Ethical Code

(Codice Etico – english version)

Drafted	Verified	Approved
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CTO	HRAO	CEO

1 Revision History

Revision History					
No.	Edited/Modified	Verified	Approved	Change made	Date
1	Pietro N. Roselli Lorenzini	Ugo Bottone	Massimiliano Pastorino	Document writing	04/03/2024
1.1	Marco Schiavetti / Pietro N. Roselli Lorenzini	Ugo Bottone	Massimiliano Pastorino	Integration of laws and texts	05/03/2024
1.2	Marco Schiavetti	Ugo Bottone	Massimiliano Pastorino	Proofreading and small changes	21/03/2024
1.3	Marco Schiavetti	Ugo Bottone	Massimiliano Pastorino	Alignment with all recalled documents and small changes	21/03/2024
1.4	Marco Schiavetti	Ugo Bottone	Massimiliano Pastorino	Added references to the Career Paths document and general rereading with small corrections	01/04/2024
1.5	Pietro N. Roselli Lorenzini	Ugo Bottone	Massimiliano Pastorino	Inserted references to the Active Participation Guidelines document	26/04/2024
1.6	Pietro N. Roselli Lorenzini	Ugo Bottone	Massimiliano Pastorino	Isolated only in ethical code	11/14/2024
1.7	Rachele Conte	Pietro N. Roselli Lorenzini	Massimiliano Pastorino	Alignment between MOGC documents	21/01/2025

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2 Introduction

This document summarizes the fundamental ethical principles that guide every aspect of the operations of PC Cube Srl (hereinafter PC Cube) and represents the main reference for the conduct of all collaborators.

The goal is to offer a clear vision of the values that the company considers essential: integrity, compliance with the law, transparency, social responsibility and centrality of human resources.

These values not only outline PC Cube's identity, but also establish standards of behavior that help build trusting relationships and promote the company's sustainable success.

Each ethical issue mentioned in this document is explored in depth in a series of specific guides and procedures, which employees can consult to fully understand the application methods and continuous improvement processes adopted by the organization.

PC Cube is aware that business ethics are the basis of a respectful and inclusive work environment, which values people and guarantees fair relationships with customers, suppliers and partners. For this reason, the Ethical Code is not just a set of rules to follow, but a collective commitment to contribute to the common well-being, both inside and outside the company.

PC Cube invites each employee to consult the in-depth documents relating to each topic covered, so that each employee is aware of their duties and the standards to be respected, and can actively contribute to maintaining a high level of integrity and consistency with the company values.

This document is a translation of the original Italian guidelines. In case of discrepancies or ambiguities, the Italian version shall prevail. In order to simplify the access to the corresponding information, documents may be referred with their original name, but a description or a translation is made available.

2.1 Document review

This document will be reviewed and updated as necessary as follows:

- Upon request, in order to correct, integrate or improve the content;
- On an as-needed basis, for organizational changes or company restructuring;
- Periodically, following annual checks.

3 Objectives

This document was created to provide a clear and shared summary of the ethical principles and fundamental values that guide the work of PC Cube. It is conceived not only as a regulatory reference, but as a guide that directs every corporate decision and behavior, promoting a work environment characterized by transparency, respect and social responsibility.

The Ethical Code aims to promote corporate culture and define the standards that all collaborators, suppliers, customers and business partners are required to respect. It represents a formal commitment by PC Cube to guarantee commercial and professional practices based on integrity, compliance with regulations and sustainability, both in the technology sector and in the relationship with stakeholders.

Through this document, PC Cube intends to make explicit the values on which its success is based and ensure that every business activity is carried out according to criteria of integrity and professionalism. Each employee is invited to consider this Code as a practical guide to act in line with the company values and to actively contribute to a culture of ethical and operational excellence.

4 Scope of application

The provisions of this document apply, without exception, to all employees, executives, board members, and collaborators of PC Cube, as well as to anyone who has working or collaborating relationships with the company, whether stable or temporary, directly or indirectly, to contribute to the achievement of company objectives (hereinafter, "Recipients").

This Code is a fundamental reference that establishes not only the principles of behavior, but also the ethical guidelines that must guide every activity and professional relationship. PC Cube is committed to actively disseminating the Code among its stakeholders, using the most appropriate means of communication and training to ensure that each Recipient is fully aware of the company's values and expectations. The company requires alignment with the principles expressed in the Code as an essential requirement for establishing and maintaining collaborative relationships.

The Recipients, in addition to complying with all applicable national and international regulations, are required to conform their actions to the principles set out in this document and to ensure that partners, suppliers and external collaborators are in turn informed, aware of and comply with the obligations envisaged, ensuring overall coherence in the conduct of PC Cube's business.

In situations where there are divergences between the provisions of this Code and local or international regulations, the most restrictive or conservative rule will be applied, in compliance with the law and the highest ethical standards. The PC Cube Ethical Code must be understood as an integral part of the company's Organizational Model and related policies, and its application is supported by procedures and monitoring systems that allow constant control of compliance.

Each Recipient is invited to promptly report any doubts or potential violations of the Code, in compliance with company procedures. In this context, PC Cube has prepared specific tools, such as the ethical reporting system, to allow transparent and respectful management of reports. The company periodically monitors and verifies compliance with the principles established in the Ethical Code, reserving the right to update it to ensure continuous alignment with regulatory changes and best industry practices.

5 Acronyms and abbreviations

The following table lists all the acronyms and abbreviations used, with their description:

Acronym	Description
CE	**Ethical Code**
CEO	Chief Executive Officer
CTO	Chief Technology Officer
MOGC	Organization, Management and Control Model provided by Legislative Decree no. 231/01

6 External Document References

The following documents are considered an integral part of this document:

Original Name	Translated Name
Codice di Condotta e Sanzioni	Code of Conduct and Sanctions
D. Lgs. n. 231/01	Legislative Decree no. 231/01
Linee Guida di Monitoraggio	Monitoring guidelines
Linee guida di Partecipazione Attiva	Active Participation Guidelines
Percorsi di Carriera	Career Paths
Politiche di Whistleblowing	Whistleblowing Policy
Ruoli, Mansioni e Assegnazioni	Roles, Duties and Assignments

7 Ethical Code

PC Cube's Ethical Code is part of a MOGC compliant with the provisions of Legislative Decree no. 231/01, which regulates the administrative responsibility of companies. This model integrates the Ethical Code, ensuring that the principles of legality, correctness and diligence are applied in all corporate activities and are respected by employees, managers, administrators, collaborators and anyone who has relationships with the company. Adherence to these principles is an essential condition for building a solid, coherent corporate culture oriented towards transparency and operational excellence.

To ensure compliance with these values, the company has established a compliance and monitoring system that allows to verify the effective application of the Ethical Code and to intervene promptly in case of any discrepancies. A fundamental role in this system is played by the Ethical Compliance Officer, a figure designated by the Company Management, responsible for promoting the ethical culture, monitoring compliance with the rules and coordinating training and awareness programs on ethical and legal issues. The Head of Ethical Compliance is also responsible for receiving and managing reports of potential violations of the Code, ensuring maximum confidentiality and impartiality in their management.

PC Cube has also established an ethical reporting system both at the whistleblowing level and at the active participation level that allows employees to communicate, in a confidential and secure manner, any doubts, violations or behaviors that do not comply with the principles of the Code. For further information, please refer to the specific documents.

Ultimately, the PC Cube Ethical Code represents a shared commitment to a respectful, ethical and socially responsible work environment. Compliance with these principles is essential not only to protect the company's reputation, but also to consolidate relationships based on trust and transparency with customers, suppliers, partners and the entire community. Through compliance with this Code, PC Cube aims to build a sustainable, fair and equitable future, in which every employee is called to actively contribute to the ethical and operational success of the company.

7.1 Core Values

The company is committed to operating according to fundamental ethical principles that guarantee a responsible, inclusive and quality-oriented work environment, promoting employee well-being, respect for the community and transparency towards all stakeholders.

The main ethical values to be respected are:

- Integrity and Legality: The company acts with integrity and responsibility, strictly adhering to national and international laws and operating honestly and fairly in every situation. This commitment extends to all relationships with employees, customers, suppliers and partners, ensuring that every activity is carried out in compliance with current regulations and without ethical compromises.

- Transparency and Integrity: Transparency is the basis of the corporate identity and the relationship with stakeholders. All financial, operational and strategic information is made accessible in a clear and responsible manner. In contractual relationships, the company maintains a fair approach, avoiding abuse and ensuring fair relations. Furthermore, all activities are carried out with correctness, without favoritism or undue advantages.
- Professionalism and Excellence: Each employee is required to carry out their work with the utmost professionalism, respecting deadlines and high standards, and making the best use of company resources. The company aims to provide superior quality products and services, anticipating market expectations and aiming for excellence and continuous innovation, promoting efficient and safe software development processes.
- Respect, Inclusion and Non-discrimination: The company promotes an inclusive and respectful work environment, where all people are treated with dignity and where diversity is considered a value. Discrimination of any kind is not tolerated, including that based on gender, religion, ethnicity, sexual orientation or political opinions, thus ensuring equal opportunities for all.
- Human Resources Development and Enhancement: PC Cube recognizes the importance of human resources for success and promotes dialogue, a sense of belonging and continuous professional development. Each employee is encouraged to contribute with commitment and competence, and to operate in an environment that respects dignity and autonomy, avoiding abuse of authority.
- Privacy and Data Protection: All employees are required to protect the company's confidential information and intellectual property. The information must be used exclusively for business purposes, in compliance with privacy laws and internal procedures, ensuring data security at every stage of software development and management.
- Corporate Social and Environmental Responsibility: PC Cube is committed to operating sustainably and contributing to the well-being of local and national communities by supporting cultural, social and environmental initiatives. Social responsibility also translates into reducing the environmental impact of business activities, especially in the technology sector.
- Conflicts of Interest: Each employee is required to pursue company objectives, avoiding situations in which their personal interests may conflict with those of the company. Any conflicts must be declared promptly and managed in accordance with company policies.
- Mutual Trust and Respect: In all internal and external interactions, the company promotes a climate of mutual respect and trust. Each person is encouraged to respect the skills and roles of others and to contribute to building a positive and collaborative work environment, refraining from making personal or inappropriate comments. Integrity is the cornerstone of our business ethics. We are committed to acting with honesty, consistency and transparency in all our interactions.

PC Cube Management, meaning the group of figures to whom there is a reporting function within the company, has the duty to be an example of integrity, transparency and loyalty, and to discourage any behavior that is not in line with the company's core values. We do not tolerate any unfair behavior or the use of improper advantages. All forms of communication must always be truthful and accurate, avoiding any misleading or deceptive information.

Employees and collaborators maintain a personal conduct that is honest, balanced and respectful of the individuality of others and base their behavior on principles of honesty, loyalty, correctness, transparency and good faith towards all subjects with whom, in any capacity, they come into contact, for any reason, in the performance of their activities. From internal communication to the representation of products and services, transparency is essential to maintain the trust of stakeholders.

7.2 Relations with the Public Administration

"Public Administration" means any figure, body or subject that operates on behalf of a public administration, whether central or local, Italian or of a country of the European Union. This includes government bodies, supervisory authorities, independent institutions, community bodies such as the European Commission and the European Parliament, and private partners in charge of public services.

The company maintains relationships with these entities following principles of correctness and honesty, ensuring that its representatives never attempt to influence public decisions with improper or illicit means, such as offers of money or advantages that could compromise the impartiality of the representatives of the Public Administration. Only authorized persons can maintain relationships with the Public Administration, ensuring that the information provided is always truthful, accurate and complete.

When hiring or collaborating with former public employees, the company applies rigorous selection procedures to avoid conflicts of interest and ensure transparency in its activities.

Furthermore, any contributions, subsidies or funding obtained from the European Union, the State or other public bodies are used exclusively for the purposes for which they were granted, in full compliance with the intended purposes, ensuring responsible management of public resources.

7.3 Goals and KPI

The Ethical Code stems from the company's commitment to creating an environment based on integrity, respect, and responsibility, promoting transparent and sustainable behavior throughout the entire value chain.

Specifically, the company aims to pursue the following objectives:

- Prevent and combat all forms of corruption, whether active or passive, by ensuring that all decision-making and operational processes are conducted with transparency and in full compliance with the law.
- Protect confidential information and personal data in accordance with current regulations (e.g., GDPR), safeguarding both the company's informational assets and the privacy of employees, customers, suppliers, and other stakeholders.

- Ensure full compliance with applicable local, national, and international laws and regulations, reinforcing the company's commitment to legal integrity, human rights, and fair competition.
- Promote freedom of expression and provide safe, confidential tools for reporting unethical behavior (whistleblowing), in order to foster a culture of trust and shared responsibility.

To support these goals, the company has established the following Key Performance Indicators (KPIs):

KPI	Data Collection	Frequency	Target
% of employees trained on ethics	Training records	Annually	>90%
Number of reported ethical violations	Reporting log	Quarterly	0
Number of internal ethics audits completed	Audit reports	Annually	1
% of reports addressed within 30 days	Whistleblowing register	Monthly	>90%

In order to achieve the established objectives, periodic monitoring and audit activities are planned for this Code and for all related company guidelines and policies. For further details, please refer to the document "Monitoring Guidelines," which includes information on the processes for ensuring continuous improvement and regular updates of these documents, and to Risk Assessment for information about compliance and ethical risks identified.

7.4 Head of Ethical Compliance

PC Cube appoints an Head of Ethical Compliance responsible for promoting and monitoring compliance with corporate ethics regulations and applicable laws and regulations. The Head of Ethical Compliance is a high-level corporate figure, appointed by the Management, with direct access to Management and the resources necessary to carry out his/her functions. For detailed information on the current positions and the assignees of specific roles, please refer to the document "Roles, Duties and Assignments".

8 Final Remarks and Final Remarks and CEO's Message

The PC Cube Ehical Code is not just a formal document: it is a living tool that guides our daily choices and reflects who we are as an organization. The principles it contains are the foundation of the trust we aim to build and maintain with everyone we work with: colleagues, clients, partners, suppliers, and the broader community.

I firmly believe that integrity, transparency, and respect are essential values for doing business today. It's not only about complying with the rules—it's about choosing to do the right thing every day, even when it's more difficult. This is the commitment I ask of each of you.

In a context like ours, where technology, innovation, and social responsibility intersect, we must be fully aware of the impact we can generate. That's why we've chosen to adopt increasingly high standards of security, data protection, and sustainability. Respect for people, the promotion of talent, and inclusion are integral to this vision.

Each of us plays a role in bringing these values to life. The Ehical Code is our compass: I encourage you to refer to it, apply it, and feel free to report any situations that don't align with what we have chosen to stand for. The whistleblowing system is a valuable tool to improve, correct, and strengthen our culture.

My thanks go to everyone who contributes every day to making PC Cube a solid, skilled, and value-driven company. Together, we can continue to build a workplace we're proud of—and a future where innovation always goes hand in hand with responsibility.

With respect and gratitude,

Massimiliano Pastorino

Chief Executive Officer

PC Cube Srl

ELEMENTI DI VERIFICA PER MODELLI, DOCUMENTI SG, LINEE GUIDA E POLITICHE AZIENDALI:

Categoria	Elemento da Verificare	Esito verifica
Criteri Generali	Rispetto struttura documentale prevista (RESPECT FOR STANDARD)	Sì ☒ No ☐ NA ☐
	Leggibilità del testo (READIBILITY)	Sì ☒ No ☐ NA ☐
	L'estetica del documento è piacevole (LOOK & FEEL)	Sì ☒ No ☐ NA ☐
	Eventuali immagini sono leggibili e piacevoli (IMAGE READIBILITY & APPAERANCE)	Sì ☒ No ☐ NA ☐
	Le dimensioni del file non ne compromettono l'utilizzo (DOCUMENT SIZE)	Sì ☒ No ☐ NA ☐
	Corretta specifica modifiche rispetto versione precedente (Se V. > 1.0 - NON REPUDIATION)	Sì ☒ No ☐ NA ☐
Adeguatezza	Il contenuto è ben strutturato (CONTENT ORGANIZATION)	Sì ☒ No ☐ NA ☐
	Definizione del campo di applicazione completa (inc. destinatari)	Sì ☒ No ☐ NA ☐
	"Scopo" come da obiettivo	Sì ☒ No ☐ NA ☐
	Il documento è stato redatto da una persona con il giusto livello di competenza nella materia trattata	Sì ☒ No ☐ NA ☐
	Sono coperti tutti i contenuti previsti o necessari per lo specifico documento (COMPLETENESS)	Sì ☒ No ☐ NA ☐
	I ruoli e le responsabilità sono definiti	Sì ☒ No ☐ NA ☐
	Il livello di riservatezza è coerente con l'uso previsto (CONFIDENTIALITY)	Sì ☒ No ☐ NA ☐
	È completa delle evidenze eventualmente previste (moduli, registri, etc.)	Sì ☐ No ☐ NA ☒
	I riferimenti legali sono aggiornati	Sì ☒ No ☐ NA ☐
Idoneità	Le modalità descritte sono applicabili	Sì ☒ No ☐ NA ☐
	Le risorse necessarie sono disponibili	Sì ☒ No ☐ NA ☐
	I controlli e le registrazioni previsti sono fattibili	Sì ☒ No ☐ NA ☐
	Non contraddice altre procedure o documenti	Sì ☒ No ☐ NA ☐
	È comprensibile per gli utilizzatori previsti	Sì ☒ No ☐ NA ☐
	Il flusso operativo definito è coerente	Sì ☒ No ☐ NA ☐
Note (eventuali)		

ELEMENTI PER APPROVAZIONE DI MODELLI, DOCUMENTI SG, LINEE GUIDA E POLITICHE AZIENDALI:

Categoria	Elemento da Verificare	Esito verifica
Generale	**I documenti che puntano alla procedura sono stati aggiornati a loro volta (ove necessario)**	Sì ☒ No ☐ NA ☐
Adeguatezza	**Il contenuto è adeguato ai requisiti normativi e aziendali**	Sì ☒ No ☐ NA ☐
	Gli argomenti sono trattati in modo completo e adeguato (COMPLETENESS)	Sì ☒ No ☐ NA ☐
	Le informazioni contenute nel documento sono corrette (CORRECTNESS)	Sì ☒ No ☐ NA ☐
	I ruoli e le responsabilità eventualmente definiti sono coerenti rispetto i livelli di responsabilità gerarchica	Sì ☒ No ☐ NA ☐
	Le modifiche implementate sono meritevoli e giustificano il rilascio di una nuova versione (solo per V > 1.0)	Sì ☒ No ☐ NA ☐
Idoneità	**La verifica è stata effettuata come da procedura**	Sì ☒ No ☐ NA ☐
	Il documento è allineato rispetto alle opportunità e i rischi identificati dal SG	Sì ☒ No ☐ NA ☐
	Il documento risponde alle necessità dell'organizzazione identificate (MATURITY)	Sì ☒ No ☐ NA ☐
	Non prevede attività contrarie a obiettivi, leggi applicabili e procedure	Sì ☒ No ☐ NA ☐
	Gli eventuali oneri implementativi sono sostenibili dalla società	Sì ☒ No ☐ NA ☐
Note (eventuali)		