

CODE OF ETHICS

DoveVivo
by **Joivy**

Approved by the Board of Directors

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1 PREMISE

The creation and dissemination of the values on which a company bases its ability to be a competitive player in its business sector and a responsible subject in the social context in which it operates, are the elements necessary to build a corporate culture suitable for achieving the objectives that the company sets itself:

- the production of high quality products,
- protection of health and safety within the workplace in compliance with applicable legislation,
- the management of corporate risks (in particular non-compliance with mandatory or voluntary regulations) in such a way as not to have negative repercussions on the Company.

With this in mind, DoveVivo S.p.A. has deemed it appropriate to define and formalize this Code of Ethics as a compendium of the rules, values and guiding principles adopted and to which a positive value is recognized.

2 CODE OF ETHICS

DoveVivo S.p.A. has deemed it essential to adopt an Organisational, Management and Control Model pursuant to Legislative Decree 231/2001, which includes this Code, with the aim of identifying and indicating clearly and transparently the principles and values that inspire the Company's activities.

In fact, it is believed that in order to achieve the statutory purpose and the company's ambitious objectives, it is essential that the subjects operating in the Company and all those who enter into any relationship with it, comply with the rules of conduct that inspire the Company's work.

The Code must guide the Company's daily business and work actions in its entirety, in the belief that the achievement of corporate purposes cannot be separated from ethics and absolute respect for legality in the conduct of business activities.

In order to avoid damage to the Company's image, good name, reputation and institutional, economic and commercial relations, even in the face of ambiguous or potentially risky situations, the Code of Ethics must be a guide, the knowledge and application of which are essential and necessary.

Furthermore, this Code, without replacing the responsibility and action of each person according to common sense, is a fundamental element in the prevention of the crimes provided for by Legislative Decree no. 231 of 8 June 2001, and is also prepared pursuant to and for the purposes of the aforementioned regulatory provision, forming an integral part of the Company's Organisation and Management Model.

All persons in top positions, such as directors, statutory auditors or persons with managerial functions, as well as all employees, collaborators, consultants and, more generally, all third parties who enter into relations with the Company must never fail to comply with fundamental principles such as honesty, moral integrity, fairness, transparency and objectivity in the pursuit of corporate purposes.

By providing adequate information, prevention and control tools, the Company guarantees the transparency of the conduct carried out, intervening, where necessary, to repress any violations of the Code and supervising effective compliance with the Code.

3 RECIPIENTS

The following are Addressees of this Code of Ethics pursuant to Legislative Decree 231/2001 with the obligation to comply with its content:

Which internal subjects

- the directors of the Company as well as those who hold or actually perform functions of representation, administration, management or control;
- the Company's employees.

Which external parties

- the Company's staff and all persons acting on behalf of or in the interest of the Company.
- external professionals, collaborators, consultants and in general those who carry out self-employment activities;
- suppliers and partners.

The aforementioned external parties, as they have commercial and working relationships with the Company, will be required to comply with the ethical values and principles of conduct expressed in this Code of Ethics and, should individual or corporate conduct and actions be detected in contrast with the values and principles of the Company, and/or with laws or regulations, All appropriate steps will be taken to terminate and terminate the existing relationship.

It is the responsibility of the internal Recipients who have dealings, in particular but not exclusively with external parties, to inform them about the obligations imposed by the Code of Ethics, to demand compliance with them and to take appropriate initiatives in the event of non-compliance.

Recipients who hold the status of managers and heads of company functions are also obliged to exercise supervisory activities by paying the utmost attention and diligence to all other Recipients towards whom they have a relationship of direct and indirect hierarchical superiority. They must also report any irregularity, violation or non-compliance with the principles contained in this Code of Ethics in the manner specified below.

Compliance with the ethical values and related principles of conduct, illustrated in this Code of Ethics, by the Recipients, both internal and external, represents a contractual obligation as described in the sanctioning system.

4 VALUES

In achieving its objectives, DoveVivo S.p.A. is inspired by the following values, which are binding on the Recipients of this Code of Ethics:

4.1 Legality

The Company undertakes to conduct its activities in compliance with national and EU regulations, rejecting any form of illegal practice, including conduct that directly or even indirectly may integrate forms of collaboration with criminal associations.

The members of the corporate governance bodies, the company management, and in general the Company's employees and collaborators, as part of their professional activities, are required to diligently comply with current legislation, this Code of Ethics, company procedures, the organizational model pursuant to Legislative Decree 231 and any other form of internal regulation.

The pursuit of an interest of the Company may not, under any circumstances, be considered an exemption from non-compliance with the law, nor may it justify dishonest conduct.

4.2 Honesty, moral integrity and fairness

In carrying out activities and relationships of any type and nature, all those who work with and for the Company are required to diligently comply with current laws and regulations, as well as the Code of Ethics.

They must behave in a manner based on respect for the fundamental principles of honesty, moral integrity, fairness, transparency, objectivity and respect for the individual personality in the pursuit of corporate objectives and in all relations with internal and external people and entities

Under no circumstances will there be any justification for actions that are not in line with an honest course of action.

Therefore, the Company will not enter into or continue any type of relationship with anyone who adopts conduct that differs from what is established in this specific point of the Code of Ethics.

4.3 Transparency

Transparency is an essential principle in all the relationships that the Recipients have with their interlocutors, committing themselves to always provide accurate, objective, truthful, timely and unambiguous information.

Those entrusted with the task of keeping accounting records are required to make each record accurately, completely, truthfully and transparently and to allow any checks by parties, including external ones, in charge of us.

Accounting evidence must be based on accurate and verifiable information and must fully comply with internal accounting procedures.

Each writing must make it possible to reconstruct the relevant operation and must be accompanied by adequate documentation.

All actions concerning the company's activity must result from adequate records that allow checks and controls to be carried out on the decision-making, authorization and performance process.

Recipients who, for any reason, become aware of omissions, falsifications, negligence in the accounts or documentation on which the accounting records are based, are required to report the facts to their superior and to notify the Supervisory Body.

4.4 Confidentiality

The Company ensures the confidentiality of the information and personal data being processed and the protection of the information acquired in relation to the business activity; it also requires that the information obtained is not used for its own interests in order to gain undue profit from it or in a

manner contrary to the law or in such a way as to cause damage to the rights, property, objectives of the Company or the Company.

The Recipients are also prohibited from using confidential information for purposes not related to the exercise of their professional activity and in any case in violation of the applicable regulations.

4.5 Impartiality and equal opportunities

Any form of discrimination is prohibited, and in particular any discrimination based on race, nationality, sex, age, disability, sexual orientation, personal or social condition, political or trade union opinions, philosophical orientations or religious beliefs towards any person inside or outside the Company.

4.6 Corporate information and cash flows

Every operation and transaction is correctly recorded, authorized, verifiable, legitimate, and it is always possible to verify the decision-making, authorization and execution process. Each operation is supported by adequate documentary evidence in order to be able to proceed, at any time, to carry out checks that certify the traceability, characteristics and reasons of the operation and identify who authorized, carried out, registered, verified the operation itself.

All Recipients must ensure the utmost truthfulness, transparency and completeness of the information, both verbal and documentary (paper and digital), produced in the course of carrying out the activities, each for the part of its competence and responsibility.

It is strictly forbidden to carry out any transaction that may involve the slightest possibility of the involvement of the Companies in the event of a relevant offence pursuant to Legislative Decree 231/01.

4.7 Safety, health and working conditions

The Company ensures the protection of safety, hygiene and health in the workplace and considers it essential and a priority, in carrying out its activities, to fully respect the health, physical integrity and rights of workers with strict compliance with all the requirements dictated by current legislation on safety, hygiene and health at work.

Anyone among the recipients who detects situations of harm to health and safety in the workplace or becomes aware of situations and/or facts that may harm or prejudice respect for the aforementioned rights, is required to immediately report the matter both to their superior and to the SB.

4.8 Professionalism and enhancement of human resources

The Company recognises the centrality of human resources and, to this end, is committed to enhancing the skills of its resources, providing them with suitable training, professional updating and development tools.

4.9 Risk culture

The Company intends to increase its employees' awareness of the risks underlying their daily operations. This awareness must shine through in the concrete behaviour of each person. There must be a widespread perception of how the internal control system actually controls these risks without harmful overlaps or culpable gaps.

4.10 Protection of personal data

In compliance with current legislation, the Company is committed to protecting the personal data of each of its employees and, more generally, of those who interact with the company (employees, customers and suppliers).

5 PRINCIPLES OF CONDUCT IN INTERNAL RELATIONS

5.1 Personnel and Collaborator Selection Policies

Human resources are an indispensable element for the existence of the company and a critical factor to compete successfully on the market. The honesty, loyalty, ability, professionalism, seriousness, technical preparation and dedication of the staff are therefore among the decisive conditions for achieving the Company's objectives and represent the characteristics required by DoveVivo S.p.A. and its directors, employees and collaborators in various capacities.

In order to contribute to the development of the company's objectives, and to ensure that these objectives are pursued by all in compliance with the ethical principles and values that inspire DoveVivo S.p.A., the company policy is aimed at selecting each employee, consultant or collaborator in various capacities according to the values and characteristics set out above. As part of the selection, the Company works to ensure that the resources acquired correspond to the profiles actually necessary for the company's needs, avoiding favoritism and facilitations of any kind.

5.2 Prevention of conflicts of interest

In conducting any activity, each person involved must avoid any conflict between his or her personal, social, financial or political interests and the progress of the business interests of DoveVivo S.p.A. or its customers.

The occurrence of situations of conflict of interest, in addition to being in contrast with the law and the principles set out in the Code of Ethics, is detrimental to the company's image and integrity.

Directors, employees and collaborators must therefore exclude any possibility of overlapping or in any case crossing, exploiting their functional position, the economic activities that respond to a logic of personal and/or family interest and the duties they hold within the Company.

Employees who believe they may be in conflict should inform their supervisor or HR personnel manager so that the company can decide whether such a conflict actually exists.

5.3 Duties of employees and collaborators

Each employee and collaborator is required to act loyally in order to comply with the obligations signed in the employment contract and the provisions of this Code, ensuring the required performance.

To this end, all personnel are required to work diligently to protect company assets, through responsible conduct and in line with the operating procedures set up to regulate their use.

Each employee and collaborator of the Company is responsible for the protection of the material and financial resources entrusted to him or her and has the duty to promptly inform the relevant units of any risks or harmful events.

All personnel must comply with the provisions of the company's policies on information security to ensure its integrity, confidentiality and availability, and process their documents using clear, objective and exhaustive language, allowing any checks by managers or authorized external parties.

5.4 Use of company resources; Use of contributions and funding received

Each Recipient is responsible for the protection and conservation of the company resources entrusted to him for the performance of his duties, as well as for their use in their own way and in accordance with the company purposes and the company procedures that govern their use.

In particular, each Recipient must:

- operate diligently in the use of the company resources entrusted to him;
- avoid improper use of company resources that may cause unlawful acts, damage or reduction in efficiency, or in any case contrary to the Company's interest;
- strictly comply with the company procedures that govern its use and the applicable reference legislation, in particular that relating to software or, in general, the protection of intellectual works;
- base the use of resources on the highest levels of safety, decorum and respect for the sensitivity of others.

In particular, the Company prohibits any use of company resources that may constitute a violation of the laws in force, as well as in any case an offense to the freedom, integrity and dignity of persons, especially minors.

The Company also prohibits any use of company resources that may cause undue intrusion or damage to the computer systems of others.

It is forbidden to use contributions, loans, or other disbursements, however named, granted to the company by the State, by a Public Body or by the European Union, for purposes other than those for which they were disbursed.

6 PRINCIPLES OF CONDUCT IN EXTERNAL RELATIONS

6.1 Customer relations

The Company considers it essential to maintain high standards of quality of its services.

In relations with their customers, each employee or collaborator is required to conform their conduct to criteria of correctness, courtesy and availability, providing, where required or necessary, exhaustive and adequate information and avoiding the use of elusive, unfair practices or in any case aimed at undermining the independence of judgment of the interlocutor.

6.2 Relations with suppliers

The Company applies the utmost transparency and fairness in its relations with suppliers of goods and services, in compliance with the laws and regulations in force as well as internal procedures regarding purchasing and selection of suppliers.

It is the Company's policy, in fact, to negotiate in good faith and in a transparent manner with all potential suppliers, as well as to avoid even the semblance of putting in place unjustifiably partial negotiations or any logic motivated by favoritism or dictated by the certainty or hope of obtaining advantages, even with reference to situations unrelated to the supply relationship, for yourself or for the Company.

6.3 Relations with public authorities

In relations with the Public Administration or with entities that carry out activities of public utility or public interest, the Company strictly complies with applicable EU, national and company regulations.

All recipients of this Code are obliged to refrain:

- from offering job opportunities or any advantage in favor of the public official involved in the relationship, to his family members or to subjects in any way attributable to him;
- from offering gifts, gifts or benefits to the aforementioned subjects, even through third parties, except in the case of an act of courtesy of modest value;
- from promising or causing to be promised any other form of benefit or advantage;
- improperly influence, including through third parties, the decisions of the institution concerned;
- from creating advantageous situations in favour of the public official involved in the relationship, to his family members or to subjects in any way attributable to him, by means of simulated operations.

In the event that the Company is a party to civil, criminal or administrative litigation proceedings, including those of an out-of-court nature, the corporate bodies, employees and consultants shall not in any way adopt conduct that may lead to measures that illegitimately benefit the Company.

In relations with the judicial authorities, all employees must offer the widest cooperation, making truthful statements. Any form of reticence, silence and falsehood is contrary to the interests of the company since DoveVivo S.p.A. intends to act in full compliance with the law.

6.4 Relations with political and trade union organisations

DoveVivo S.p.A. does not directly or indirectly promote or discriminate against any political or trade union organisation. The company refrains from making any contribution, direct or indirect, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except those due under specific legal provisions.

6.5 Assignment of professional assignments

Collaborators in any capacity and the Company's consultants are required, in the execution of the contractual relationship established or the assignment received by the same, to behave with

correctness, good faith and loyalty, complying, as far as applicable to them, with the provisions of this Code of Ethics, the company regulations and the instructions and prescriptions given to the Company's personnel.

The Company identifies and selects collaborators and consultants with absolute impartiality, autonomy and independence of judgement without accepting any conditioning or compromise of any kind aimed at achieving or obtaining favours or advantages. In this context, the Company considers only professional competence, reputation, independence, organizational capacity, fairness and timely execution of contractual obligations and assignments as requirements.

6.6 Gifts, Benefits, and Promises of Favors

DoveVivo S.p.A. prohibits all those who act in its own interest, in its own name or on its own behalf from accepting, offering or promising, even indirectly, money, gifts, goods, services, benefits or undue favours (including in terms of employment opportunities) unrelated to the normal relations of courtesy between the parties.

6.7 Environmental protection

The environment is a primary asset that DoveVivo is committed to safeguarding and, to this end, it is committed to managing its activities by seeking a balance between economic initiatives and environmental needs, developing its business in full compliance with current environmental regulations and always taking into account the rights of future generations.

The Company is committed to protecting the environment in all its activities, using processes, technologies and materials that make it possible to avoid or limit the impacts deriving from the company's activities in terms of pollution.

All recipients of the Code are required to always evaluate and manage environmental aspects with great care in a preventive manner and to intervene effectively to avoid incorrect environmental situations and behaviors.

The commitment to spreading the culture of the environment in the workplace involves all staff in information activities.

7. MONITORING AND CONTROL OF THE APPLICATION OF THE CODE OF ETHICS

DoveVivo S.p.A. undertakes to comply with and ensure compliance with the rules of the Code of Ethics also through the establishment of the Supervisory Body pursuant to Legislative Decree 231/01, appointed by the Board of Directors by virtue of its own deliberative act.

The Supervisory Body is assigned tasks and powers to monitor and control the implementation of the rules of ethical conduct, through, in particular:

- constant supervision of the application by the Addressees of the rules of the Code of Ethics;
- the promotion and evaluation of any report and suggestion aimed at improving the Code of Ethics;
- the promotion of communication, training and refresher programmes for all Recipients;

- opinions on the revision of the Code of Ethics or on the most relevant company policies and procedures, so that they are consistent with the Code itself.

In order to allow the effective application of the Code of Ethics, all Recipients have the right to report to the Supervisory Body any alleged violation of the values and related behavioural principles outlined in this Code of Ethics of which they become aware, or to report any attitude or situation of potential criticality. Reports can be submitted:

- by sending it to the mailbox managed by the SB odv@dovevivo.it
- by sending it to the dedicated mailbox segnalazionidovevivo@gmail.com

The Supervisory Body acts in such a way as to ensure that the authors of the reports are not subject to any form of retaliation, discrimination or penalization or any consequence deriving from the same, ensuring the confidentiality of their identity, without prejudice to legal obligations and the protection of the rights of the company or of the persons accused in bad faith.

In particular, the following provisions apply:

- information and reports from whomsoever they receive, including those relating to any violation or suspected violation of the principles enshrined in the Code of Ethics, must be made in writing and not anonymously;
- Any anonymous reports will be taken into consideration for in-depth analysis only if they are substantiated and, therefore, contain all the objective elements necessary for the subsequent verification phase; anonymous complaints that are considered unreliable will not be taken into consideration;
- information and reports must be sent by the interested party directly to the Supervisory Body.

The Supervisory Body evaluates the reports received, deciding whether to take specific actions.

In any case, there is a protection of the whistleblower that protects him/her from retaliatory and/or discriminatory acts, in accordance with the provisions of Law 179/2017.

All Recipients are required to cooperate with the Supervisory Body, in order to allow the collection of all additional information deemed necessary for a correct and complete assessment of the reports received.

In the face of the reports, the facts will be evaluated, possibly also hearing the author of the same and the alleged responsible for the possible violation.

For the analysis and evaluation of conduct involving violations of the Code of Ethics and the law, the Supervisory Body may make use of specific units or subjects with expertise in the specific matter.

8. SANCTIONING SYSTEM

In the event of an ascertained violation of the Code of Ethics, the SB reports the report and requests the application of any sanctions deemed necessary to the General Management and/or the

Administrative Body. In the event that such violations concern the General Management or one or more members of the Administrative Body, the Supervisory Body will report the reports and the proposal for disciplinary sanctions to the Administrative Body, for all the necessary determinations.

The competent functions, activated by the above-mentioned bodies, approve the measures, including sanctions, to be adopted in accordance with the regulations in force, take care of their implementation and report the outcome to the Supervisory Body. If the sanction proposed by the Supervisory Body is not imposed, adequate reasons will be given.

Violation of the principles set out in the Code of Ethics and in the procedures provided for by the internal protocols referred to in Model 231/2001 compromises the relationship of trust between the Company and its directors, shareholders, employees, consultants, collaborators in various capacities, suppliers, commercial and financial partners. Such violations will therefore be prosecuted by the Company incisively, promptly and immediately, through the disciplinary measures provided for in Model 231/2001, in an adequate and proportionate manner, regardless of the possible criminal relevance of such conduct and the initiation of criminal proceedings in cases where they constitute a crime.

Failure to comply with and/or violation of the rules of conduct indicated in the Code by employees of the Company constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions. The sanctions that can be imposed will be applied in compliance with the provisions of the Law and the National Collective Labour Agreement applied.

These sanctions will be issued on the basis of the importance of the individual cases considered and will be proportionate to their seriousness.

The ascertainment of the aforementioned infringements, the management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company functions in charge and delegated to us.

In the event of a violation by managers of the rules of conduct indicated in the Code of Ethics, the Company will evaluate the facts and conduct and take the appropriate action against those responsible in accordance with the provisions of the law and the applicable National Collective Bargaining Agreement, bearing in mind that such violations constitute a breach of the obligations arising from the employment relationship.

Any conduct carried out by collaborators, consultants or other third parties connected to the Company by a non-employee contractual relationship in violation of the provisions of the Code of Ethics, may also determine, in the most serious cases, the termination of the contractual relationship, without prejudice to any claim for compensation if such conduct results in damage to the Company and this also regardless of the termination of the contractual relationship.