

# Corporate Code of Conduct

2026 Edition

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# 1.0 Introduction

The present Corporate Code of Conduct is a fundamental tool for safeguarding the integrity, transparency and professionalism that characterize the activities of HRIT S.r.l. (hereinafter "HRIT"). It establishes the behaviors expected from every person who operates in any capacity within the organization: employees, collaborators, consultants, interns and long-term partners.

HRIT operates in a highly responsible context, managing sensitive information, payroll data and processes that are crucial for its clients' organizational operations. Compliance with the rules contained in this document strengthens the company's credibility and promotes an internal culture aligned with the principles outlined in the Ethical Code, to which this Code of Conduct is complementary and which all recipients are required to strictly adhere to.

# 2.0 Integrity and personal responsibility

Every member of the HRIT team is called upon to fulfill their role with seriousness, punctuality and a spirit of service. Attention to detail, formal and substantive correctness, as well as compliance with shared procedures, are essential elements in all activities, especially in payroll management and HR consulting.

Respectful, collaborative behavior oriented toward constructive problem solving is required. Personal responsibility is expressed not only in the results achieved but also in the quality of internal relationships and respect for deadlines and professional standards.

# 3.0 Confidentiality and data protection

HRIT handles a large amount of confidential data relating to employees, administrators, consultants and internal processes of clients. Every collaborator is required to protect such information by strictly following current legislation on personal data protection (GDPR), internal policies and confidentiality agreements.

Unauthorized disclosure—even accidental—of information or documents is considered a serious violation and will be addressed according to company disciplinary procedures.

## 4.0 Professionalism in customer relations

The relationship with clients is based on trust, transparency and continuity of service. It is essential to maintain clear, timely and precise communication, reporting any issues proactively and collaboratively.

In the presence of problems, errors or sensitive situations, it is mandatory to coordinate with one's direct manager to analyze the issues and jointly determine the communication method and content to be provided to the client. This ensures message consistency, protects the commercial relationship and enables a structured approach to delicate cases.

Every HRIT employee must behave professionally and discreetly in every interaction, maintaining impartiality, respect and a focus on safeguarding clients' interests in compliance with applicable regulations.

## 5.0 Team spirit and internal collaboration

HRIT's success is based on everyone's contribution but can only be achieved through effective collaboration among colleagues, departments and functions. Working as a team is not only an organizational necessity but a concrete commitment to efficiency, service quality and meeting client deadlines.

Each collaborator is expected to foster trust, listening and mutual support by sharing useful information, helping colleagues in difficulty and reporting problems constructively. Cooperation is built daily through respect, reliability and openness to dialogue.

Individualistic, competitive or obstructive attitudes damage the company's functioning and are considered contrary to the principles of this Code.

## 6.0 Conflicts of interest

Every collaborator must avoid situations that may create an actual or potential conflict between personal interests and those of the company or its clients. In case of doubt, one must promptly inform their manager or the HR office so that the situation may be assessed and managed transparently.

External assignments, involvement in competing activities or personal influence on decisions affecting family, friends or former colleagues must always be declared and authorized.

## 7.0 Proper use of company resources

Company resources—IT tools, payroll software, mobile devices, archives and accounts—are provided for the proper performance of work activities. Their use for personal purposes should be avoided unless explicitly authorized.

In particular, the use of payroll platforms, access credentials to external systems and communication tools must follow company instructions on cybersecurity, data integrity and traceability of operations.

All collaborators must fully comply with the Internal Regulation for the Use of IT Tools, which governs access, use and protection of corporate systems. Failure to comply may result in disciplinary action proportionate to the severity of the violations.

## 8.0 Internal and external communication

Effective communication is essential to ensure accuracy, consistency and continuity in services offered. Communications among colleagues, clients and suppliers must be formulated clearly, courteously and in compliance with deadlines.

Any external communication, including informal or digital channels, must be consistent with HRIT's identity and reputation. Public statements, comments on clients or disclosure of company information on social media are not permitted without authorization.

## 9.0 Use of social media

HRIT recognizes collaborators' personal freedom in using social media but reminds that online behavior can affect the company's image. It is therefore required to avoid content or comments that may be offensive, damaging to the company's reputation or that indirectly reveal sensitive information.

Explicit association with one's job role must be managed carefully to avoid misunderstandings or improper interpretations.

## 10.0 Workplace safety and well-being

HRIT promotes a safe, orderly and inclusive work environment. All collaborators must follow workplace safety regulations (Legislative Decree 81/08) and adopt behaviors aimed at preventing physical and psychological risks.

Abuse of alcohol, use of drugs and any behavior that may compromise personal or others' safety are prohibited. Reporting unsafe or distressing conditions is encouraged through dedicated confidential channels.

Organizational well-being is a value: HRIT supports work—life balance, promotes flexible working arrangements when possible and supports personal and professional development.

## 11.0 Equal opportunity and inclusion

Every person in HRIT has the right to be treated with fairness, respect and dignity. The company rejects all forms of discrimination or exclusion based on gender, age, race, religion, disability, sexual orientation or personal beliefs.

Respect for the person extends to physical appearance: judgments, comments or derogatory attitudes concerning colleagues' appearance, body or physical characteristics are not tolerated. Any form, even subtle or ironic, of body shaming is

contrary to company values and will be reported and addressed by the responsible functions.

Diversity is seen as a resource to be valued and a fundamental condition for a modern, respectful and growth-oriented work environment.

## 12.0 Continuous training and service quality

The accuracy and precision required in payroll services and HR consulting demand constant updating. HRIT invests in continuous training and encourages everyone to stay informed on regulatory, technical and process developments.

Each collaborator is responsible for contributing to service improvement, proposing solutions, reporting inefficiencies and sharing best practices.

## 13.0 Sustainability and social responsibility

HRIT is committed to operating with attention to the environmental and social impact of its activities. Sustainability also involves small daily actions: reducing waste, limiting printing, using digital tools and promoting responsible behaviors.

The company supports social responsibility initiatives and encourages active participation in community projects.

## 14.0 Reporting and managing violations

All collaborators may report behaviors inconsistent with this Code through dedicated channels, even confidentially. Reports made in good faith will not result in retaliation. HRIT guarantees anonymity when requested and ensures that information is handled impartially.

A whistleblowing procedure compliant with applicable legislation is active, allowing the reporting of illegal acts, violations of the Code of Conduct or misconduct in a protected and confidential manner. Reports may be submitted through the dedicated platform available on the company website.

All reports will be handled by third parties or specifically appointed internal figures, respecting confidentiality, impartiality and protection of the reporting person.

Violations will be assessed based on severity, repetition and context and may result in disciplinary actions up to termination of employment or reporting to competent authorities.

## 15.0 Conclusion

Being part of HRIT means actively contributing to a serious, reliable and respectful workplace. This Code of Conduct is not merely a set of rules: it is a shared commitment, a daily responsibility assumed toward colleagues, clients and the professional community to which we belong.

Only through mutual respect, professional integrity and quality behaviors can we build and maintain the trust placed in us.