

# **FIXI Srl**

## **CODE of ETHICS**

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## 1. INTRODUCTION

Ethical behavior is a core value and a prerequisite for success.

Respect, passion, determination, honesty, reliability, and a sense of responsibility have always been our *modus operandi* and represent the fundamental prerequisites for achieving our corporate objectives, as well as the benchmark for the daily work of directors, employees, collaborators, and all those who work, either permanently or temporarily, on behalf of the Company.

The principles and rules of conduct set out in this Code of Ethics contribute to strengthening the credibility of our Company.

Each of us, at every level, is required to demonstrate awareness of and commitment to the values and principles contained herein.

The creation of value for the Company and for the society in which we operate depends on the ability of each individual to uphold these principles in daily conduct.

The Code of Ethics therefore constitutes an essential behavioral reference model, identifying the values we believe in both as individuals and as a company, and guiding the conduct of all those who act on behalf of Fixi Srl in an increasingly complex environment.

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### 1.1 Adoption

The corporate culture of Fixi Srl has always been founded on integrity and ethical, lawful conduct.

Aware that behavior defines the way we work, the Company has adopted this Code of Ethics as a guideline for responsible corporate conduct.

This document defines and consolidates the set of principles and values that inspire the Company's activities and that must be observed by all those who interact with Fixi Srl, in any capacity, including directors, employees, collaborators, partners, suppliers, and other stakeholders.

In particular, this Code of Ethics aims to:

- emphasize the ethical principles and behavioral standards adopted by the Company, also with a view to preventing unlawful or improper conduct in the management of business activities that could compromise the relationship of trust between Fixi Srl and its stakeholders and expose the Company to the risk of administrative liability pursuant to Legislative Decree 231/01;
- define and clarify the values and principles that underpin all internal and external activities of Fixi Srl;
- indicate the principles of conduct that all recipients of this Code are required to observe;

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- ensure that all parties who have dealings with Fixi Srl are aware of their responsibility to comply with these principles, including the possibility of sanctions in the event of non-compliance;
- protect and enhance the Company's reputation and image, which constitute essential intangible assets that promote, in particular:
  - externally, shareholder investment, customer loyalty, the attraction and retention of highly qualified human resources, supplier confidence, and creditor reliability.
- **internally, the implementation of a harmonious and well-structured work organization.**

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## 2. RECIPIENTS OF THE CODE OF ETHICS

The provisions of this Code apply, without exception, to all individuals who, directly or indirectly, on a permanent or temporary basis, establish relationships or collaborative arrangements with, or operate in the name of, on behalf of, or in the interest of Fixi Srl.

Such individuals are hereinafter referred to as the **“Recipients”** and include, by way of example:

- individuals holding representative, administrative, or management positions, or those who exercise, even de facto, management and control of the Company, and who give substance to the values and principles set out in this Code by assuming responsibilities both internally and externally, thereby strengthening trust, cohesion, and team spirit;
- employees, who, in compliance with applicable regulations, adapt their actions and behavior to the principles, objectives, and commitments set forth in this Code;
- consultants, collaborators, suppliers, business partners, and any other parties who cooperate with Fixi in any capacity, and who are required to align their conduct and professional practices with the principles contained in this Code.

Fixi Srl is committed to promoting the dissemination and observance of the principles contained in this Code of Ethics through appropriate information, training, and awareness-raising initiatives, so that such principles may be effectively applied in daily activities and translated into concrete and consistent conduct.

In order to ensure proper understanding of the Code of Ethics, it has been communicated to employees through internal channels aimed at guaranteeing awareness and comprehension of the principles set forth herein. This Code of Ethics is also published on the Company's website at **www.fixi.it**.

Any violation of the provisions of this Code shall constitute a breach of the obligations arising from the employment or collaboration relationship, with all consequent legal and contractual effects, including those provided for under Articles 2104 et seq. of the Italian Civil Code.

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Compliance with the principles and rules set out in this Code of Ethics also constitutes an express contractual obligation in relationships between Fixi Srl and its suppliers. Accordingly, procurement and supply contracts entered into by the Company include a specific clause requiring compliance with the Code of Ethics, the violation of which shall result in the automatic termination of the contract.

The principles of this Code of Ethics guide the Company's directors in every decision and action relating to corporate management. Likewise, managers, in the performance of their duties, are required to be guided by the same principles, also in order to act as role models for employees and collaborators.

Every senior company manager:

- sets an example for employees through ethical and responsible conduct;
- promotes compliance with this Code by all "Recipients";
- ensures that the "Recipients" understand that compliance with the Code constitutes an essential element of the quality of their work and professional activities;
- takes timely and appropriate corrective measures whenever required by the circumstances;
- endeavors, within the limits of their powers and responsibilities, to prevent any conduct that is not compliant with applicable laws and regulations, this Code, or internal policies and procedures.

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### 3. GENERAL ETHICAL PRINCIPLES

Fixi considers its image and reputation to be fundamental values that must be protected and enhanced, including through the widespread dissemination, sharing, and observance of the ethical and behavioral principles contained in this Code.

In carrying out its activities, the Company is guided by the ethical principles set out below, which must be observed by all individuals involved, in any capacity, in the performance of corporate activities.

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#### HONESTY AND RESPECT, LEGALITY, LOYALTY, AND FAIRNESS

Honesty and respect are fundamental principles underlying all Fixi activities and necessarily inspire its initiatives, conduct, and communications. They represent essential elements of corporate management.

Legality, loyalty, and fairness form the basis of Fixi's relationships with all stakeholders. Accordingly, Fixi undertakes to:

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- 3.1. act in full compliance with applicable laws and regulations;
- 3.2. conduct its activities in a responsible, fair, and honest manner, safeguarding the interests of customers and the community;
- 3.3. establish fair, transparent, and collaborative relationships with all counterparties;
- 3.4. refrain from making misleading or incomplete communications;
- 3.5. refrain from engaging in conduct that exploits situations of vulnerability, dependence, or lack of knowledge.

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## TRANSPARENCY, COMPLETENESS, AND TRUTHFULNESS OF INFORMATION

Fixi recognizes the fundamental importance of providing accurate, timely, and reliable information to shareholders, corporate management and control bodies, and the competent internal departments with regard to significant events relating to corporate governance, operations, and accounting.

Managers and employees of Fixi are required to provide information that is complete, transparent, truthful, clear, and accurate, so as to ensure that stakeholders and any other parties interacting with the Company are able to make informed and independent decisions, with full awareness of the Company's situation, financial position, interests involved, available alternatives, and related implications.

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## PROFESSIONALISM

Fixi carries out its activities with diligence, competence, and professionalism, making every effort and assuming responsibility within the scope of its duties and assigned roles.

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## TREATMENT OF CONFIDENTIAL INFORMATION

The quality and efficiency of the Company's organization, as well as its reputation, are significantly influenced by the conduct of each Recipient, who is therefore required to contribute, through their behavior, to the protection and enhancement of these values.

Mutual collaboration among all parties involved, in any capacity, in the same project or process is an essential principle.

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Documents, information, and data that are not in the public domain and that, if disclosed, could be detrimental to the Company are considered confidential.

Fixi undertakes to ensure the protection and confidentiality of the personal data of Recipients and stakeholders, in compliance with all applicable legislation on the protection of personal data.

Recipients are required not to use confidential information obtained in the course of their activities for purposes unrelated to the performance of their duties, except where expressly authorized and, in any case, in full compliance with applicable privacy laws and internal Company policies and procedures.

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## RESPECT AND VALORIZATION OF HUMAN RESOURCES

The unique characteristics, skills, and competencies of employees represent one of Fixi's key strengths.

The professional development of personnel is based on the principle of equal opportunity. Recognition of individual achievements, professional potential, and demonstrated competencies constitutes an essential criterion for evaluation and career development.

Fixi respects the fundamental rights of individuals. Any form of discriminatory behavior based on political opinions, religion, race, nationality, age, gender, sexual orientation, health status, or any other protected characteristic is not permitted.

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## PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY

Fixi operates in full compliance with intellectual and industrial property rights legitimately held by third parties, as well as with applicable laws, regulations, and conventions at national, European, and international levels.

In particular, the Company refrains from importing, marketing, using, or otherwise placing into circulation industrial products bearing counterfeit or altered distinctive signs, or products manufactured in violation or usurpation of intellectual or industrial property rights.

## ENVIRONMENTAL PROTECTION

Fixi considers environmental protection and the sustainable development of the territories in which it operates to be of primary importance, taking into account the rights of the community and future generations. Its environmental protection initiatives are based on the awareness that the environment is a common good that must be safeguarded.

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The company promotes awareness-raising activities on this topic and is committed to training its employees to understand the environmental aspects and impacts associated with their activities. All company operations are implemented with this responsibility in mind.

## HEALTH AND SAFETY IN THE WORKPLACE

Fixi guarantees working conditions that respect individual dignity and ensures safe and healthy working environments, in compliance with applicable regulations on occupational health, hygiene, and accident prevention.

The Company actively promotes the dissemination of a culture of safety and risk awareness related to work activities, requiring everyone, at every level, to behave responsibly and to comply with the safety system in place and all related Company procedures.

Accordingly, every employee, collaborator, and any individual working in any capacity at Fixi's premises is required to actively contribute to maintaining a safe and high-quality work environment.

During working hours, the consumption of alcoholic beverages, drugs, or other substances that may impair performance or safety is strictly prohibited. Employees are also strongly encouraged to refrain from consuming such substances immediately prior to working hours, as their effects may persist during the subsequent work shift.

The Company acknowledges that the abuse of alcohol, drugs, or similar substances may negatively affect work performance and may result in serious consequences for the individual concerned and for the safety of colleagues, third parties, facilities, machinery, and work environments.

Employees who believe they may be affected by dependency on such substances are encouraged to seek medical advice promptly in order to undertake appropriate therapeutic treatment, before their condition may adversely affect their ability to work or pose a risk to health and safety.

The Human Resources Department, through the Company-appointed physician, is available to provide information and assistance, on a voluntary and strictly confidential basis, to any employee seeking support in this regard.

## CONFLICT OF INTEREST

Fixi's relationships with suppliers, customers, and institutions are based on the principles of loyalty, fairness, and transparency. Relationships with counterparties are governed by clear rules and objective criteria that exclude any form of personal interest.

In pursuing the Company's objectives and overall interests, Fixi requires that no personal interest may prevail over the interests of the Company or improperly influence internal decision-making processes.



## TAX RISK MANAGEMENT

Fixi is committed to ensuring proper management of tax matters and obligations in order to contribute to the creation and maximization of value for all stakeholders.

In carrying out its activities, the Company promotes and implements tax management practices aimed at minimizing the risk of non-compliance with tax laws or conduct contrary to the principles and purposes of applicable tax systems. This approach is also intended to prevent tax disputes and is based on transparency and constructive dialogue with the tax authorities of the countries in which the Company operates.

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## COMBATING SMUGGLING

Fixi strongly condemns all forms of smuggling and strictly prohibits business relationships with parties that do not comply with customs regulations.

Accordingly, the Company requires all suppliers and collaborators to strictly adhere to applicable customs laws and regulations in the context of import and export activities. Relationships with the Customs Authorities are based on the principles of maximum cooperation, correctness, and transparency.

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## 4. RULES OF CONDUCT

Fixi requires all Recipients to refrain from promoting, facilitating, or engaging in any conduct—whether active or passive—that may result in an illegitimate or unlawful economic or other benefit for themselves or for third parties, or that is intended to promote or favor unlawful or improper interests.

To this end, the Company has established specific rules of conduct with reference to:

- 4.1. rules of conduct towards stakeholders;
  - 4.2. rules of conduct towards collaborators and employees;
  - 4.3. rules of conduct towards the social and professional community.
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## 4.1 RULES OF CONDUCT TOWARDS STAKEHOLDERS

In conducting its business activities, Fixi ensures compliance with the ethical principles and rules of conduct set out in this Code in all relationships with stakeholders, without any distinction based on the relevance, value, or importance of the business relationship.

### CUSTOMER RELATIONS

Fixi bases its business activities and conduct on quality, understood not only as excellence of products but also as attention to the specific needs of customers and their stakeholders. The Company is committed to establishing professional relationships founded on trust and to providing transparent, complete, accurate, truthful, detailed, and understandable information, enabling customers to make informed and independent decisions with full awareness of the interests involved, available alternatives, and related implications.

The Company also guarantees the utmost confidentiality of data and information received from customers, which are collected and processed in compliance with applicable data protection and privacy legislation.

Fixi is committed to full compliance with the laws governing the marketing of its products. No employee may be involved in the marketing or sale of products that mislead consumers as to their origin, quality, or characteristics. The Company further refrains from any conduct that may result in the circulation of products that infringe industrial or intellectual property rights, bear counterfeit trademarks, or are falsely marked.

In managing customer relations, the Company undertakes to:

- formalize, in a transparent and clear manner, the main aspects relating to commercial negotiations;
- operate with diligence, fairness, and due care in the customer's interest;
- faithfully and diligently comply with the obligations undertaken in commercial negotiations and contractual agreements;
- provide efficient, courteous, and high-quality services that meet or exceed the reasonable expectations and needs of customers;
- provide complete, accurate, and comprehensive information in a clear and simple manner, enabling customers to make informed decisions;
- refrain from arbitrary or unequal treatment of customers, including differentiation based solely on economic relevance or order volume;
- ensure truthfulness and correctness in advertising and all commercial communications;
- refrain from any form of discrimination against customers on the basis of religious, political, or ethnic beliefs, gender, or sexual orientation;
- adopt conduct characterized by helpfulness, respect, and courtesy, with a view to fostering collaborative and highly professional relationships;

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- not accept gifts, money, or any other benefits from customers that could be interpreted as intended to obtain favors; in particular, neither the Company nor individuals acting on its behalf may accept gifts or donations that could compromise, or appear to compromise, their independence and impartiality;
- avoid any situation of actual or potential conflict of interest.

When entering into contractual relationships with new counterparties, as well as in the management of existing relationships, it is prohibited to:

- maintain relationships with individuals or entities involved in illegal activities or criminal organizations, in particular those connected with arms and drug trafficking, money laundering, smuggling, or terrorism, or, in any event, with parties that do not meet the necessary standards of integrity and commercial reliability;
- maintain financial or commercial relationships with entities that, even indirectly, hinder human development or contribute to the violation of fundamental human rights (e.g., exploitation of child labor, promotion of sex tourism, or similar practices);
- maintain relationships with entities that fail to comply with applicable workplace health and safety regulations;
- use confidential customer information for purposes unrelated to the performance of professional activities and/or beyond the limits permitted by applicable legislation;
- request or accept, directly or indirectly, gifts, money, favors, or other benefits that may be interpreted as exceeding normal expressions of courtesy or gratitude in commercial practice, or that are in any case intended to obtain preferential treatment.

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## RELATIONS WITH SUPPLIERS, DISTRIBUTORS, AND BUSINESS PARTNERS

The Company adopts a transparent and fair approach toward suppliers, distributors, and business partners, in compliance with internal procedures, and seeks to establish stable and lasting relationships aimed at satisfying mutual needs while preserving the professional nature of such relationships.

Employees are prohibited from abusing their position, role, or authority within the Company in order to exert undue pressure on third parties or improperly influence the performance of assigned activities. Any abuse of professional position constitutes a violation for which not only the individual who commits the act is responsible, but also any person who knowingly encourages or tolerates such conduct.

Fixi establishes relationships exclusively with suppliers, distributors, and business partners who enjoy a solid reputation, operate lawfully, and adopt ethical standards and corporate values comparable to those of the Company.

Suppliers are selected on the basis of objective criteria such as economic convenience, quality, reliability, and efficiency. The selection of suppliers based on subjective, personal considerations, or on interests that conflict with those of the Company, is strictly prohibited.

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With this in mind, in managing its relationships with suppliers, distributors, and commercial partners, the Company undertakes to:

- assign tasks and orders according to objective criteria, in compliance with the principles of impartiality, transparency, and independence;
- establish transparent, fair, and collaborative relationships to create a solid foundation for mutually beneficial and long-lasting partnerships;
- regulate and clarify mutual commitments through comprehensive, written contracts;
- verify that suppliers, distributors, and business partners have a solid reputation and possess competence, professionalism, honesty, and moral integrity;
- ensure that third parties are engaged exclusively in lawful activities and adhere to ethical principles that do not conflict with those of the Company;
- ensure maximum transparency in agreements, avoiding the signing of secret or unlawful pacts;
- refrain from taking undue advantage of contractual relationships in which suppliers, distributors, or business partners may find themselves due to limited knowledge of the Company's operations, particularly in long-term relationships or in cases where services are provided in advance of payments or investments;
- not request or accept gifts, money, or other benefits that could be interpreted as intended to obtain favors or preferential treatment.

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## 4.2 RELATIONSHIPS WITH COLLABORATORS AND EMPLOYEES

Fixi recognizes that human resources are a fundamental factor for its existence and development. Interpersonal relationships within the Company are based on the principles of respect, loyalty, and transparency. Remuneration, career opportunities, and professional development are defined equally for all employees.

No forms of exploitation, isolation, harassment, or stress induction are tolerated. Collaborators and employees are protected against any form of mobbing or workplace bullying.

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## STAFF SELECTION AND DEVELOPMENT

Staff selection is carried out by the relevant departments in accordance with the Company's values, ethical principles, and all applicable laws, and is based exclusively on competence and merit.

Fixi places the utmost importance on the development of human resources and condemns all forms of discrimination based on ethnic, cultural, religious, age, disability, race, gender, or sexual orientation. The Company also rejects any form of incitement to racism, xenophobia, Holocaust denial, or exploitation of personnel.

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The Company does not establish any employment or collaboration relationship with individuals without a valid residence permit, or in any case in violation of national labor laws and generally accepted working standards.

The hiring of spouses, relatives, or partners of employees is permitted at Fixi; however, employees are required to inform both their department manager and the Human Resources Department.

Employees and collaborators are required to:

- behave respectfully towards the Company and the customer for whom they work, in order to protect the Company's image and contribute to its enhancement;
- base their actions on respect for the individual, the good name of the Company, and its working environment;
- ensure order and respect in the use of Company premises, taking proper care of the Company assets entrusted to them;
- behave in a manner that respects the rights and dignity of colleagues, collaborators, and third parties, regardless of their role in the Company or the operational circumstances;
- not use names, trademarks, intellectual creations, or achievements owned by the Company and/or its customers for personal purposes;
- not disclose methodologies, processes, or work documents outside the Company;
- refrain from taking personal advantage of acts, information, or opportunities that have come to their knowledge in the course of their duties;
- avoid situations of actual or potential conflict of interest arising from their own activities;
- undertake business trips solely for work-related purposes;
- not consider rewards or incentives of any kind: travel expenses must be expressly authorized and always accompanied by a proper expense report;
- request approval from the department manager for business lunches and dinners, ensuring that these are conducted in the interest of the Company and do not constitute undue or irregular influence;
- obtain authorization from the department manager for the acceptance or distribution of promotional material;
- obtain authorization from the department manager for participation in training, demonstration, or professional development activities, which must be evaluated based on the topics covered, time required, and associated travel expenses;
- immediately notify their department manager if they receive complimentary products, tickets to shows or sports events, trips, or other forms of reward from current or potential suppliers as a recognition or motivational incentive. Small gifts or products of modest value may be accepted as acts of commercial courtesy, provided that their value does not compromise the integrity or reputation of the Company.

## USE OF COMPANY ASSETS AND RESOURCES

The use of Company assets and resources must be strictly functional to the performance of Company activities or for purposes expressly authorized by the department manager. Such use must be carried out efficiently and in a manner that protects their value, in accordance with applicable laws, avoiding any alterations, damage, or misuse.

Under no circumstances is it permitted to use Company assets or resources for personal purposes that conflict with the interests of the Company, for unlawful purposes, against public order or morality, or to commit or facilitate the commission of crimes.

Each employee is responsible for safeguarding the resources entrusted to them, ensuring their security, and preventing fraudulent or improper use that could cause damage, reduce efficiency, or otherwise be contrary to the interests of Fixi.

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## USE OF COMPANY INTERNET ACCESS

Employees must use Company Internet access exclusively for work-related purposes. The use of Internet access to obtain, share, or distribute illegal material, or material that could expose the Company to administrative or legal liability, is strictly prohibited.

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## COMPLIANCE WITH THE RULES CONTAINED IN THE CODE OF ETHICS

The Company ensures that the Code of Ethics is widely disseminated among all employees. Employees are required to be familiar with and comply with its provisions and, where possible, to promote awareness of the Code among newly hired employees and third parties with whom they interact in the course of their work.

In particular, employees are required to:

- refrain from behavior that violates the rules of the Code of Ethics and actively demand compliance with it;
- contact their superiors or the relevant departments for clarification on the application of the rules, if necessary;
- promptly report to their superiors or Company representatives any information regarding potential violations, whether directly observed or reported by others, including any requests made to them to contravene the Code;
- cooperate fully with the departments responsible for verifying and investigating potential violations of the Code.

## 4.3 RULES OF CONDUCT TOWARDS THE SOCIAL AND PROFESSIONAL COMMUNITY

### RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

Any behavior that violates applicable laws or this Code of Ethics and may constitute corruption, extortion, or undue inducement—committed by directors, managers, employees, or collaborators in the performance of their duties—is never justified, even if motivated by the pursuit of a general “interest” of the Company. Such behavior will result in the adoption of disciplinary measures.

Fixi prohibits its employees, agents, and, more generally, all those who operate in its interest, on its behalf, or in its name, from accepting, promising, or offering—directly or indirectly—money, gifts, goods, services, benefits, or favors not due in relation to relationships with public officials, public service employees, or employees of Public Administration or other Public Institutions. The same prohibition applies in relations with private individuals, whether Italian or foreign, when the intention is to influence decisions, obtain more favorable treatment, or secure undue benefits, or for any other improper purpose.

Any employee who receives—directly or indirectly—requests or offers of money, gifts, or favors of any kind (including high-value presents) improperly made in the context of relations with public officials, public service employees, employees of Public Administration (Italian or foreign), other public institutions, or private individuals must immediately report this to the competent internal department so that appropriate measures can be taken.

Regarding requests for public funds from the State, the European Union, or other public bodies, Fixi undertakes to manage the process of obtaining and using such funds correctly, in full compliance with the law, this Code of Ethics, and internal procedures, in order to protect the Company’s reputation.

Directors, managers, and employees of Fixi are strictly prohibited from using funds received to promote initiatives or carry out works or activities of public interest for purposes other than those for which the funds were granted. It is also forbidden to submit false statements, certificates, or documents, to provide untrue information, or to omit required information in order to obtain funds improperly. Likewise, promising or giving a public official—directly or indirectly—undue remuneration or benefits in cash or in kind, for themselves or a third party, in exchange for an act of their office necessary to obtain funds, is strictly prohibited.



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## **RELATIONS WITH TRADE UNIONS, POLITICAL PARTIES, AND PUBLIC ORGANIZATIONS**

Relations with political parties, trade unions, and other interest groups are conducted exclusively by authorized Company representatives or their delegates, in full compliance with this Code, the Articles of Association, and applicable laws, with particular attention to the principles of fairness, cooperation, impartiality, and independence.

The Company does not make contributions of any kind—directly or indirectly—to political parties, trade unions, their representatives, or candidates. Fixi also refrains from exerting any pressure on public officials (such as through consultancy contracts, recruitment recommendations, or similar actions).

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## **RELATIONS WITH COMPETITORS**

Fixi is committed to full compliance with all competition and market protection laws in every jurisdiction in which it operates. No employee may engage in initiatives, agreements, or contacts with competitors—such as price-fixing, quantity agreements, market-sharing, or similar arrangements—that could be interpreted as a violation of competition laws.

Any breach of these rules may have serious consequences, including legal, financial, and reputational damage, and will be subject to sanctions under current legislation.

Employees are required to strictly observe these provisions. In particular, information deemed confidential or subject to professional secrecy must never be disclosed to competitors. Likewise, sensitive information regarding competitors must not be shared with third parties.

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## **CORPORATE COMMUNICATIONS AND SOCIAL MEDIA**

All corporate communications disseminated through the media must respect the right to information and adhere to the principles of transparency, fairness, and timeliness. Under no circumstances may false, misleading, or biased news, information, rumors, or comments be disclosed.

All communications are to be managed exclusively by officially designated departments. Relations with the press are handled solely by the Legal Representatives, unless specific authorization is granted, in full compliance with applicable laws, regulations, and professional conduct standards.



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Fixi is committed to using social media responsibly, in accordance with the principles of transparency, fairness, and accountability, to ensure the protection and safeguarding of the Company's image, reputation, and the individuals who work there.

## 5. RULES FOR IMPLEMENTING THE CODE

The Board of Directors continuously monitors the effective implementation of the Code of Ethics and, to this end:

- verifies compliance with the rules of conduct by employees, including those in management positions, and by all other recipients;
- has access to all relevant documents;
- may request information from anyone working on behalf of the Company in areas considered at risk or involving sensitive processes;
- proposes the activation of disciplinary procedures in the event of violations of the rules of conduct;
- periodically reviews the Code of Ethics to assess its actual effectiveness and its ability to prevent unlawful conduct, proposing appropriate updates to the Board of Directors;
- receives any reports of irregularities or violations (so-called “ethical alerts”) and manages the assessment and decision-making process.

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## REPORTS OF VIOLATIONS OF THE LAW AND THE CODE OF ETHICS

It is the responsibility of every employee, manager, executive with management and control duties, or collaborator to verify, within the scope of their knowledge and responsibilities, the correctness of the processes in which they participate. They must immediately report (in accordance with the Whistleblowing Policy pursuant to Law No. 179 of November 30, 2017) to their superior, to Management, or directly to the department responsible for compliance, any irregularity that can be classified as a “**significant irregularity**”, including:

- criminal acts;
- violations of civil law (including negligence, fraudulent conduct in contractual matters, or violations of administrative law);
- breaches of internal protocols;
- legal risks;
- dangers to health, safety, or the environment;
- concealment of any of the above.

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The Company has established appropriate communication channels through which interested parties may submit reports regarding the Code of Ethics or its violations, ensuring:

- full compliance with the right to a fair hearing;
- maximum confidentiality;
- protection against any form of retaliation or discrimination, in accordance with legal obligations.

Reports may be submitted via:

- **Email**, which may also be anonymous, sent to: **[whistleblowing@fixi.it](mailto:whistleblowing@fixi.it)**

According to the Whistleblowing Policy, aligned with the protections established by Law No. 179 of November 30, 2017:

- submitting a report does not constitute a breach of confidentiality obligations arising from the employment relationship;
- the procedure guarantees protection against any retaliatory or discriminatory conduct at all stages;
- the reporting party is protected from any disciplinary action or retaliation by superiors for reports or complaints made in good faith and based on a reasonable belief.

## SANCTIONING SYSTEM

Compliance with the principles and rules of the Code of Ethics, as well as their dissemination and operational application within the scope of assigned responsibilities, constitutes an integral part of the contractual obligations of each recipient, pursuant to Article 2104 of the Italian Civil Code.

Any violation will be addressed by the Company in accordance with the law and may constitute a breach of contractual obligations, with all related legal consequences, including termination of the contract or assignment and compensation for any damages incurred.

Violations committed by individuals holding positions of representation, administration, or management within the Company will result in the adoption of sanctions deemed appropriate, taking into account the nature and severity of the violation and the status of the individual, in accordance with applicable regulations.

Recipients are required to regard compliance with the Code as an essential element of the quality of their work and, therefore, to act and behave consistently with its provisions.