



CODE OF BUSINESS ETHICS

1. PREMISE

Ai Engineering s.r.l., Engineering Company and the associated **Ai Studio**, Professional Association (hereinafter abbreviated as “**Ai**” and/or “Company”) intend to adopt this **Code of Business Ethics** (hereinafter also abbreviated as “Code”), which contains the general principles of fairness, transparency, legality and moral integrity; these principles represent an indispensable prerequisite for the performance of Ai's activities and for the achievement of the productive, economic and social objectives pursued by the Company.

In particular, this Code of Business Ethics defines:

- rules of conduct, in relations with external operators, collaborators, consultants, the market and the environment, to which the Company provides information about its activities (internal and external), demanding compliance with them by all those involved (partners, employees, collaborators, consultants and - to the extent of their competence - external operators);
- rules of organization and management of professional activities, with the aim of obtaining an effective and efficient system, aimed at planning, execution and control of activities, capable of ensuring constant compliance with the rules of conduct by preventing their violation by any person acting on behalf of the Company.

This document is not intended to be a tool for resolving disputes of any kind, but is intended to be a point of reference for each operator and a reminder to adhere to basic ethical principles in the daily conduct of their work.

2. Dissemination and Updating

This Code has been widely disseminated within **Ai** and is available to any of the Company's stakeholders.

It is also published on the Ai Group web page, under the “Info” section.

Each partner, employee, collaborator and consultant of **Ai** is required to know and comply with the rules contained in this Code.

Through the use of appropriate information, prevention and control tools, **Ai** carefully monitors compliance with the Code and, if necessary, takes corrective action.

The **Code of Business Ethics** has been drafted on the basis of the Guidelines issued by Confindustria pursuant to Legislative Decree 231/2001, as amended and supplemented, on the subject of “*Administrative Responsibility of the Company*,” and may be amended and/or supplemented at any time if the need arises.

3. Relationships with external operators

3.1 Competition

Ai's corporate policy is based on principles of free and fair competition.



All actions put in place for the conduct of professional activities are aimed at obtaining competitive results that reward the efficiency, skills and experience of resources.

Ai and its collaborators must maintain proper conduct in business affairs of company interest, with particular reference to relations with external stakeholders, whether private or public operators. Any action that could alter fair competition is prohibited for any person acting on **Ai**'s behalf and contrary to company policy. In addition, the pursuit of the company's interest does not justify conduct (of partners, employees, collaborators and consultants) that does not comply with the rules of this Code and respect mandatory regulations.

In any communication with the outside world, information regarding the company and its activities must be truthful, clear and verifiable.

3.2 Relations

3.2.1 External stakeholders

The relations and relationships that the Company undertakes with any interlocutor, public or private, are based on principles of fairness, transparency and verifiability. In particular, with regard to relations with the public administration, the Company proposes and shares compliance with the rules dictated by the code of conduct for public employees. Therefore, forms of gifts that may appear as exceeding normal business practices or courtesy and in any case aimed at acquiring favorable treatment in the conduct of professional activity are not allowed.

With regard to representatives or employees of public administrations, the pursuit and establishment of personal relationships of favor, influence and interference suitable for directly or indirectly conditioning the outcome of the relationship are prohibited.

Also prohibited are offers of goods or other benefits to representatives, officials or employees of public administrations, including through intermediaries, unless they are gifts of modest value, conforming to custom and as long as they cannot be understood as aimed at seeking undue favors.

Ai does not distribute contributions, benefits or other utilities to political parties and labor unions (or their representatives), except in accordance with the general principle of transparency and in any case in compliance with the applicable regulations on the subject.

3.2.2 Clients and Contractors

Ai's policy is geared toward excellence in the quality of services rendered to be understood as the goal of full satisfaction of customers and other parties to whom the activity itself is addressed according to the principles of diligence, competence, professionalism, fairness and transparency.

Customer satisfaction monitoring data are constantly examined with the aim of continuous improvement in accordance with the regulations for corporate quality.

In relations with Clients, **Ai** ensures fairness and clarity in business negotiations and the assumption of contractual obligations, as well as faithful and diligent contractual performance.

When participating in tenders and in private business negotiations, **Ai** carefully evaluates the appropriateness and feasibility of the services requested, paying particular attention to the technical and economic conditions, detecting potential anomalies where possible.

All bids are prepared in full compliance with quality standards, employee salary levels, and current safety and environmental protection measures.

Ai does not resort to litigation except in specific cases in which its legitimate claims do not find due satisfaction in the interlocutor.

As part of any negotiations, **Ai** avoids situations in which the parties involved are or could potentially appear to be in conflict of interest.



3.2.3 Suppliers

Relations with **Ai**'s suppliers (including consulting, financial contracts, etc.) are governed by the rules of this Code and are subject to constant and careful monitoring by the Company. It should be noted how **Ai** makes use of suppliers and subcontractors who operate in accordance with current regulations and the rules set forth in this Code. The selection of suppliers and the determination of purchasing conditions are therefore based on an objective assessment of the quality, price of the services requested, and ability to provide and guarantee services in a timely manner at a level appropriate to the Company's needs. Under no circumstances shall one supplier be preferred over another on the basis of personal relationships, favoritism or advantages other than those inherent in the exclusive interest and benefit of the Company.

3.3 Environment

In view of the rights of future generations, the environment is a primary asset that **Ai** is committed to safeguarding. When promoting, planning, or entrusting the design of construction projects, the Company plans its activities by seeking a balance between economic initiatives and unavoidable environmental needs.

Ai is therefore committed to improving the environmental and landscape impact of its activities, as well as preventing risks to populations and the environment not only in compliance with current regulations.

Ai is committed to spreading and consolidating among all its members, collaborators, consultants, subcontractors and Customers a culture of environmental protection and pollution prevention, developing awareness of risks and promoting responsible behavior by all those involved.

4. Relationships with employees

4.1 Work

Human resources are the main factor in the success of any business venture. **Ai** promotes a framework of mutual loyalty and trust between employer, employees, contractors and consultants. Employees are managed with the utmost respect for the contractual regulations of their sector, tax, social security and insurance regulations.

Ai will provide its employees and/or collaborators and/or candidates with equal employment opportunities, without discrimination on the basis of race, color, religion, sexual orientation, disability, nationality or any other characteristic that is protected by the laws and regulations to which **Ai** is subject.

Disparities are not considered discrimination if they can be justified on the basis of objective criteria.

Ai, also by carrying out training initiatives, promotes the continuous improvement of the professionalism of its employees, collaborators and consultants.

In addition, and within the scope of its possibilities, **Ai** is committed to ensuring that all partners, employees, collaborators and consultants, as well as the personnel of other companies or professionals with whom activities should be carried out in common or between them coordinated (even temporarily), observe constant compliance with the laws and regulations in force, as well as with the organizational and procedural rules adopted, with particular reference to those expressly provided for in the model of organization, management and control for the prevention of crimes.

4.2 Health & Safety

Ai is committed to achieving working conditions functional to the protection of the psycho-physical integrity, health of workers and respect for their moral responsibility, avoiding discrimination, unlawful conditioning and undue hardship. The Company carries out its activities under technical, organizational and economic



conditions that enable it to ensure adequate accident prevention in a safe and healthy working environment.

Ai internally spreads the culture of “safety” by developing risk awareness and promoting prevention responsibilities and activities by all members, employees, collaborators and consultants.

4.3 Contrasto alla violenza di genere e molestie nei luoghi di lavoro

Ai strongly condemns all forms of harassment, sexual and gender-based violence perpetrated in the corporate environment.

Personnel who believe they have been subjected to harassment or discrimination may report what has happened to the Company's management, which will assess the actual violation of this Code.

Disparities are not considered discrimination if they can be justified on the basis of objective criteria.

In order to prevent the occurrence of all possible forms of harassment and violence in the workplace **Ai** adopts the following set of deterrent rules and behaviors aimed at maximizing the protection of its employees and/or collaborators:

- consolidation of a work environment free of prejudice, respecting the professionalism of each person involved in the company's professional reality;
- condemnation of all forms of slander, defamation, false accusations and discriminatory behavior put in place by anyone who is part of the corporate reality of **Ai**;
- reporting, prosecuting and sanctioning all forms of harassment and violence to the competent authorities;
- material and psychological assistance to any victim of abuse.

5. Methods of implementation

5.1 Prevention

In compliance with current regulations and with a view to the planning and management of company activities aimed at efficiency, fairness, transparency and the quality of services rendered, **Ai** uses organizational and management measures suitable for preventing unlawful conduct or conduct that is in any case contrary to the guidelines of this Code by any person acting on its behalf.

Given the complex organization in sectors subdivided by discipline, **Ai** adopts a system of delegation of powers and functions, providing in explicit and specific terms for the assignment of tasks to persons with suitable capacity and competence.

5.2 Controls

Ai adopts specific ways of controlling the compliance of the conduct of anyone acting on its behalf with the rules of conduct of this Code and the provisions of current regulations.

5.3 Sanctions

Compliance by the Company's employees, collaborators and consultants with the rules of this **Code of Business Ethics** shall be considered an essential part of their contractual obligations pursuant to Article 2104 of the Civil Code. Conversely, violation of the rules of the Code by all the above-mentioned resources may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences.