

Joivy

Code of Ethics



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1 FOREWORD

The creation and spread of values on which a company bases its ability to be a competitive player in its business sector and also an accountable subject in the social context in which it operates are the elements required to build a corporate culture able to achieve the following objectives:

- The creation of high-quality products;
- The safeguard of health and safety at work;
- The management of corporate risks (in particular non-compliance) that could impact its reputation in a negative way.

2 CODE OF ETHICS

In line with these values, DoveVivo S.p.A. (the “Company”) and its subsidiaries (the “DoveVivo Group”) have adopted a Code of Ethics to achieve their aim of identifying and indicating the principles and values that inspire the DoveVivo Group in a clear and transparent manner.

It is necessary that people operating for the DoveVivo Group and all those who enter into any relationship with the group follow the rules of conduct that inspire the DoveVivo Group itself.

The Code of Ethics guides the business and day-to-day operations of the group in accordance with corporate purposes based on ethical values and respect of legal compliance.

Furthermore, the Code of Ethics represents a guide to avoid damage to the DoveVivo Group’s image, reputation and institutional, economic and commercial relationships, also when facing ambiguous or potentially risky situations.

All subjects in key positions, such as directors or managers, as well as all employees, collaborators, consultants and more generally all third parties who enter into a relationship with the DoveVivo Group must never fail to comply with fundamental principles such as honesty, moral integrity, correctness, transparency.

The DoveVivo Group, thanks to efficient instruments of information, prevention and control, is able to guarantee the transparency of conduct, the observance of the code and the repression of any violations.

3 RECIPIENTS

The recipients of this Code of Ethics, held to respect it, are:



Internal parties:

- directors of the DoveVivo Group as well as those who perform functions of representation, administration, management or control in companies belonging to the DoveVivo Group;
- employees of the DoveVivo Group.

External parties

- the staff of organisations or other parties acting on behalf or in the interests of the DoveVivo Group;
- External professionals, collaborators and consultants working for the DoveVivo Group;
- suppliers and partners.

External persons that have commercial and business relationships with the DoveVivo Group have to comply with the ethical values and principles of behaviour expressed in this Code of Ethics. If any conduct, individual or corporate, or actions are in contrast with the values and principles of the DoveVivo Group, and / or with laws or regulations, the relevant company of the DoveVivo Group will be obliged to interrupt and terminate the existing relationship.

It is the responsibility of internal recipients who have relations with external workers to inform them of the requirements of the Code of Ethics, to demand compliance with them and to adopt suitable initiatives in the case of non-compliance.

The Directors and the senior management have the obligation to exercise supervisory activities and, at the same time, to report any irregularities, violations or non-compliance related to the principles of the Code of Ethics. The respect of the values illustrated in this Code of Ethics represents a contractual obligation as described in the disciplinary system.

4 VALUES

The DoveVivo Group is inspired by the following values that are binding for the recipients of this Code of Ethics:

4.1 Legal Compliance

The DoveVivo Group conducts its business in compliance with national and EU regulations, rejecting any form of illegal practice, directly or indirectly,



with criminal associations.

The members of the DoveVivo Group must diligently comply with current legislation, this Code of Ethics, company procedures, and any other form of internal regulation.

The pursuit of an interest of the DoveVivo Group cannot justify a dishonest conduct.

4.2 Honesty, moral integrity and fairness

The employees of the DoveVivo Group must behave with respect for the fundamental principles of honesty, moral integrity, correctness, transparency, objectivity and respect for the individual personality in all relationships with internal and external persons and entities.

In no case can actions that differ from honest lines of conduct be justified.

Therefore, the DoveVivo Group will not undertake or continue any form of relationship with anyone who behaves in a way that differs from what is established in this specific point of the Code of Ethics.

4.3 Transparency

Transparency is an indispensable principle in all relations that the recipients of this Code of Ethics have with their interlocutors in order to give accurate, objective, truthful, timely and unambiguous information.

The accounting records must be accurate, complete, truthful and transparent and available to all staff, including external ones.

The accounting records must be based on accurate and verifiable information and must fully comply with internal accounting procedures and complete with adequate documentation.

Recipients who, for any reason, become aware of omissions, falsifications, negligence of the accounting or of the documentation on which the accounting records are based, are required to report the facts to their supervisor.

4.4 Confidentiality

The DoveVivo Group ensures the confidentiality of the information and personal data and the protection of the information acquired in relation to the business activity; it also requires that the information obtained is not used for one's own interests, in order to profit or in a way contrary to the law or in such a way as to damage the rights, assets, objectives of the DoveVivo Group .

Confidential information can be used only for the activities related to the



exercise of professional activity.

4.5 Impartiality and equal opportunities

Any form of discrimination 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 and outside the DoveVivo Group is prohibited.

4.6 Corporate information and financial flows

Each operation and transaction must be correctly recorded, authorized, verifiable, legitimate. Each operation must be supported by adequate documentary evidence in order to be able, at any time, to carry out checks that certify the traceability and reasons why the operation is carried out and identify who authorized, carried out, registered, verified the operation itself.

All recipients must ensure the maximum truthfulness, transparency and completeness of the information, both verbal and documented (paper and digital), produced as part of the performance of the activities.

Any operation that could compromise the DoveVivo Group is strictly prohibited.

4.7 Health and safety at work

The DoveVivo Group ensures the protection of safety, hygiene and health in the workplace in order to respect the health, physical integrity and rights of workers, according to the current legislation on safety, hygiene and health at work.

Anyone among the recipients who should detect situations that could prejudice the health and safety in the workplace or become aware of situations and / or facts that may harm or prejudice compliance with the law, must report the information to their supervisor.

4.8 Professionalism and valuing of human resources

The DoveVivo Group recognizes the importance of human resources and the enhancing of the skills of the resources, making suitable tools for training, professional updating.

4.9 Culture of risk

The DoveVivo Group aims to increase its employees' sensitivity to the risks. This awareness must emerge from the concrete behaviours of everyone. There must be a widespread perception of how the internal control system



actually monitors these risks.

4.10 Protection of personal data

In compliance with current legislation, the DoveVivo Group is committed to protect 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 Policies for the selection of employees and collaborators

Human resources are an indispensable element for the existence of the company and a critical factor for successfully competing on the market. Honesty, loyalty, ability, professionalism, seriousness, technical preparation and dedication of the staff are therefore a decisive condition for achieving the DoveVivo Group's goals.

In order to contribute to the development of the business aims, and ensure that these goals are pursued by all in compliance with the ethical principles and values to which the DoveVivo Group is inspired, the DoveVivo Group selects employees, consultants, collaborators according to the values and characteristics set out above. Furthermore, the DoveVivo Group works to ensure that the resources acquired correspond to the profiles actually necessary for business needs, avoiding favouritism 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 personal, social, financial or political interest and the advancement of the business interests of the DoveVivo Group or its customers.

The occurrence of situations of conflict of interest, in addition to being in contrast with the law and with the principles set out in the Code of Ethics, is injurious to the image and integrity of the DoveVivo Group.

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

Employees who believe they may be in a conflict should notify 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 must act loyally in order to comply with the obligations signed in the employment contract and the rules of this Code, ensuring the required services. According to these principles, all employees must work diligently to protect company assets, through responsible behaviour and in line with the operating procedures set up to regulate their use.

Each employee and collaborator of the DoveVivo Group is responsible for the protection of the material and financial resources entrusted to him and has the duty to promptly inform the units in charge of any risks or harmful events. All staff must comply with the provisions of company policies on information security to guarantee its integrity, confidentiality and availability, and process their documents using clear, objective and exhaustive language, allowing for any checks by managers or authorized external subjects.

5.4 Use of company resources: grants and loans

Each recipient is responsible for the protection and conservation of the corporate resources entrusted to him for the performance of his duties, as well as for their use in a proper and compliant manner for business purposes.

In particular, each recipient must:

- operate diligently in the use of company resources entrusted to him;
- avoid improper use of company resources that may cause offenses, damage or reduction in efficiency, or in any case in conflict with the interest of the DoveVivo Group;
- strictly comply with the company procedures governing its use and the applicable reference legislation, particularly that relating to software or, in general, the protection of intellectual property;
- to base the use of resources on the highest levels of safety, decorum and respect for the sensitivity of others.

In particular, the DoveVivo Group prohibits any use of company resources that may represent a violation of the laws in force, as well as an offense to the freedom, integrity and dignity of people, especially minors

The DoveVivo Group also prohibits any use of company resources that could cause undue intrusions or damage to the computer systems of others.

It is forbidden to use contributions, loans, or other disbursements granted to the company by the State, by a public body or by the European Union, for other purposes than those for which they were made.



6 PRINCIPLES OF CONDUCT IN EXTERNAL RELATIONS

6.1 Relations with customers

The DoveVivo Group considers it essential to maintain high quality standards for its services.

In relations with their customers, each employee or collaborator must be correct and kind and provide exhaustive and adequate information, avoiding the use of elusive or incorrect language.

6.2 Relations with suppliers

The DoveVivo Group applies the values of transparency and correctness in relations with suppliers of goods and services, in compliance with the laws and internal regulations.

According to the DoveVivo Group's policy, it is required negotiate transparently with all potential suppliers, avoiding favouritism or way to obtaining advantages for oneself 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 DoveVivo Group strictly complies with the applicable community, national and company legislation.

All recipients of this Code are obligated to forbear:

- from offering job opportunities or any advantage in favour of the public official involved in the relationship or to his/her family;
- from offering gifts or benefits to the aforementioned subjects, including through third parties, except in the case of a courtesy act of modest value;
- from promising or having promised other forms of benefit or advantage;
- from improperly influencing, even through third parties, the decisions of the institution concerned;
- from creating advantageous situations in favour of the public official involved in the relationship, his family members or subjects in any way related to the same, by means of simulated operations.

In the event that the DoveVivo Group is a party in civil, criminal or administrative litigation proceedings, including those of an out-of-court nature, the corporate bodies, employees and consultants must in no way adopt any conduct that could lead to measures that are illegitimately to the



advantage of itself.

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 the DoveVivo Group intends to act in full compliance with the law.

6.4 Relations with political and trade union organizations

The DoveVivo Group doesn't directly or indirectly favour or discriminate against any political or trade union organization. The DoveVivo Group refrains from providing 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 Professional appointments

The collaborators and the consultants of the DoveVivo Group must be, in the execution of the contractual relationship established or the assignment received by the same, correct and loyal, respecting, as far as applicable to them, the rules of this Code of Ethics, the regulations and the instructions and prescriptions given to the DoveVivo Group's staff.

The DoveVivo Group proceeds with the identification and selection of collaborators and consultants with absolute impartiality, autonomy and independence of judgment and without accepting any conditioning or compromise of any kind aimed at achieving or obtaining favours or advantages. In this context, the DoveVivo Group considers only professional competence, reputation, independence, organizational capacity, correctness and timely execution of contractual obligations and assigned tasks as requirements.

6.6 Gifts, benefits and the promise of favours

The DoveVivo Group forbids all those who operate in their own interest, in their own name or on their own behalf from accepting, offering or promising, even indirectly, money, gifts, goods, services, services or favours that are not due (also in terms of employment opportunities) from strangers the normal courtesy relations between the parties.

6.7 Environmental protection

The DoveVivo Group safeguards the environment and manage its activities by seeking a balance between economic initiatives and environmental needs, developing its business with the utmost respect for current environmental regulations and always having into consideration the rights of future generations.



The DoveVivo Group undertakes to protect the environment in all its activities, using processes, technologies and materials that make it possible to avoid or limit the impacts deriving from company activities in terms of pollution.

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

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

7. DISCIPLINARY SYSTEM

In the event of an ascertained violation of the Code of Ethics, any sanctions deemed necessary will be applied by the General Management and / or the Board of Directors.

Failure to comply with and / or violation of the rules of conduct indicated in the Code by employees of the DoveVivo Group constitutes a breach of the obligations deriving 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 applied National Collective Labour Agreement.