



Code of Business Ethics and Conduct

Legislative Decree No. 231/2001

DeepInspect S.r.l.

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1 Terms and Definitions

Terms	Definitions
Code of Business Ethics and Conduct	This Code of Ethics established by DeepInspect S.r.l.
Relevant Activities	The activities carried out by the Company within the Risk Areas exposed to the potential risk of commission of the predicate offences.
Collaborators	Those who act in the name and/or on behalf of DeepInspect S.r.l. based on a mandate or other professional collaboration relationship
CCNL	The National Collective Labour Agreements
Code of Business Ethics	Code of ethics and conduct adopted by DeepInspect S.r.l.
Consultants	Those who act in the name of and/or on behalf of DeepInspect based on a mandate or other professional consultancy relationship
Whistleblowing Decree	Legislative Decree No. 24 of 10 March 2023 implementing Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law or national regulatory provisions
Employees	All employees of DeepInspect S.r.l. (incl. managers)
Legislative Decree 231/2001 and/or Decree	Legislative Decree No. 231 of 8 June 2001, which lays down the rules on the <i>“administrative liability of legal persons, companies and associations, including those without legal personality, under Article 11 of Law No. 300 of 29 September 2000”</i>
Suppliers	The Company's professional and non-professional suppliers of goods & services, incl. financial services
Organisational Model and/or Model	The organisation, management and control model required by Legislative Decree 231/2001
Supervisory Body (SB)	The control body responsible for supervising the operation of and compliance with the Organisational Model and its updates, in accordance with Art. 6(1)(b) of Legislative Decree 231/2001. In the case of DeepInspect, Supervisory Body corresponds to the governing body.

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Partners	The Company's contractual counterparties, both natural and legal persons, with whom the Company enters into any form of contractually regulated cooperation relationship (e.g., temporary business association – ATI, joint ventures and consortia) whereby they are to cooperate with the Company in the context of Relevant Activities
Control protocol	A set of rules of conduct, prohibitions and controls that must be observed when carrying out an activity
Public Administration or P.A.	All officials and personnel in charge of a public service. This includes: (a) the judicial authorities; (b) Italian and foreign – national and local – institutions and public authorities; (c) the Antitrust Authority, the Personal Data Protection Authority, the Authority for Electricity, Gas and the Water System and other Italian and foreign supervisory authorities; and (d) private parties comparable to any of those listed in the previous points and their officials and internal bodies
Public Officials or P.U.	<p>This includes:</p> <p>any individual exercising a legislative, judicial or administrative public function;</p> <p>any person acting (in an official capacity) for or on behalf of: (i) a Public Administration of a State, whether local, national or federal; (ii) an agency, office or body of the European Union or of a Public Administration of a State; (iii) where the law of the relevant State so provides, an enterprise owned, controlled or participated in by a Public Administration of a State, unless this enterprise operates on a normal commercial basis in the relevant market, i.e., on a basis substantially equivalent to that of a private enterprise; (iv) a public international organisation, such as the European Bank for Reconstruction and Development, the International Bank for Reconstruction and Development, the International Monetary Fund, the World Bank, the United Nations or the World Trade Organisation; or (v) a political party, a member of a political party or a candidate for political office, whether Italian or foreign; or</p> <p>any individual in charge of a public service, to be understood as a person who, for whatever reason, performs a public service (i.e., an activity that is regulated in the same way as a public function, but characterised by the lack of the powers typical of the latter). The performance of simple orderly tasks and the performance of merely material work are excluded.</p>
Offences or Predicate Offences	The types of offences to which the provisions of Legislative Decree 231/2001 apply
Price Sensitive Information	Specific information which is not disclosed to the public, that directly or indirectly relates to one or more Financial Instruments or companies issuing Financial Instruments and which, if made public, could have a significant effect on the market prices of those Financial Instruments (i.e., it would be used by a reasonable investor as an element on which to base his investment decisions). For example, Price Sensitive Information includes information relating to economic and financial data, projects, acquisitions, mergers and commercial strategies relating to the Company's activities
Confidential Information	Any information, data, knowledge, whether discovered, patented or patentable, know-how and, in general, any technical, industrial, economic,

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commercial, administrative or other information, as well as any design, document, magnetic medium or sample of material, which is not public or publicly available, relating to the Company and/or third parties, which will be made available to the Recipients in paper form, on computer and/or in any other form, including, but not limited to, the following:

- any information, documents, data and prospectuses relating to the present or future equity and/or organisational structure of the Company;
- any information, data, prospectuses, estimates, studies relating and/or connected to the assets used and/or owned by the Company, to the operational and management processes in place, which will be or may be adopted by the Company (including any estimates and forecasts of an operational-management nature), as well as to the products and/or services offered or to be offered to customers and/or current or future commercial policies;
- all information deriving from and/or connected to any analysis, summary and/or studies of Confidential Information that are prepared or processed by the Company and/or the Recipients (including the documents, activities and information, both formal and informal, that are transmitted orally (including by telephone) or in writing following meetings or conversations);
- Price Sensitive Information

Risk Assessment

A risk analysis activity aimed at identifying the areas/processes, activity sectors and methods that potential risks could be directly or indirectly linked to regarding potential Predicate Offences to which the Company's administrative liability is attached

Disciplinary system

Set of principles and procedures suitable for sanctioning breaches of the measures under the management system for the prevention of Predicate Offences

Company or DeepInspect

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2 Introduction

The Code of Business Ethics and Conduct (hereinafter, for brevity, the "Code") represents an integral part of the organizational model of DeepInspect adopted pursuant to Legislative Decree 8 June 2001, n. 231. The Code, which is inspired by the "Guidelines for the construction of organization, management and control models pursuant to Legislative Decree no. 231/2001" adopted by Confindustria on 7 March 2002 and subsequently updated several times, contains a series of principles and rules of conduct which its recipients must comply with in carrying out their activities.

This Code was approved by the Governing Body on 25 March 2024 and it is therefore an official document of the Company. Any changes and additions to the Code can be adopted, always with a resolution of the Company's management body, on the basis of regulatory developments and application experience.

2.1 Purpose of the Code

Pursuant to Legislative Decree no. 231/2001 and, more generally, by virtue of a policy attentive to issues of legality, DeepInspect intends to clearly define the set of values that the Company recognizes and adopts as guiding criteria for its operations, as well as the set of responsibilities that it assumes internally and externally.

For this reason, the Governing Body of DeepInspect has adopted this Code, which aims to base the operations, behaviors and *modus operandi* of the Company on correctness, legality, impartiality, transparency, protection of privacy, value of human resources and professional rigor both in internal relations and in relations with external parties, placing full compliance with current regulations at the center of attention, in addition to observance of the internal procedures of DeepInspect.

A clear "ethical orientation" in the Company's actions which, in fact, translates into transparency, loyalty and honesty of behavior towards the outside and inside, appears in fact indispensable to guarantee the credibility of DeepInspect towards its stakeholders (Public Administration, partners, customers, suppliers, etc.) and, more generally, within the civil and economic context in which it operates.

Each Recipient is required to know the Code, to actively contribute to its implementation and to report any shortcomings.

DeepInspect undertakes to promote knowledge of the Code by its Recipients, to incorporate their contribution in the definition of its contents and to prepare suitable tools to ensure the full and effective application of the Code itself. Any behavior contrary to the spirit of the Code will be sanctioned in accordance with the procedures adopted by the Company. Any update, modification or addition to this Code of Ethics must be approved by the Single Director.

2.2 Recipients

The Code is binding for the CEO and his employees, including the managers (hereinafter, for brevity, the "Recipients"), as well as for all those who, although external to the Company, operate, directly or indirectly, on behalf of DeepInspect, such as, by way of example and not limited to, collaborators in any capacity, consultants, suppliers (hereinafter, for brevity, the "Third Parties").

Recipients and Third Parties are required to respect the principles contained in the Code, which also applies to any activities carried out by DeepInspect abroad. The claim to act in the interests of the Company cannot under any circumstances justify the adoption of behavior contrary to the principles of the Code.

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Finally, attention is drawn to the fact that compliance with the principles of the Code is one of the contractual obligations to which DeepInspect employees are required pursuant to Articles. 2104 and ff. of the Italian civil code. The principles and contents in this Code therefore constitute exemplary specifications of the obligations of diligence, loyalty and impartiality imposed by law on employees and which qualify the correct fulfillment of work performance and behavior in general towards DeepInspect. In fact, the violation of the principles contained in the Code undermines the relationship of trust established with DeepInspect and may lead to the initiation of disciplinary actions and compensation for damages, in compliance, for employees, with the procedures referred to in the Art. 7 of Law 20 May 1970 no. 300 (Workers' Statute), collective labor agreements and any regulations adopted by DeepInspect.

2.3 Dissemination of the Code of Business Ethics and Conduct

The Code is also brought to the attention of those who have commercial and business relations with the Company. DeepInspect will disseminate the Code through:

- distribution to the members of its corporate bodies and to all staff;
- provision of the Code via DeepInspect site;
- provision of the Code to Third Party Recipients.

The Governing Body (hereinafter "GB"), in collaboration with the human resources managers, promotes the implementation of information and training initiatives on the principles of the Code.

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Chapter I: Principles

The behavioral principles listed below apply to all Recipients of this Code.

1. Legality

DeepInspect recognizes as a fundamental principle compliance with the laws, regulations and regulations in force in Italy and in all the countries in which it operates, as well as the democratic order established therein. The Recipients and Third Parties, in carrying out their functions and carrying out their respective activities, are required to comply with the regulations in force. DeepInspect will not start or continue any relationship with anyone who does not intend to align with the above principle.

2. Fairness

The Recipients must act correctly and avoid situations of conflict of interest, meaning all those situations in which an individual's behavior or decision could generate an immediate or deferred advantage for themselves, their family members or acquaintances, to the detriment of the interests of the Company or if the pursuit of personal interest conflicts with the interests and objectives of DeepInspect.

3. Impartiality

DeepInspect respects the fundamental rights of the person, protecting their moral integrity and guaranteeing equal opportunities. DeepInspect repudiates any discrimination based on political opinions, trade union membership, religion, racial or ethnic origins, nationality, age, sex, sexual orientation, state of health, marital status, state of disability, physical appearance, economic and social condition and, in general, any individual characteristic of the human person.

4. Transparency

The information disseminated by DeepInspect, both internally and externally, must be truthful, accurate and complete.

Every operation and transaction must be correctly recorded, authorized, verifiable, legitimate, coherent and appropriate.

For all actions and operations, it must be possible to verify the decision-making, authorization and execution process.

DeepInspect uses objective and transparent criteria for the choice of suppliers. This choice, in compliance with current regulations and internal procedures, must be inspired by values and parameters of competence, cost-effectiveness, transparency, competition and impartiality. The selection of suppliers must take place on the basis of objective assessments relating to competitiveness, quality, the economic conditions applied and on an accurate evaluation of the guarantees.

The supplier will also be selected in consideration of their ability to guarantee compliance with this Code of Conduct; the availability of suitable means and organizational structures; compliance with labor legislation, including provisions regarding child and women's labor, workers' health and safety, trade union and association and representation rights.

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DeepInspect adopts procedures for documenting the selection and purchasing process, to ensure maximum transparency in the evaluation and choice of the supplier.

5. Protection of privacy

DeepInspect undertakes to protect the privacy and, therefore, the personal data of the Recipients, in compliance with the provisions of the law.

The acquisition and processing of the data of the Recipients and all other interested parties takes place according to specific procedures adopted in accordance with the law.

6. Value of Human Resources

Human resources represent a fundamental factor for DeepInspect, which is committed to developing everyone's abilities and skills, offering its employees the same opportunities and ensuring that everyone can enjoy fair treatment based on criteria of competence and merit.

DeepInspect protects workers from acts of psychological violence or mobbing and counteracts any attitude or behavior that is discriminatory or harmful to the person, their beliefs and inclinations, in compliance with current regulations regarding individual personality rights.

Hiring takes place solely on the basis of regular employment contracts and specific internal procedures.

During the personnel selection and hiring phases, DeepInspect adopts as exclusive evaluation criteria the correspondence of the candidates' profiles to the needs of the Company and the verification of their professional abilities.

DeepInspect enhances the professionalism of its employees by facilitating and, where appropriate, promoting their training, making the necessary training tools available as well as expanding the specific skills of each one.

7. Relations with public institutions

DeepInspect acts in compliance with the principles of maximum integrity, transparency and correctness in relations with the Public Administration and, more generally, with public institutions.

Relationships with the Public Administration are managed in absolute and rigorous compliance with current legislation, the ethical and behavioral principles established in this Code and in the procedures adopted and, in any case, in such a way as to never compromise the reputation and integrity of DeepInspect itself.

DeepInspect does not intend to give rise to even the slightest suspicion of wanting to unduly influence such subjects to obtain illicit benefits.

The Company therefore condemns any behavior that could constitute an act of corruption, even if inspired by a misunderstood social interest.

Employees and collaborators have the obligation to report to their manager any attempt at extortion or extortion by a public official of which they may be the recipient or of which they simply have knowledge.

The Recipients are, therefore, required to provide maximum collaboration to the supervisory and control authorities and to the public authorities who may request it in relation to their relationship with the Company and, more generally, not to illegitimately interfere in the correct carrying out of any activity. inspection and/or investigation.

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8. Relations with political parties and trade unions

DeepInspect does not provide political contributions in any form, direct or indirect, aimed at financing parties, movements and other political and trade union organizations, nor their representatives or candidates.

9. Relations with international operators

In all relationships with entities operating at an international level, DeepInspect respects the laws and regulations in force and adopts all the necessary precautions to verify the reliability of such operators, as well as the legitimate origin of the capital and means used by the latter in the context of relationships existing with them.

DeepInspect also undertakes to collaborate, with correctness and transparency, with the Authorities, including foreign ones, in the case of requests for information or in the context of investigations concerning the relationships between DeepInspect and international operators.

10. Smuggling

Where import and export activities are carried out, the Company complies with current legislation and in particular the provisions of the Consolidated Customs Act D.P.R. 23 January 1973 n. 43 and subsequent amendments, adopting all control and surveillance measures suitable for the prevention of any possible conduct aimed at the smuggling of goods.

Company representatives ensure maximum transparency in the management of all documents, requests and formal communications towards the Customs Authorities. To this end, the involvement of individuals with suitable powers of representation of the Company is guaranteed.

Third parties who manage customs operations and obligations on behalf of the company (i.e. courier, customs broker) are required to comply with the contents of this Code of Business Ethics.

11. Protection of individual personality

DeepInspect ensures the protection of individual freedom in all its forms and repudiates any manifestation of violence, especially if aimed at limiting personal freedom.

DeepInspect is committed to creating a peaceful working environment in which everyone can work in compliance with the laws, principles and shared ethical values.

DeepInspect ensures that its employees and collaborators behave and are treated with dignity and respect, in compliance with the provisions of the laws in force.

The Company does not tolerate any form of isolation, exploitation, harassment or discrimination, for personal or work reasons, by any manager, employee or collaborator towards another manager, employee or collaborator.

Sexual harassment of any kind is severely punished, even with the termination of the employment or collaboration relationship.

The Company reiterates its firm opposition to any type of discrimination based on diversity of race, language, color, faith and religion, opinion and political orientation, nationality, ethnicity, age, sex and sexual orientation, marital status, disability and physical appearance, economic-social condition; likewise, DeepInspect opposes the granting of privileges for the same reasons.

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DeepInspect does not tolerate any form of irregular work or "undeclared" or child labor or any other conduct that could, even abstractly, constitute an offense against the person

The Company considers it a mandatory principle to employ only personnel, if of non-EU origin, who are fully compliant with current immigration regulations.

DeepInspect, therefore, undertakes not to use human resources of non-EU origin who are not in compliance with the residence permit, as established by current legislation on immigration and requires all its partners/suppliers to make use exclusively of non-EU origin who has a regular residence permit.

12. Health and safety of the workplace and environmental protection

DeepInspect pursues the objective of guaranteeing the health and safety of the workplace with the utmost commitment.

To this end, DeepInspect, after an adequate risk assessment, adopts the most appropriate measures to avoid the risks associated with carrying out its activity or reduce them to a minimum.

In carrying out its activity, DeepInspect undertakes to adapt work to the individual, including everything relating to the design of workplaces and the choice of work equipment and work methods, in particular to mitigate monotonous and repetitive work and to reduce its effects on health.

In terms of health and safety at work, DeepInspect also undertakes to operate:

taking into account the degree of evolution of the technique;

replacing what is dangerous with what is not dangerous or what is less dangerous;

adequately planning prevention and aiming for a coherent complex that takes into account and integrates technique, work organization, working conditions, social relations and the influence of working environment factors;

giving priority to collective protection measures over individual protection measures;

giving adequate instructions to the Staff.

Based on these principles, DeepInspect adopts the necessary measures to protect the safety and health of workers, including the following activities: (i) information aimed at all workers on the risks associated with the work activity ii) training carried out constantly and adequately to the task carried out by each person, (iii) prevention of professional risks iv) the preparation of an organization and the necessary means.

Furthermore, the Company promotes the conduct of its activities by focusing them on the correct use of resources and respect for the environment. To this end, it directs its choices in such a way as to guarantee compatibility between development and environmental needs, taking into account the progress of scientific research and the best experiences in the field.

The Recipients comply with these principles, in particular when making certain choices and decisions and, subsequently, when they must be implemented.

13. Protection of cultural heritage

The Company undertakes to recognize, protect and conserve assets understood as cultural heritage, i.e. immovable and movable things of artistic, historical, archaeological, ethno-anthropological, archival and bibliographic interest and other things identified by law or on the basis of law such as testimonies having civilizational value. The

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Company, therefore, refrains from carrying out any activity that could cause damage to the heritage of cultural or landscape importance and/or interest and from complying with all the requirements of the public authority.

14. Repudiation of criminal organizations

DeepInspect repudiates any form of criminal organization (in particular mafia-type associations), of a national and transnational nature.

The Company adopts the most suitable measures to prevent the danger of its own involvement or that of its employees in relationships and activities carried out in any capacity and in any way, even in the form of mere assistance and help, with these organizations.

To this end, the Company does not establish any working, collaborative or commercial relationship with individuals, be they natural or legal persons, directly or indirectly involved in criminal organizations or, in any case, linked by ties of kinship and/or affinity with representatives of known criminal organizations, just as it does not finance or, in any case, facilitate any activity referable to such organizations.

15. Rejection of every form of terrorism

DeepInspect repudiates all forms of terrorism and adopts, within the scope of its activities, suitable measures to prevent the danger of involvement in terrorist acts, so as to contribute to the affirmation of peace between peoples and democracy.

To this end, the Company undertakes not to establish any working or commercial relationship with individuals, be they natural or legal persons, involved in acts of terrorism, as well as not to finance or otherwise facilitate any of their activities.

16. Management of tax matters

The Company implements a non-evasion policy and undertakes to implement all necessary measures in order to comply with national and international tax and fiscal regulations. It promotes the adoption of all appropriate measures to prevent behavior that could give rise to significant tax risks.

The Company does not tolerate the adoption of fraudulent behavior aimed at tax evasion. The objectives of the top management are in no way commensurate with containing the fiscal impact on the company's results.

All subjects involved in the activities are called upon to ensure correct and truthful accounting records, ensuring that no behavior can jeopardize the transparency and traceability of financial statement information and applying suitable processes and controls. The falsification, omission or alteration of any information reported in the company's tax returns is prohibited.

17. Traceability and correctness of financial flows

Any operation that could involve the slightest possibility of involvement of the Company in matters of receiving stolen goods, money laundering, use of goods or money of illicit origin, as well as tax evasion, is strictly prohibited.

Financial flows must be managed ensuring complete clarity, correctness, traceability and transparency of operations, maintaining adequate documentation and always within the limits of the responsibilities assigned to each individual. In particular, all payments and other transfers made by or to the Company must be accurately and

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fully recorded in the accounting systems and must be made only to the subjects and for the activities contractually formalized and/or decided by the Company and/or functional to the realization of the social object.

18. Copyright protection

The activities are managed in compliance with current legislation regarding the protection of copyright for intellectual works of a creative nature. The materials or intellectual works protected by copyright owned by the Company cannot be reproduced without having previously requested the necessary authorizations.

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Chapter II: Rules of conduct

1. Rules of conduct for Top Managers

Top managers must:

- maintain a behavior inspired by autonomy, independence and correctness in relations with public institutions, private entities, economic associations, political forces, as well as with any other national and international operator;
- behave in a manner inspired by integrity, loyalty and a sense of responsibility towards DeepInspect;
- evaluate and avoid possible situations of conflict of interest or incompatibility of functions, tasks or positions held outside and inside DeepInspect, refraining from carrying out acts in situations of conflict of interest within the scope of one's activity;
- do not hinder the control activities carried out by the other bodies of DeepInspect;
- respect, as applicable, the rules of conduct dictated for employees by the following paragraph. 2.

2. Rules of conduct for Employees

Employees must comply with current legislation, as well as the principles of the Model and this Code of Business Ethics and Conduct. In particular:

- must not implement, cause or collaborate in the implementation of behavior suitable for integrating any of the types of crime referred to in the Decree;
- must collaborate with the Governing Body during the verification and supervision activities, providing all the information, data and news requested;
- must carry out the communications required by par. 4. of this Code towards the Governing Body;
- must report via the internal reporting channels implemented pursuant to Legislative Decree no. 24/2023 any dysfunctions or violations of the Model or the Code of Conduct, in compliance with the provisions of par. 4. of this Code.

Employees can contact the Governing Body at any time, in writing (also by email to the address marco.lombardi@deepinspect.it) or verbally, also to request information or clarifications regarding, for example, the interpretation of the Code of Business Ethics and Conduct or other protocols connected to the Model, the legitimacy of a certain behavior or their appropriateness or compliance with the Model or the Code.

In addition to what is provided in this paragraph, employees are required to comply with the principles and rules of conduct indicated below.

2.1 Conflict of interest

In the management of any activity, situations must always be avoided where the parties involved in the transactions are, even potentially, in conflict of interest.

Furthermore, the Governing Body, employees and collaborators must refrain from acting in situations of current conflict of interest, obliging themselves to communicate the existence of conflicts of interest, even potential ones.

The employee must refrain from any activity in conflict of interest, even potential, with DeepInspect. To this end, in addition to personal interests, those of the spouse, cohabitants, relatives and in-laws up to the second degree are also relevant. The employee immediately informs his/her superior of such situations.

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It is the duty of all employees to avoid and prevent the emergence of a conflict of interest.

By way of example and not exhaustively, the following situations may cause conflicts of interest:

- to have economic and financial interests (professional etc.), also through family members, with suppliers, customers or competitors;
- to accept money, gifts or favors of any nature from people, companies or entities that are or intend to enter into business relationships with the Company, except for amounts of modest value;
- to use one's position in the company or the information acquired in one's work in a way that creates conflict between one's own interests and those of the company.

Anyone who finds themselves in a situation which, even potentially, may give rise to a conflict of interest must immediately inform their superior so that its actual presence can be assessed and any intervention defined.

In order to prevent situations of conflict of interest, the Company establishes the following rules of conduct:

- directors and auditors cannot carry out or collaborate in the execution of operations (or participate in the related resolutions) which for them have an interest that is even partially in conflict with that of the Company;
- the employees, collaborators and auditors of the Company cannot engage in business or professional activities in concrete or potential conflict with the interests of DeepInspect.

2.2 Relations with public authorities

In relations with Public Officials or Public Service Representatives, employees must comply with the laws and provisions of the Model and the Code of Conduct.

Any behavior (even if carried out in the interest and/or to the advantage of DeepInspect) directed and/or in any case aimed at offering or promising, even indirectly, money, gifts, services or favors (including in terms of employment opportunities or to means of activities directly or indirectly attributable to the employee) or other benefits to Public Officials or Public Service Representatives, to influence their decisions, including the performance of acts of their office.

Any requests or offers of money, gifts, except those with a value of less than 150 euros, or favors of any kind, must be promptly communicated to the hierarchical superior.

DeepInspect employees also have the obligation to communicate to their manager any business relationships or economic activities undertaken on a personal basis with public officials.

Gifts and acts of courtesy towards Public Officials, Public Service Representatives or public employees are permitted only if the value is less than 150 euros

In any case, during any relationship with the Public Administration, employees must refrain from:

- proposing employment or commercial opportunities from which advantages may derive, for oneself or for others, to employees of the Public Administration or their relatives or in-laws;
- sending false or counterfeit documents, certify non-existent requirements or give untrue guarantees;
- unduly procuring for the Company any other type of profit (licenses, authorizations, financing, relief from social security obligations, etc.), leading others into error with means that constitute artifice or deception (for example: sending false documents or documents certifying things that are not true);
- undertaking economic activities, confer professional tasks, give or promise, directly or indirectly, gifts, money or other advantages (such as, by way of example but not limited to, hiring or promises of hiring) to public officials or public employees involved in proceedings administrative from which advantages can derive for DeepInspect;
- altering in any way the functioning of an IT or telematic system of the Public Administration or intervene without right in any way on data, information or programs contained in one of the aforementioned systems;

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- unduly receiving contributions, financing, subsidized mortgages or other disbursements of the same type however denominated, granted or disbursed by the Public Administration, through the use or presentation of false or mendacious documents, or through the omission of required information;
- using contributions, grants or public funding intended for the carrying out of activities of public interest, for purposes other than those for which they were granted;
- disseminating in any way sensitive information relating to the economic and financial conditions of the Company;
- soliciting or obtaining confidential information that could compromise the integrity or reputation of one or both parties.

Employees are required to ensure the necessary collaboration in the event of investigations, inspections or requests from the Public Authority and, more generally, not to illegitimately interfere in the correct carrying out of any inspection and/or investigative activity.

2.3 Relationships with suppliers

Employees must base their relationships with suppliers on the utmost correctness and transparency, in compliance with the laws and regulations in force, the Model and the Code of Conduct, as well as internal procedures and, in particular, those relating to purchases and the selection of suppliers.

Any direct behavior and/or in any case aimed at accepting money, gifts, services or favors (including in terms of employment opportunities or through activities directly or indirectly attributable to the employee) from the supplier is prohibited.

Any offers of money, gifts, except those of modest value (by which we mean those that are customary in relation to the circumstances), favors of any kind, must be promptly communicated to the hierarchical superior.

DeepInspect ensures that purchases of goods and services take place exclusively on the basis of objective parameters of quality, convenience, price, capacity, efficiency, avoiding agreements with unreliable contractual counterparties (with regard, for example, to issues of respect for the environment, working conditions and/or human rights).

DeepInspect expects suppliers and collaborators to adopt legal, ethical behavior that respects internationally recognized standards and principles regarding the treatment of workers, with particular regard to the protection of fundamental human rights, the prohibition of discrimination and the protection of children, the prohibition of forced labor, the protection of trade union rights, the protection of health and safety in the workplace, respect for working hours and the principle of fair pay and respect for the environment.

Behaviors different from those described constitute a serious breach of the duties of correctness and good faith in the execution of the contract, entail the compromise of the fiduciary relationship and represent just cause for termination of the contractual relationship.

The behavioral rules indicated above are also valid in relation to relationships with international operators.

2.4 Confidentiality

Employees must treat with absolute confidentiality, even after the termination of the employment relationship, data, news and information which they have come into possession of, avoiding their dissemination or use for their own benefit or that of third parties. Confidential information may be made known, within DeepInspect, only to those who actually need to know it for work reasons.

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2.5 Diligence in the use of DeepInspect's assets

Employees must protect and safeguard the assets of DeepInspect that have been entrusted to them and contribute to the protection of the Company's assets, avoiding situations that could jeopardize their integrity and safety.

In any case, each employee is required to use the company assets (such as telephones, PCs, internet/intranet, photocopiers, machines, etc.) entrusted to him by operating diligently and to use them exclusively for work activities appropriately and in accordance with the interest of the Company, preventing third parties from making improper use of it.

2.6 Budget and other social documents

Employees must pay particular attention to the preparation of the financial statements and other accounting documents, guaranteeing:

- adequate collaboration with the functions responsible for drafting accounting documents;
- the completeness, clarity and accuracy of the data and information provided;
- compliance with the principles of compiling accounting documents.

Corporate communications must be truthful, clear, correct, transparent and exhaustive. They must be made in compliance with the principles, criteria and formalities provided for by the legislation in force, by the accounting principles and in compliance with the provisions of the tax legislation, also with the aim of mitigating, mainly, the risk of committing the (prerequisite) corporate and tax crimes of referred to in the articles 25-ter and 25-quinquiesdecies of Decree 231.

2.7 Correct accounting

Correct management of all accounting obligations reflects on the reputation and credibility of the company. Accounting data is not limited to financial information alone but also includes other documents such as expense reports and any document that contains accounting, administrative or financial information.

The Company undertakes to comply with all applicable regulations and, in particular, the regulations relating to the preparation of the financial statements and any type of mandatory administrative-accounting documentation.

Accounting is based on generally accepted accounting principles and systematically records events arising from management, including tax aspects. All accounting operations must be accurately reflected in the company accounting and, under no circumstances can accounting records be justified that are not complete, accurate, corresponding to the underlying operations and supported by suitable documentation.

In general, every employee is responsible for maintaining accurate records and reports. Suitable supporting documentation must be kept for each accounting record. This documentation must make the rationale of the underlying operation and the related authorization traceable. The supporting documentation must be easily available and archived so as to always allow easy consultation.

Employees are required to promptly report the existence of errors or omissions in the accounting reporting process of management facts. Employees who knowingly prepare or authorize significantly incomplete or inaccurate documents and reports will be subject to disciplinary action.

If legal proceedings, investigations or inspections occur, the Company will make the requested documentation available and will not destroy any official documents until the proceedings are completed.

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2.8 Occupational Health and Safety

In terms of health and safety at work, employees must:

- a) take care of his own health and safety and that of other people present in the workplace, on whom his actions or omissions may have effects, in accordance with the training, instructions and means provided by the employer;
- b) contribute together with the employer, managers and supervisors to the fulfillment of obligations to protect health and safety in the workplace;
- c) observe the provisions and instructions given by the employer, managers and supervisors, for collective and individual protection;
- d) follow organizational safety procedures;
- e) correctly use work equipment, dangerous substances and preparations, means of transport and safety devices;
- f) use the protective devices made available to him appropriately;
- g) immediately report to the employer, manager or person in charge the deficiencies of the means and devices referred to in the letters. e) and f), as well as any dangerous condition of which it becomes aware, acting directly, in case of urgency, within the scope of its competences and possibilities and without prejudice to the obligation referred to in the following letter. h), to eliminate or reduce situations of serious and imminent danger, informing the workers' safety representative;
- h) do not remove or modify safety, signaling and control devices without authorization;
- i) take care of the personal protective equipment made available to him, without making any changes on his own initiative and reporting any defects or inconveniences to the employer or manager or person in charge;
- j) not carry out on their own initiative operations or maneuvers not within their competence which may compromise their own safety or that of others;
- k) participate in information, education and training programs organized by the employer;
- l) undergo the health checks required by current legislation or ordered by the competent doctor.

2.9 Anti-money laundering and fencing

Employees adopt all the tools and precautions necessary to guarantee the transparency and correctness of commercial transactions.

Every economic-financial operation and transaction must be correctly recorded, authorized, verifiable, legitimate, coherent and congruous, as well as verifiable through paper and/or IT support.

In particular:

- a) the tasks assigned to any service companies and/or natural persons who look after the economic/financial interests of DeepInspect must be drawn up in writing, with an indication of the contents and the agreed economic conditions;
- b) the competent functions must ensure control of the regularity of payments to all counterparties, also by verifying the coincidence between the person to whom the order is registered and the person who collects the related sums, including the correct management of the obligations related to value added tax;
- c) control of the financial flows relating to relationships with third parties (intragroup payments/transactions) must be carried out. This control must take into account the registered office of the counterparty (e.g. tax havens, countries at risk of terrorism, etc.), the financial intermediaries used (registered office of the banks involved in the operations and institutions that do not have physical establishments in any country) and any corporate shields and trust structures used for transactions or extraordinary operations;

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- d) false, incomplete or misleading records must not be created and hidden or unregistered funds must not be established and funds must not be deposited in personal accounts or accounts not belonging to DeepInspect;
- e) no payment must be made in cash or with bearer means of payment for amounts exceeding the amount identified from time to time by the anti-money laundering legislation;
- f) the minimum requirements established and required for the purposes of selecting the subjects offering the goods and/or services that the Company intends to acquire must be scrupulously respected;
- g) the criteria for evaluating the offers must be established;
- h) with reference to the commercial/professional reliability of suppliers and partners, all necessary information must be requested and obtained.

2.10 Use of banknotes, public credit cards, stamps and other payment instruments

DeepInspect, sensitive to the need to ensure correctness and transparency in the conduct of business, requires that every person who enters into a relationship with the Company respects, in the relationship itself, the current legislation regarding the use and circulation of coins, public credit cards and securities of stamp duty, and therefore will not enter into contact with or interrupt any relationship with anyone who engages in behavior aimed at the illicit use or falsification of credit cards.

Furthermore, the Company prohibits the use of any type of payment instrument that is available or to which one has access due to the activity performed for the Company in a manner that differs from the indications and instructions received for this purpose from the latter. . Finally, it prohibits unauthorized access, illicit interference or use in a manner that differs from the Company's provisions and indications, with IT or telematic applications, tools or programs designed to manage and/or allow access to payment instruments. material or virtual, even if not owned by the Company (e.g. internet banking programs; e-commerce platforms).

2.11 Management of the IT and telematic systems

Employees and anyone who works in the name or on behalf of DeepInspect must use the IT and telematic system in compliance with the rules established by law and internal procedures and on the basis of the principles of correctness and honesty.

IT and network resources and e-mail:

- must be used according to the indications and purposes envisaged by DeepInspect;
- must comply with IT security procedures;
- cannot be used as an instrument of offense or threat or to express comments that damage people or the image of DeepInspect;
- must not be used to commit or induce the commission of crimes, including computer crimes, violations of the regulations on the processing of personal data, violations of the regulations on copyright and industrial property rights and the detention and exchange of child pornography.

In particular, employees must:

- refrain from any activity or operation that could alter the functioning of the IT and telematic system, as well as intervene, illegitimately, on DeepInspect data and information both to the detriment of the same and to the detriment of the State, public bodies and community bodies to obtain an advantage or other benefit to DeepInspect, itself or third parties;
- refrain from any activity that could lead to the modification, suppression or fraudulent creation of electronic documents, public or private, which could have probative value;

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- refrain from illegally accessing the Company's IT or telematic system or the protected system of third parties, be they public or private entities, in order to modify or delete data, documents and information stored there;
- refrain from illegally holding and disseminating authentication credentials or access codes to IT or telematic systems;
- refrain from carrying out any activity that could lead to the damage or interruption of an IT or telematic system of third parties, whether public or private, as well as from disseminating equipment, devices or IT programs aimed at damaging or interrupting an IT or telematic system;
- refrain from carrying out any activity that could cause damage to information, data and computer programs of third parties, whether public or private, or in any case damage to computer or telematic systems;
- refrain from carrying out any abusive activity of interception, impediment or interruption of computer or telematic communications, as well as from installing equipment aimed at intercepting, preventing or interrupting computer or telematic communications.

Under no circumstances it is permitted to use the Company's IT resources for purposes contrary to mandatory provisions of law, public order or morality, as well as to commit or induce the commission of crimes or in any case racial hatred, glorification of violence or violation of human rights.

3. Rules of conduct for third parties recipients

This Code and the Model also apply to third party recipients, meaning subjects external to DeepInspect who operate, directly or indirectly, for DeepInspect such as, by way of example and not limited to, collaborators in any capacity, consultants, suppliers, commercial partners (hereinafter, for brevity, the "Third Party Recipients").

Third Party Recipients are required to comply with the Model and the Code and, in particular, to the extent that they are compatible, with the relevant ethical principles (see Chapter I) and with the rules of conduct dictated for DeepInspect employees (see Chapter II, par. 2).

In the absence of an express commitment to respect the rules of this Code of Conduct, DeepInspect will not conclude or continue any relationship with the Third Party Recipient. To this end, the inclusion, in the letters of appointment or in the negotiation agreements, of specific clauses which provide for the obligation of the Third Party Recipient to respect this Code, as well as, in case of violation, a warning to promptly comply with the Model or the application of penalties or termination of the contract.

For contractual relationships existing at the time of approval of the Code of Conduct, DeepInspect ensures that the Third Party Recipient signs a specific supplementary agreement which expressly establishes the above.

4. Whistleblowing

The Company has adopted a whistleblowing system in compliance with the provisions of Legislative Decree no. 24/2023.

The management of reports by Recipients who, due to their relationship with DeepInspect, become aware of illicit or potentially illicit conduct, is regulated, consistently with the provisions of Model 231, in the Whistleblowing Procedure.

As regards the details of the information to be transmitted to the Manager, please refer to the provisions in the Paragraph dedicated to "Whistleblowing" within the General Section of the DeepInspect Organization, Management and Control Model.

In any case, the Company works to ensure that the person making the communication is not subject to retaliation, discrimination or, in any case, penalization, thus ensuring confidentiality (except in the case of any legal obligations that require otherwise).

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Chapter III: Implementation and control of compliance with the Code of Conduct

1. Responsibilities of the Governing Body

Control over the implementation and compliance with the Model and Code of Conduct is entrusted to the Governing Body.

The tasks of the Governing Body in relation to this Code are, among others, the following:

- monitor compliance with the Model and the Code of Conduct in order to reduce the risks of committing the crimes envisaged by the Decree;
- provide interested parties with clarifications also in relation to the legitimacy of behavior, or the correct interpretation of the provisions of the Model or Code of Conduct;
- follow and coordinate the updating of the Code of Conduct;
- promote and monitor the implementation, by DeepInspect, of communication and training activities on the Model and, in particular, on the Code of Conduct;
- report any violations of the Model or Code of Conduct to the competent DeepInspect bodies, proposing the sanction to be imposed and verifying the effective application of any sanctions imposed.

2. Violations of the Code of Conduct and the relative disciplinary system

As regards the typification of violations of the Model, including the Code of Conduct, as well as the disciplinary system and the procedure for contesting violations and applying sanctions, please refer to the provisions of the Disciplinary System adopted by DeepInspect, pursuant to Legislative Decree. Legislative Decree no. 231/2001, as part of its Organization, Management and Control Model.

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