

THE CODE OF ETHICS OF MAPS GROUP

SUMMARY

- **Foreword** 5
- **Recipients of the Maps Code of Ethics** 7
- **Principles of conduct for the organization** 8
 - Introduction 8
 - Integrity of conduct and compliance with Laws and Regulations 9
 - Repudiation of all discrimination 9
 - Centrality, development and enhancement of human resources 9
 - Diversity 9
 - Enhancement of knowledge sharing 9
 - Sharing values 9
 - Transparency and business ethics 10
 - Protection of competition, respecting the rules in force and competitors 10
 - Data quality, security and confidentiality 10
 - Legality and combating terrorism and crime 10
 - Eco-sustainable development 10
- **Criteria for conduct** 12
 - Introduction 12
 - Relations with personnel 12
 - Personnel selection 12
 - Establishment of the employment relationship 12
 - Working environment 12
 - Protection of people 12
 - Development and training of resources 13
 - Health and safety 13
 - Protection of privacy 13

- Duties of personnel 13
 - Professionalism 13
 - Loyalty 13
 - Honesty 14
 - Legality 14
 - Fairness and transparency 14
 - Confidentiality 14
 - Resolution of conflicts of interest 14
 - Diversity 14
 - Respect, courtesy and kindness 14
 - Punctuality 14
 - Care for people 14
 - Obligations of department heads towards the Code of Ethics 14
 - Obligations for employees towards the Code of Ethics and the documents produced by Maps 14
 - Protection of Company assets 15
 - Gifts and benefits 15
 - External disclosure of Company data and information 15
- Relations with customers 16
- Relations with suppliers 16
- Relations with Public Administrations 18
 - Employment relationships with former employees of the Public Administration 18
 - Grants and financing 18
 - Gifts and complimentary items 18
- Relations with Shareholders 18
- External relations 19
 - External effectiveness of the Code of Ethics 19
 - Competitive practices 19
- Relations with Public Supervisory Authorities 19
- **Enforcement mechanisms of the Code of Ethics** 20
 - Organizational principles 20
 - Accounting transparency 20
 - Checks and verifications 21
 - Supervision of the implementation of the Code of Ethics 21
 - Reporting problems or suspected violations 21
 - Disciplinary measures resulting from violations 22
 - Dissemination, communication and training 23
 - Operational procedures and decision-making protocols 23
 - Delegation system 23
- **Final provisions** 24
 - Conflicts with the Code of Ethics 24
 - Approval process and amendments 24

1. FOREWORD

1. FOREWORD

Maps believes in the value of work and considers legality, fairness and transparency to be essential prerequisites for achieving its economic, production and social objectives.

In business and work relationships, the Company acts with objectives characterized by a medium- and long-term vision, so that trusting and long-term relationships have the highest value for Maps, both towards employees and towards partners and customers. With this in mind, the Company establishes and promotes relationships based on mutual trust and respect for the commitments made.

It also believes that professionalism, spirit of initiative together with constant study and updating are essential for the continuous improvement and development of the activity. Knowledge sharing and training are also essential values for the implementation of the Company's mission, which aims, among other things, to carry out activities with a high innovative content.

Our approach to business is guided by the values of commitment, respect, integrity and responsibility.

The Company is committed to sustainable growth, pursuing its own growth objectives while remaining aware of how its actions have an impact on the contexts in which it operates.

For the full realization of the principles set out above, Maps promotes and supports the full development and protection of people, in both professional and purely human terms, also ensuring respect for diversity and equal opportunities.

All the People who work or collaborate with Maps, without distinctions or exceptions, are committed to observe and enforce the principles of the Code of Ethics within their functions and responsibilities.

In particular, the Code of Ethics is aimed at:

- members of the Company's administrative bodies;
- employees;
- external and internal consultants;
- suppliers of goods and services;
- any other person who may act in the name and on behalf of Maps either directly or indirectly, permanently or temporarily.

Maps' Management is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the organization.

In fact, an essential requirement of any successful relationship with Maps is the respect of the principles and provisions contained in this Code of Ethics. In this sense, when signing contracts or agreements with other recipients, Maps represents to its interlocutors, by means of a specific contractual clause, the presence of the Code of Ethics and the possibility to view it on the website "<https://mapsgroup.it/>".

- **PRINCIPLES OF CONDUCT FOR THE ORGANIZATION**

- **Introduction**

The principles listed below are considered fundamental and it is therefore essential that these do not remain mere statements, but are translated into concrete conduct within Maps. As an organization and as individuals, all recipients in the work environment are expected to apply them properly in the performance of their work.

The core values on which Maps' business is based are:

- Integrity of conduct and compliance with Laws and Regulations;
- Repudiation of all discrimination;
- Centrality, development and enhancement of human resources;
- Diversity;
- Enhancement of knowledge sharing;
- Sharing values;
- Transparency and business ethics;
- Innovation;
- Data quality, security and confidentiality;
- Legality and combating terrorism and crime;
- Sustainable development.

- **Integrity of conduct and compliance with Laws and Regulations**

Maps is committed to providing quality services and to compete in the marketplace according to the principles of fairness, free competition and transparency, maintaining fair relationships with all businesses, public institutions, government and administration.

Maps operates in strict compliance with the Law and ensures that all employees act accordingly.

Each recipient is required to operate, in any situation, with integrity, transparency, consistency and fairness, conducting every

business relationship with honesty. This commitment also applies to consultants, suppliers, customers and anyone who has relations with the Company.

- **Repudiation of all discrimination**

In decisions that impact relations with stakeholders (personnel management and work organization, selection and management of suppliers, relations with the surrounding community and the institutions that represent it), Maps prohibits any discrimination, direct or indirect, based on age, gender, health, race, nationality, political opinions and religious beliefs of its interlocutors.

- **Centrality, development and enhancement of human resources**

Maps recognizes the centrality of human resources and believes that an essential factor for success and development is the professional contribution of the people who work in the Group.

Therefore, the Company places the dialogue, the enhancement and the professional updating of its collaborators at the centre of its daily work.

This value translates into:

- the creation of a work environment capable of enhancing the potential of the individual;
- the promotion of dialogue and dialectic within the organization;
- the creation of a relationship system that favours teamwork over hierarchical relationships;
- the daily effort aimed at sharing skills and knowledge, also through the use of innovative systems.

- **Diversity**

Maps requires its directors, employees and collaborators to behave in such a way as to ensure absolute respect for the dignity of people. Therefore, the organization does not allow any form of discrimination, guarantees equal opportunities and impartial treatment for all parties. It also promotes an attitude that is not limited to the safeguarding of differences, but also to their enhancement, for a full expression of the principle of centrality and development of the person.

- **Enhancement of knowledge sharing**

Maps aims to enhance the sharing of knowledge and transparency within the Company, as well as in relations with the various stakeholders, in the belief that this helps to make the best use of human resources and strengthen relationships with customers.

- **Sharing values**

The Company expresses its intention not to entertain relationships with parties that do not comply with legal obligations and/or that do not conform their activities to the values and principles of conduct expressed in the Code of Ethics.

- **Transparency and business ethics**

The history, identity and values of the organization are reflected in a business ethic based on:

- reliability, understood as a guarantee of compliance with the commitments undertaken;
- solidity, relating to an entity that has a solid and well-defined capital base;
- transparency, in order to allow social players to verify the correctness of Maps' actions;
- fairness in contractual matters, whereby contracts must be performed in good faith, with loyalty and respect for the interests of others.

- **Innovation**

Maps places innovation at the core of its activities.

In fact, the Company is committed to studying and implementing new solutions that respond innovatively to the needs of its customers. For the realization of these solutions, Maps uses modern and innovative technologies, the result of independent developments or acquired through careful study.

Innovation for Maps is also expressed in the continuous search for new models for carrying out its activities and in an innovative approach to the proposal of its solutions to the market.

- **Data quality, security and confidentiality**

Maps is committed to and responsible for ensuring quality in every activity and every solution used by its customers. Maps is also committed to ensuring the security and confidentiality of the data that is the subject of its activities, in line with its long-term vision.

In particular, the activities are carried out within Maps in accordance with an integrated management system for quality and data security.

- ### Legality and combating terrorism and crime

Maps believes deeply in democratic values and condemns any activity that may be aimed at terrorism or subversion of the democratic order.

The organization also condemns any criminal and/or Mafia-like activity that consists, merely by way of example, in the acceptance and handling of proceeds from criminal activities (money laundering) or in the unauthorized access to internal and/or external computer systems.

- ### Eco-sustainable development

The Company is committed to pursuing growth objectives, remaining aware of how its actions have an impact on its stakeholders and more generally on the context in which it operates.

The approach to business is guided by the values of commitment, respect, and responsibility. Maps' sustainability is based on a model of shared responsibility that, promoted by the highest levels of management, involves all employees and every corporate function.

More specifically, the Group is guided in its activities by the following sustainable development objectives:

- improve the quality of life, through the provision of solutions enabling higher levels of service (e.g. of the health system and institutions);
- protect and respect the environment, trying to encourage solidarity and responsible consumption and supply;
- create new jobs, eschewing inequality and promoting diversity in its broadest sense, for the creation of a sustainable workplace that is at the same time, in line with sustainable macroeconomic needs, composed of a mix of complementary professional skills;
- promote technical, scientific and entrepreneurial training, in order to achieve conscious and sustainable growth, which takes into account the impact of the enterprise in its context;
- promote, in general, a corporate culture based on human respect and respect for the planet and all its life forms.

In addition, the personnel who work, in any capacity, in the name or on behalf of the Company, in the performance of their duties are required to comply with the rules and any internal regulations adopted on environmental protection. The use of resources and means necessary to perform work is carried out, as far as possible, in compliance with environmental and social sustainability.

Maps is also committed to spread the messages about environmental protection, to strengthen the adherence of the whole Company to a culture of sustainability, and to work with suppliers who in turn take into account the environmental impact of their products and services.

- **CRITERIA FOR CONDUCT**

- **Introduction**

The rules contained in this section are intended to indicate to the recipients of this Code of Ethics the conduct to be observed during the performance of the various activities in accordance with the values that inspire this document.

- **Relations with personnel**

- **Personnel selection**

The evaluation of personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with the internal requirements (detailed in the job description), respecting equal opportunities for all the persons concerned and adopting appropriate precautions to avoid favouritism.

- **Establishment of the employment relationship**

Personnel is hired under regular employment or internship contracts. No form of irregular work is tolerated.

- **Working environment**

The Company considers it a priority to create a positive working environment oriented towards utmost mutual cooperation, teamwork and sharing of objectives, in which everyone can express their potential, free from any conditioning or any form of intimidation.

- **Protection of people**

Flexible forms of work organization shall be favoured to facilitate all personnel, with particular attention to persons on maternity leave and to those who have to care for their children and other family members in need.

- **Development and training of resources**

Maps provides people with information tools and training courses, with the aim of enhancing and developing the specific skills of personnel.

Recurring training is provided, for example on safety in the workplace, 231 management and Code of Ethics. Technical and organizational skills training is also provided. Training planning is carried out at least once a year and takes into account the needs that emerged in the previous period, the challenges that the Company will face in the future and regulatory obligations.

- **Health and safety**

Maps is committed to providing a working environment that can protect the health and safety of its personnel, spreading and consolidating a culture of safety, developing risk awareness and promoting responsible conduct by all personnel.

In particular, Maps adopts the general measures for the protection of health and safety at work prescribed by law, with particular reference to the provisions of Legislative Decree 81/08 and subsequent amendments and integrations.

All employees are required to comply with the internal rules and procedures on risk prevention and health and safety protection and to promptly report any shortcomings or failure to comply with the applicable rules. In particular, the Company coordinates its activities in the field of health and safety at work in accordance with the following principles:

- define the operational procedures to be followed;
- constantly monitor legislative changes and work towards their implementation;
- assessment of all health and safety risks;
- elimination of risks and, where this is not possible, their minimization in relation to knowledge acquired as a result of technical progress;
- assessment of all health and safety risks that cannot be eliminated;
- health monitoring of workers;
- give appropriate instructions to workers.

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- **Protection of privacy**

In the processing of the data of its personnel, the Company complies with the provisions contained in EU Regulation 2016/679, referred to as “General Data Protection Regulation – GDPR”, and in Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, according to which a Privacy Policy must be delivered that identifies:

- purposes and methods of processing;
- any parties to whom the data is communicated;
- information necessary for the exercise of the right of access.

In cases where legislation requires it, personnel will be asked for specific consent to process their personal data. Any investigation into the ideas, preferences and in general the private life of employees and collaborators is excluded.

- **Duties of personnel**

Personnel is required to act loyally in order to comply with the obligations underwritten in the employment contract and the provisions of the Code of Ethics, inspiring their activities to the following principles and values:

- Professionalism
- Loyalty
- Honesty
- Legality
- Fairness and transparency
- Confidentiality
- Resolution of conflicts of interest
- Diversity
- Respect, courtesy and kindness
- Punctuality
- Care for people

- **Professionalism**

Each person is required to carry out their work and their services with diligence, efficiency and fairness, making the best use of the tools and time at their disposal and assuming the responsibilities related to the obligations to which they are bound.

- **Loyalty**

Recipients are expected to be loyal to each other and to Maps. It is everyone’s duty to share the Company’s policies and to make sure that they are respected, preserving Maps’ interests and image.

- **Honesty**

Honesty represents the fundamental and inspiring principle of all Company activities and constitutes an essential value of organizational management. Professional relationships must be based on criteria and conduct of integrity, rectitude, collaboration and mutual respect. Under no circumstances can the pursuit of the Company’s interest justify dishonest conduct.

- **Legality**

Personnel is required to comply with all national and European standards, laws, directives and regulations.

- **Fairness and transparency**

Maps is committed to operate in a clear and transparent manner, without favouring any interest group or individual.

Individuals may not use for personal purposes any information, property or equipment available to them in the performance of their assigned function or duties.

Each person shall not accept or make for themselves or for others any pressure, recommendation or report that could be prejudicial to Maps or procure undue advantages for themselves, the Company or third parties.

Each person shall reject and not make promises of improper offers of money or other benefits.

- **Confidentiality**

People shall ensure the utmost confidentiality with regard to news and information that are part of the Company's assets, in compliance with the law, current regulations and the Integrated Quality and Safety Manual adopted by Maps. In addition, recipients are required not to use confidential information for purposes unrelated to the conduct of their business.

- **Resolution of conflicts of interest**

People pursue the general objectives and interests of Maps in their work. They shall inform their superiors or contacts without delay of situations or activities in which there may be an interest in conflict with that of the Company, on the part of the persons themselves or their close relatives and in any other case in which there are significant reasons of convenience.

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- **Diversity**

Discrimination and harassment of any kind related to race, gender, religion, nationality, age, sexual orientation, disability or other personal or gender characteristics will not be tolerated.

- **Respect, courtesy and kindness**

Respect for others, kindness and courtesy must be a criterion of conduct in relations with customers, suppliers and any person inside and outside the Company.

- **Punctuality**

Punctuality is a form of respect for those who are waiting. If you are late for an appointment, it is good practice to give notice before the end of the agreed time.

- **Care for people**

In the workplace, employees and collaborators are required to behave and take care of their personal appearance and clothing in a manner appropriate to the working environment.

- **Obligations of department heads towards the Code of Ethics**

Specific resolutions of the competent bodies define the duties, responsibilities and powers of directors, employees and collaborators.

Each department head, identified as such in the organization chart, has the obligation to:

- ensure compliance with the Code of Ethics by the persons directly or indirectly under their responsibility;
- set an example to their employees and collaborators with their own behaviour;
- promptly report to the General Management or to the Supervisory Board or to the Internal Auditor any reports or special needs of their subordinates.

Failure to comply with the obligations set out in this chapter on the part of the department heads may result in the application of disciplinary sanctions, as provided for in the sanctions system.

- **Obligations for employees towards the Code of Ethics and the documents produced by Maps**

Each employee is required to be familiar with the provisions contained in the Code of Ethics or referred to therein, as well as with the reference laws governing the activities carried out within the scope of their function, which are an integral part of each employee's work performance.

Any employee who becomes aware of alleged unlawful conduct is obliged to communicate the information in their possession regarding such conduct only to their superiors or to the Supervisory Board, in the manner provided for by the internal system.

Employees and collaborators are required, in accordance with a broader duty of diligence and obligation of loyalty of the employee under articles 2104 and 2105 of the Italian Civil Code, to:

- refrain from conduct contrary to these provisions;
- contact their superiors or the Supervisory Board and/or the internal contact for the management of the prevention model, for the necessary clarifications on the application methods of the Code of Ethics or the reference regulations;
- cooperate with Maps in case of possible investigations aimed at verifying and possibly sanctioning possible violations.

- **Protection of Company assets**

Personnel is required to use work tools, Company assets and data with the utmost care and in accordance with the principle of economy. Improper use, damage and waste must therefore be avoided.

People must be aware of and implement the provisions of internal policies on information security in order to guarantee the integrity, confidentiality and availability of the information.

Information and know-how must be protected with the utmost confidentiality. The data that Maps acquires or creates in the course of its business must be considered confidential information and subject to appropriate security measures.

Persons who, in the performance of their duties, accidentally come into possession of confidential information, materials or documents not intended for them shall promptly inform those responsible.

The obligation of confidentiality exists both during and after the termination of the employment relationship with Maps.

- **Gifts and benefits**

In relations with Customers, Suppliers and third parties in general, it is forbidden to offer or accept money,

gifts or benefits, even on a personal basis, in order to obtain undue advantages of any kind, contrary to official duties or in any case in violation of any regulations.

Acts of commercial courtesy towards third parties, as well as the receipt of the same, are permitted, provided of modest value and, in any case, such as not to impact the integrity and reputation of Maps and not to influence the independent judgement of the recipient. Gifts of modest value are considered to be those of a value less than Euro 50.00 (fifty/00). In the case of gifts of higher value, prompt notice must be given to the Maps Personnel Department.

All acts aimed at corruptive practices of any kind towards third parties, whether private or public, are also expressly forbidden.

- **External disclosure of Company data and information**

The issuance of any statements, disclosures, communications in the name and on behalf of Maps is the exclusive responsibility of the Chair of the Board of Directors and the Chief Executive Officer, also severally.

The same shall verify and authorize any written communication made available to the public in the press and in MAPS' institutional information channels (website, blog, social networks).

- **Relations with customers**

The Company intends to develop lasting economic relationships with its customers, based on trust and mutual satisfaction.

Therefore, Maps ensures the customer the best execution of the tasks entrusted and is constantly oriented to offer increasingly advanced and innovative solutions with a view to efficiency, confidentiality and security.

RELATIONS WITH CUSTOMERS

- **DECISION**

Maps provides accurate, complete and truthful information so that the customer can make a rational and informed decision. Therefore, it promotes and adopts a style of communication based on completeness, transparency, collaboration and courtesy.

- **PRIVACY**

All information acquired, directly or indirectly, about customers is used and

stored with the utmost confidentiality and compliance with current privacy legislation. In particular, in the processing of customers' personal data, the Company complies with the provisions contained in EU Regulation 2016/679, referred to as "General Data Protection Regulation – GDPR", and in Legislative Decree 196/2003, as amended and supplemented by Legislative Decree 101/2018.

- **Relations with suppliers**

The selection of Suppliers and the formulation of the conditions of purchase of goods and services must be guided by criteria of competition, objectivity, fairness, impartiality, price equity and quality of the good and/or service.

Relations with Suppliers are based on transparent agreements and constructive dialogue aimed at achieving common objectives, in accordance with the principles of this Code of Ethics.

RELATIONS WITH SUPPLIERS

- **SUPPLIERS OF GOODS AND PROVIDERS OF SERVICES**

Maps defines relationships with its suppliers of goods and providers of services, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment.

- **INTERNAL AND EXTERNAL CONSULTANTS**

Consultants are chosen on the basis of their professionalism and reputation, as well as their reliability and adherence to values compatible with those expressed in this document.

- **CLAUSES**

In the event that a supplier behaves in a way that is contrary to the principles and values expressed in the Code of Ethics, Maps will be able to make use of the express termination clause according to article 1456 of the Italian Civil Code included in each contract.

- **MONITORING**

Relations with suppliers, including those concerning financial and consulting contracts, are constantly monitored by the Company.

- **CONTRACT**

The stipulation of a contract with a supplier must always be based on extremely

clear relations, avoiding any forms of dependency where possible.

• DOCUMENTS

Documents exchanged with suppliers must be appropriately filed; in particular, those of an accounting nature must be kept for the periods established by the regulations in force.

• Relations with Public Administrations

Maps inspires and adapts its conduct, in its relations with the Public Administration, to the principles of legality, fairness and transparency. On this basis, the people appointed by Maps to follow any negotiation, request or relationship with the Public Administration, Italian or foreign, must not for any reason try to improperly influence its decisions or behave unlawfully, such as offering money or other benefits, which could alter the impartial judgement of the representative of the Public Administration.

The persons entrusted by the Company organization with the management of relations with any authority of the Public Administration must verify that the information provided in any way and for any reason is true, accurate and correct.

• Employment relationships with former employees of the Public Administration

The hiring or establishment of other employment relationships with former employees of the Public Administration who, in the performance of their duties, have had relations with Maps or their family members and/or relatives, shall take place in strict compliance with the standard procedures for personnel selection.

As a general rule, it is forbidden to establish employment relationships with former employees of the Public Administration or their family members in the two years following the performance of an act, falling within the competence of the aforementioned persons and expression of the relative discretionary power, from which an advantage for the Company has derived.

• Grants and financing

It is forbidden to use contributions, subsidies or funding obtained from the European Union, the State or any other Public Entity for purposes other than those for which they were granted, even if of modest value and/or amount.

In the event of participation in public procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practice, avoiding in particular to induce the Public Administration to operate unduly in favour of the Company.

The use of manipulated or falsified declarations or documents or through the omission of information or, in general, the use of artifices or deception, aimed at obtaining concessions, financing, contributions from the European Union, the State or other Public Entity, also constitutes illegal conduct.

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Gifts and complimentary items

No recipient may give money or offer economic or other advantages to Public Administration subjects in order to obtain assignments, personal advantages or benefits for Maps. Any form of gift, even indirect, to family members of Public Administration employees is also prohibited.

If an employee, consultant or any person working on behalf of Maps receives explicit or implicit requests for advantages from a member of the Public Administration, they must immediately inform the Board of Directors or the Supervisory Board, which will conduct the appropriate checks.

• Relations with Shareholders

Maps, listed on the AIM Italia segment of Borsa Italiana, is committed to satisfying the right of Shareholders, as well as potential investors, to obtain information and news about Maps as complete and exhaustive as possible, in order to allow informed investment choices.

To this end, Maps promptly and adequately informs the public of any transaction or decision relevant to Maps and, consequently, Shareholders, making available on its website, and through all appropriate institutional channels, the financial statements and periodic accounting documents, as well as any other document relevant to the law on the Company's performance. The directors, employees and collaborators of Maps who, as part of their responsibilities, become aware of "price sensitive" information not available to the public concerning, directly or indirectly, the Company or Maps stock, are required to handle it correctly. In this regard, Maps has adopted a specific Procedure that regulates the processing and communication, both inside and outside the Company, of documents and information concerning the Company and its subsidiaries, published on the company website <https://mapsgroup.it/>.

Any favouritism or preferential behaviour towards one or more Shareholders is expressly prohibited.

- **External relations**

- **External effectiveness of the Code of Ethics**

Whoever, acting in the name and on behalf of Maps, comes into contact with third parties with whom the organization intends to undertake business relations or is required to have relations of an institutional, social, political or any other nature, has the obligation to:

- require compliance with the obligations of the Code of Ethics in the performance of their activities;
- adopt the necessary initiatives, in the event of refusal by third parties to comply with the Code of Ethics or in the event of failure or partial execution of the commitment made to observe the provisions contained in the Code of Ethics itself, informing the Supervisory Board.

- **Competitive practices**

For Maps, it is of paramount importance that the market is based on fair competition. It therefore undertakes to scrupulously observe the relevant laws and to cooperate with the market regulatory Authorities. In particular:

- it undertakes to carry out the activities in compliance with the rationale of the law for the supply of goods and provision of services that are entrusted through express agreements with public entities, including economic entities and joint stock companies with public participation;
- it competes fairly in the marketplace by respecting the rules of competition;
- it undertakes to provide correct information about its activities both internally and externally in response to legitimate requests;
- it ensures the truthfulness and correctness of corporate data relating to financial statements, reports and other official documents.

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Relations with Public Supervisory Authorities

The recipients of this Code of Ethics undertake to:

- scrupulously comply with the provisions issued by the competent institutions or Public Supervisory Authorities for the observance of the regulations in force in the sectors related to their respective areas of activity;
- not submit, as part of the preliminary investigations with Institutions and/or Public Supervisory Authorities, applications or requests containing untrue statements;
- comply with any request from the above-mentioned Institutions or Authorities within the scope of their respective supervisory functions, providing – where required – full cooperation and avoiding obstructive behaviour.

- **Enforcement mechanisms of the Code of Ethics**

- **Organizational principles**

Maps ensures that the organizational system is based on the criterion of separation between decision-maker, executor and controller. Maps binds those performing the audit function to the truthfulness and correctness of the data and information. Every operation and/or activity must be lawful, authorized, consistent, documented, verifiable, in compliance with the principle of traceability and Company procedures according to the criteria of prudence and protection of Company interests. Company procedures must allow controls to be carried out on operations, authorization processes and the execution of the operations themselves.

- **Accounting transparency**

The Company accounting complies with the generally accepted principles of truthfulness, accuracy, completeness and transparency of the data recorded.

The recipients of this Code of Ethics undertake to refrain from any conduct, whether active or omissive, that directly or indirectly violates the regulatory principles and/or internal procedures concerning the formation of accounting documents and their external representation.

Recipients are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to allow:

- accurate accounting;
- immediate identification of the underlying characteristics and reasons;
- easy formal and chronological reconstruction;
- verification of the decision-making, authorization and implementation process in terms of legality, coherence and consistency and the identification of the various levels of responsibility.

Recipients who become aware of cases of omission, falsification or negligence in accounting records or supporting documentation are required to promptly report them to their superior or to the Supervisory Board.

- **Checks and verifications**

Maps guarantees the availability, through the competent persons, to provide all the information and viewing of the documents, requested by the auditing and control bodies.

The organization prohibits its directors, employees and collaborators from making false statements and submitting false documents or certifying untrue situations, including through computer systems, in order to unduly receive public funds and/or obtain and maintain any economic benefits.

- **Supervision of the implementation of the Code of Ethics**

The task of verifying the implementation and application of the Code of Ethics is the responsibility of:

- Department heads, regarding the work of their subordinates/collaborators;
- Internal functions with control duties (e.g. Head of Quality Management System, Head of Information Security Management System, Compliance Manager, etc.);
- Internal Auditing function (for the parts under its responsibility);
- Board of Directors;
- Supervisory Board: this body, in particular, in addition to monitoring compliance with the Code

of Ethics, having access to all of Maps' sources of information, suggests appropriate updates to the Code, also on the basis of reports received from personnel.

The Supervisory Board is responsible for the following tasks:

- communicate to the Board of Directors, for the adoption of the appropriate measures, the reports received concerning violations of the Code of Ethics;
- express opinions on the revision of the most relevant policies and procedures, in order to ensure consistency with the Code of Ethics;
- promote the periodic review of the Code of Ethics: to this end, the Supervisory Board makes appropriate proposals to the Board of Directors, which evaluates them and, if necessary, approves and formalizes them.

The Supervisory Board maintains the requirements of autonomy and independence, assumes powers of investigation and control as well as powers of initiative for the performance of the functions assigned to it.

- **Reporting problems or suspected violations**

All the recipients of the Code of Ethics are required to report to the Supervisory Board and/or to the Internal Auditor or, in the case of employees and internal collaborators, to their direct superiors and Department Heads, any anomalous situation and/or situation potentially at risk in terms of commission of offences.

In case of violation of this Code of Ethics, the aforementioned subjects are required to give appropriate and timely reports, confidentially, directly to the Supervisory Board appointed by Maps and/or to the Internal Auditor appointed by Maps.

For this purpose, Maps has activated and makes available to the recipients specific channels for the submission of detailed reports of illegal conduct, based on precise and consistent facts, or violations of this Code of Ethics and of the Organizational, Management and Control Model adopted by Maps, of which they have become aware due to their functions. These channels guarantee the confidentiality of the identity of the reporting agent in the management of the report.

Reports should be in writing, signed or anonymous, and addressed to:

A. THE SUPERVISORY BOARD

- to the e-mail: **odv@mapsgroup.it**,
- by registered mail, to "**Maps S.p.A., To the kind attention of the Chair of the Supervisory Board – Confidential**", sent to the address "Via Paradigna 38/a, 43122 Parma".

B. THE INTERNAL AUDITOR

- to the e-mail: **segnalazioni@mapsgroup.it**,
- by registered mail, to "**Maps S.p.A., To the kind attention of the Internal Auditor – Confidential**", sent to the address "Via Paradigna 38/a, 43122 Parma".

A. THE SUPERVISORY BOARD

- to the e-mail: **odv@mapsgroup.it**,
- by registered mail, to "**Maps S.p.A., To the kind attention of the Chair of the Supervisory Board – Confidential**", sent to the address "Via Paradigna 38/a, 43122 Parma".

B. THE INTERNAL AUDITOR

- to the e-mail: **segnalazioni@mapsgroup.it**,
- by registered mail, to "**Maps S.p.A., To the kind attention of the Internal Auditor – Confidential**", sent to the address "Via Paradigna 38/a, 43122 Parma".

Whichever channel is used, Maps is committed to safeguarding the anonymity of the whistleblower and to ensuring that the same is not subject to any form of retaliation.

The Supervisory Board and/or the Internal Auditor will collect the report, checking its grounds and assessing whether it is appropriate to proceed with further investigation, always without prejudice to the confidentiality and protection of the report.

Recipients are expressly and absolutely prohibited from retaliating or discriminating, directly or indirectly, against the person making the report, for reasons directly or indirectly related to the report.

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Disciplinary measures resulting from violations

The provisions of this Code of Ethics are an integral part of the contractual obligations undertaken by personnel, as well as by those who have business relations with Maps.

The violation of the principles and conduct indicated in the Code of Ethics compromises the relationship of trust between Maps and the perpetrators of the violation, whether they are directors, employees, consultants, collaborators, customers or suppliers.

In case of violations of the Code of Ethics, Maps takes action against those responsible for such violations, where deemed necessary to protect the interests of the organization,

appropriate disciplinary measures, in addition to compensation for any damages deriving from the violations, for which reference should be made to the Document “Disciplinary System pursuant to Legislative Decree 231/2001”.

The fundamental requirement of these measures is proportionality with respect to the violation detected; proportionality must be assessed in accordance with three criteria:

- seriousness of the violation;
- type of employment relationship established with the employee (subordinate, para-subordinate, managerial, etc.), taking into account the specific regulations and contracts in force;
- possible recurrence.

- [Dissemination, communication and training](#)

This Code of Ethics is brought to the attention of all internal and external stakeholders or those involved in Maps’ mission through appropriate communication and training activities.

- [Operating procedures and decision-making protocols](#)

This Code of Ethics is an integral part of and implements the 231 Model adopted by the Company for the purpose of preventing crimes committed in the interest or to the advantage of the organization itself by the persons indicated in Legislative

Decree 231/2001.

In order to prevent violations of the regulations in force, as well as of the Code of Ethics itself, Maps provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the persons responsible for the processes of decision, authorization and performance of the operations themselves.

- **Delegation system**

Maps adopts a delegation system on the basis of which certain activities can only be carried out by persons expressly authorized to do so because they have the power to do so by means of a special proxy and/or notarized power of attorney.

In fact, it is necessary that the individual operations are carried out in the various phases by different subjects, whose competences are clearly defined and known within the organization in order to avoid unlimited or excessive powers being attributed to single subjects.

- **Conflicts with the Code of Ethics**

In cases where even one of the provisions of this Code of Ethics conflicts with the provisions of internal regulations or procedures, the Code of Ethics shall prevail over any of these provisions.

- **Approval process and amendments**

This Code of Ethics was originally approved by the Company's Board of Directors on 29 March 2018.

Any variation and/or integration of this Code of Ethics will be approved by the Board of Directors after consultation with the Supervisory Board and promptly circulated to all recipients of the same, in particular:

- the Supervisory Board periodically reviews the Code of Ethics for any legislative or corporate amendments and proposes amendments and/or additions;
- the Board of Directors examines the proposals of the Supervisory Board and resolves accordingly, making the approved amendments immediately operative.