



## **Acpsystem s.r.l.**

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## **ETHICAL CODE**

Acpsystem srl, (hereinafter alternatively "Acpsystem" or the "Company") is a leading company in the business consultancy for each type of sector in which they operate, with a particular focus on the SAP platform and on Low Coding.

ACPSYSTEM aims to offer customers the highest level of professional competence also in terms of Ethics, Quality and Integrity, values which form the foundation of the activities corporate.

Therefore, constant pursuit is inherent in the performance of professional activities of ethical goals, as well as business ones. In this perspective, ACPSYSTEM undertakes to protect also the legitimate interests of third parties, relying on his professional judgment, independence and competence, working to ensure that partners, employees and collaborators mature and maintain over time, a professionalism suited to the needs of the market.

ACPSYSTEM promotes correctness in the conduct of its business and in the performance of related corporate activities, also to protect one's image, also ensuring compliance of the fundamental values of the dignity of the human person and of diversity.

This document (hereinafter the "Code of Ethics") therefore contains the common values of Aware group, to which ACPSYSTEM belongs, as well as the related principles with which the Company conforms its activities, operations, behaviors and relationships, both internally and externally of the corporate organization.

To this end, the Company believes that the adoption of a Code of Ethics, which sanctions the values to which it inspires and to which it conforms its conduct, is of primary importance for its reliability and for the integrity of its reputation, also in order to ensure compliance with the purposes of the Decree 8 June 2001 n. 231 (hereinafter also the "Decree"), which - as known – introduced in the Italian legal system the administrative liability of entities.

### **1. SCOPE OF APPLICATION AND RECIPIENTS**

All ACPSYSTEM activities are based on the strictest respect for the values shared by network DTTL and the principles of honesty and integrity, professionalism and competence, confidentiality, loyalty and good faith, compliance with applicable laws and regulations. Consequently, anyone holds administrative, representation and/or management functions in the Company, the shareholders, the employees, collaborators, and, more generally, all those who work - in any capacity – for account of the same, within the limits of one's office and one's responsibilities (hereinafter also the "Recipients"), are required to comply with this Code of Ethics.

ACPSYSTEM undertakes to disseminate the Code of Ethics to all Recipients, so that they may, in carrying out their related professional and working activities, comply with it their own behaviors.



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Responsibility for disseminating the Code of Ethics, as well as for any activity aimed at encourage and promote its observance, is entrusted to all the members who work in the Company.

The Company recommends to shareholders, employees and collaborators, on the occasion of relationships that they entertain with third parties (Customers, suppliers, business partners, investors, competitors, Public Authorities, political, trade union and social organizations, the market or the community in general) of inform them, if necessary, about the principles of this Code of Ethics.

To this end, the Company guarantees the maximum dissemination and knowledge of the Code of Ethics, too from third parties who receive assignments from ACPSYSTEM or who have business relations with it of another nature.

## **2. VALUES**

The behaviors of the Company are identified with the following values:

- Integrity, to be understood as an essential condition for establishing a business relationship trust between the customer and the professional and, at the same time, to ensure the reliability of his professional judgement. ACPSYSTEM therefore requires its members, employees and collaborators, in carrying out their professional activities, integrity, honesty, diligence e sense of responsibility.
- Objectivity, to be understood as professional objectivity to be applied in analysis activities carried out in the context of the professional assignments received, which must necessarily be independent and free from external pressure of any kind or personal interests.
- Competence and professional diligence, these are indispensable requisites in the performance of the activity of ACPSYSTEM, to be understood as a high level of knowledge and skills techniques for the proper performance of professional services. It follows for each employee and/or collaborator of the Company a duty of professional updating continuous and, at the same time, a commitment by ACPSYSTEM to guarantee suitable instruments of training and professional growth as well as to promote innovation and development of new ideas in order to increase the value and performance in the services provided. In from this point of view, the Company has prepared specific standards and assessment tools systematic of the skills acquired by employees (professional and non-professional) and non-employee, which, on the basis of homogeneous and standardized criteria, allow identify the strengths and weaknesses of each, planning the training path e of growth, professional and personal, more suitable for achieving high standards qualitative.
- Compliance with current regulatory provisions, technical and professional principles and values ethical-behavioural, in this regard ACPSYSTEM undertakes:
  - to disseminate the technical knowledge necessary for carrying out the activities professional yields;
  - to provide support to the Company's professionals regarding the interpretation of regulations and technical-professional principles, as well as regarding their correctness application.



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In compliance with shared values, ACPSYSTEM aims to satisfy and, where possible, exceed customer expectations through the quality of its professional services, making use of all the specialist skills existing within the organisation, by conforming to the following global principles of business conduct

**Honesty and integrity** in behavior and professional services rendered, refraining from professionally illegitimate or incorrect conduct, in compliance with the law;

**Competence**, to be understood as maximum attention to the needs of customers and full willingness to satisfy their requests, through the involvement of all resources necessary professional skills, as well as through immediate and qualified responses;

**Confidentiality**, as a guarantee to customers that access to confidential information is permitted to only authorized personnel, and as a commitment to avoid personal interests and/or benefits that may derive from knowledge of the Customer or from the abusive exploitation of information acquired in the performance of one's professional activities;

**Respect and fairness within the company**, through the enhancement of the differences of experience and culture and maximum openness to new or different ideas;

**Promptness and willingness to support the Client**, respecting the agreed deadlines and the commitments undertaken;

**Independence and objectivity of judgement**, to be understood as intellectual integrity in research of any solution that can satisfy the Customer, free from impositions or subjection psychological towards the members and/or representatives of the corporate bodies, the employees of the company or third parties;

**Responsibility towards society and the market**, to be understood as awareness of the role played in society and of the consequences that may arise in the world economic from the activity carried out.

**Autonomy** as a promotion of the freedom of choice of the customer and related stakeholders so that, on the basis of the advice offered, the Client is put in a position to take their decisions responsibly.

**Fair contractual conduct**, to be understood as an offer of real benefits to the Customer against a fair remuneration. From this point of view: i) the terms of the service are described from principle comprehensively; ii) when unforeseen events occur, terms are proposed that would have been commonly accepted in an initial agreement where all the information was been equally owned by the parties.

**Fair remuneration**, to be understood as remuneration proportional to the contribution given, either by its employees and as consideration for the services rendered to Customers as well as as equity in the opportunities offered to everyone

**Cooperation and fair competition** in relations with colleagues and in the interests of customers for the purpose to develop and circulate knowledge and innovations within the professional community scientific, technological and cultural enabling the overall improvement of quality and of the social utility of counseling.

### 3. OBSERVANCE OF THE LAWS AND OF THE RULES OF CONDUCT

The shareholders, employees and collaborators of the Company are required, in carrying out their duties activities, to observe the laws in force, the corporate conduct procedures, as well as the instructions given by ACPSYSTEM, possibly through its managers.



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If a shareholder, an employee or a collaborator has reasonable grounds to believe that a any work activity is not carried out in accordance with the provisions of the law, the values shared or the directives of the Company, must promptly inform the Unique Administrator, who, having carried out the necessary checks and assessments, together with the top management group of Company, will identify the measures to be taken.

Relations within the company must be based on mutual respect and courtesy. To all the staff, both at headquarters and at Customers, is also entrusted, each according to their own role and responsibility, the task of conveying, not only with the professional quality, but also with the behavior, confidence, project management and control skills, skill and speed in dealing with unexpected events, understanding the needs of the customer.

#### **4. CONFIDENTIALITY**

As part of the activities rendered on behalf of ACPSYSTEM, the Recipients can acquire and/or handle confidential information.

ACPSYSTEM, aware of the importance that the protection of such information has for the stability of the Company and for the protection of the interests of third parties, guarantees the confidentiality of information in its possession and refrains from using confidential data, except in the case of express and conscious authorization and, in any case, in the strictest observance of the legislation in force, also in terms of privacy.

Members, employees and collaborators are required to process only the necessary data and directly connected to the performance of their activities or functions, as well as to communicate and disclose the same in strict compliance with specific company procedures.

The shareholders, employees and collaborators of the Company are responsible for the correct management of information and documentation relating to customers, acquired as part of the activity of professional consultancy carried out. In particular, they must ensure that access to information and documentation is reserved only for members of the working group involved in each individual project or professional assignment, or to the subjects there of expressly authorized, in compliance with current regulations and directives business (including, by way of example, PPM and periodic instructions).

ACPSYSTEM absolutely prohibits members, employees and collaborators from using, for purposes personal or on behalf of third parties, price sensitive information (i.e. non-domain information concerning, directly or indirectly, one or more issuers of financial instruments or one or more financial instruments, which, if made public, can have a significant impact on the prices of financial instruments) acquired as a result of professional or work activities carried out for ACPSYSTEM, for the purpose of buying, selling and/or fulfilling (also through third parties) person) transactions on the financial instruments concerned by this information. The Company prohibits the themselves to advise others to carry out such operations or to communicate to others, without justification, such information.



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### 5. PREVENTION OF CORRUPTIVE PRACTICES

ACPSYSTEM conducts its social and business activities in compliance with the principles of legality, loyalty and fairness.

In general ACPSYSTEM prohibits any form of corruptive practice and requires all those who operate in its name and/or on its behalf, to ensure that all actions and operations (including commercial) with third parties, public or private, are managed according to principles of integrity e transparency, in compliance with current national and international regulations.

Specifically, ACPSYSTEM prohibits partners, employees and collaborators from promising and offering to third parties, directly or indirectly, benefits in cash or in any other form, in order to achieve a improper advantage, also forbidding to solicit, request or accept money or other money from third parties utilities that are not reflected in commercial practice. By way of example and not exhaustive it is therefore forbidden to:

- offer to third parties for corrupt purposes or receive from them for the achievement of a improper personal advantage, gifts, other benefits or forms of hospitality,
- recognize, directly or through third parties, representatives of the public administration cash or other benefits to facilitate decision-making processes concerning ACPSYSTEM or obtain undue advantages,
- promise, or offer, directly or indirectly, contributions to political parties or to organizations or politically engaged persons, as a means of obtaining an improper advantage,
- promise or offer, directly or indirectly, charitable contributions or promote e support sponsorship initiatives with corrupt purposes.

### 6. CORRECTNESS AND TRANSPARENCY OF COMPANY INFORMATION

Every action, operation or transaction must be correctly recorded in the system company accounting according to the criteria indicated by the law and the applicable accounting standards, and must also be duly authorised, verifiable, legitimate, consistent and congruous.

In order for the accounting to meet the requirements of truthfulness, completeness and transparency of the data registered, for each operation an adequate and complete supporting documentation of the activity carried out, in order to allow:

- accurate accounting records;
- the immediate identification of the underlying characteristics and motivations to the operation itself;
- the easy formal and chronological reconstruction of the operation;
- verification of the decision-making, authorization and implementation process, as well as the identification of the various levels of responsibility.

Each shareholder, employee and collaborator works, within his area of responsibility, to ensure that any matter relating to the management of the Company is properly and promptly recorded in its accounts.



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Each accounting entry must exactly reflect the results of the supporting documentation. Therefore, it will be the duty of each employee and collaborator, to this deputy, make sure that the supporting documentation is easily available e ordered according to logical criteria.

Employees and collaborators are required, the latter as far as they are concerned:

- to cooperate in the correct functioning of the control systems;
- to responsibly look after corporate assets, whether tangible or intangible, instrumental to the activity carried out and not to misuse them.

### **7. ANTI-MONEY LAUNDERING**

The Recipients, in the context of the various relationships established with the Company, must not, in any in any way and under any circumstances, be involved in events related to money laundering and self-laundering of money from illegal or criminal activities.

Before establishing relationships or entering into contracts with non-occasional suppliers and other partners in business relations, the Company and its employees and/or collaborators will have to ensure the moral integrity, reputation and good name of the other party.

### **8. PROTECTION OF COMPETITION**

ACPSYSTEM, aware that a healthy and fair system of competition contributes to the best development of the business objectives of each company, believes in the competitiveness of the market and observes the competition rules in force, refraining from implementing and sanctioning behaviors that may integrate forms of unfair competition and, in general, any violation of the antitrust legislation, promoting correctness in relations with the competitors, as well as requesting compensation that reflects the value of the services provided and the responsibilities assumed.

ACPSYSTEM has the activities of collecting and analyzing information about the activities of competing companies are carried out with the utmost correctness and in compliance with the provisions laws in force, as well as specific internal procedures.

ACPSYSTEM remits the management of any relationships with authorities responsible for the protection of the market and competition exclusively to persons authorized to do so on the basis of the system proxies and proxies and, in any case, in compliance with the principles of fairness and loyalty.

Advertising and any other promotional activity must be carried out according to the law in force on the subject and, in any case, in compliance with the values of truth and integrity. The Company prohibits any form of misleading or ethically reprehensible advertising.



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Furthermore, ACPSYSTEM identifies the corporate function in the Clients & Industries area of the network in charge of coordinating marketing activities.

### **CHAPTER II - INTERNAL RELATIONS**

ACPSYSTEM recognizes the centrality of human resources in the belief that the most relevant success factor of every company, is guaranteed by the professional contribution of the people who they operate in an environment of loyalty and mutual trust.

The Company recognizes as essential principles of its corporate philosophy, in line with the international organization to which it belongs, the respect for the work, the contribution professionalism and commitment of each, respect for different opinions, independently from seniority and experience, and the strength of ideas.

In this regard, ACPSYSTEM ensures equal opportunities at any level of the organization, according to criteria of merit and without discrimination of any kind.

On the other hand, employees and collaborators are required to commit themselves and act loyally ensuring the services due and the commitments undertaken towards the Company.

Also aware that professionalism is a value that is acquired with practice and experience and specific training, ACPSYSTEM recognizes the decisive contribution that this process receives from the most senior professionals and promotes the transferring their knowledge and professional attitude to more young staff.

The Company pursues the enhancement of professionalism, promotes the aspirations of individuals, everyone's expectations of learning, professional and personal growth.

#### **9. DISCRIMINATION AND HARASSMENT.**

The Company does not tolerate any discriminatory conduct, nor any form of harassment and/or offence personal or sexual. ACPSYSTEM is therefore committed to providing a working environment that excludes any form of discrimination and harassment relating to race, gender, religion, nationality, age, sexual orientation, disability or other characteristics non-work related personalities.

#### **10. PROHIBITED CONDUCT AT WORK**

Any illegal conduct or any form of illegal conduct is strictly prohibited in the workplace abuse, threat or assault on people or company property.

The staff is required to report any behavior of this nature and, in any case, any alleged violation of rules, policies or procedures, to their manager or to Ethics Leader, who will report, with the appropriate guarantees of confidentiality, to the Human function Resources, which, having carried out the necessary checks and



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evaluations, will perform an advisory function vis-à-vis the Board of Directors, providing an opinion on the measures to be adopted.

### **11. HEALTH AND SAFETY IN THE WORKPLACE AND ENVIRONMENT**

ACPSYSTEM guarantees working conditions that respect individual dignity and environments safe and healthy workplaces, also through the dissemination of a culture of safety and risk awareness, promoting responsible behavior on the part of everyone.

With this in mind, each employee and collaborator is called to contribute personally to the maintaining the quality of the working environment.

The Company undertakes:

- to carry out safe activities in order to protect the health of its employees e of the community that surrounds its offices, aligning its operational strategies with the compliance with the company policy on safety, health and the environment;
- to periodically review the performance and efficiency of its systems, for achieve the objectives set in terms of safety, health and the environment;
- is committed to sustainable development that respects the highest standards on the subject of human rights;
- is aware of the impact that the activities carried out can sometimes have on the environment and consequently undertakes to reduce its potentially harmful effects.

### **CHAPTER III - RELATIONS WITH THIRD PARTIES**

The Company is particularly careful to develop a relationship of trust with all its possible interlocutors, i.e. individuals, groups or institutions whose contribution is necessary to pursue its corporate mission, as well as with collaborators, customers, suppliers, business partners, public institutions, the market, political, trade union and social organizations, whose interests may be directly or indirectly affected by the Company's activities.

In carrying out its activities, ACPSYSTEM conforms to the principles of loyalty and correctness, requiring all those who work on its behalf to behave honestly, transparent and compliant with the law in every relationship they maintain, not tolerating corruptive and/or collusive conduct, nor undue favouritism.

ACPSYSTEM, in the awareness of the relevance of the services rendered by the same, ensures the transparency of its actions and behaviours.

It is forbidden for shareholders, employees and collaborators to give/offer and/or accept/receive gifts, benefits and/or any other utility, personal or otherwise, in the context of the activities carried out for





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ACPSYSTEM, such as to generate even the suspicion of having acted in the interest and on behalf of the Company, with the exception of gifts of modest value attributable to normal relations courtesy or business practices.

### **12. RELATIONS WITH PRIVATE AND PUBLIC CUSTOMERS**

In line with the fundamental values of which it is the bearer and aware of the fact that each Client has different needs and expectations and that each represents, however, an opportunity to growth, ACPSYSTEM marks the relationships with all customers, whether private or public, to integrity principles, honesty, fairness, respect and mutual trust, as well as professionalism, independence and equity.

In the event that the recipients of the consultancy activity are Public Administrations, Bodies public, including economic, local, national or public bodies or companies international (hereinafter referred to as the "Public Administration"), the management of such relationships must be based on the most rigorous compliance with the legislative provisions in force, as well as comply with the principles of honesty, fairness and transparency and with respect for internal procedures existing.

The Company also requires that the personnel responsible for negotiating and managing the contractual relations with the Public Administration ascertain the truthfulness and correctness of the statements made to the same, with particular reference to information relating to possession of requirements, i.e. costs and financial data.

### **13. RELATIONS WITH SUPPLIERS.**

Similarly, ACPSYSTEM manages relations with suppliers with loyalty, correctness, professionalism, encouraging continuous collaborations and solid and lasting relationships of trust.

The selection of suppliers and the determination of the conditions for the purchase of goods and services take place on the basis of objective and impartial assessments, based on quality, price and on the guarantees provided.

The Company, in relations with its suppliers, observes the following principles:

- the purchase is sent to a dedicated office;
- the Company does not practice or approve any form of "reciprocity" with suppliers: the services that ACPSYSTEM searches for are selected and purchased exclusively on the basis of their value in terms of price and quality;
- any negotiation with a supplier, current or potential, must concern exclusively the goods and services subject to negotiation with the supplier;
- personnel responsible for the purchase of goods and services must not be subject to any form of pressure from suppliers to donate materials, products and/or sums of money in favor of charity/solidarity associations or similar.



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The assumption of commitments and the management of relations with current and potential suppliers must take place in compliance with the Company's directives on conflict of interest and management of business.

### **14. RELATIONS WITH PUBLIC INSTITUTIONS**

Relations with national, community and/or international public institutions, as well as with public officials or persons in charge of a public service, or bodies, representatives, agents, representatives, members, employees, consultants, persons in charge of public functions, of Public Institutions, Supervisory Authorities and/or other Independent Administrative Authorities, must be based on the strictest compliance with the legislative provisions in force; such reports are remitted exclusively to persons authorized to do so on the basis of current proxies and proxies granted by the Company's Board of Directors.

ACPSYSTEM undertakes to maintain towards the subjects indicated above, with whom it relates in any capacity, an attitude of maximum collaboration, based on transparency and correctness.

### **15. RELATIONS WITH THE PUBLIC ADMINISTRATION**

Relations with the Public Administration (including, by way of example, public entities, also economic entities, local, national or international public entities and/or companies, concessionaires of public services and/or persons in charge of public functions) and with public officials or persons in charge of public service, and in any case any relationship of a public nature, must always be inspired by the most rigorous observance of the applicable legal provisions, the principles of transparency, honesty and correctness, and cannot in any way compromise the integrity and reputation of ACPSYSTEM.

The management of relationships with the Public Administration or relationships of any nature publicity, are reserved exclusively for the company functions in charge and authorized for this purpose.

In relations with the Public Administration, the Company must not influence improperly the decisions of the Administrations concerned, in particular of the officials who deal with or decide on their behalf.

During a negotiation or a business relationship, even commercial, with the Public Administration, in Italy or in other countries, ACPSYSTEM refrains from conduct contrary to principles set out above, including but not limited to:

- offer or grant job opportunities and/or commercial advantages to the personnel of the Public Administration, involved in the negotiation or relationship, or related family members;
- offer or receive gifts or other benefits, unless they are acts of commercial courtesy of modest value;
- provide false information or fail to communicate relevant facts, where required by the Public Administration.

In relations with the Public Administration, in Italy and abroad, the representatives and/or employees of the Company to pay or offer, directly or through third parties, sums of money or other benefits of any kind and entity, whether they are public officials, government representatives, public employees or private individuals,



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to compensate or repay them for an act of their office, nor to achieve or delay the execution of an act contrary to their duties office.

### **16. RELATIONS WITH POLITICAL, TRADE UNION AND SOCIAL ORGANIZATIONS**

ACPSYSTEM contributes to the economic well-being and growth of the community in which it operates. For this purpose, the Company complies with respect for the community in carrying out its activities local and national, promoting dialogue with trade unions or other associations.

The Company bases its relations with political parties or their representatives or candidates at the most strict compliance with current legislation and company directives.

ACPSYSTEM promotes and supports social, sporting, humanitarian and cultural initiatives, possibly also through the disbursement of contributions to foundations, institutions, organizations or entities dedicated to carrying out social, cultural and, more generally, oriented towards the improvement of living conditions and the diffusion of a culture of peace and solidarity. The process of disbursement of these contributions must take place in compliance with the regulatory provisions in force and be correctly and adequately documented.

The Company does not promote or maintain any kind of relationship with organizations, associations or movements that pursue, directly or indirectly, criminal purposes illicit or, in any case, prohibited by law.

## **CHAPTER IV - FINAL PROVISIONS**

ACPSYSTEM specifies that the provisions and principles of this Code of Ethics can be, in in some cases, more restrictive than the regulatory provisions in force and commonly used practices.

### **17. VIOLATIONS AND SANCTIONAL CONSEQUENCES**

All members, employees and collaborators, in the event that they become aware of alleged violations of this Code of Ethics or behaviors that do not comply with the rules of conduct adopted by the Company, must inform their direct superior without delay. In case in which a resolution of the matter is not reached through this channel or if the recipient is uncomfortable discussing it, you can consult the senior management team or the sole director. The need to specifically report to the Bodies remains unaffected established on the basis of current legislation. In fact, these bodies will proceed with the verification of the legitimacy of the alleged violations, hearing, if necessary, the person who carried out the violation report and/or the alleged perpetrator.

Furthermore, information relating to official documents must be transmitted resulting from non-compliance with the provisions of Decree 231/2001 (e.g. provisions by bodies of the judicial police, requests for legal assistance forwarded by managers and/or by employees in the event of initiation of legal proceedings, etc.).



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Compliance with the provisions of this Code of Ethics must be considered an essential part of the contractual obligations of the employees pursuant to and by effect of art. 2104 code civ. Any violation of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or disciplinary offence, in accordance with the established procedures by art. 7 of the Workers' Statute and applicable collective bargaining, with each consequence of the law, also with regard to the maintenance of the employment relationship, and may entail compensation for damages deriving from the same.

Compliance with the principles of this Code of Ethics is part of the contractual obligations undertaken by collaborators, consultants and other subjects in business relations with ACPSYSTEM. In consequence, any violation of the provisions contained therein may constitute non-fulfilment of the contractual obligations assumed, with all legal consequences with regarding the termination of the contract or of the assigned assignment, and the compensation for damages derivatives.