

# Code of Ethics

2026 Edition

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# 1.0 Introduction

HRIT Srl (hereinafter the "Company" or HRIT) in order to clearly and transparently define the set of values which inspire the Company in order to achieve its objectives, has drafted this Code of Ethics, the observance of which is essential for the proper functioning, reliability, reputation and image of the Company, which constitute the foundations for its current and future success and development.

Company activities must therefore comply with the principles expressed in this Code of Ethics.

HRIT recognizes the importance of ethical and social responsibility in conducting business and corporate activities and is committed to respecting the legitimate interests of its stakeholders and the community in which it operates. At the same time, it requires all Company employees and all those who work in the Company's interest and on its behalf to comply with the Company's rules and principles as established in this Code of Ethics.

The Company, in order to implement the provisions contained in the Model 231, has integrated into this Code of Ethics the principles of correctness, loyalty, integrity, transparency, moral and professional commitment which, since its establishment, have shaped the Company's relations with personnel, collaborators and third parties and which, more generally, characterize the performance of its corporate activity.

This document constitutes a fundamental safeguard for Model 231 and the Management System for the Prevention of Corruption implemented by the Company.

For this reason, all personnel may be subject to sanctions in the event of non-compliant behaviour.

# 2.0 Mission and Ethical Vision

The Company intends to maintain and develop a relationship of trust with its stakeholders and pursue its objectives by seeking the best balance of all interests involved, in compliance with all legal provisions and the principles of honesty, impartiality, reliability, loyalty, correctness, transparency, and good faith.

# 3.0 The Code of Ethics

The Company has deemed it appropriate and necessary to adopt and issue its own code of conduct to make explicit the values to which all its directors, employees, and

collaborators in various capacities must comply, accepting responsibilities, structures, roles, and rules whose violation, even in the case of not resulting in any corporate responsibility towards third parties, requires the assumption of personal responsibility both inside and outside the company.

The knowledge and observance of the Code of Ethics by all those who work for the Company are therefore primary conditions for the Company's transparency and reputation.

Furthermore, the Code of Ethics is brought to the attention of all those with whom the Company has business relations.

Verification of the content and principles of the Code of Ethics, and of its application, is the responsibility of Management and Company management, which may also propose the integration or modification of its contents. It is also the duty of Management and the corporate Compliance function to update the Code of Ethics to adapt it to any relevant legislation and corporate changes that may cause risks to vary.

Stakeholders involved in this Code of Ethics include all stakeholders in the Company, such as employees, customers, suppliers, and institutions.

## 4.0 Recipients of the Code of Ethics

This Code of Ethics applies to all services performed by HRIT and is defined in the Special Section of Model 231 and the Corruption Prevention Manual, and is specified by purpose and field of application.

The principles and provisions of the Code of Ethics are binding on directors, employees, customers, suppliers, and all those who work with the Company under a contractual relationship, even temporary. All aforementioned subjects are collectively referred to below as "recipients".

The signing of this Code of Ethics is to be considered tacit by all interested parties, but specifically, formal methods of signing are also established, as in the table.

Recipients	Subscription method
Clients	Letter of assignment
Employees	Regulation in the recruitment phase
Executives	Issuing of this document

The Company carries out its business activities with the utmost fairness and refuses to compromise. Every employee of the Company, including directors and all personnel, has a duty to comply with all applicable laws and regulations and to uphold the highest principles of business ethics. No employee may, for any reason, engage in any illegal or unethical activity, or direct others to do so.

This Code of Ethics applies to all predicate offenses of Decree 231 and is the basis of company policies such as the Quality Policy, Data Security Policy, and Corruption Prevention Policy. These documents represent a clear declaration by company management of the satisfaction of the requirements of the standards in the company.

The Code of Ethics is communicated to interested parties through the company website.

To ensure a clear understanding of the Code of Ethics, periodic communication plans are prepared and implemented to promote awareness of the principles and ethical standards it contains.

## 5.0 Reference principles and standards

The Company operates in full compliance with the laws and regulations in force, in alignment with the principles established by the Code of Ethics, Model 231 and the procedures adopted.

Transparency, fairness, professional commitment and moral rigor are the values that inspire the Company - and from which it draws its models of conduct - in order to compete effectively and fairly on the market, with the aim of improving customer satisfaction, and develop the skills and professional growth of its human resources. All behavior in contrast with the aforementioned principles are considered prohibited, even if carried out in the interest of the company. All actions, operations and transactions referable to the Company must be undertaken and pursued in full compliance with legality, impartiality and the principles of fair competition, must be managed with the utmost correctness, must be inspired by the completeness and transparency of information, must be supported by documentary evidence and must be able to be subjected to checks and controls. Relations with Authorities, public bodies and third parties must be based on maximum transparency and collaboration, in full compliance with their institutional functions.

- promptly contact the compliance officer in case of need for clarification;
- promptly contact the compliance officer in case of need for clarification;
- collaborate with the SB or whoever may be delegated for possible checks and inspections.

HRIT, in carrying out its activity, informs all counterparties with which it maintains relations in the adoption of Model 231 with the Company represented and provides for specific express termination clauses in the drafting of the contracts.

Fundamental principles of the Code of Ethics are:

1. Respect for the law;
2. Honesty and fairness;
3. Centrality of the individual;
4. Impartiality and equal opportunities;
5. Transparency and completeness of information;
6. Trust and collaboration;
7. Correctness in accounting records;
8. Confidentiality of information;
9. Prevention of conflicts of interest;
10. Protection and proper use of company assets;
11. Clients
12. Suppliers
13. Relations with the public administration
14. Personal Responsibilities
15. Equity in the exercise of authority;
16. Fair competition and adequacy of remuneration in relation to products and services offered;
17. Diligence in the performance of duties;
18. Value of human resources.

## 5.1 Respect for the law

The Company recognizes compliance with the laws and regulations in force in all the countries in which it operates and for all activities carried out as an essential principle.

In compliance with this, the Company requires all operators to comply promptly with the applicable regulations in carrying out their duties and any improper behavior will be sanctioned.

## 5.2 Honesty and fairness

Company personnel must act fairly, honestly, ethically and in compliance with applicable laws in all business dealings on behalf of the Company, including dealings with customers, suppliers, competitors and Company employees.

No employee is authorized to take unfair advantage of another person through the manipulation, concealment, illicit use of privileged or confidential information, the misrepresentation of essential facts or any other unfair practice.

Under no circumstances can the pursuit of the Company's interests justify dishonest conduct.

## 5.3 Centrality of the individual

The Company promotes respect for the physical and cultural integrity of the individual.

The Company guarantees the well-being of individuals who work within the organization.

The Company does not tolerate requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behavior that is harmful to the beliefs and moral and personal preferences of each.

The Company supports and respects human rights in accordance with the UN Universal Declaration of Human Rights.

The Company guarantees the physical and moral integrity of its workers, employees and collaborators, promoting working conditions that respect individual dignity and safe and healthy working environments in full compliance with sector regulations.

With reference to moral integrity, attitudes aimed at inducing people to act against the law and the Code of Ethics or adopting behavior harmful to the beliefs and moral and personal preferences of each, are not acceptable.

## 5.4 Impartiality and equal opportunities

The Company undertakes to avoid any discrimination based on age, gender, sexuality, state of health, race, nationality, political opinions and religious beliefs, in all decisions that affect relations with its stakeholders.

## 5.5 Transparency and completeness of information

The Company undertakes to inform all stakeholders in a clear and transparent manner of episodes that may have an influence on the quality of the activities carried out, without favoring any interest group or individual, through the functions delegated for this purpose.

## 5.6 Trust and collaboration

Relations with stakeholders must, at all levels, be based on criteria and behavior marked by loyalty, honesty, collaboration and mutual respect through constant and transparent dialogue. Only in this way is it possible to guarantee the continuity of relationships of trust and collaboration for mutual benefit and sustainable growth of the value created.

In particular, the conviction of acting in some way to the benefit of the company does not justify the adoption of behavior in contrast with the aforementioned principles. All those who work for the Company, without distinctions and exceptions,

are therefore committed to observing and ensuring that such principles are observed within the scope of their duties and responsibilities. This commitment is justified and requires that even the subjects with whom the Company has relations in any capacity act towards it with rules and methods inspired by the same values.

### 5.7 Accounting records

Accuracy and integrity in the maintenance of the Company's bookkeeping and records are paramount to the Company's success. Personnel are required to comply with the following guidelines regarding Company financial records.

**Accounting Principles:** Personnel are expected to comply with generally accepted accounting principles where applicable and all related regulatory requirements. Personnel are expected to execute all transactions in accordance with Company policies and procedures.

**Unrecorded Funds:** All transactions and arrangements, assets, liabilities, income and expenses, must be recorded and described in the Company's books and accounting documents.

**False Entries:** Personnel are not permitted to intentionally and for any reason make false or misleading entries in Company books or records, nor contribute to or facilitate such conduct.

**Recognition of income and expenses:** income, as well as the expenses, must be recognized by applying the provisions of accounting standards and the laws in force. Under no circumstances shall acknowledgment be expedited (before a chargeable period), postponed (after a chargeable period) or manipulated in any way that results in a change to a proper accounting and recording system.

**Authorization:** In order to have access to bank account funds or to execute wire transfers, personnel must be authorized according to the Company's cash management policies. Personnel may use Company funds or other assets only with prior authorization and only for legitimate business purposes.

**Payments:** Staff may not make any type of payment on behalf of the Company without adequate supporting documentation, or for any purpose other than that described in said supporting documentation.

**Monitoring and Control:** Any payment for travel, gifts or hospitality must be authorized by management. Such costs must always be documented by the internal accounting manager who will have documented evidence of control activities. During internal audits, the company must ensure careful control of financial aspects for the purpose of preventing corruption.

### 5.8 Confidentiality of information

All personnel have an obligation to safeguard non-public Company information.

All employees are expected to maintain the confidentiality of information entrusted to them by the Company or its customers, except where disclosure of such information is authorized or mandated by law. Confidential information includes any non-public information that, if disclosed, could benefit a competitor or harm the company or its customers. Some non-limiting examples of such information are: business information, projects, practices, customer contacts, potential customers, pricing structures, financial information, manuals, methodologies and management philosophies relating to Company business. Confidential information is also information relating to other employees, including - but without limitation - compensation, performance evaluations, disciplinary actions or investigations, medical information, personal addresses and telephone numbers.

Company personnel are prohibited from (i) personally taking advantage of opportunities arising from the use of Company property, information or their position, (ii) using Company property, information or their position for their own personal benefit, and (iii) to compete with the Company.

The Company ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express and informed authorization and compliance with current legal regulations. The Company protects information relating to its employees, and to third parties, generated and acquired internally and externally, and activates any other useful measure aimed at avoiding the improper use of such information.

The Recipients of this Code of Ethics are required not to use confidential information for purposes not connected with the exercise of their business.

## 5.9 Prevention of conflicts of interest

Personnel will do their utmost to avoid any activity that may affect their ability to act in the interests of the Company or that may create obstacles to carrying out their work objectively and effectively.

Any business gifts, given or received by personnel, should be intended to establish good aptitude and strong working relationships, and not to obtain an improper advantage from customers or suppliers.

No employee of the Company shall knowingly enter into a transaction with any firm or person or in any capacity as an associate (other than in his/her capacity as an employee for the benefit of the Company) that would give rise to an actual or apparent conflict of interest between such employee and the Company.

Employees cannot hold public positions within Public Administrations nor have relatives who work within Public Administrations in the same area in which the Company operates.

In relations with Public Administrations, all members of the Company are prohibited from establishing relations of a confidential or personal nature.

The Company promotes the holding of exclusively formal meetings with officials of Public Administrations. Every meeting held with Public Administration must be communicated to the Compliance Manager function.

## 5.10 Protection and proper use of company assets

Company personnel are responsible for protecting Company assets and ensuring that they are used efficiently. Theft, negligence and waste have a direct impact on the Company's net profit. All Company property, such as office supplies, computers, office space and materials, must be used only for legitimate business purposes, although personal use may be permitted on an occasional basis.

## 5.11 Clients

Behavior towards customers is to be based on openness, respect and courtesy, with a view to a collaborative and highly professional relationship.

Consistent with the principles of impartiality and equal opportunities, HRIT undertakes not to arbitrarily discriminate against its customers, to provide high-quality services that meet the customer's reasonable expectations and protect their safety and security and to comply with truthfulness in communications, whether commercial or of any other kind.

HRIT operates towards customers for the purpose of ethically valid behavior in compliance with the following specific principles:

- Correctness and truthfulness of information;
- All information regarding services must be provided in a clear, truthful and balanced manner;
- All communications addressed to customers are to be written in clear language, in the simplest possible way and with an easy-to-read graphic form, so as to facilitate immediate understanding;
- Customer Satisfaction monitoring.

HRIT constantly verifies the quality of services rendered and the level of customer satisfaction. HRIT pays particular attention to customer complaints as the correct, transparent and balanced management of the same promotes greater understanding between parties aimed at settling disputes.

Complaints are also analyzed in order to understand the causes that may have generated irregularities, inefficiencies or misunderstandings and to promote improvement in the quality of products and services.

## 5.12 Suppliers

Purchasing processes are based on the search for the maximum competitive advantage, the granting of equal opportunities for each supplier, loyalty and impartiality.

The selection of suppliers and the determination of purchase conditions are based on an objective evaluation of quality, the price and the ability to supply and guarantee services of an adequate level. Specifically, employees cannot:

- receive any form of consideration from anyone for the execution of an act of one's office or contrary to one's official duties;
- be subject to any form of conditioning by third parties outside the Company, and by the same not authorized to do so, for the taking of decisions and/or the execution of acts relating to work activity.

Employees who receive gifts or other forms of benefit not directly attributable to normal courteous relations must take all appropriate steps to refuse said gifts or other forms of benefit, and inform their superior.

## 5.13 Relations with the public administration

Company relations with Public Administrations will be maintained only by company functions delegated for this purpose.

In relations with employees and representatives of public bodies, members of the Company's corporate organization must behave in a manner inspired by principles of transparency, honesty and correctness.

Compliance with the provisions of the Code of Ethics regarding conflicts of interest is prescribed, with particular reference to the company procedures for authorizing gifts.

The Company Management and the Corruption Prevention Manager must be immediately notified of any attempted extortion made against them by operators of Public Administrations (Revenue Agency or GdF Financial Police) in the capacity of public officials or public service officers.

In the event that the Company grants a representation assignment to a third party, to be represented in relations with Public Administrations, this third party is subject to the application of the Code of Ethics, with particular reference to the rules applying to the subject of conflicts of interest, as well as the directives issued with the allocation of the assignment.

## 5.14 Personal responsibility

Each Receipt of the Company Code of Ethics assumes personal responsibility in terms of complying with ethical behaviour. Management is responsible for leading

by example and ensuring that all employees read the Code and have the opportunity to discuss its practical application. Staff are required to examine the Code of Ethics in order to propose the necessary changes. Everyone has a duty to be vigilant and detect situations that may indicate illegal or unethical behavior and to act appropriately and promptly to prevent improper conduct.

## 5.15 Fairness in the exercise of authority

In signing and managing contractual dealings which imply the establishment of hierarchical relationships - especially with employees and collaborators — the Company undertakes to ensure that hierarchical authority is exercised fairly and correctly, avoiding any kind of abuse.

The Company guarantees, in particular, that authority does not turn into the exercising of power, harmful to the dignity and autonomy of the employee and that working organizational choices always safeguard the value of the employees.

## 5.16 Fair competition and adequacy of remuneration in relation to products and services offered

HRIT intends to protect the value of fair competition by refraining from collusive and predatory behaviour. Appropriate remuneration, a fundamental condition to ensuring the quality of the products and services offered as well as the necessary professionalism, is recognized as the cornerstone that regulates relations between our Company and clients.

## 5.17 Diligence in the performance of duties

Contracts and work assignments must be performed in accordance with that which was knowingly agreed by all parties.

HRIT undertakes, with reference to the negotiating sphere, not to exploit conditions of ignorance or the incapacity of its counterparties.

## 5.18 Environmental protection

HRIT undertakes to disseminate and consolidate a culture of environmental protection and pollution prevention among all its employees, consultants and suppliers, developing risk awareness and promoting responsible behavior by all.

# 6.0 Principles of Behaviour

This Code of Ethics contains both the principles that inspire the management of the company but also, and above all, certain behavioral rules that all individuals must observe whenever working on behalf of the Company.

For this reason, for implementation purposes only, the behaviour to be followed by the individuals involved is also indicated.

## 6.1 Management of business activities

### General direction

The board of directors is responsible for corporate management and for all company decisions.

Directors, regardless of the responsibilities connected to the specific status of a director and governed by reference standards, are generally required to:

- play an active part in their role, ensuring that HRIT benefits from the specific skills of all;
- guarantee the confidentiality of news and not divulge documents and information acquired in the performance of duties;
- always ensure HRIT's interests prevail over the particular interests of individual shareholders;
- avoid any situations of conflict of interest.

### Management of general business affairs

All operations and transactions carried out or implemented for the benefit of HRIT or in its interest must be inspired by maximum correctness from the point of view of management, completeness and transparency of information, legitimacy from a formal and substantial point of view and clarity and truthfulness in the accounting checks and compliance with the regulations in force, with Model 231 and according to the procedures adopted by the Company.

Every operation and transaction must be easily identifiable and verifiable in compliance with general auditing principles. No form of gift is permitted that can reasonably be interpreted as exceeding normal commercial practice or courtesy, or in any case aimed at acquiring favorable treatment in the conduct of any activity connected to the Company.

Each individual must work diligently in order to protect corporate assets, using the resources entrusted to them with care and responsibility, avoiding improper uses that could cause damage or reduce efficiency, or that are in any case contrary to the interests of the Company.

Behavior in business - always pertaining to a corporate purpose - both individual and the collective of all must comply with company policy and must concretely

translate into collaboration, social responsibility and compliance with national and international laws with specific reference to the pursuit of the objectives and /or in the conclusion of any operation.

All those who work in the interest of the Company must avoid all situations and activities in which a discrepancy could arise between the duties and functions they cover within the structure to which they belong and any personal interests.

## 6.2 Personnel policy

The evaluation of personnel to be hired, as well as of collaborators and consultants must be carried out on the basis of the correspondence of the profiles of the candidates with respect to company needs, in compliance with the equal opportunities of all interested parties. HRIT undertakes to place its collaborators and employees in full compliance with contractual and social security regulations. Access to roles and assignments is also established in consideration of skills and abilities; moreover, compatibly with the general efficiency of the work, flexibility in the organization of work is favored, aimed at facilitating the management of maternity status; personnel are hired with a regular employment contract and therefore no form of irregular work or “undeclared work” is tolerated. Similarly, and in compliance with the principles indicated above, special contracts are stipulated with collaborators and consultants.

HRIT undertakes to disseminate and consolidate a culture of safety by developing risk awareness, promoting responsible behavior by all employees, collaborators and consultants; moreover, it works to preserve, above all through preventive and organizational action, the health and safety of the employees.

The protection of the personal data of employees, collaborators, consultants, patients, suppliers, and in general of those who come into contact with HRIT is guaranteed by adopting the procedures and standards established by the applicable regulations (which specify the information the company requests from collaborators, customers and suppliers and the relative methods of treatment and conservation). These measures provide, inter alia, for the prohibition, except in the cases provided for by law, to communicate/disseminate personal data without the prior consent of the interested party and establish the rules for the control and protection of data and the procedures for the protection of privacy.

The Company undertakes to protect the moral integrity of its employees and collaborators by guaranteeing working conditions that respect the dignity of the person. For this reason, it safeguards employees and collaborators from acts of psychological violence and opposes any attitude or behavior that is discriminatory or harmful to the individual, his/her beliefs and preferences.

Sexual harassment is not permitted and behavior or speech that may disturb the sensitivity of the individual must be avoided. The employee or collaborator who believes that they have been subjected to harassment or has been discriminated against for reasons related to age, gender, sexuality, race, state of health, nationality,

political opinions and religious beliefs etc. can report the incident to the company and to the Body which will evaluate the effective violation of the Code of Ethics.

The Company guarantees the confidentiality of the identity of the author of the report and the protection of the same against any form of retaliation or discrimination that could be understood as a penalty due to the report.

The employee, the consultant and the collaborator must act loyally in order to comply with the obligations signed in employment contracts or in consultancy contracts and with the provisions of this Code of Ethics, ensuring the services and the quality level required.

All workers, employees, collaborators and consultants are required to avoid and abstain from personally taking advantage of business opportunities of which they become aware in the course of carrying out their duties. In the event that such a situation arises, even if only in appearance, which could lead to non-compliance with a duty in working or collaborative activity, it is necessary to immediately notify the respective manager in a senior position, who must inform the Supervisory Body Authority and competent bodies, which will assess the effective existence of situations of incompatibility with the status of employee, collaborator or consultant on a case-by-case basis.

Every employee, consultant or collaborator is required to work diligently in order to protect company assets, through responsible behavior and in line with the operating procedures set up to regulate use and must accurately document their use.

In particular, each collaborator employee or consultant must:

1. use the assets entrusted scrupulously and sparingly;
2. avoid the improper use of corporate assets (tangible and intangible) which may cause damage or reduce efficiency, or which are in conflict with Company interests;
3. avoid the use of corporate assets by parties outside the Company.

The Company reserves the right to prevent the misuse of its assets and infrastructures through the possible use of accounting, reporting, financial control and risk analysis and prevention systems, without prejudice to compliance with the provisions of the laws in force (law on privacy, Workers' Statute, etc.).

## 6.3 Management of accounting and financial data

HRIT has accounting and financial tools with the aim of guaranteeing the transparency and correctness of data; it therefore keeps truthful and accurate records of all financial transactions, which must be accompanied by adequate supporting documentation; the irregular keeping of accounting books constitutes a violation of the code and it is therefore forbidden for all employees, Directors, Partners and/or consultants in order to adopt behavior or give rise to omissions that could lead to the recording of fictitious and/or misleading and/or missing transactions, not supported by adequate supporting documentation.

## 6.4 Conflicts of interest

There is a relationship based on mutual trust between the Company and the Recipients of this Code of Ethics; within the context of this relationship, it is the primary duty of the employee and/or collaborator to operate in the corporate interest and in compliance with the principles of this Code of Ethics.

The Recipients of this Code of Ethics are required to avoid any situation and to refrain from any activity that could oppose a personal interest to the interest of the Company. This therefore means avoiding any exploitation of their position and, in particular, must exclude any possibility of overlapping or crossing of economic activities in which there is or may exist a personal and/or family interest with the duties covered and/or assigned by the Company.

Every situation presenting a conflict of interest must be communicated to the SB, so that its existence and seriousness can be assessed, and the consequent real or only potential effects can be excluded or mitigated.

# 7.0 The provision of sanctions

Compliance with the provisions of the Code of Ethics must be considered an essential part of the contractual obligations of any employees pursuant to and by effect of Art. 2104 of the Civil Code. Violations of the rules of this Code of Ethics may constitute a breach of primary obligations of the employment relationship or a disciplinary offence, in compliance with the procedures set out in Art. 7 of the Workers' Statute, with all legal consequences, also with regard to the preservation of the employment relationship and may lead to compensation for damages deriving from the same.

Compliance with the Code must be considered an essential part of the contractual obligations assumed by non-subordinate collaborators and/or persons entering into business relations with the Company. Violation of the rules of the Code of Ethics may constitute a breach of contractual obligations, with full legal consequences, including in relation to the termination of a contract and/or the assignment and may lead to compensation for damages deriving from the same.

# 8.0 Final provisions

This Code of Ethics, in recognizing corporate practice, is approved by the directors of the Company. Any variation and/or integration of the same will be approved by the board of directors and promptly disseminated to all recipients.