the postal address INDICAM - Comitato Parità di Genere, Via Serbelloni No. 5, 20122 Milan.

INDICAM undertakes to protect whistleblowers from any form of retaliation or discrimination, ensuring confidentiality, without prejudice to its legal obligations. In order to protect INDICAM, the senders of malicious or grossly negligent reports that prove to be unfounded shall be sanctioned.

INDICAM undertakes to take charge of and process reports and to provide feedback on the outcome of its investigation to anyone that reports a violation of the Code of Ethics.