GreenGo

CODE OF ETHICS

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The CEO's Message

Dearly beloved,

With the adoption of this Code of Ethics, our Company wishes to formalise, also for the purpose of a more efficient sharing, the principles and rules of conduct that have guided our way of doing business since the very beginning.

GreenGo has always carried out its activities by applying a sustainable development model, in the awareness that only through dialogue with all stakeholders and increased synergies with the territory can high standards of quality, transparency and fairness be guaranteed.

This Code of Ethics therefore responds to the need to explicitly share the values and rules that all the people who make up the Company must be inspired by in their daily actions.

Respect for these values is a necessary condition to maintain and rafforce the fidence that the market and shareholders have i n us, as well as to contribute to the development and serenity of the human resources through which the Company operates.

Certain of your support and approval, I remain at your complete disposal for any questions or queries in this regard.

Giuseppe Mastropieri

Foreword

This Code of Ethics, approved by the Board of Directors in its meeting of 18 December 2023, sets out the ethical values and rules of conduct and behaviour, relevant to the performance of company activities, which the Company promotes and recommends to all Directors, employees and collaborators.

The purpose of this Code of Ethics is also to introduce and make binding in the Company the principles and rules relevant to the effective prevention of the offences indicated in Legislative Decree No. 231/2001. This document is therefore an integral part of the Organisation, Management and Control Model. Any update, amendment or integration of the Code of Ethics must be approved by the Board of Directors, in the same manner adopted for its initial approval.

The Code of Ethics is therefore aimed at the corporate bodies and their members, employees, workers, including temporary workers, consultants and collaborators in any capacity, proxies and any other person who may act in the name of and on behalf of GreenGo (hereinafter also referred to as "Addressees").

The addressees of this Code are obliged to learn the contents and comply with the precepts of the Code that will be made available to them, as specified below.

The management bodies of the Company, in setting corporate objectives, undertake to be guided by the principles contained in the Code.

Top management is responsible for the effective implementation of the Code and its diffusion within and outside GreenGo.

The Company's employees, in addition to complying with the regulations in force and the provisions of collective bargaining, undertake to adapt the way they perform their work to the provisions of this Code; this, both in intra-company relations and in relations with parties external to the Company itself and, in particular, with Public Administrations and other Public Authorities.

Similarly, collaborators and other third parties working for GreenGo undertake to fully respect the principles and provisions contained in this Code. With this in mind, at the time of entering into contracts or agreements, the Company shall make this Code of Ethics or a significant extract from it available to the counterparty, and shall collect their formal commitment to comply with its contents.

The Code of Ethics consists of three sections:

- **Section No. 1** contains the ethical values and rules of conduct that each Addressee must implement in the performance of his or her duties and activities;
- **Section No. 2** contains the rules of conduct to be observed in respect of each *stakeholder;*
- **Section No. 3** describes the monitoring, control and sanction mechanisms aimed at promote continuous compliance with the Code of Ethics and its constant monitoring.

Section 1

ETHICAL VALUES AND RULES OF CONDUCT

ETHICAL VALUES

GreenGo S.r.l. acts according to the highest *standards* of ethics and probity.

All Addressees must observe, and ensure that they observe, the following values, which define what the Company stands for and how it operates.

I. **DYNAMISM**: understood as the ability to constantly put oneself out there in a collaborative spirit, a prerequisite for offering integrated and customised solutions that meet the increasingly evident needs of the community.

II. **INNOVATION**: understood as curiosity and the ability to think about things in a new way, optimising and efficientising organisation and processes, so as to realise novel solutions, through research and development, technical skills, experience and cutting-edge technologies.

III. **INTEGRITY:** understood as the will to guarantee the physical and moral integrity of employees and collaborators, of working conditions, of the safety of the places where the activity is carried out, favouring active participation and the ability to work as a *team*.

IV. **LEGALITY:** understood as compliance with the regulatory and corporate provisions applicable in Italy and in any other country in which the Addressees operate

V. **HONESTY:** understood as a constant attitude of good faith in any activity or decision.

VI. **SUSTAINABILITY**: understood as respect and care for the environment, for the land and for the people who are an integral part of it.

VII. **TRANSPARENCY**: understood as the need for clarity, completeness and uniformity vis-à-vis all stakeholders, i.e. those categories of individuals, groups or institutions whose interests are directly or indirectly affected by the performance of the company's activities.

RULES OF CONDUCT

The rules of conduct contained in this Section are intended to indicate the conduct to be observed in the performance of the various corporate activities in accordance with the values that inspire this Code.

The Addressees of the Code must observe a conduct that is correct and consistent with the principles laid down therein in the performance of their duties and/or in their relations with the Company and their contractual counterparts.

Any person who, acting in the name of or on behalf of GreenGo, comes into contact with third parties with whom the Company intends to enter into commercial relations or relations of an institutional, social, political or any other nature is obliged to

- informing them of the commitments and obligations imposed by the Code;
- require compliance with the obligations of the Code in the performance of their activities;
- take the consequent initiatives in the event of any refusal by third parties to comply with the Code or of any failure or partial performance of the commitment undertaken to observe the provisions contained in the Code.

Each Addressee is required to act diligently to protect corporate assets from improper or incorrect use.

All Addressees are bound to avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict between individual interests and those of the Company. In the event that situations of conflict of interest, even if potential, are identified, whether internal or external to the Company's activity, each person involved is required to refrain from carrying out the conduct in conflict, also giving prompt notice thereof to the Supervisory Body, which is responsible for assessing the existence, case by case, of any incompatibility or prejudicial situations.

Recipients are obliged to:

- refrain from conduct contrary to these provisions and rules;
- contact the Supervisory Board for the necessary clarifications on how to apply the Code or the relevant regulations;
- cooperate with the Company in the event of any investigations aimed at verifying and possibly penalise possible violations.

Section 2

RULES OF CONDUCT

RELATIONS WITH SHAREHOLDERS

The company shall take all necessary measures to ensure full and informed participation of the shareholders in decisions within their competence, promote equality of information and protect its own and the shareholders' interests against any actions brought by shareholders or coalitions of shareholders and aimed at having their particular interests prevail.

GreenGo also endeavours to ensure that its economic/financial *performance* is such as to safeguard and increase the value of the company, in order to remunerate its shareholders' investment adequately.

Furthermore, all operations relating to the keeping and processing of accounting data shall be based on truthfulness, correctness, clarity and completeness of information.

The Company condemns any conduct aimed at altering accounting and corporate information and data that are disclosed to corporate bodies, Supervisory Authorities or stakeholders.

The Addressees of this Code therefore 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. In particular, the Addressees undertake to cooperate so that every operation and transaction is promptly and correctly recorded in the respective company accounting system according to the criteria indicated by the law and the applicable accounting principles and, where applicable, duly authorised and verified.

RELATIONS WITH EMPLOYEES AND COLLABORATORS

GreenGo promotes the valorisation and development of the skills and competences of its employees and collaborators, in order that they may contribute to the achievement of the company's legitimate objectives, fully maturing their professional career.

The Company offers all its employees equal employment opportunities, according to their professional characteristics and performance capabilities, without any discrimination on political, trade union, religious, racial, territorial, linguistic or gender grounds.

GreenGo does not establish any employment relationship or any form of collaboration with persons without a regular residence permit, nor does it make use of companies or entities that use illegal labour or labour in violation of generally applied labour *standards* or those laid down by national and international regulations.

The Company also guarantees the respect and application of the provisions of national collective bargaining and ensures compliance with the regulations on working hours, rest and adequate remuneration.

It also upholds, with fairness and transparency, its legitimate interests in business relations, favouring constructive dialogue with workers' trade unions, business and trade associations.

In its personnel selection procedures and within the limits of the information available, the Company operates the necessary controls to avoid favouritism, nepotism, or forms of patronage.

The company also pays particular attention to the creation and management of workplaces and environments that are adequate from the point of view of the safety and health of employees and collaborators in

compliance with the relevant national and international directives. In particular, GreenGo constantly strives to:

- prevent the occurrence of accidents;
- adequately assess health and safety risks;
- take into account the degree of technical development in risk prevention;
- planning prevention, aiming for a coherent system that integrates technology, work organisation, working conditions and the influence of factors in the working environment;
- give appropriate instructions to staff.

Each employee or collaborator who, acting in the name or on behalf of the Company, comes into contact with third parties with whom GreenGo intends to enter into commercial relations or is obliged to have relations of an institutional nature with them, is obliged to

- informing them of the commitments and obligations imposed by this Code;
- require compliance with the obligations of the Code in the performance of their activities;
- take the necessary steps in the event of refusal by third parties to comply with the Code or in the event of failure or partial fulfilment of the commitment undertaken to comply with the provisions contained in the Code.

BUSINESS RELATIONS

In carrying out their activities, the Addressees base their conduct on the principles of honesty, transparency, loyalty, integrity and fairness, in compliance with company policies, as well as with the laws and regulations in force.

The Company undertakes to operate on the market in accordance with the rules of fair and equitable competition.

No offers of money, gifts or benefits of any nature whatsoever exceeding normal business practices or tending to obtain undue advantages of any kind are allowed: only acts of business courtesy are allowed, provided they are of modest value and, in any case, such as not to compromise the integrity and reputation and not to influence the recipient's autonomy of judgement.

Any Addressee who receives gifts, beyond the limits of normal courteous relations and not of modest value, or in non-transparent circumstances or in a non-transparent manner, shall refuse them and immediately inform his/her superior.

Likewise, the Company undertakes not to discriminate arbitrarily against its suppliers. Bargaining shall take place according to the principle of good contractual faith and the proper performance of mutual obligations.

The management of the purchasing process is indeed governed by the following principles of conduct:

- the granting of equal opportunities to any supplier with adequate professionalism, efficiency and reliability;
- clarity and transparency in supply conditions;
- transparency and traceability of the evaluation criteria adopted and the reasons for the choices made;
- the provision of periodic control activities on the quality of purchased goods and services;

- the adoption of precautions to avoid the use of suppliers whose behaviour is not inspired by the principles set out in this Code.

RELATIONS WITH THE COMMUNITY AND PUBLIC ADMINISTRATION

GreenGo, wherever it operates, is committed to acting sustainably, minimising environmental impacts and optimising the use of energy resources.

The Company is committed to conducting its activities in compliance with the applicable regulations and to adopting the highest *standards* and observing the relevant international guidelines.

Each intervention is carried out in a way that does not compromise local places and needs. The activities carried out always aim to create value for *stakeholders* and the community.

In fact, GreenGo is committed to supporting the social and economic development of the local communities in which it operates, investing resources for the enhancement of the territory in a spirit of active collaboration.

In its relations with Public Bodies and Institutions, GreenGo is inspired by and adapts its conduct to the principles of fairness and honesty.

Relations with Institutions and the protection of the Company's interests with them must be managed by the corporate functions that have been delegated to do so, which must behave in such a way as not to induce them to partial, false or misleading interpretations. Persons in charge of conducting any negotiation, formulating a request or in any case maintaining relations with public Bodies or Institutions must not seek to improperly influence their decisions, nor must they behave in such a way, such as offers of money or other benefits, that may alter the impartial judgement of the official involved in the proceedings.

OTHER RULES OF CONDUCT

Rejection of corrupt practices or attitudes

GreenGo prohibits and opposes all forms of corruption in favour of anyone, without exception.

Each Addressee must pursue his or her own legitimate business objectives, refusing any agreement - even if only apparently - unlawful with holders of public powers and with representatives of other companies.

In particular, the following actions are prohibited:

- agreeing to give or promise money or other benefits as a result of undue requests and/or pressure from public officials;
- propose - in any manner whatsoever - employment and/or business opportunities that may benefit persons holding public authority;
- solicit or obtain confidential information that may compromise the integrity or reputation of either party;
- Engaging in any other act intended to induce persons vested with public authority to do or omit to do something in violation of the laws of the system to which they belong.

The same prohibitions apply in the event that unlawful requests come, directly, indirectly or through an intermediary, from public officials, public service appointees, managers, officials or employees of the Public Administration or their relatives or cohabitants.

Recipients of this Code are also prohibited from accepting or offering gifts or other forms of hospitality that may appear to be in excess of normal business practices or professional courtesy.

Similarly, so-called *facilitation* payments, i.e. payments not officially made in favour of public officials for the purpose of expediting, favouring or generally facilitating the performance of an activity, are prohibited.

If a director, employee or collaborator of the Company receives pressure, conditioning, allusions or explicit or implicit requests for benefits of any kind from the Public Administration, or from natural or legal persons acting in the employ or on behalf of the same Public Administration, he/she must immediately suspend all relations with the latter and inform his/her superior and the Supervisory Board.

Use and protection of company assets

Each Recipient is responsible for the use and safekeeping of the tangible and intangible assets provided to him/her by GreenGo for the performance of his/her activity and is obliged to act diligently to protect them, behaving responsibly and in line with the procedures in force.

In particular, with regard to computer applications, each employee is required to scrupulously adopt the provisions of the Company's security policies so as not to compromise the functionality and protection of computer systems. In particular, all users authorised to use the Company's IT equipment and systems shall use the Company's IT resources in compliance with the applicable regulations: it is forbidden to intrude into and damage other people's IT systems.

Confidentiality and data protection

The Recipients of this Code are obliged to observe the utmost confidentiality on information, documents, initiatives, projects, contracts, as well as on any other situation of which they become aware as a result of their working relationship/collaboration with GreenGo.

In particular, they must refrain from disclosing them to third parties or using them to obtain direct or indirect personal advantages.

Similarly, the Company pays particular attention to the implementation of the requirements regarding the protection and safeguarding of personal data, as enshrined in the EU Regulation/2016/679 (GDPR) and the applicable *privacy* legislation.

All company documents, whether in paper or electronic form, that contain personal data or confidential information are used and stored with the utmost care, in the knowledge that they must only be used for legitimate business purposes, ensuring protection, integrity and confidentiality.

Intellectual and Industrial Property

The Addressees whose activity, assignment or function involves, in any way, the processing of data, information or documents concerning the Company's intellectual and/or industrial property rights have a duty to guard them with the utmost diligence, accuracy and confidentiality.

Intellectual and/or industrial property rights to products, works and/or knowledge developed in the course of work belong to the Company, which holds the right to exploit such knowledge, in the manner and at the times deemed most appropriate, in accordance with the laws applicable from time to time.

Each Addressee undertakes to protect any industrial and intellectual property rights and not to unlawfully use goods protected by industrial and/or intellectual property rights.

Section 3

CONTROL SYSTEMS

Observance of the Code of Ethics must be considered an essential part of the contractual obligations undertaken by the Addressees in the context of their respective contractual relationship with the Company, also pursuant to Article 2014 of the Civil Code.

The violation of the Code of Ethics represents, depending on the legal relationship established with the Company, an offence of a disciplinary nature (with reference to workers and collaborators employed on the basis of a labour-law relationship), the violation of a fiduciary mandate (with reference to members of corporate bodies) or the violation of contractual obligations (with reference to contracts with counterparties within which special clauses expressly recalling this Code of Ethics are included).

Such violations will therefore be prosecuted incisively, promptly and immediately, by means of appropriate and proportionate disciplinary measures, regardless of the possible criminal relevance of such conduct and the initiation of criminal proceedings in cases where such conduct constitutes a criminal offence, in compliance with the provisions of the law, the applicable National Collective Labour Agreement and also with the system of sanctions set out in GreenGo's Organisation, Management and Control Model.

The Supervisory Board, which the Company has set up pursuant to Legislative Decree 231/2001, has the task of promoting the contents of this Code of Ethics and supervising compliance therewith.

All Addressees are required to promptly and confidentially report to their department head and/or to the Supervisory Board any news they become aware of concerning breaches of the law, of the Code of Ethics or of other corporate provisions that may, for any reason, involve the Company.

The heads of functions must supervise the actions of their employees and must inform the Supervisory Board of any possible breach of the aforementioned rules.

Reports, possibly also in anonymous form, may also be addressed directly to
to the Supervisory Board and may be made in written, oral or telematic form.

All reports received by the Supervisory Board shall be treated with due respect for the confidentiality of the identity of the reporter, provided that they are made in good faith in accordance with criteria of determinacy and precision.