Code of Ethics and Conduct

Revision Matrix

SAFO UK Limited (company number 06478031)

Version: [2.1]. Prepared by: [Legal Department / A.C.T. London Limited]. Approved by: [Claudia Barbotto, Managing Director], [20 October 2026]. Policy owner: [Claudia Barbotto, Managing Director].
Next review: [October 2027].
Definitions: in this document, "the Company" means SAFO UK Limited. "SAFO GROUP S.p.A." is the Italian head company of the Group, and "the Group" or "SAFO Group" means SAFO GROUP S.p.A. together with the companies it controls and the Company. This document applies to the Company in the United Kingdom, its directors, employees and all persons acting on its behalf. References to the Group apply to other Group companies only to the extent of their activities in or connected with the United Kingdom.

Version	Date	Subject	Prepared by	Approved By
1.1	20.03.24	1st Issue	Legal Department	CB
2	07.10.26	Changed to Group Logo	Managing Director	CB
2.1	20.10.2026	Review against UK legal requirements	A.C.T. London Limited / Legal Department	CB

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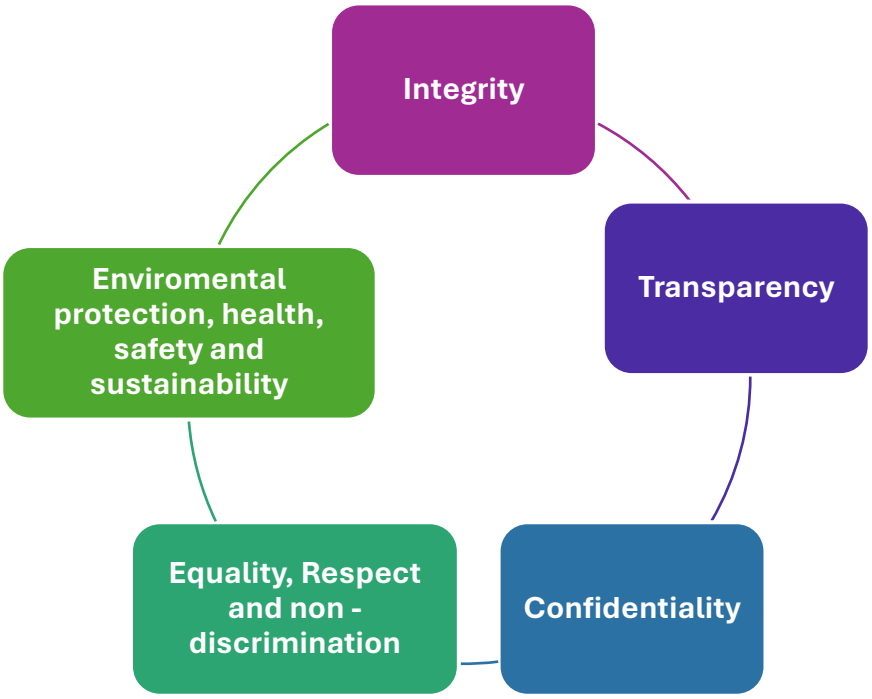
Introduction

Safo Group has been operating in the market since 1981 and, thanks to the constant commitment and dedication of its staff and management, has established a position of undisputed respectability within its target market.
SAFO, being aware of the importance of the social contribution of business activity, aims to consolidate and enhance its competitiveness in the market through the proper and effective use of its resources, in full compliance with current regulations, the principles of integrity and transparency, environmental protection, and the physical and moral integrity of individuals.
The Group is constantly committed to consolidating and enhancing this position, for the benefit of all staff and in accordance with its founding principles:



Our Code of Ethics and Conduct sets forth our vision for our employees, contractors, partners, and all other stakeholders.
The Code reflects the core values that guide our actions and those of our partners, ensuring we conduct ourselves appropriately in all circumstances.
The principles set forth in the Code are incorporated into company policies and procedures that define their practical application within the Group.

Intended Recipients

This Code, approved by the Safo Group's management body and periodically reviewed and updated, sets forth the standards of conduct that must be followed by all those who, directly or indirectly, on a permanent or temporary basis, enter into any form of collaborative relationship or act in the interest of the Group, in the conduct of business and the management of corporate

activities.
The Code is therefore binding on Employees, Executives, Directors, and temporary or ongoing external collaborators. Specifically, this Code applies to all companies within the Safo Group and its closest partners: Safo Group, Safo Informatica, Safo UK, Safo France, Safo Group Romania, Safo Dynamic, and New Mobility Services, without exception.
The provisions contained in the Code also apply to collaborators (e.g., consultants, representatives, intermediaries, agents, etc.), suppliers, and all those who, directly or indirectly, on a permanent or temporary basis, maintain business relationships or operate for or with the Group's companies.
Under no circumstances may the claim or belief that one is acting in the Group's interest justify conduct that conflicts with the principles set forth in the Code.
To ensure awareness and understanding of the Code and the consequences of failing to comply with it, we promote information and training initiatives for all recipients of the Code.

Principles

Integrity

We believe in the need to ensure, promote, and strengthen a culture based on fairness, integrity, and transparency in the conduct of our business and in our dealings with all stakeholders.
We operate with integrity in compliance with laws, rules, and regulations, and we work to ensure that our entire organization is committed to this principle.
Our conduct is based on full respect for the moral principles of honesty, legality and compliance, loyalty, reliability, mutual respect, dignity, and transparency.
We act in compliance with the law and all applicable regulations, as well as our Code and company policies and procedures.
The principle of legality is non-negotiable, and all those who collaborate with the Group must adhere to it.
Under no circumstances and for no reason is the violation of this principle permitted or justified to achieve a personal or group advantage.

Transparency

We promote transparent, clear, accurate, and comprehensive communication at all levels.
We are committed to ensuring transparency in all our activities and related decision-making processes and to avoiding conflicts of interest.

Confidentiality

We are committed to ensuring the integrity, privacy, and appropriate use of the data to which we have access, in compliance with applicable regulations and laws.

Equality, respect and non-discrimination

We fully support the principles established under the United Nations Universal Declaration of Human Rights.

We respect and protect human dignity, equality, and freedom, as well as the cultural and physical integrity of the individual, and we value opinions and differences, recognizing diversity as a treasure to be cherished.

We do not tolerate any discrimination, whether direct or indirect, based on age, gender, sexual orientation, gender identity, health status, disability, pregnancy or maternity, marriage or civil partnership, race, ethnic origin, nationality, religious beliefs, or political opinions.

We are committed to supporting and respecting the protection of human rights, avoiding complicity in human rights abuses, and promoting a diverse and inclusive workforce.

We reject all forms of child labour and forced labour, slavery, human trafficking, and any form of exploitation, abuse, or coercion.

We promote a positive work environment based on respect, honesty, integrity, safety, and trust that fosters personal development and growth.

We are committed to ensuring the fair and respectful treatment of our employees by prohibiting discrimination, harassment, and offensive or unwelcome behaviour.

We respect and protect the personal data of our employees and collaborators by collecting and managing it diligently.

Environmental protection, health, safety and sustainability

We ensure full compliance with applicable environmental laws and regulations by drafting and disseminating the Group's Environmental Protection Policy.

We integrate the principles of resource conservation, pollution prevention, and environmental responsibility into our business processes.

We are committed to protecting health and safety in the workplace in full compliance with applicable laws and regulations for our employees, contractors, and all those who access the Group's premises.

Principles of conduct and relations with stakeholders

Prevention of Corruption

We adopt a "zero-tolerance" approach toward any corrupt practice, whether active or passive, and prohibit, under any circumstances, the bribery or attempted bribery of elected public officials, public officials, public service employees, or private individuals. We are committed to implementing all necessary measures to prevent and avoid corrupt practices.

All activities must be conducted transparently and properly documented.

No one may offer, promise, or transfer money or other benefits for the purpose of improperly favouring, facilitating, or expediting the performance of an activity.

Furthermore, it is not permitted to request money or other benefits to perform improper acts, nor to accept sums of money, gifts, or favours from third parties for the purpose of procuring direct or indirect benefits for the Group.

We may accept and offer gifts or other benefits only if they are of modest value and fall within local customs of courtesy, in compliance with applicable laws and regulations.

Conflict of Interest

We must refrain from engaging in activities or finding ourselves in situations that interfere, or could interfere, with our ability to make impartial decisions in the Group's best interest, and we must immediately report any conflict of interest—even a potential one—to our manager or designated company representative.

It is prohibited to derive personal benefit from business opportunities that come to our attention while performing our duties and functions; if a real interest—even a potential one—arises, we are required to promptly report it in writing to our manager or company representative and await instructions before taking any action.

We must ask our manager or company representative for clarification on how to handle a conflict of interest in case of interpretive doubts.

Prevention of Illegal Financial Activities

We must ensure that our activities or services are not used to facilitate financial crimes, such as money laundering, tax evasion, the financing of terrorist activities, or any other form of involvement in illegal activities.

We may not establish relationships with partners, suppliers, or third parties who do not provide guarantees of integrity and do not enjoy a good reputation, or whose names are associated with incidents related to money laundering or other illegal activities.

We ensure that financial transactions are adequately justified by contractual relationships and that their traceability is guaranteed.

Fair Competition

We are required to comply with all laws and regulations governing competition, antitrust matters, and the acquisition of competitive information in the countries where we operate.

We refrain from any conduct that could in any way distort competition in the markets affected by the activities of Group companies.

We obtain sensitive competitive information exclusively through lawful means, and we may not share the Group's sensitive competitive information with competitors.

Relations with the Government

In our dealings with the public administration, we ensure strict compliance with legal provisions and the principles of transparency and fairness.

We refrain from engaging in any transactions with the public administration where there is a potential conflict of interest.

We must not in any way influence or attempt to influence the decisions of the institution involved.

We must not promise or offer employment opportunities or business opportunities to Public Administration personnel involved in negotiations or relationships, or to the family members of such personnel.

We must not promise or offer Public Officials, civil servants, or public employees money, goods, or benefits of any other kind in order to induce them to act in a manner favourable to our own interests or those of the Group.

We may not offer gifts or gratuities, unless they are courtesy gifts of modest value and, in any case, in accordance with the limits set forth in regulations and procedures.
We must not seek to obtain confidential information in a manner that could compromise the integrity or reputation of the Group.
We must not submit false or fictitious documentation or statements, or generally attempt to mislead public authorities, in order to obtain reimbursements, financing, subsidies, concessions, authorisations, licenses, or other administrative acts.
It is not permitted to use funds received from one's own government or the European Union in the form of grants, contributions, or other forms of financial assistance for purposes other than those stated at the time of applying for the grant or, more generally, other than those specified in the documentation submitted to obtain such funds.

Relationships with Suppliers and Business Partners

We select suppliers and business partners based on objective and verifiable criteria, assessing their reputation, integrity, and reliability.
We formalise contracts with suppliers and business partners, clearly defining the rights and obligations of both parties, and requiring compliance with applicable laws and the principles of our Code, which must be formally accepted.

Protection of Confidential Information

We must use and protect all information appropriately and in accordance with its classification.
We are committed to maintaining the confidentiality of trade secrets.
We do not publish, disclose to third parties, or make available in any other form information or news relating to the Group without prior authorisation.
We collect, process, store, and dispose of sensitive data relating to employees, customers, and suppliers/business partners in accordance with applicable data protection laws.

Respect for Employees

We adopt fair and impartial recruitment, hiring, and development processes based on skills and abilities, promoting inclusion, gender equality, and integration while avoiding any form of discrimination.
We do not employ minors.
We establish employment relationships in compliance with applicable employment law and, where applicable, the relevant national collective bargaining agreements.
We act with fairness, courtesy, and professionalism in our interactions with colleagues, using language and behaviour appropriate to the workplace.
We avoid behaviour that could be construed as harassment of any kind or psychological abuse, as well as any other discriminatory or harmful conduct toward individuals.
We take all reasonable steps to prevent harassment, including sexual harassment, of our employees in the course of their employment, including harassment by third parties such as clients, suppliers and visitors. Any employee who experiences or witnesses such conduct should report it in accordance with the Employee Handbook or the Whistleblowing Procedure.
The Group has adopted a diversity and inclusion policy that is shared with employees,

collaborators, partners, customers, suppliers, and any other party that has legal or commercial relations with the Group.

Compensation and Benefits

The compensation of employees and contractors complies with applicable regulations (including, in the UK, the National Minimum Wage) and, where applicable, the collective bargaining agreement applicable to the various companies within the group. Benefits are provided in accordance with criteria of consistency and appropriateness relative to the role held. For employment relationships where the law does not provide specific regulations applicable to wages, these will be adjusted to the general market standards in the relevant sector to ensure an appropriate standard of living for employees and their families. The Group's partners and suppliers must provide their staff and external collaborators with the same guarantees set forth in this paragraph.

Working Hours

The working hours of the Group's employees comply with national and industry regulations, and, where applicable, with the provisions of applicable collective bargaining agreements. The Group's partners and suppliers must provide their employees and external collaborators with the same guarantees set forth in this paragraph.

Freedom of Association

The personnel of Group companies are granted the full right to join trade unions as regulated by national law. Personnel participation in trade union activities will be guaranteed and supported in all ways provided for by the relevant legislation, including applicable collective bargaining agreements.

Health & Safety

We provide safe and healthy workplaces, preventing work-related injuries and illnesses in compliance with applicable laws, regulations, and technical standards regarding occupational health and safety and fire prevention.
We have prepared the Risk Assessment Document in accordance with British regulations on workplace safety.
We have appointed a Health and Safety Manager.
We take action to eliminate hazards and minimise health and safety risks by implementing appropriate preventive and protective measures.
We provide information and training to employees at the start of their employment and on a regular basis to ensure compliance with regulations and responsible behaviour.
We have implemented an emergency plan, ensuring that all necessary equipment, the emergency team and first-aid personnel are available.

Environmental Protection

We adopt responsible practices aimed at reducing resource consumption and waste generation.
We manage waste by prioritising recovery and recycling.
We adopt procurement policies that favour suppliers committed to environmental protection and sustainable products and services.
We have adopted a specific company policy aimed at environmental protection.

Compliance with the Code of Ethics and Conduct

All intended recipients of the Code are required to:

- Be familiar with and comply with the principles and rules of conduct set forth in the Code.
- Complete all necessary training identified to understand their responsibilities.
- Act and conduct their business in accordance with the Code of Ethics in all aspects of their role

Anyone who has questions about the Code should contact their manager or the Human Resources Department.
To facilitate compliance with the Code, the Group conducts regular training sessions to ensure that employees, contractors, and consultants are fully informed of its provisions.
Those who violate the Code and applicable laws, or who act in a manner contrary to the spirit of the Code, are subject to consequences that may include termination of employment or termination of the consulting or advisory relationship, as well as the initiation of legal proceedings. Any violation of the Code will be assessed objectively and fairly by the Company, which will apply the appropriate disciplinary sanctions in accordance with the applicable disciplinary procedure (for UK employees, the Disciplinary Policy and Procedure in the Employee Handbook).

Reporting

Anyone who has questions about the Code, becomes aware of a potential violation, or has other concerns may submit a report—even anonymously—through the platform provided by the company, which is designed to ensure the anonymity of the report. Alternatively, they may contact their manager or the Whistleblowing Officer or the Human Resources Department. It is everyone's responsibility to report suspected or potential violations of the Code. The reporting procedure is detailed in the document titled "Whistleblowing Procedure."
Reports will be investigated by qualified personnel or experts in the specific subject matter, following procedures that maximise confidentiality.

All reported cases will be investigated until they are fully resolved. If a violation of the Code is confirmed, we will take appropriate action.
We do not tolerate any retaliation against those who report concerns in good faith and cooperate with the investigation. Anyone who retaliates against a person who reports a concern in good faith will be subject to disciplinary action.