

# CODE OF ETHICS

Aéroports de la Côte d'Azur

Francia

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# ABOUT US

We conduct business in the infrastructure sector by managing concessions in the motorway and airport industry in Italy and abroad. We provide mobility services.

We act in accordance with environmental, social, ethical and governance principles that comply with the best international standards, and carry out our activities with ethical-professional integrity and fairness, in compliance with the laws and regulations in force in the countries in which we conduct business.

Since 2004 we have adhered to the 10 principles of the Global Compact and are actively committed to the protection of Human Rights, Labour Rights, the Environment and Anti-corruption practices.

We ensure respect for universally recognized human rights in line with the provisions of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work (ILO).

In our business, we are inspired by the Sustainable Development Goals (SDG) set out in the United Nations 2030 Agenda and we direct our choices and our development in such a way as to contribute to the achievement of these goals.

## Sustainable Development Goals (SDGs) to which Mundys adheres



## OUR MISSION

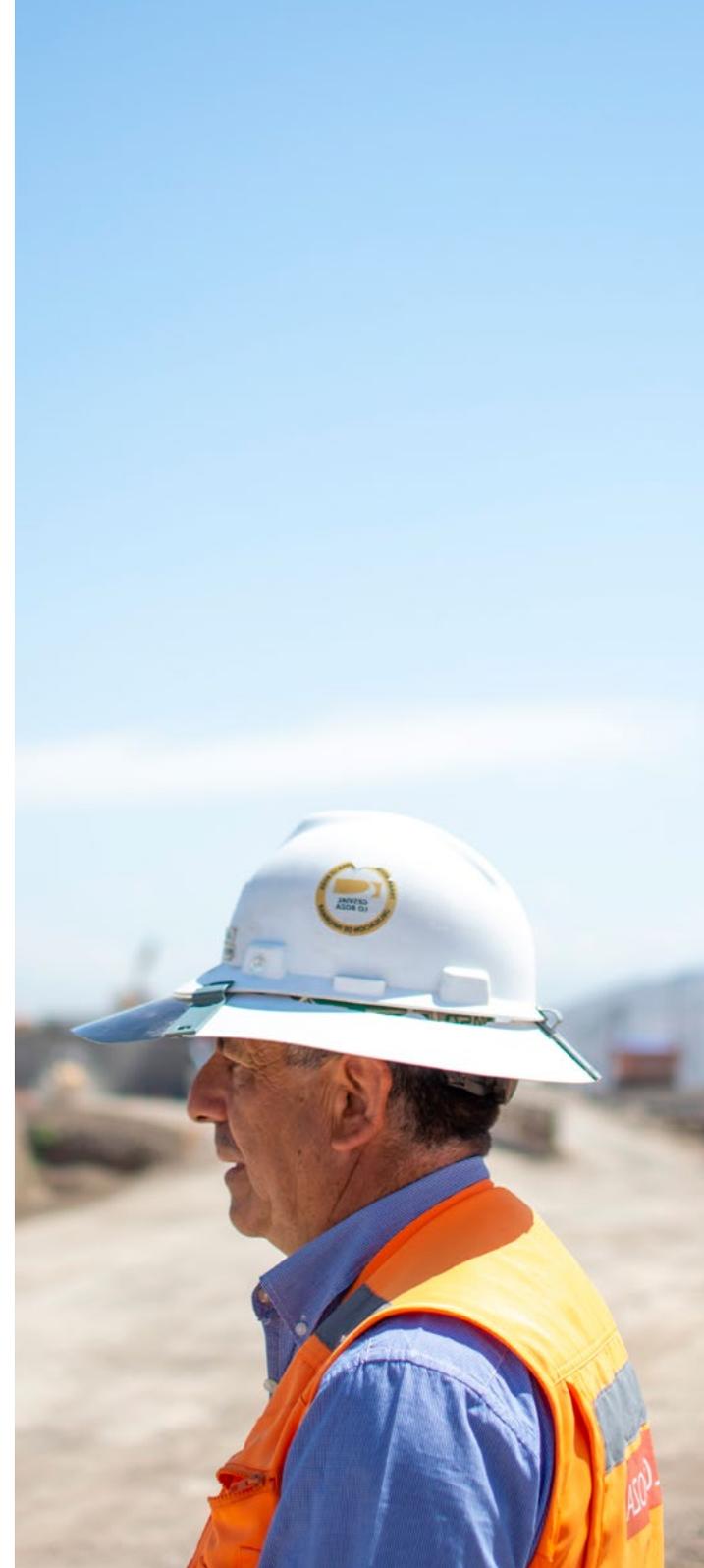
***“To drive the development of increasingly sustainable, safe, innovative and efficient mobility that responds to the needs of society as a whole”***

Our goal is to develop mobility in the territories in which we conduct business, supporting the economic and social progress of local communities and promoting innovative and sustainable solutions.

## OUR VISION

***“To create economic and social value for communities and territories through active investment in cutting-edge assets, capable of offering mobility services that provide a stand-out travel experience and simplify daily life”***

Our goal is to develop mobility in the territories in which we conduct business, supporting the economic and social progress of local communities and promoting innovative and sustainable solutions.



# OUR VALUES

***“Our organization consists of 30,000 people in three continents. It has deep roots in the territories in which it conducts business and wishes to feel a responsible inhabitant of the planet as a whole. Our name, Mundys, encourages us to see far beyond the boundaries of our entrepreneurial action.”***

## *Development AND Sustainability*

We develop our business by promoting the well-being of the communities and territories in which we conduct business and protecting the environment through solutions that are consistent with the transition to a low-carbon economy and that preserve natural resources.

## *Continuity AND Innovation*

We promote innovation and digitalization to improve constantly the solutions we offer to our Group’s customers.

## *Value AND Progress*

We generate sustainable value for all our stakeholders by driving transformation, with a view to becoming pioneers of innovation and focusing on new mobility services.

## *Diversity AND Inclusion*

We do not admit any form of discrimination and we promote a cohesive and collaborative work environment, guaranteeing dignity and impartiality of treatment to all the people involved.

## *Individuality AND Community*

We encourage the personal and professional growth of our people, which is fundamental for our Group. We establish collaborative relationships in the communities in which we operate with a view to contributing to their development.

Our idea of value is encompassed in the unifying force of the conjunction **AND**.

A conjunction that in Mundys means translating the words that matter into facts, seeking their harmonious application, on behalf of all the stakeholders. Our history, and above all our capacity to imagine the future and know how to translate it into reality, are the fundamental ingredients at the basis of our success. A success that must be sustainable and long-lasting, based above all on our human capital.

Every day we share talent, skills and aspirations, with commitment, passion and responsibility, because we believe that our work can make a difference to people’s lives, everywhere.

# OBJECTIVES AND RECIPIENTS OF THE CODE

This Code of Ethics (hereinafter also the “Code”) lays out the principles that guide our decision-making and actions in agreement with our culture of responsibility, legality, transparency and the creation of long-term value for our stakeholders and communities at large, contributing to sustainable development.

The Code is an integral part of a more comprehensive Internal Control and Risk Management System. It is a useful tool for creating and maintaining values and integrity over time, and consolidating trust and team spirit within the Group.

The Code is addressed to the members of governance and control bodies, managers and employees of Mundys and its subsidiaries, to third parties/business partners (such as suppliers, consultants, representatives, trade partners, etc.), who work with us or in the name or on behalf and/or in the interest of Mundys and its subsidiaries (hereinafter also referred to as then **“recipients”** of the Code of Ethics).

We also ask all investee companies to adopt codes of ethics and conduct in line with the general principles defined in this Code.

This Code of Ethics applies to all Italian and foreign Group companies.

## **What is expected of the recipients of the Code of Ethics**

- They shall undertake to know and abide by the contents of this Code and to act in a professional and ethical manner in compliance with the principles defined herein;
- They shall report the violation or suspected violation of the Code through the channels made available by each Group company;
- They shall collaborate with the bodies in charge of internal control;
- They shall not undertake any other type of initiative in contrast to the contents of the Code.

## **Of the people in our group we also expect:**

- That they promote and raise the awareness of every person with whom they work to the knowledge of and compliance with the principles of this Code;
- That they talk to their manager if they have any doubts about the most ethically correct conduct to adopt in any given situation or about the interpretation of the Code;
- That they participate in training initiatives aimed at promoting ethical conduct and awareness as well as professional and personal growth;
- That they undertake to inform any third parties dealing with the Group about the provisions of the Code, to support them in applying the Code and adopting compliant and appropriate actions, within their sphere of competence, to deal with actual or potential violations of the Code of Ethics.

01.  
WE ACT WITH  
INTEGRITY



## 1.1 We conduct our business in compliance with applicable regulations

*We conduct our business in compliance with the principle of legality and with national and international laws and regulations applicable wherever we carry out our activities.*

### What we do:

- **We oppose any illegal and unethical practice**, which as such damages our reputation.
- We adopt constantly evolving **management models** in order to **prevent the risk of violation of applicable regulations**, assessing compliance with the principles of conduct and the control measures that govern our processes.
- In order to support a competitive market, **we protect the value of competition** in the countries in which we conduct business. We firmly **oppose** any **restriction of competition**. We also refrain from collusive business practices that could be in violation of antitrust legislation.
- **We guarantee** the correct management of **corporate information** and particularly **inside information**, discouraging any behaviour that could constitute **market abuse** or even only facilitate it.



### **What are we talking about?**

Inside information is defined as “information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments» art. 7 of Regulation (EU) no. 596/2014.



## 1.2 We operate transparently

*We operate transparently to make our information accessible and as accurate as possible, by promoting the stakeholders' participation in Group activities.*

### What we do:

- **We ensure all our stakeholders that we operate transparently** in all our activities. We undertake to **establish** and maintain a **constant dialogue** with third parties, without prejudice to the confidentiality required by the business and the protection of fair competition, informing them clearly, completely and truthfully. By this, we provide them with the tools necessary to make informed choices.
- **In order to offer shareholders and third parties a transparent** and clear view of the Group's economic, equity and financial situation, **we register every operation or transaction in the company's accounts in a true, accurate, complete and clear manner**, in accordance with the criteria provided by the law and by applicable accounting principles.
- **For each transaction, we keep adequate documentation** in support of our activity, so as to **allow easy and timely accounting registration**, the identification of the different levels of responsibility and segregation of duties, and the **accurate tracking of each operation**.



### 1.3 We avoid and manage conflicts of interest

*We prevent and manage any actual and potential conflict-of-interest, with a view to ensuring fair and unbiased decisions and supporting the integrity of the organization and its individual employees while preserving the trust of stakeholders.*

#### What we do:

- We recognize and respect the **right** of our people to participate in investments, business and activities outside those carried out in the interest of the Group, provided that these activities are permitted by law, compatible and in any event not in contrast with the contractual obligations towards the Group.
- We avoid situations in which actual or potential **conflicts of interest** may arise and interfere with our ability to make decisions in the interest of the Group. We refrain from personally taking advantage of business opportunities of which we become aware in the performance of our functions.
- We communicate the cases in which a conflict of interest occurs or may occur to one of our managers and to the competent Structures, as defined in the company's relevant regulatory instruments, which identify the measures suitable to **safeguard**, in each specific situation, **transparency and fairness in carrying out** activities without prejudicing people's interests.



#### What are we talking about?

A conflict of interest may arise in any situation where decisions taken within the scope of one's work can generate an immediate or deferred advantage, including a non-economic advantage, for persons of the Mundys Group or any of their family members or anyone else with whom they have close personal or business relationships.<sup>1</sup>

Conflict of interest may therefore be any actual or potential situation in which the secondary interest of a person of the Group tends to interfere (real conflict) or could interfere in the future (potential conflict) with the primary interest of the Group towards which the person has specific duties and responsibilities.

<sup>1</sup> Family includes spouse, partner, parents, children, siblings, grandparents, uncles and aunts, grandchildren, nephews and nieces and first cousins of the employee and of the spouse or partner. The spouse or partner of each of the above, as well as in-laws, i.e. any relative of a spouse or partner, are also regarded as family.

## 1.4 We protect the security of corporate information

*We protect the security of corporate information in order to prevent its improper dissemination, creating potential economic and reputational damage to the Group.*

### What we do:

- We guarantee the correct management and protection of corporate information, including confidential information.
- We ensure that all necessary precautions are taken to prevent the disclosure of confidential information, which shall be kept in suitably protected archives.
- We treat confidential matters with the utmost discretion, particularly in public, and including in the workplace.





## 1.5 We prevent and fight corruption

***We prevent, oppose and do not tolerate corruption in any form in order to avoid that it represents not only an illegal phenomenon, but also an obstacle to economic development, a threat to commercial business activities and a distortion of competition, as well as a hindrance to the maintenance of a sustainable environment and a risk to our reputation.***



### **What are we talking about?**

Corruption is defined as the conduct of a person who directly or indirectly (and therefore also through a third party) offers, promises, receives or gives undue benefits and/or compensation to third parties, for a personal advantage or to the advantage of any Group companies or third parties, while directly or indirectly carrying out activities on behalf or in the interest of Group companies.

### **What we do:**

- We **fight** and first of all **prevent the occurrence of corrupt practices** in the performance of our activities, defining and applying procedures and policies aimed at preventing and fighting **corruption**, promoting its dissemination to all stakeholders.
- **We do not pay, offer or promise**, whether directly or indirectly (for example through the intermediation of a third party), undue **payments, services or favours to national and international authorities and institutions** or their families. This includes job and/or commercial opportunities, donations or gifts<sup>2</sup>, meant to influence decisions in which the Group is a party and we do not make facilitation<sup>3</sup> payments either in Italy or abroad.
- **We do not offer, promise or give money, goods, advantage or any direct or indirect benefits to any business partners unless they are justified by a contract** between the parties or are aimed at obtaining favourable treatment for an individual or the Group, **nor do we accept any promise or giving of money, goods, or other benefits** from them, if they involve the **violation of the duty of loyalty or the obligations** linked to the performance and aimed at favouring them with the Group.
- In the countries where the Group companies conduct business, **we comply with the regulations in force on the prevention and fight against corruption**. Furthermore, in application of the “zero tolerance” principle, we do not justify behaviors that facilitate corruption, even if adopted in the advantage of the Group.

<sup>2</sup> Gifts can be given to staff employed in institutions and authorities only if they comply with normal commercial practices, are of modest value and in any case are such as not to give the counterparty or a foreign or impartial third party the impression that they are aimed at acquiring undue benefits.

<sup>3</sup> Direct or indirect payments or donations of other benefits to Public Officials, Public Service Officers, or private individuals, whether natural persons or economic entities, Italian or foreigners, with a view to speeding up, facilitating or simply ensuring the execution of a 'routine activity or an activity, however, lawful and legitimate within the scope of one's duties.

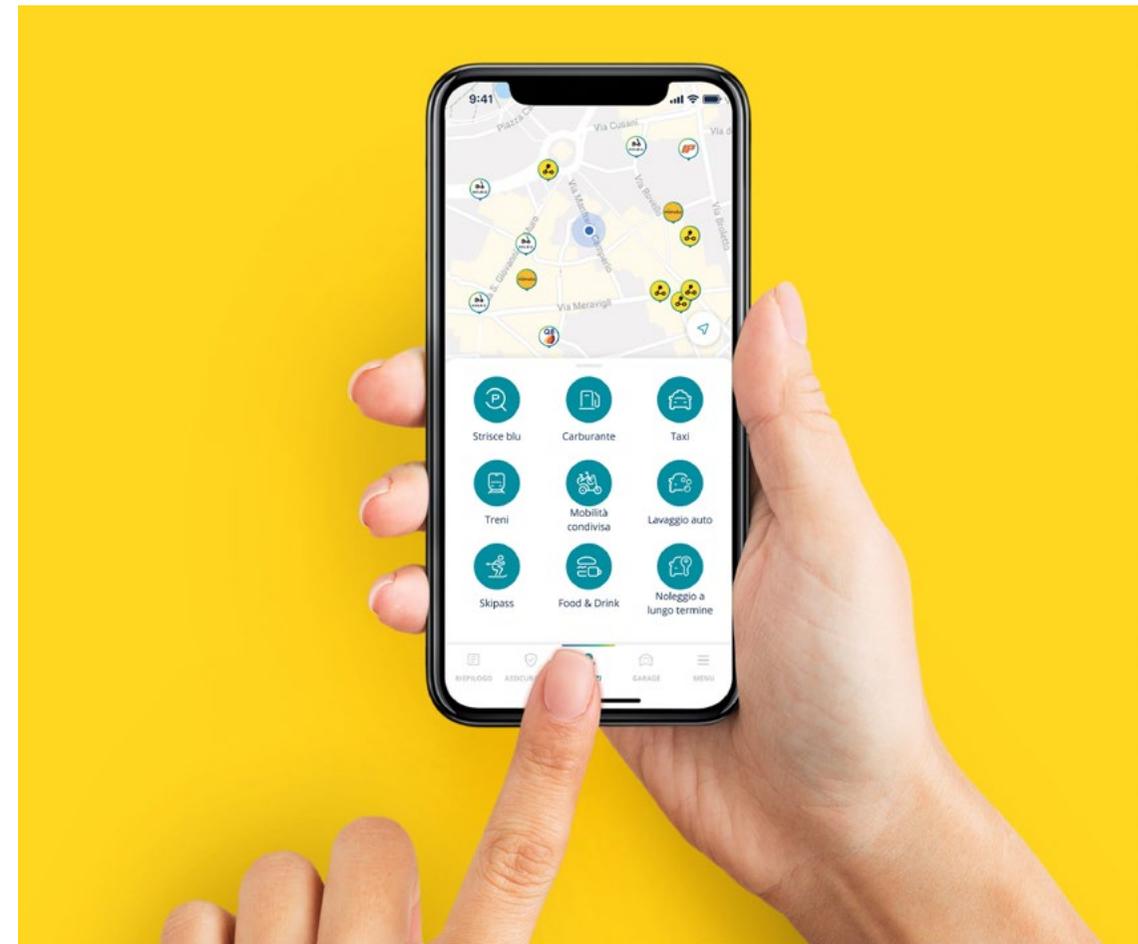


## 1.6 We protect the privacy of our stakeholders

*We protect the right to privacy by undertaking to protect the personal data collected and acquired in order to carry out institutional activities and to guarantee their treatment in compliance with fundamental rights and freedoms, as well as the dignity of the data subjects. We make sure that data is processed in compliance with the principles of lawfulness, fairness and transparency, so that personal data are processed only for specific, express and legitimate purposes and we undertake to adopt the appropriate technical and organizational security measures to meet the requirements set by data protection regulations.*

### What we do:

- **We acquire and process only the data necessary to carry out our activities**, in line with the purposes for which it is collected and exclusively in the pursuit of **corporate purposes** and **undertake to process it in compliance with applicable data protection and confidentiality laws**, prohibiting its use, communication or improper disclosure.
- **We protect the confidentiality of information acquired** in the performance of our duties and **use such data only for defined and appropriate purposes**, ensuring its protection, integrity and confidentiality, in accordance with the provisions of applicable laws.
- **We safeguard the integrity of IT, information and digital systems and adopt appropriate policies** to ensure that personal data and confidential information are adequately protected from unauthorized access or improper use.





## 1.7 We fight money laundering, financing of terrorism and use of proceeds of crime

***We fight money laundering, terrorist financing and the use of proceeds of crime. We work to ensure that the Group's activities are managed transparently, with reputable counterparties and in such a way as to prevent and fight money laundering and the reuse of proceeds of crime. the trust of stakeholders.***



### ***What are we talking about?***

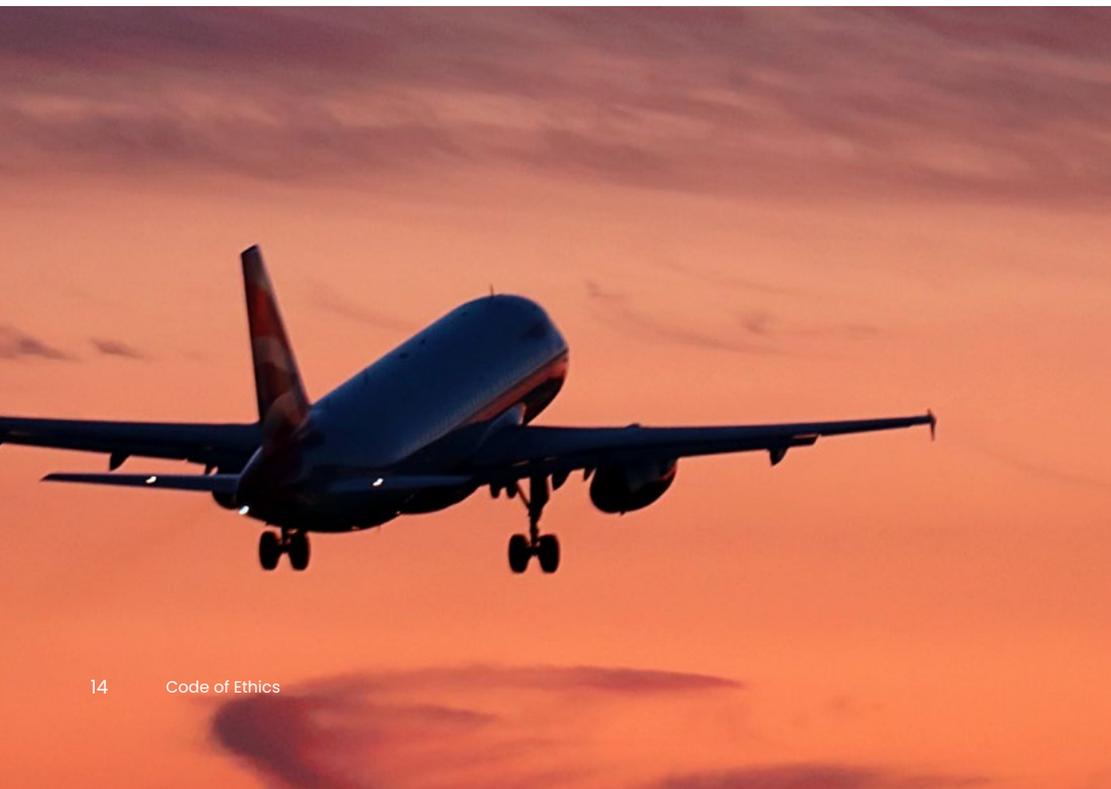
Money laundering is defined as the replacement or transfer of money, goods or other proceeds of crime or the performance of other operations aimed at interfering with the identification of the criminal origin of the proceeds.

By financing of terrorism, we mean the supply or collection of funds, by any direct or indirect means, with the intention or awareness that they are earmarked for purposes connected to the financing of terrorist activity.

By use of proceeds of crime we mean the use of money, goods or other proceeds of crime in legitimate economic or financial activities.

### **What we do:**

- **We comply with all national and international laws and regulations on antimoney laundering and the financing of terrorism.**
- **We conduct our business in compliance with the principle of the utmost transparency in commercial and financial transactions**, ensuring the traceability of operations. We implement appropriate controls to prevent and fight money **laundering** and the **reuse of proceeds of crime**.
- **We check in advance all the information available on our business partners** before having any dealings or entering into contracts with them, with a view to ascertaining the other party's reputation and legitimacy.





## 1.8 We protect company assets

*We conduct our operations with a view to making proper use of our assets, in line with corporate objectives, so that no inefficiency, damage or harm may result to the Group, our stakeholders and the environment because of their incorrect use.*



### **What are we talking about?**

By corporate asset we mean any tangible or intangible asset open to economic evaluation that can be owned or controlled by a company of the Group and that can be used for the purpose of obtaining a profit or an advantage in the future.

#### **What we do:**

- **We guarantee the integrity and protection of corporate assets**, whether tangible or intangible (such as, for example, patents, projects, algorithms, etc.) and **we ensure that they are correctly used** in pursuit of the Group's objectives.
- **We disseminate a corporate culture that encourages responsible behaviour** that is in line with the operating procedures set up to regulate a fair use of the assets entrusted.

## 1.9 We protect our reputation

*We work to ensure that the Group's activities are carried out in such a way as to protect the prestige and reputation of our Group.*

#### **What we do:**

- **We safeguard the relational capital of our Group** considering the expectations of all the stakeholders.
- **We use our brands** or any other symbol and/or iconography associated with the Group, always **in line with our Mission and our Values** and never in such a way as to cause actual or potential damage to our image and **reputation**.
- **We only use institutional channels to communicate within and outside the Group** and, in order **to prevent any reputational risk**, all communications are preliminarily verified by the competent structures.



### **What are we talking about?**

By reputation we mean the perception of the past and future actions of a company or group that determines their general attractiveness for the stakeholders, compared to their main competitors. It includes the economic, legal and ethical expectations of the stakeholders towards the company or the Group. It is an element that cannot be imitated and strongly differentiates the company and the Group from their competitors.

02.

WE ESTABLISH AND  
MAINTAIN LONG-  
LASTING CONSCIOUS  
RELATIONS WITH OUR  
STAKEHOLDERS



## 2.1. We maintain constant dialogue with the financial community, protect shareholders' investments and maximize their value

*We work to maintain a constant and constructive dialogue with our shareholders, institutional and private investors, financial analysts and market operators and, in general, with the financial community, with a view to protecting their investments in our Group and maximizing their value in compliance with ethical standards.*

### What we do:

- **We promote the sustainable success of our activities and create common value with our shareholders** in the long term, ensuring an effective management of the Group, **protection of trust and value for the shareholders**, control of business risks and transparency towards the market.
- **We provide systematic, accurate and exhaustive information on our activities**, in accordance with the confidentiality requirements on information related to our business, and in compliance with applicable legislation.
- **In compliance with our Mission and our Values**, which inspire our strategies and our investments, **we ensure: (i) transparent, clear, accurate and complete communication; (ii) equal access to information for all shareholders and investors;<sup>4</sup> (iii) participation of all the shareholders in shareholders' meetings; (iv) engagement policies** aimed at encouraging the active participation of all stakeholders.
- **We are committed to transparently reporting** the environmental results, goals, and performance, **and to maintaining an ongoing dialogue with stakeholders** in order to integrate their perspectives into our strategies.

<sup>4</sup> Indeed, discrimination or preferential treatment towards our shareholders are expressly prohibited and all information is published on our institutional website, where the Group's press releases are issued and the financial statements, periodic reports, minutes of meetings and our main corporate documents are published.



## 2.2. We responsibly manage dealings with our suppliers and customers

### 2.2.1 WE LOYALLY AND FAIRLY MANAGE DEALINGS WITH OUR SUPPLIERS

***Our dealings with our suppliers are inspired by the principles of loyalty, fairness, transparency and efficiency, in compliance with the laws of the countries in which the Group conducts business, with the principles and values set out in the Code of Ethics and with our contractual commitments.***

#### **What we do:**

- **We choose our goods, services and works suppliers through transparent, traceable and impartial** qualification and evaluation processes, aimed at promoting free competition and equal treatment of the parties. In selecting our suppliers we take into account the quality, the technical-professional suitability, the integrity, the economic conditions and the methods for supplying goods and services, as well as their ability to meet the obligations of transparency and confidentiality, depending on the nature of the service.
- **We ask our suppliers to work in line with our principles of respect for Human Rights, environmental protection and the protection of staff and workplace health and safety, as well as sustainability.** We promote socially responsible behaviors and practices, and we expect our partners to share and uphold our high ethical and environmental standards. We demand compliance with the laws and international regulations in force in the country in which the company conducts business, as well as the adoption of socially responsible labour practices that exclude any form of discrimination or that facilitate the exploitation of child labour or any workers against their will. In fact, we do not work with anyone who does

not accept these conditions and we reserve the right to take suitable measures, including the termination of the contract, in the event that our business partner, in carrying out activities in the name or on behalf of the Mundys Group, violates any provisions of the law, of a contract or of this Code of Ethics.

### 2.2.2 WE BUILD TRUSTING RELATIONSHIPS WITH OUR CLIENTS AND CONSUMERS

***We conduct business by building relationships based on trust with our customers and consumers, with a view to meeting their expectations, maintaining high levels of quality, innovation, performance and reliability as well as safety.***

#### **What we do:**

- **We work with high management and technical standards to provide our customers with safe and sound infrastructures. We adopt commercial policies and make choices in line with international best practices.** We ensure complete, updated, verified and transparent information on the specifications and quality of our services and activities.
- **We promote constant innovation in our activities, with the aim of anticipating the needs of our customers** and meeting their requests through prompt and competent response.
- **We act in compliance with current regulations on the protection of consumer interests and customer satisfaction.**



## 2.3 We promote dialogue and transparency in relationship with institutions and authorities

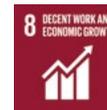


*We work to create and maintain a constructive and transparent dialogue with national and international institutions and authorities, in compliance with applicable legal and regulatory provisions, so that our integrity and reputation may not be compromised. environment because of their incorrect use.*

### What we do:

- **We do not have relations with representatives of institutions and authorities for the purposes of exercising improper influence** and undue interference in decisions affecting our Group.
- **We do not provide grants, advantages or other benefits to political parties and workers' trade unions**, or to their representatives or candidates, with the exception of any grants allowed in the countries where we conduct business,<sup>5</sup> under specific regulatory provisions.
- **We have a system of delegations of powers and authorities in place, which identify the corporate roles and functions responsible for and authorized to interface with the representatives of institutions** and/or public authorities in the name and on behalf of the Group. The persons in these roles and functions are also required, as part of their duties, to verify in advance and with reasonable care that all declarations or representations made in the interest or on behalf of the Group are true and correct and that no false or partially untrue declarations are made.

- **We comply** with every request of the judicial authorities and regulatory bodies, including Public Supervisory Authorities (such as CONSOB) and collaborate in any relevant preliminary procedures, in accordance with the principles of loyalty, fairness and transparency and in compliance with any current applicable regulations, without causing obstruction or prejudice to their activities.



## 2.4 We create value in the communities in which we conduct business



*We positively contribute to the socio-economic development of the communities in which we conduct our business, by providing efficient and innovative services. We support and encourage, to the extent possible, the use of local labour and suppliers.*



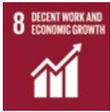
### What we do:

- **We respect the rights of individuals and communities, including indigenous ones. We recognize and value their culture, lifestyle and institutions.**
- **We maintain ongoing transparent dialogue with the communities and the main local stakeholders** directly and/or indirectly involved in our activities, promoting forms of continuous and informed consultation in order to understand their expectations and needs, foster and establish a climate of mutual cooperation, and prevent potential conflicts.
- **We support social, cultural and educational initiatives geared to improve people's living conditions** and foster autonomous, lasting and sustainable local growth.

<sup>5</sup> Such direct or indirect contributions, whether in cash, in kind or in any other form, to political parties, movements, committees and other political and trade union organizations are made to the extent of, and in compliance with, the transparency required by the laws and regulations in force, and are adequately documented.

03.

WE PROMOTE AND PROTECT  
PEOPLE'S RIGHTS AND VALUE



### 3.1 We respect human rights

*We conduct our business in the belief that respect for and protection of human rights are the essential principles in every area of activity.*



#### What are we talking about?

By human rights we mean the universal and inalienable rights granted to everyone without distinction of race, nationality, language, age, sex/gender, gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic condition, political or trade union opinion and more.

#### What we do:

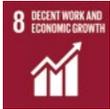
- We foster and promote a culture of diversity as the founding value of the concept of equality and inclusion, which we support in the way we do business.
- We guarantee equal conditions and opportunities to all our employees, without distinction of race, nationality, language, age, sex/gender and gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic condition, political or trade union opinion and more. We foster an inclusive work environment that protects the psychophysical health and safety of people.

- We fight discrimination and harassment, the exploitation of forced, compulsory or child labour, human trafficking and violations of the freedom of association.
- We conduct our business in compliance with human rights, also considering the potential and actual impact on human rights of the activities performed by our business partners, whom we expect to give similar consideration to the activities they assign to, or perform in cooperation with, our Group.
- We improve our procedures for detecting and addressing human rights violations in our supply chain.
- We do not tolerate any form of violation of human rights and we are committed to guaranteeing the rights of people in every activity carried out by Group companies, in order to create economic and social value for the communities, including indigenous ones and territories in which we operate.





### 3.2 We safeguard people's health and safety



***We safeguard the health and safety of people and comply with the highest international health and safety standards and any specific laws and regulations applicable, in order to ensure that our management is based on principles of precaution, prevention, protection and risk management, in any activity we carry out.***

#### What we do:

- We adopt measures and tools suitable to prevent and protect from any malicious or negligent behaviour, including by third parties, which could cause direct and/or indirect damage to employees and/or business partners and/or assets of our Group, periodically updating the methodologies on prevention and using the best protection technologies and practices available.
- We build and maintain inclusive and motivating work environments, designed to promote the psycho-physical well-being of people and to ensure the health and safety of our employees and our business partners, and we continuously monitor them, reporting any situations of danger.
- We periodically organize specific training for all employees who, because of their position, are called upon to assess and manage the risks associated with workplace health and safety and to ensure the safety of their colleagues and coworkers.
- We clearly and transparently inform our employees and our business partners about the essential preventive and protective measures that need to be implemented in order to eliminate or mitigate the risks and criticalities of the processes and activities in which they are involved.

- We recognize and protect the staff's right to rest and have leisure time, by respecting the applicable laws and collective agreements, the applicable Conventions of the International Labour Organization (also known as ILO) and allowing all our employees and other staff to meet both corporate and personal needs.



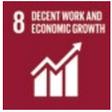
### 3.3 We value our people

***We believe our people to be the essential element or the existence, future development and success of the Group. For this reason we value their abilities and skills, so that everyone may be in a position to fulfil their potential.***



#### What we do:

- We are committed to creating a serene work environment, open to dialogue and aimed at enhancing diversity and talents. We are also committed to promoting excellence and the personal and professional growth of each individual, encouraging innovation and change and ensuring fair working conditions for everyone.
- We organize and promote training programs for our people, also taking into account the needs and aspirations present within the Group.
- We demand that interpersonal relationships are maintained in accordance with principles of integrity and mutual respect, condemning any type of discrimination, harassment or abusive or defamatory attitude because we believe that respect for the freedom and dignity of each individual is fundamental.



### 3.4 We promote an ethical and responsible use of artificial intelligence



*We are committed to ensuring an ethical and responsible development, implementation and use of Artificial Intelligence (AI) systems and tools, in order to achieve an adequate level of accuracy, robustness and security, in compliance with applicable AI regulations.*



#### **What are we talking about?**

An AI system is defined to be an automated system intended to operate with varying levels of autonomy. It may display adaptability after deployment and, for explicit or implicit objectives, infer from the input it receives how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

#### **What we do:**

- We are committed to **using and, where applicable, developing AI systems in a reliable, responsible and ethical manner**, promoting trust, transparency, inclusion and respect for fundamental rights, with the aim of contributing to the sustainable development and management of transport infrastructure and the well-being of society.
- **We adopt a structured risk management system to identify, assess and mitigate the potential** impacts of AI systems, safeguarding individual freedoms and the environment, and promoting the responsible use of resources.
- **We promote the dissemination of appropriate knowledge and skills among employees regarding AI** by designing training programs that are equally accessible and using clear language, as well as providing transparent information on the purposes and methods of use of AI systems in business processes. We ensure that such use is ethical and responsible, in compliance with applicable laws.
- **We guarantee an active, conscious and responsible role for humans** in the use and development of AI systems. We are committed to preventing the risk of automatic or excessive reliance on AI-generated outputs in evaluation and decision-making processes, which must always be supported by adequate documentation to enable informed assessment by employees. **We oppose any prohibited practice**, including the design or use of AI systems that foster bias and discrimination, and that are not designed in accordance with the principles of fairness and impartiality.
- **We are committed to protecting personal data**, as well as the integrity and security of information at all stages of the AI systems' lifecycle, integrating security measures from the design phase and throughout the entire lifecycle.



### 3.5 We reject any form of discrimination

***We work to protect diversity and guarantee the dignity of our people. We consider diversity and inclusion as strategic elements for our Group, as the interaction of different genders, cultures, generations, perspectives and different backgrounds allows us to create lasting value, guarantees progress and is fertile ground for innovation and merging of ideas.***

#### What we do:

- We guarantee equal dignity and impartiality of treatment for all those involved in the activities, rejecting any form of **discrimination and harassment**, any inappropriate or disrespectful behaviour, such as physical and verbal abuse and sexual harassment in the workplace or in events associated with it.
- We adopt procedures and policies on diversity and inclusion with the aim of fostering and reinforcing a culture of integration of diversity and informing all staff on their rights and obligations regarding the prevention and removal of any discriminatory behaviour and the maintenance of a working climate that ensures respect for everyone's dignity.

- We respect the diversity of our employees and potential employees, and promote equal opportunities, both at the time of establishing employment, and at every stage of the performance of work.
- We avoid any discrimination in terms of remuneration and we base our choices as to the hiring of staff and career advancement, on merit and performance. We do not let ourselves be influenced by factors such as race, nationality, language, age, sex/gender, gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic condition, political-trade union opinion and more.



#### **What are we talking about?**

Discrimination means any conduct (or omitted conduct) that involves an unjustified or illegitimately unequal treatment of individuals within or outside the Group. Discrimination can occur on the basis of race, nationality, language, age, sex/gender, gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic condition, political or trade union opinion, or other personal condition, including as a result of certain behaviors (for example whistleblowing). In the workplace, discrimination also includes harassment, defined as a repeatedly and persistently hostile conduct, with persecutory intent, which violates the dignity of a person and creates an intimidating, degrading, humiliating, hostile or offensive climate.



### 3.6 We fight child labour, any form of forced labour and modern slavery



***We fight child labour, any form of forced labour and modern slavery.***



#### ***What are we talking about?***

Child labour is defined as any type of work which, by its nature or by the circumstances in which it is carried out, might endanger the health, safety or morality of a child.

By forced labour and modern slavery we mean any form of work or service carried out either against one's will<sup>6</sup> or for remuneration, however under physical threats or constraints, including prostitution, trafficking in human beings<sup>7</sup>, sexual slavery.

<sup>6</sup> Work for which a person has not spontaneously applied is included in this definition (ILO Convention no. 29).

<sup>7</sup> Trafficking in human beings is defined as the recruitment, transport, transfer, accommodation or reception

of people, under the threat or by the use of force or other forms of coercion or deception.

<sup>8</sup> ILO Convention n. 138.

<sup>9</sup> ILO Convention n. 29.

#### **What we do:**

- **We recognize children's human rights, including the right to education, the right to play and have their basic needs attended.** For this reason we reject the use of **child labour**, as defined by applicable legislation in each country where our activities are carried out. In no case work below the minimum age limits can be deemed to be acceptable.<sup>8</sup>
- **We reject the use of any type of forced or compulsory labour, including forced labour in prison, bonded labour, trafficking and exploitation of human beings in all its forms,**<sup>9</sup> as well as confiscation of money or identity documents on commencement of employment in order to detain the worker against his will.
- **We ensure** that all our employees and the employees of our business partners **enjoy freedom of movement and are not restricted by physical coercion, abuse, threats or psychological intimidation** and that they have the right to work freely, knowing their working conditions in advance and in return for regular payment.
- **We ensure that the remuneration of employees is at least equal to the limits set by collective agreements and by any legislation applicable** in the countries in which we conduct business. We also strive to meet higher standards by ensuring a fair income and living wage.





### 3.7 We respect the rights of workers and their freedom of association

*We respect workers' rights and trade union freedom, in particular freedom of association and collective bargaining, including through responsible and constructive negotiation with labour protection organizations and workers' representatives.<sup>10</sup>*

#### What we do:

- We recognize the right of our employees to form and join a union chosen and the right to collective bargaining without fear of intimidation.
- We encourage a climate of mutual respect in line with the principles of fairness, transparency and participation. We do not tolerate any discriminatory behaviour towards employees who belong to a particular association (including, but not limited to, trade unions, political parties, charities, etc.) and towards workers' and employees' representatives within the company.<sup>11</sup>

<sup>10</sup> ILO Conventions n. 87 and 98.

<sup>11</sup> ILO Convention n. 135.



#### What are we talking about?

Freedom of association is defined as the possibility for workers, without any distinction and without prior authorization, to form organizations of their choice and become members thereof, without bearing any type of discrimination or other repercussions.

04.

WE PROTECT THE  
ENVIRONMENT





## We protect the environment



*We are committed to the protection of the environment as a whole by preserving its integrity threatened as a result of human activities.*



### What we do:

- **We intend to achieve sustainable mobility that contributes to the development of the territories and communities** in which we conduct business, in line with the **protection of the environment** and a responsible use of resources.
- **We intend to fight climate change, reducing our emissions and supporting the evolution process towards a low-carbon economy**, also through research on **innovative technological solutions and the development of partnerships** and synergies to accelerate and give impulse to processes of change.
- **We promote solutions that might reduce our environmental impact** by improving the **efficiency of plants and processes, saving energy and generating and using energy from renewable sources.**
- **We measure direct and indirect emissions from the execution of our activities.** We promote the **strengthening of environmental performance control processes and the monitoring of indicators** to evaluate the effectiveness of systems and to define **goals and actions for a constant improvement** of performance.

### What are we talking about?

Environmental protection is defined as the protection of natural resources and the environment as a whole, by preserving its integrity and minimizing the effects of human activities on biodiversity and local ecosystems, including through appropriate renaturalization.

- **We comply with applicable regulations in the countries in which we conduct business and adapt our business to the main international standards and guidelines on environmental management and energy management**, promoting the implementation of **certified management systems.**
- **We promote sustainable consumption and production models of the resources** that serve our activities, encouraging on the one hand **a reduction in the use of natural resources and on the other their recycling and reuse.**
- **We train our people and raise their awareness on environmental issues. We commit ourselves to the promotion of activities that involve** all the players in the **supply chain**, in order to align their behaviour to the required standards and drive positive change.
- **We intend to combine economic growth and the protection of natural assets in all the phases of our business**, in strategic decision-making processes, in the establishment of partnerships, in investment operations and business development.

# 05. IMPLEMENTATION OF THE CODE OF ETHICS



## 5.1 Dissemination and awareness of the contents of the Code of Ethics

The Code of Ethics is a **fundamental document** for the performance of all our activities and, for this reason, **we promote its dissemination to all our stakeholders, also through publication** on the internet and intranet sites. We provide information on our Code of Ethics to Group staff when they are hired, and again when there are any changes or updates.

**The Code of Ethics applies to the subsidiaries of Mundys S.p.A.**, which receive and adopt this document. If, due to the specificity of the reference regulatory and organizational context, a subsidiary needs to make changes to the document, such changes must in any event be in line with the reference principles and rules of conduct described in this Code.

To promote the dissemination of the Code of Ethics, **we encourage mandatory training programs for all the staff of our Group and all the corporate bodies**, in order to ensure and maintain effective knowledge and application of the rules of conduct over time.

***We promote, in all Group companies, the establishment of an ethical climate that is consistent with the Values set out in the Code. Our Values must guide the daily action of each person within the Group.***

## 5.2 Reporting violations to the Code of Ethics

**Whenever we come across behaviors that we believe do not comply with the Code of Ethics** or that we believe may put our Group and our people at risk, we have a duty to report them in order to safeguard our reputation. All reports of violation, or suspected violation, of the Code of Ethics and/or of the internal and external regulatory system will be taken seriously, provided they have a precise and detailed content.

We have promoted the adoption of **procedures aimed at regulating the process of receiving and managing reports**, in line with international regulations and standards on whistleblowing.

The violation, or suspected violation, of the Code of Ethics must be reported immediately through one of the dedicated channels made available by the companies of the Group (for example IT platform, e-mail addresses and ordinary mail).<sup>12</sup>

Anonymous reports are allowed, although a more prompt and efficient investigation is possible for nominative reports and through a dialogue with the whistle-blower.

We guarantee confidentiality on the contents of the report and on the identity of the whistle-blowers (if communicated) and the reported persons, in compliance with privacy legislation and applicable regulations.

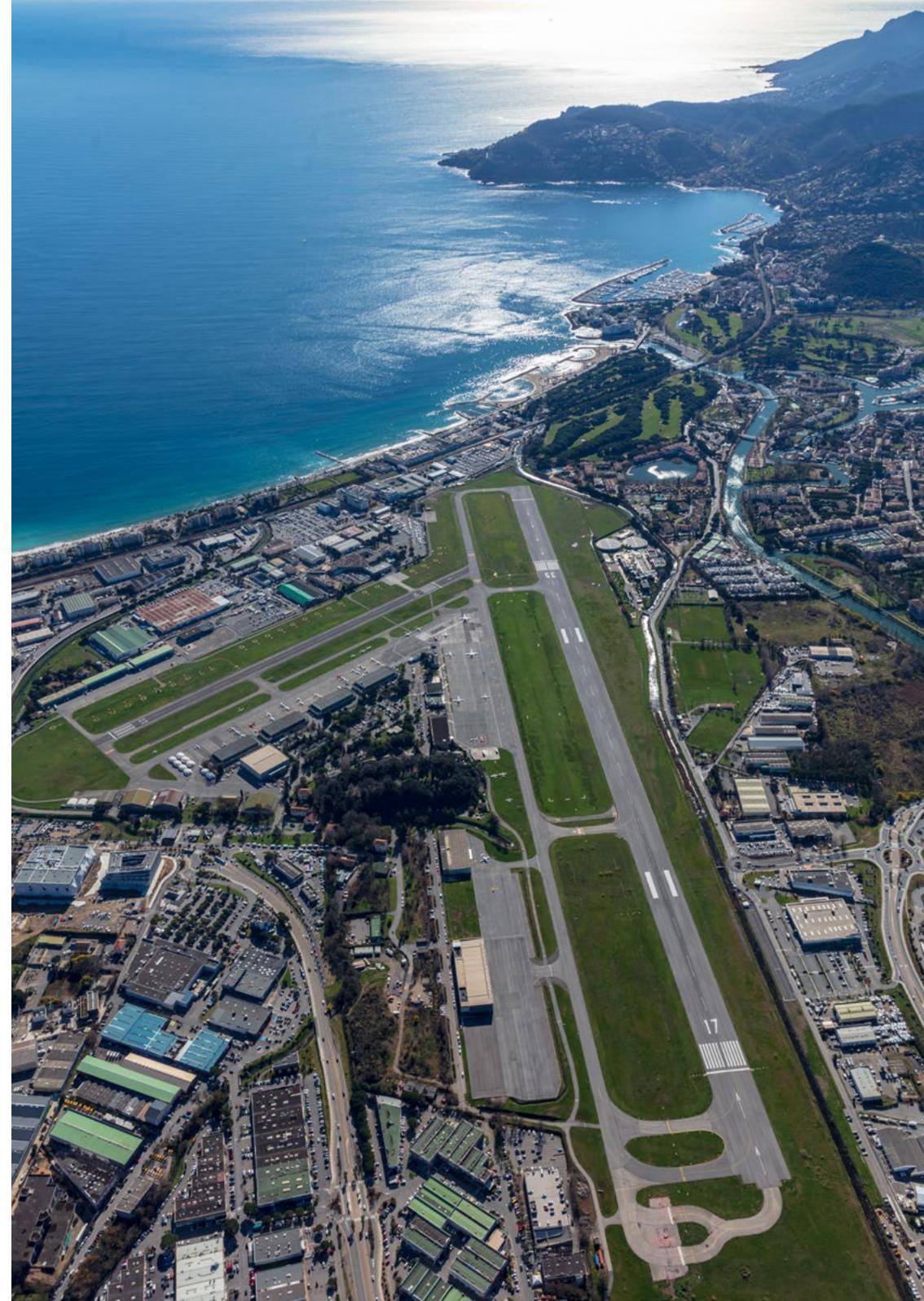
**We forbid any act of retaliation or discrimination, direct or indirect, against the whistle-blower** or anyone who raises concerns in good faith regarding compliance with the Code or ethical issues.

## 5.3 Disciplinary system and contractual remedies

Compliance with the rules of the Code of Ethics and company regulatory instruments must be considered an essential part of the contractual obligations we have undertaken.

**For the employees of our Group, the violation of the principles and contents of the Code of Ethics constitutes a breach of primary employment obligations or a disciplinary offense which entails legal consequences**, including the possible **loss of employment**, depending on the seriousness of the offence. It may also lead to a liability for damages arising from the violation itself.

**For all the other recipients of the Code of Ethics, a violation** of the principles and contents of the Code shall give rise to contractual **remedies in accordance with the applicable laws**.



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