



**CODE OF CONDUCT
&
DISCIPLINARY PROCEDURES**

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1. INTRODUCTION

As a part of Medov Group, MEDOV is committed to creating a work environment in which employees can flourish. One component of establishing this environment is to have HR practices and policies that are straightforward to guide our employees and help them make informed decisions.

This handbook contains the Code of Conduct and the Disciplinary Procedures of the Company, including policies and general guidelines.

Our employees are required to familiarize themselves with this document to be informed about the rules of conduct and properly address any situation they might face at work.

Employees at MEDOV should act with morality and dignity, upholding ethical standards in their interactions: this includes treating colleagues with respect, maintaining professional communication, and acting with integrity in all workplace activities.

As MEDOV is constantly growing, our practices and policies may change over time. We reserve the right, at the Company's sole discretion, to depart from, revise, amend, enforce or even rescind the handbook and/or individual policies at any time.

Feel free to reach out to HR to ask any questions, make suggestions, share your opinion.



2. ANTI-HARASSMENT AND DISCRIMINATION STATEMENT

MEDOV is committed to providing an atmosphere where all employees perform their duties free from discrimination and harassment based on race, religion, color, national origin, age, sex, ancestry, disability, marital status or any other basis prohibited by applicable law.

Harassment, including but not limited to sexual harassment, is strictly forbidden at MEDOV. We expect all employees to understand the responsibility that MEDOV has, as an employer, to protect our employees and to maintain a work environment free from harassment and intimidation. Harassment can result from a broad range of conduct with or without intent, which may include, but is not limited to, the following:

- Intimidation, ostracism or animus
- Racial insults or comments
- Derogatory gender related comments
- Derogatory ethnic related comments
- Derogatory religious related comments
- Derogatory age-related comments

Sexual Harassment is defined as unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct or abuse of a sexual nature in situations where:

- Submission to such is an explicit or implicit term or condition of employment.
- An individual's submission to or rejection of such conduct becomes the basis for employment decisions affecting that individual; or
- Such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment. This may include objectionable posters or other material, physical touching or impeding of movement.

All employees are responsible for conducting themselves in ways that ensure others can work in an atmosphere free from harassment. This includes but is not limited to all Company sponsored events.

We expect managers, directors and employees to endeavor to protect all employees and to maintain a work environment free from harassment, including but not limited to sexual harassment and racial harassment.

Any employee who has witnessed or experienced harassment should report the incident to HR.

We will immediately investigate complaints and take corrective action which is deemed appropriate under the circumstances.

Individuals who make reports of harassment or register complaints will have their reports or complaints held in confidence to the extent possible within the scope of the investigation. Individuals who have filed a complaint of harassment or assisted in an investigation of harassment are protected from harassment, coercion, intimidation, interference or discrimination in accordance with applicable law.

No employee will be discriminated against on the grounds of religion or belief, nor will they be forced to express their religion or beliefs.



3. DIVERSITY & INCLUSION

Different backgrounds and perspectives make our Company stronger.

MEDOV is committed to building diverse teams with unique strengths that thrive in an innovative and inclusive environment.

As a part of Medov Group, MEDOV aims to create a workplace where employees feel a sense of belonging and can express their unique talents and ideas while giving the best of themselves.

MEDOV works to ensure inclusion among its employees, getting inspired by equity principles and equal opportunities for everyone across the Company.

In support of a diverse, equitable and inclusive workplace, MEDOV is focused on:

- Striving to hire, develop, and retain diverse talent, and respect qualities that make employees who they are.
- Providing all employees with a safe avenue to voice concerns regarding diversity, equity and inclusion (Whistleblowing).
- Supporting flexible work arrangements that accommodate the different needs of all employees.

All MEDOV employees are expected to support an inclusive workplace by adhering to the following conduct standards:

- Always treat others with dignity and respect.
- Address and report inappropriate behaviour and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Foster teamwork and other participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives, and background.
- Recognize and address the decisions or behaviour that are based on conscious or unconscious biases.
- Be always open-minded and good listener.

Employees are expected to report incidents that violate this Code of Conduct by contacting a manager or HR or following the Whistleblowing procedures.

Retaliation against any person who reports an incident is strictly prohibited and will not be tolerated.

Employees who violate MEDOV's Code of Conduct may face disciplinary action, up to and including termination of employment.



4. RULES OF BEHAVIOUR

Employees at MEDOV must duly observe Company's conduct rules and behaviour guidelines, including but not limited to:

- Maintain the confidentiality of the Company's sensitive data, without sharing any information with third parties.
- Be professional, polite, inclusive and respectful with colleagues, managers, clients and any third parties.
- Avoid any conflicts of interest and conduct different activities during working hours.
- Use office equipment only for working purposes, including any Company tool (i.e. instant messaging app, email, mobile phone, printer, scanner, etc.), and promptly inform in case of malfunctioning, damage, loss or theft.
- Drinking alcohol, using drugs and smoking are strictly forbidden during the working hours.

Any conduct in breach of such provisions will result in disciplinary sanctions as per the Disciplinary Code provisions.



5. EMPLOYMENT

5.1 Appointment

5.1.1 A Letter of Appointment or Offer Letter and an Employment Contract will be issued by the Company to all new employees before or on the day the employee commences work.

5.1.2 The offer and/or confirmation of employment is subject to the following:

- Medical examination by our Company's appointed doctor
- Reference Check, if applicable
- Self-declaration of Pending Criminal Proceeding, if applicable under the Italian law

5.2 New Employee Onboarding

5.2.1 HR will provide new employees with the proper documentation to start. Dedicated meetings will be set to introduce new employees to both Company and local policies, processes and procedures.

5.2.2 Line Managers and Mentors will design the Onboarding Program during the probationary period to ensure new employees have all information, resources and tools to quickly familiarize with their role and responsibilities.

5.2.3 New employees must complete all the training activities assigned, as a part of the Onboarding Program.

5.3 Probation and Confirmation

5.3.1 Based on the applied NCBA, the probationary period may not exceed the limits indicated under art. 7 (as amended from time to time).

5.3.2 During the probationary period the relationship may be terminated at any time without notice nor reason by either party. The employee would be entitled only to the severance pay (TFR), pro-rata supplementary monthly payments and holidays (if due).

5.4 Compulsory Training

Staff are required to undertake compulsory training and refresher courses where necessary. Failure to comply with these obligations, including during an apprenticeship, may result in disciplinary or financial penalties, and in the most serious cases, dismissal, as set out in current legislation.

5.5 Termination of Service

5.5.1 The employment relationship may be terminated, by each party, in accordance with Italian law provisions and NCBA.

5.6 Changes in Job Assignment

The Company reserves the right to reassign the employee's tasks, on a temporary or permanent basis, in accordance with the specific requirements set forth by the local law..

5.7 Outside Employment

Any outside employment must be promptly communicated to HR; situations will be evaluated case by case, and the Company may prohibit the employee from working outside the Company as deemed necessary. With reference to the above, please refer to your employment contract.

The Company shall in no way assume any responsibility for any incident that may occur to the employee whilst engaging their time outside employment.

5.8 Employees' Records

Employees' records may be accessed by the Company under the conditions provided by applicable law and within the respect of the privacy information notice delivered to the employee and available on Medov's website.



6. COMPENSATION

6.1 Payroll Arrangements

6.1.2 Employees must inform HR before the monthly payroll cut-off date if there is any change related to the payroll accounts and the Company shall not be liable for any error resulting therefrom. Information related to personal data, address, family status, bank details must be promptly communicated as per the policy currently in place.

6.1.3 The first pay slip will include a pro-rated salary based on the number of effective days worked by the new employee.

6.2 Remuneration Confidentiality

Employees must not disclose, either directly or indirectly, any information regarding salary, bonus, fringe benefit or other details to anyone, including other employees within the Company or the rest of the Group.

Any disclosure or divulging of salary information may result in disciplinary action.



7. TRAVEL POLICY & ENTERTAINMENT EXPENSES

Corporate travel is encouraged to meet clients, attend conferences and events, visit other Company locations and network with new prospects.

All employees are eligible to travel for business reasons; interns and apprentices must discuss with HR before any domestic or international movements.

7.1 Business travel procedure

7.1.1 All business travel requests must be approved in advance by the Line Manager.

7.1.2 At least one week in advance, an email to trasferte@ilinvestimenti.com must be sent (cc'ing the Line Manager) with the travel details, as only the Company travel dept. is in charge of booking both accommodation and transportation. Hotels, flights and trains should not be booked autonomously.

7.1.3 Business expenses incurred by staff whilst on a business trip will only be reimbursed upon submission of the mandatory expense report.

7.1.4 The use of private cars for business purposes is prohibited, unless prior authorisation has been granted by the Line Manager.

7.2 Travel Risks

To mitigate risks related to business travel, while organizing the trip it is crucial to take into account the geopolitical, socio-economic, and environmental specifics of destination.

To ensure a safer and more informed journey, both frequent and occasional traveling employees should consider the following potential travel issues, and get up to date information from governmental and official websites:

- Travel-related risks: jet lag effects, mobility issues after long transfers, air or sea sickness.
- Transport and accommodation: safety of transport means, infrastructure conditions, reliability of lodging facilities.
- Trip duration: prolonged exposure to certain risk factors, climatic and seasonal impacts.
- Health risks: personal medical conditions, vaccination needs, risk of transmissible diseases.
- Destination-related risks: local conflicts, acts of terrorism, high-crime zones.
- Personal safety: specific issues for women and members of the LGBTQIA+ community.
- Environmental conditions: climate, altitude, differences between urban and rural areas.
- Individual factors: age, gender, nationality, solo or group travel, risk perception.

7.3 Business Travel Insurance & Mobile Phone

Employees who are required to travel frequently shall be covered by Business Travel Insurance during their domestic or international assignments approved by the Company.

For international business travel, ensure your mobile phone plan includes the appropriate business roaming options.

For any questions and doubts regarding both travel insurance and mobile phone please direct contact chiara.schenone@ilinvestimenti.com.

7.4 Expenses Reimbursement

7.4.1 Travel expenses reimbursement generally happens monthly; employees will be reimbursed for their business travel-related expenses once the reimbursement process has been correctly completed.

7.4.2 At any rate, travel expenses paid with Company credit cards require the related fiscal receipts as well, to be reimbursed.

7.4.3 Non-business related expenses, non-documented expenses and expenses that exceed the limits as per the policy in place will not be reimbursed.

7.4.4 All travel and entertainment expenses must not exceed the limits as per the policy in place:

TRAVEL EXPENSES REIMBURSEMENT LIMITS - ITALY	
LUNCH	€ 20
DINNER	€ 40
TRAINS	ONLY ECONOMY
HOTEL	MAX 4 STARS
FLIGHTS	ONLY CAT. ECONOMY
CAR RENTAL	CAT. B

TRAVEL EXPENSES REIMBURSEMENT LIMITS - OVERSEAS	
FOOD & BEVERAGE: EUROPA, UAE, SOUTH PACIFIC, SOUTH EAST ASIA	€ 80 PER DAY
FOOD & BEVERAGE: US, AUSTRALIA, NEW ZEALAND, SINGAPORE, NORTHERN ASIA (CHINA, HK, JAPAN, SOUTH KOREA, TAIWAN)	€ 150 PER DAY
FOOD & BEVERAGE: MIDDLE EAST, RUSSIA, SOUTH AFRICA, INDIA, SOUTH AMERICA	€ 60 PER DAY
HOTEL	MAX 4 STARS
FLIGHTS	ONLY CAT. ECONOMY (*)
CAR RENTAL	CAT. B

(*) For long distance flights, Premium cat. is allowed with prior approval by Line Manager.

7.5 Entertainment Expenses

Entertainment expenses – that is, lunches and dinners – are aimed at the promotion of the Company and its image. Such expenses are reimbursable if duly justified and documented, and only if incurred in compliance with the laws and regulations in force.

The initiatives shall be non-repetitive and reflect their value to the Company, and the cost per guest shall not exceed the following limits, to be considered as a spending limit, and not a reimbursement limit:

- **Italy:** €60 for lunch; €80 for dinner
- **Overseas:** €200 per day



8. CAR POLICY

The Company's Car Policy sets out the rules and guidelines for staff regarding the use of the Company car fleet. A Company car refers to any vehicle that the Company assigns to staff, regardless of the duration of use or assignment, which may be granted:

- *For business or operational use:* MEDOV provides a vehicle for work purposes only. The vehicle is kept at the Company's premises for staff use and is allocated as required, without any form of exclusivity. In this case, the vehicle may not be used for personal reasons or during staff's free time.
- *For mixed use:* the vehicle is provided for the staff member's exclusive private use. The allocation of a car for mixed use entails the application of the relevant tax deduction from the pay slip; the taxable value of the fringe benefit is calculated in accordance with current legislation.

The policy applies to anyone using a Company car both during and outside working hours.

8.1 Company Car Assignment

8.1.1 The assignment of a car, with particular regard to the vehicle class, make, model and fitted accessories, is at the Company's discretion.

8.1.2 Staff may be eligible to use a Company car if they require a vehicle to carry out their daily duties or if it forms part of the Company's benefits package. The criteria determining who is entitled to a Company car are subject to management's assessment but normally depend on the nature of the work itself – i.e. whether the vehicle is used to perform duties as per the contract – or on the nature of the Company's benefits.

8.1.3 Company cars may be driven by staff to whom such a vehicle has been assigned and who hold a valid driving license in accordance with current legislation.

8.1.4 MEDOV will provide reasonable solutions to facilitate the use of the Company car by eligible staff with disabilities.

8.1.5 MEDOV may revoke access to the Company vehicle at its discretion.

8.2 Equipment

8.2.1 Company cars are fitted by the manufacturer with standard equipment, selected at the time of ordering, designed to ensure road safety as well as business-related functions.

8.2.2 No modifications of any kind to the mechanics or bodywork are permitted, nor is it possible to fit or remove from the vehicle, even partially, parts and accessories forming part of the original equipment.

8.2.3 At the end of the period of use, dual-purpose cars must be returned in accordance with the rental Company's instructions.

8.3 Vehicle conditions

Upon handover of the vehicle, an inspection is always carried out to verify and, where necessary, report any discrepancies from the condition stated in the documents accompanying the vehicle; any signs of accidents, neglect, vandalism or malfunctions are also noted. At the end of the hire period, vehicles for mixed use must be returned in accordance with the rental Company's instructions.

The Company reserves the right at any time to verify the condition of the vehicles assigned.

8.4 Use of the Company Car

8.4.1 Staff are allocated a Company car for business or mixed use. The type of use and allocation is determined by Management and is specified in the allocation letter.

8.4.2 In the case of business use, the car is available to staff who require it for the performance of their work, in accordance with the duties set out in their contract or letter of appointment. The vehicle must be left at the Company premises when not in use and use during leisure time is not permitted.

- 8.4.3 Staff assigned a Company car for mixed use may also use it during their free time and on weekdays.
- 8.4.4 The Company car must always be kept in perfect working order, adhering to scheduled maintenance and exercising due care.
- 8.4.5 In order to prevent both damage to the vehicle and the theft of Company property, any Company equipment (laptop, mobile phone) must not be left inside the vehicle when it is unattended.
- 8.4.6 Renting out the vehicle, lending it to third parties, and participating in games, races and competitions are prohibited.

8.5 Withdrawal and change of vehicle allocation

MEDOV reserves the right, for any reason and at any time, at its sole discretion, to change the vehicle allocated, or to terminate the vehicle allocation and consequently withdraw the vehicle.

8.6 Roadside vehicle breakdowns, maintenance and repairs

- 8.6.1 In the event of a mechanical breakdown on the road or an accident, the driver must request assistance by calling the toll-free roadside assistance number provided in the documentation supplied and must follow the instructions carefully.
- 8.6.2 Maintenance and repairs must only be carried out at authorised garages, strictly following the prescribed schedule, which can be found in the documentation provided with the vehicle.
- 8.6.3 It is mandatory to carry out all the services specified in the maintenance booklet and in accordance with the mileage.
- 8.6.4 It is mandatory to check that the tires are in good condition and at the correct pressure, to carry out the specified checks, and, where required, to replace them within the limits imposed by law.
- 8.6.5 For mixed-use vehicles, in the event of total theft or where the vehicle is immobilised following a breakdown, accident, fire, attempted theft or partial theft, a replacement vehicle may be provided by the hire Company.
- 8.6.6 Employees will be charged for any repair costs to the Company car resulting from failure to carry out or incorrect maintenance (both routine and non-routine) and damage caused by improper use, with the costs calculated taking into account the current rental contract terms (e.g. the presence of any comprehensive insurance or excesses).

8.7 Refueling and electric charging

The Company will cover the cost of consumption. Expenses incurred in relation to refueling or electric charging will be reimbursed in accordance with local procedures and terms.

8.8 Traffic offences

- 8.8.1 Without prejudice to strict compliance with the Highway Code and the requirement to drive safely at all times, any administrative penalties resulting from traffic offences shall be borne by the staff member using or assigned to the vehicle. They will be promptly informed so that they can pay the fine or formally contest it where grounds exist.
- 8.8.2 Staff also accept responsibility for any consequences relating to their employment arising from a driving license suspension due to serious breaches of the Highway Code or repeated offences.

8.9 Return of the Company car

- 8.9.1 At the end of the hire period, the vehicle must be returned in perfect condition, except for normal wear and tear. The vehicle must be returned with all documents and accessories supplied.
- 8.9.2 Upon returning vehicles for mixed use, if any discrepancies are found and have not been previously reported in accordance with the guidelines in the handbook, they shall be attributed to the assignee's responsibility, and the assignee shall be charged for any necessary repairs.
- 8.9.3 Any costs arising from negligence or gross negligence in the management of the Company car shall be charged to the assignee.



9. DRESS CODE

A Business Casual dress code is more than welcome and accepted at MEDOV.

The dress code is an integral part of the corporate identity, along with items such as business cards, letterhead, brochures, and gadgets. It represents a Company standard to which everyone must conform.

When Company uniforms and/or personal protective equipment (PPE) are not mandatory, all employees must dress in clean, appropriate clothing that is suitable for the work environment and the tasks to be performed, in respect of colleagues and clients.

It is particularly important to consider whether one's attire may offend or be inappropriate for others, inside or outside the office, and whether it could harm the Company's reputation or image.

9.1 Guidelines

No discrimination for dressing will be allowed at MEDOV, and gender-specific work uniforms are not required.

Employees must dress in a manner that is not obscene; offensive; or substantially or materially disruptive to the business environment.

It is everyone's responsibility to help ensure the Company dress code is being followed.

9.1.1 When health, medical, or religious reasons require exceptions to the guidelines for an individual employee, HR should be contacted.

9.1.2 Apparel or items that impact health and safety at work are not permitted.

9.1.3 Examples of inappropriate clothing include, but are not limited to:

- Clothing with political, religious or other words or imagery that could be offensive or distracting
- Athletic clothing, such as jogging / yoga pants, shorts
- Revealing clothing, such as halter tops, tank tops, crop tops, skirts, trousers or dresses that are inappropriately short for the workplace
- Excessive jewelry or fragrances

9.1.4 Traditional tribal regalia or objects of cultural significance shall not be prohibited at public events.

Employees who violate this dress code may not be allowed to work until their attire and hygiene are consistent with the policy. Employees who repeatedly violate this policy may be subject to disciplinary actions.

If you have any questions or concerns about this part of the Code of Conduct, please contact HR (hr@medovgroup.com).



10. PET POLICY

Currently, there is no specific legislation in Italy that governs the practice of bringing pets into the workplace. However, the Ministry of Health has issued a number of regulations and guidelines, which MEDOV has adopted to allow its staff to bring their dogs into the office.

Cats are not currently permitted due to the risks associated with common allergic reactions and their more unpredictable behaviour.

The Pet Policy is a pilot scheme being implemented by MEDOV: the medium- to long-term effects on benefits, environmental impact, productivity levels and stress will be monitored with a view to maintaining, improving or revoking the policy, at the Company's discretion.

10.1 Obligations and responsibilities

As it is always MEDOV's aim to ensure the safety of its staff and maintain a harmonious working environment, the dog must:

- Be free from any medical conditions and up to date with the compulsory vaccinations required by law;
- Be registered with the relevant authorities, microchipped and covered by third-party liability insurance;
- Be accustomed to not soiling the premises and being around other people;
- Be kept in a clean and well-groomed condition.

You may not bring a dog if:

- If it has displayed aggressive behaviour;
- If it is disruptive in the workplace and has been reported as such;
- Following an incident of aggression;
- If it is unsuitable for the environment.

Pet-mates are 100% responsible for their pets, their hygiene and their comfort throughout their time in the office; they must therefore arrange their workspace so that they can always keep an eye on their pet, whilst ensuring that the pet's behaviour does not interfere with their colleagues' ability to carry out their work.

To ensure everyone's safety, pet-mates must also bring items such as a dog bed, lead, muzzle, toys, food and water bowls, and poo bags. The pet-mate is liable, both civilly and criminally, for any damage their dog may cause.

10.2 Application procedure

Applications must be sent by email to line managers, with the General Manager and HR in cc (hr@medovgroup.com), and must be accompanied by a statement of reasons and supporting documentation.

MEDOV reserves the right to assess each case individually following verification of all the requirements set out in this policy and the team's willingness to welcome the pet into the office. The possible implications of each individual situation will also be considered.



11. EMPLOYEES COMMUNICATIONS

Medov encourages healthy and constructive communication between management and employees, and cultivates this open culture through different channels:

- Official website: Every employee can check the online information about Medov and Medov Group to have a deeper understanding of the Company's business development.
- New hires induction training: New employees will be able to understand the Company's history, culture, business development and management systems, etc., to enhance their sense of membership.
- Honest conversations: If employees have any questions or suggestions, they can easily reach out to their line managers or HR, whether formal or informal.

The Company will carefully listen to the voices of employees and give positive feedback to build a better working environment through effective two-way communication.



12. WHISTLEBLOWING

For any event, fraud or suspected fraud that may damage or seek the interests of the Company, employees can report them through the dedicated channels within respect of the dedicated procedure (available on the [Company website](#) and delivered to employees).



13. LABOUR LAW: DISCIPLINARY SANCTIONS

According to article 7 of Law no. 300/70, in the event of any disciplinary action being necessary for failing to comply with regulations, procedures, and policies, the Company adopts the following measures:

- Verbal warning
- Written warning
- A penalty fee up to 3 hours' salary
- Suspension without pay for up to 5 working days
- Dismissal

On this point, please note that the detailed indication of conduct relevant for disciplinary purposes, of the disciplinary procedure and of the disciplinary measures are provided for by the law and the NCBA.



14. GENERAL SECURITY

14.1 Information Protection

14.1.1 The Company's employee private and personal data, organizational structure, compensation and other HR information should be kept confidential.

14.1.2 As the first responsible users of the business equipment, employees are required to proactively follow the Company's information security regulations and guidelines.

14.1.3 Personal account and password information should be kept confidential, and the password should be changed in accordance with the Company's relevant IT regulations.

14.1.4 Employees should clean up their desks before leaving the office, lock down computers and secure other documents, instruments and equipment.

14.1.5 Guests, clients, and visitors should only be admitted in the meeting areas. Those with special needs can only bring guests into the office area after approval and registration.

14.2 Health & Safety at work

14.2.1 Employees shall comply with the rules and regulations on dangerous machine/equipment and safety measures as prescribed under Italian law (specifically Legislative Decree No. 81/2008) and wear protective gear provided by the Company while working to the extent reasonably necessary.

14.2.2 In accordance with the Italian law (included Legislative Decree No. 81/2008), employees will be subjected to medical visits on a regular basis. The Company shall conduct health checkups for the employees, if applicable considering the specific duties performed as per their contract.

14.2.3 Employees should take care not to damage fire-fighting equipment or block emergency exits and fire passages. Any recognized potential risks in regards of safety at the workplace should be duly and promptly reported to HR or the Compliance dept.

14.2.4 The Company is equipped with first aid kits, and employees can pick them up from the reception desk when they are mildly injured.