

Argo Srl

CODE OF ETHICS

INDEX

1. INTRODUCTION	3
2. I PRINCIPLES ETHICAL GENERAL	4
2.1 LEGALITY	4
2.2 CORRECTNESS	4
2.3 TRANSPARENCY	4
3. CRITERIA FROM CONDUCT IN THE RELATIONS WITH THE STAFF	5
4. CRITERIA FROM CONDUCT IN THE RELATIONS WITH THE SUPPLIERS	6
5. RELATIONSHIPS WITH EXTERNAL CONSULTANTS, AGENTS AND OTHERSCOLLABORATORS	7
6. CRITERIA FROM CONDUCT IN THE RELATIONS WITH THE CUSTOMERS	7
7. CRITERIA FROM CONDUCT TO PROTECTION OF THE INDUSTRY AND OF THE TRADE	8
8. CRITERIA OF CONDUCT IN RELATIONS WITH THE PUBLICADMINISTRATION	8
9. CRITERIA FROM CONDUCT RELATED TO ACTIVITY FROM NATURE CORPORATE, ADMINISTRATIVE OR FINANCIAL	9
10. CRITERIA FROM CONDUCT IN USE OF THE HERITAGE CORPORATE ANDOF THE INFORMATION SYSTEMS	11
11. PROHIBITION FROM OPERATIONS FINALISED AT THE RECIPE, TO LAUNDERING AND USE OF MONEY, GOODS OR BENEFITS FROM ILLEGAL AND TO THE FINANCING OF TERRORISM.	11
12. CONDUCT CRITERIA IN THE MANAGEMENT OF GIFTS AND FREE GIFTS	12
13. PROTECTION FROM THE HEALTH AND SAFETY ON THE WORK	12
14. PROTECTION OF THE ENVIRONMENT	13
15. REPORTS WITH THERE COMMUNITY	13
15.1. TRADE UNIONS AND PARTIES	13
15.2. PRINT AND OTHERS MEANS FROM COMMUNICATION OF MASS	14
16. COMPLIANCE OF THE CODE ETHICAL	14
17. MODIFICA OF THE CODE ETHICAL	14

1. INTRODUCTION

There Direction by Argo Srl (That For ease Of exposure in followed will come indicated simply as Argo Srl) has adopted this Code of Ethics, which reflects the commitment of the Sole Director himself to:

- Maintain the attention on the mode Of management from the areas to risk deontological.
- Supply from the lines guide to the staff For contribute to recognize And to face theethical problems.
- Contribute to maintain a culture of integrity, honesty And responsibility within of the company.

This document, which forms an integral part of the Organizational Model pursuant to Legislative Decree 231/01, defines the values and principles of conduct relevant to the proper functioning, reliability and compliance Of laws And regulations as well as of the image by ARGO SRL.

It contains the set of rights, duties and responsibilities of the internal and external stakeholders.external at the Society, to the Of there And independently from How much expected to level regulatory.

All subjects who operate to achieve company objectives, whether they are subjects in top positions or employees, are required to comply with this Code of Ethics in conduction of business and from the activity corporate.

This Code also applies, in the relevant areas, to external collaborators and consultants who act in the name and for account of the company of the ARGO SRL.

The recipients must behave in a manner that respects the fundamental principles of honesty, integrity moral, correctness, transparency, objectivity And respect from the personality individual,in the pursuit of corporate objectives and in all relationships with internal and external people and entities at the Society.

In no case can the pursuit of the interests of ARGO SRL justify an action that is not compliant to a line Of conduct honesty. Therefore, ARGO SRL yes reserve there possibility Of Not to undertake or continue any type of relationship with anyone who adopts behaviors different from those as established in the Code Ethical.

2. THE PRINCIPLES ETHICAL GENERAL

2.1 LEGALITY

The recipients are required to comply with the laws and, in general, with the regulations in force in the country in which they operate.

The recipients are also required to comply with company regulations as an implementation of regulatory obligations.

2.2 CORRECTNESS

THE recipients I am kept to the respect from the rules deontological And professional, with particular reference to the duties of diligence and expertise, applicable to the operations carried out For account of the Company.

The recipients are also required to comply with company regulations, which express in detail the methods of pursuing the objectives in compliance with the ethical principles and Of behavior adopted. in How much implementation Of obligations deontological, expert or professional.

2.3 TRANSPARENCY

THE recipients I am kept to to respect The duty Of transparency understanding as clarity, completeness And relevance from the information, avoiding situations deceptive in the operations performed for account of the Company.

The recipients are required to comply with the company regulations, as an implementation of the principle of transparency.

3. CRITERIA FROM CONDUCT IN THE RELATIONS WITH THE STAFF

ARGO SRL protects and promotes the value and development of human resources, also as important success factor for the company, in order to promote it, on the basis of criteria of merit, full professional realization.

Hiring, transfer or promotion practices must not be in any way influenced from offers or promises Of sums Of money, goods, benefits, facilities or performance of every kind.

In managing relationships that imply the establishment of hierarchical relationships, ARGO SRL requires That the authority is exercised with equity And correctness, prohibiting Everything is fine behavior That may to be considered harmful from the dignity and autonomy of the employee.

Any form of discrimination must be avoided, and in particular any discrimination based on on race, nationality, sex, age, disability, guidelines sexual, opinions policies or trade union, philosophical addresses or religious beliefs towards any internal and external subject external to ARGO SRL .

Not sexual harassment or acts of violence are tolerated physical or psychological violence. ARGO SRL is committed to protecting the moral integrity of its collaborators by guaranteeing the right to working conditions that respect the dignity of the person.

No form of irregular work is tolerated, meaning, beyond mere absence Of any regularization Of a relationship, whatever typology Of use Of work performance not deducted in a contractual and regulatory framework consistent with that of the reference country.

The employee's privacy is protected in accordance with EU Regulation 2016/679.

At the constitution of the relationship Of Work Everything is fine employee must receive accurate information relating to:

- Characteristics of the membership function, responsibility of one's role and tasks to be performed;
- Disciplinary rules of legal source, contractual or regulate;
- Regulatory and remuneration elements, in general rules and procedures to be adopted in order to avoid behaviors contrary to the law and company policies.

The staff must avoid Of to put in to be or facilitate operations in conflict Of interest - actual or potential - with the Company, as well as activities that may interfere with the ability to make impartial decisions in the best interests of participating or participating companies and in full compliance with the principles of this code.

In particular, staff must not have financial or personal interests in the choice of supplier, in a competing company or customer and cannot carry out work activities that may lead to the emergence of a conflict of interest.

4. CRITERIA FROM CONDUCT IN THE RELATIONS WITH THE SUPPLIERS

The relationship with the suppliers And imprinted to principles Of transparency, loyalty, integrity, confidentiality, diligence, professionalism and objectivity of judgment.

The choice of suppliers and the purchase of goods and services are carried out by the appropriate functions companies based on objective assessments regarding legality, skills, competitiveness, quality, correctness, respectability, reputation and price. The company also holds the ISO 9001 certification for the quality management system.

THE suppliers from the ARGO SRL does not they must to be implicated in activity illicit And they must ensure

to its employees working conditions based on respect for fundamental human rights, from the International conventions, of the laws in force. In particular:

- The use of child labor is absolutely prohibited and considered unacceptable. The age of workers involved in production cannot be lower than the minimum age legal admitted in each State.
- The exploitation of child and non-child labour, the use of forced labour, physical or psychic or Of punishments corporal I am considered absolutely unacceptable And will lead to the interruption immediate Of Everything is fine And whatever relationship Between The supplier and ARGO SRL .
- Employee compensation and benefits must comply with regulations local, to the law and aligned with the provisions of international conventions in matter.
- Suppliers must ensure that all forms of production are carried out using manufacturing processes that still protect the health of workers in a way appropriate and adequate to the production processes actually used.

ARGO SRL recommends its suppliers to refrain from offering goods or services, in particular in the form of gifts, to company employees that exceed normal business practices courtesy and prohibits its employees from offering goods or services to personnel of other companies or entities to obtain confidential information or significant direct or indirect benefits, for themselves or for others the company.

In case Of violation of the principles Of legality, correctness, transparency, confidentiality And respect from the dignity from the person, ARGO SRL is legitimized to take appropriatemeasures until the relationship with the supplier is terminated.

5. RELATIONSHIPS WITH EXTERNAL CONSULTANTS, AGENTS AND OTHERS COLLABORATORS

In the context of relations with external Consultants and other collaborators, the Directors and Employees are required to:

- Evaluate carefully the opportunity Of to resort to the performance of the Consultants external And collaborators And select counterparts Of adequate professional qualification and reputation.
- Establish efficient, transparent and collaborative relationships, maintaining a dialogue open and frank online with the best commercial practices.
- To constantly ensure the most convenient ratio between quality of performance and cost.
- Require the application of the conditions contractually provided for.
- Operate within the scope of current legislation and require its strict compliance.

Relationships with agents are regulated in formalised contractual relationships in which they must the conditions and the object of the contract and the methods of collection and remuneration.

It is not permitted to make services or payments to collaborators, consultants, agents or other third parties acting on behalf of the Company, who do not find adequate justification in the context of the contractual relationship established with them or in relation to the type of task to be carried out.

Violation of the principles of legality, correctness, transparency, confidentiality and respect for dignity of the person are just cause for termination of contractual relationships.

6. CRITERIA FROM CONDUCT IN THE RELATIONS WITH THE CLIENTS

Professionalism, competence, availability, respect and correctness represent the guiding principles and the style of behavior to follow in relationships with customers.

It is therefore essential that relationships with customers are based on full transparency, and correctness, respect for the law and independence from all forms of conditioning, both internal and external.

THE contracts and communications to customers must be:

- Clear and simple;
- Compliant to the regulations in force, without to resort to practices elusive or Anyway incorrect;
- Compliant with company commercial policies and the parameters defined therein;
- Complete, Like this from Not to neglect any element relevant to the ends from the decision of the customer.

In the context of the reports commercial with the clients And Done prohibition hold conducted That may to injure there trust of the consumers, bringing to the at the same time prejudice at the transparency and market security.

ARGO SRL aims to guarantee the quality of its services by constantly adopting and

implementing a system of procedures that allow the monitoring and verification of all processes involved in the service.

7. CRITERIA FROM CONDUCT TO PROTECTION OF THE INDUSTRY AND OF THE TRADE

There ARGO SRL intends protect The value from the competition fair abstaining from behaviors collusive and predatory.

The Company And the his collaborators they must to respect the principles And the rules from the free competition and must not violate applicable competition, antitrust and other laws consumer protection.

It is therefore forbidden to carry out any conduct that violates the habitual exercise and free trade and industry and as such undermines commercial confidence and good faith in trade.

In the context from the competition fair And from the protection of the consumer the company And the his collaborators undertake not to violate third party rights relating to intellectual property and to comply with the rules established to protect the distinctive signs of intellectual works or products industrial (brands, patents) by implementing checks on full compliance with the legislation mail to protect industrial property titles.

It is forbidden to market products that feature the use of signs, figures or wording bearing false directions sufficient to to induce in misunderstanding on the actual origin, origin or quality of the work or product.

8. CRITERIA OF CONDUCT IN RELATIONS WITH THE PUBLIC ADMINISTRATION

Relations with the Public Administration and with Public Institutions (e.g. Ministries and their peripheral offices, public bodies, bodies and companies operating in the service sector public, territorial bodies, local bodies, Competition and Market Authority, Authority Guarantor For there Protection of the Data Personal) I am kept from Exponents Company or by the Managers authorised to do so or by the persons previously authorised by them and formally delegated, in compliance with the provisions of this Code, as well as the Statute Social And from the Laws Specials, having particular regard to the principles Of correctness, transparency and efficiency.

In particular, by way of example only:

- It is not permitted, neither directly nor indirectly nor through an intermediary. person, offer or promise money, gifts or compensation, in any form, nor exert unlawful pressure, nor promise any object, service, performance or in favor of managers, officials or employees of the Public Administration or to subjects in charge Of public service that is to say to They family members or cohabitants at the scopeto induce the performance of an official act or an act contrary to

official duties.

- It is not permitted to engage in misleading conduct that could induce the Public Administration in error, in particular it is not allowed to use or present statements or documents fake or certifying things Not true, that is to say omit information to obtain, for the benefit or in the interest of the company, contributions, financing or other disbursements however named granted by the State, by a Public body or the European Union.
- AND Done prohibition use contributions, funding, or other disbursements Anyway named, granted by the State, by a Public Body or by the European Union, for purposes different from those for to whom the same were assigned.
- In case Of reports commercial with there Public Administration, included there participation in public tenders, it is necessary to always operate in compliance with the law and correct business practice.
- It is prohibited to alter in any way the functioning of a computer system or telematic system of a public body or intervene illegally in any way on the data, information and programs contained therein or pertinent to it, in order to to achieve an unjust profit to the detriment of others.

The correct operation from the Function Publish, in particular from the FunctionJudicial, is also guaranteed through the prohibition, imposed on all subjects required in compliance with this Code of Ethics, to undertake, directly or indirectly, any unlawful action that may benefit or harm one of the parties involved in the course of of the civil proceedings, criminal or administrative.

In particular, it is forbidden to put in place undue pressure (offers or promises of money or other benefits) or unlawful coercion (violence or threats) in order to induce them not to make statements or make false statements the person called upon to make before the judicial authority statements that can be used in criminal proceedings, when this has the right to remain silent.

9. CRITERIA FROM CONDUCT RELATED TO ACTIVITY FROM NATURE CORPORATE,ADMINISTRATIVE OR FINANCIAL

In away general, And Done obligation Of hold a behavior correct, transparent And collaborative, in compliance with the law and internal procedures, in all activities finalized at the training of the balance sheet And from the other communications social, to the end Of supplyto the partners And to the public a piece of information truthful And correct on the situation economic assets and financial position of the Company.

Every operation or transaction must be precise, verifiable, legitimate.

This means that each action and transaction must have an accounting record. adequate And must to be supported from suitable documentation, to the end Of allow for checks to be carried out, the identification of the different levels of responsibility and the accurate reconstruction of the operation.

To all subjects who in any capacity, even as mere data providers, are involved in the

training of the balance sheet And Of documents similar, or Anyway Of documents which represent the economic, patrimonial or financial situation of the Company, as well as in particular to the administrators, to mayors and those in senior positions:

- It is mandatory to provide maximum cooperation for specific aspects and guarantee there completeness And there clarity from the information provided as well as the accuracy of the data and elaborations;
- It is forbidden to report untrue facts, even if they are being evaluated, or omit information or conceal data in direct or indirect violation of the normative principles and internal procedural rules, so as to mislead the recipients of the above mentioned documents.
- It is forbidden to carry out simulated operations or spread false news about the Company as well as on its activity.

AND prohibited impede or Anyway to hinder the development from the activity Of check legally attributed to members or other corporate bodies.

It is forbidden to carry out simulated or fraudulent conduct aimed at influencing the assembly for the purpose of obtaining an unjust profit for oneself or others.

There ARGO SRL intends guarantee there diffusion And the observance Of principles Of behavior intended to safeguard the share capital, the protection of creditors and third parties who establish reports with the company in full compliance with the law.

In particular, it is expected the express prohibition Of:

- Return Contributions to the partner or to free the same from the obligation Of execute them, to the Of except in cases of legitimate reduction of share capital;
- Distribute profits or advances on profits not actually earned or legally intended to reserve, or distribute unavailable reserves;
- Purchase or subscribe to shares of the Company outside the cases provided for by law, with damage to the integrity of the share capital;
- To carry out reductions of the capital social, mergers or splits, in violation from the provisions by law to protect creditors, causing them harm;
- Proceed to training or increase fictitious of the capital social, through allocation of shares or quotas for a value lower than their nominal value at the time of issue Of increase of the capital social, subscription mutual Of actions or quotes, overvaluation relevant of the Contributions Of goods in nature, Of credits, or of the Heritage of the Company in the event of transformation;
- Carry out any kind of illicit operation on shares or quotas of the Company (or of the Parent company);
- To carry out any kind of operation that may cause damage to creditors,
- Determine, through simulated or fraudulent acts, fictitious majorities in any intra-group meetings.

10. CRITERIA FROM CONDUCT IN USE OF THE HERITAGE CORPORATE AND OF THE INFORMATION SYSTEMS

Documents, work tools, systems and equipment and any other goods, materials and intangible (including intellectual property rights and trademarks) owned by ARGO SRL are used exclusively for the achievement of corporate purposes, in the manner set out in same fixed; they cannot be used for any illegitimate purposes, and must be used and kept with the same diligence as one's own property. Any illicit uses are punishable, including disciplinary action, whether or not they constitute criminal conduct prosecutable under the law.

The company protects the personal data of all individuals who come into contact with it, second the current regulations on privacy.

The information learned in the performance of their duties, which are also good of the Company, I am subject to the prescriptions Of law And to the duty Of confidentiality. Such duties must be observed even after the termination of the relationship with the company, according to the provisions of the aforementioned legislation.

The IT and telematic tools (such as telephones and faxes, e-mail, internet and in general the hardware and software provided) made available to the staff are tools of work and, consequently, must be used for exclusively business purposes: that is is worth so much For the use of the personal computer That Of others instruments, programs And services.

Each employee is also required to make the necessary effort to prevent the possible commission of crimes through the use of IT tools.

In particular, Staff are prohibited from:

- The access abusive use of a computer or telematic system;
- The unauthorized possession and unauthorized distribution of access codes to systems computer or telematic;
- Dissemination of equipment, devices or computer programs aimed at damage or interrupt a computer or telematics system;
- The interception, impediment or interruption illicit Of communication computer science or telematics;
- The damage Of information, data And programs computer scientists And systems computer scientists and telematics.

Staff may not upload borrowed, unauthorized software to company systems or deprived from the necessary licenses, Like this as And forbidden Do copies Not authorized Of licensed programs, For personal use, corporate or for third parties.

11. PROHIBITION FROM OPERATIONS FINALISED AT THE RECIPE, TO LAUNDERING AND USE OF MONEY, GOODS OR BENEFITS FROM ILLEGAL AND TO THE FINANCING OF TERRORISM.

ARGO SRL carries out its business in full compliance with the regulations in force regarding Anti-money laundering and provisions issued by the competent Authorities, also with reference to the illicit financing of terrorist activities.

There ARGO SRL has as principle that from the maximum transparency in the transactions commercial and prepares the most appropriate tools in order to counteract the phenomena of prescription, of money laundering and use, goods or utilities of illicit origin.

The staff Not must never carry out or to be involved in activity such from to imply The laundering (i.e. the acceptance or processing) of proceeds from criminal activities in any manner whatsoever form or manner.

Administrators, employees and collaborators must verify in advance the information available (included information financial) on counterparts commercial, consultants and suppliers, in order to ascertain their moral integrity, their respectability and the legitimacy of their business before establishing business relationships with these; they are required to observe strictly the laws, the *policies* And the procedures corporate in any economic transaction involving them, ensuring full traceability of flows incoming and outgoing financial transactions and full compliance with anti-money laundering laws where applicable.

12. CONDUCT CRITERIA IN THE MANAGEMENT OF GIFTS AND FREE GIFTS

Gifts and gratuities, if used inappropriately, can lead to the obtaining of undue benefits. In order to avoid the establishment of external relations that conflict with the ethical principles shared by Argo Srl and give rise to situations of conflict of interest or that may undermine correctness and transparency in relations with third parties, all employees are prohibited from accepting or offering gifts or gratuities that exceed normal business practices. courtesy and local customs and habits. Gifts or freebies may be accepted or offered on the occasion of holidays (e.g. Christmas, New Year, Easter), also by virtue of the Company's marketing policies, and provided that they do not exceed a modest value (not exceeding € 150.00).

In line with shared values, Argo Srl , on the occasion of the holidays, distributes among all employees any gifts or freebies related to company activities received in any capacity. In the event that this is not possible, these will be donated to non-profit associations for charitable purposes in the name of the company.

In the event that an employee receives a gift or courtesy of non-modest value, he or she is required to notify his or her area manager in order to evaluate its return.

13. PROTECTION FROM THE HEALTH AND SAFETY ON THE WORK

ARGO SRL is committed to pursuing improvement objectives of the safety and health of workers as an integral part of their business and as I commit strategic with respect to the

more general purposes of the Company. The company also holds the ISO 45001:2018 certification for the workplace health and safety management system.

To this end the Company:

- is committed to spreading and consolidating a culture of safety and health at work Work developing there awareness of the risks, promoting behaviors responsible by all collaborators;
- carries out institutional training, delivered at certain moments in life company training and recurring training for operational staff;
- promotes and implements any initiative aimed at minimising risks and removing causes that may jeopardize the safety and health of employees, realizing interventions Of nature technique And organizational, Also through the introduction of a risk, safety and resource management system to protect as well as through the implementation of a concretely effective system of monitoring of the adoption of the findings and prevention measures, supervised by sanctions which can reach the point of expulsion from the relationship Work.

Staff must take care of their own health and safety and that of others people present in the workplace, on whom the effects of his actions or omissions fall, in accordance with to training, to the instructions and means provided by the employer.

For such reason Not they will be tolerated on the place Of Work the use Of drugs, the abuse Of alcoholic beveragesor taking illegal drugs.

14. PROTECTION OF THE ENVIRONMENT

ARGO SRL intends to ensure the full compatibility of its activities with the territory and with the environment surrounding area. The company also holds the ISO 14001 certification for its environmental management system.

To this end, it undertakes to carry out its business activities with full respect for the environment, understood In the broader sense, in particular:

- Considering the impact environmental from the new activity And of the new processes productive;
- Using natural resources responsibly and consciously;
- Developing a relationship Of constructive collaboration, imprinted at the maximum transparency and trust, both internally and with the external community and institutions in the management of environmental issues;
- Keeping high indexes Of safety And Of protection of the environment through the implementation of effective management systems.

15. REPORTS WITH THERE COMMUNITY

15.1. TRADE UNIONS AND PARTIES

ARGO SRL does not provide contributions of any kind, directly or indirectly, to political

parties, movements, committees and political and trade union organisations and to their representatives and candidates except in the forms and ways provided for by the legislation in force.

15.2. PRESS AND OTHERS MEANS FROM COMMUNICATION OF MASS

ARGO SRL entertains reports with The organs Of press And Of communication Of mass, only through The organs corporate And the functions corporate to that is delegate. Such relationships must be based on principles of correctness, availability and transparency in compliance with the communication policy defined by the Company.

Employees and collaborators cannot provide information to information bodies mass without the prior and specific authorization of the competent functions.

Information and communications relating to the Company must be accurate, complete, truthful, transparent and homogeneous among themselves.

16. OBSERVANCE OF THE CODE ETHICAL

Violation of the rules of this Code of Ethics damages the relationship of trust established with the Company and may lead to disciplinary action and compensation for damages.

The observance of the present Code from part of the employees And collaborators and The They commitment to respect the general duties of loyalty, correctness and execution of the contract of work in good faith must be considered an essential part of the obligations contractual also based on and for the effects referred to in art. 2104cc

Behaviours of employees in violation of the rules of conductor procedural provisions contained in this code of ethics, must be understood as unlawful disciplinary sanctions in compliance with applicable legislation.

Compliance with the code of ethics by third parties (suppliers, consultants, customers, etc.) is integral the obligation to fulfill the duties of diligence and good faith in negotiations and execution of the contracts in place with the Company.

Violations committed by third parties will be punishable in accordance with the provisions expected in the relevant assignments and contracts.

ARGO SRL will take care of receiving the contents of this code Ethical by preparing rules for its diffusion among its employees.

The present Code Ethical will find application Also in the Villages different from Italy Where, if conflicting, it will be adapted to the laws, regulations and values of the country where the company operates Society, respecting fundamental human rights and of the international conventions.

17. EDIT OF THE CODE ETHICAL

There Direction And competent For Everything is fine edit and/or integration of the present Code Ethical. In particular, integrations And changes they could to make oneself necessary For changes of the Square reference legislation or the internal organisation of

the Company.