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Intarget
Group S.r.l.
Società
Benefit

INTRODUCTION

The Code of Ethics of the Intarget Group S.r.l. Group - Benefit Company and all its subsidiaries establishes the principles with which the Group aligns its activities, behaviors and relationships, both with regard to subjects internal and external to the company organisation.

The Code of Ethics represents the development of the principles expressed in the corporate mission that the Group has set itself to achieve and which it wants to be shared and observed by all representatives of the Group companies, understood as Directors, Auditors, managers, managers, employees, consultants, collaborators in any capacity, suppliers and customers, or all those who, directly or indirectly, temporarily or permanently, establish relations or relationships with the companies of the Group or who operate or may act in the name and on behalf of the companies themselves to pursue their objectives.

This edition of the Intarget Group Code of Ethics was approved by the Intarget Board of Directors: on February 19th of the year 2024.

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01.

What is it for the Code of Ethics

The Intarget Group Code of Ethics aims to dictate the principles and rules of conduct that must guide the behavior of all people who, in any capacity, directly or indirectly, permanently or temporarily, operate in the interests of Intarget Group s.r.l. – Società Benefit (inde , “Intarget or Intarget Group”) and its subsidiaries, towards all subjects on whom Intarget can exercise direct or indirect influence and who can, in turn, influence its operations (employees and collaborators, customers , local communities, suppliers, financial community, institutions, natural environment, etc.).

The Intarget Group is convinced that its values, and, in general, ethics, represent an essential condition for achieving its objectives.

The Intarget Group considers compliance with the law a fundamental prerequisite for its business, but is aware, at the same time, that compliance with the law alone is not sufficient. Therefore, the Intarget Group is committed to developing, implementing and applying all the measures necessary to promote corporate ethics, promoting behaviors whose guidelines are outlined in this Code of Ethics (hereinafter, "the Code").

The Code, therefore, does not replace the laws or contractual rules, but integrates them. The Code also serves to reduce the state of indeterminacy that accompanies decisions. The behaviors of the people who make up the organization - starting from those who have greater responsibility and greater authority - shape and conform its image. There is a direct relationship between respect for the rules, authority, reliability and success of the company. The Code must serve first and foremost to model the behavior of the people who work in the Intarget Group (or for the Intarget Group), but it also intends to pursue other objectives:

- A. **increasing cohesion and internal coherence:** the Code's aim is to improve internal relations and the formation of a unitary and clear external image;
- B. **greater efficiency:** the motivation of participants towards positive objectives increases the ability to produce utility, both for those directly involved and for the reference environment;
- C. **a good reputation:** an organization with good rules and which manifests its values produces security in its audience, who can thus transform from an interlocutor to a partner.

Finally, the Code intends to be above all a guidance tool, useful for helping recipients to face the ethical dilemmas (which are then one and the same with organizational problems and entrepreneurial choices) that arise in everyday activity.



02.

Recipients and dissemination of the Code

The Code is binding for all those who collaborate with the Group, directly and indirectly, permanently or temporarily.

Administrators, Auditors, managers, managers, employees, consultants and collaborators in any capacity must know and observe the content of the Code, therefore they will be held personally, and, if necessary, disciplinarily responsible for their actions, if they differ from the precepts therein contents.

The Intarget Group therefore undertakes to disseminate this Code to all the aforementioned subjects, so that they can comply, in carrying out their tasks, with the principles established therein.

The Code and its possible future updates are approved by the Board of Directors of Intarget Group s.r.l. - Società Benefit and are published and consultable within the Workplace company intranet.

Furthermore, a paper copy of the Code is distributed to staff and collaborators in current and future service, requesting from them a written declaration of receipt.

03.

Mission: what the Intarget Group is called to achieve today and in the future

Intarget Group S.r.l. - Benefit Society, together with the other Group Companies, wants to be, for its customers, the best partner for strategic consultancy in Italian digital marketing and is convinced that this can only happen through the development of an original business model capable of providing a strong innovation.

For Intarget, being the best Italian Strategic Company means representing a source of pride and trust for:

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- customers, so that they receive, through constant listening, quality services that meet their expectations;
- the women and men who work in the Group, so that they are protagonists of the results with their competence, their involvement and their passion;
- suppliers, so that they are actors in the value chain and growth partners.

04.

Ethical values and the principles in which we recognize ourselves

INTEGRITY

"Proud to be a group of correct and loyal people"

In the Intarget Group, legality, correctness, honesty, fairness and impartiality of behavior inside and outside the company constitute a common way of feeling and acting. By sharing these principles, lasting relationships are established with customers, suppliers, partners, stakeholders, in general transparency in relations with third parties, appropriate and fair recognition of the work of employees and collaborators.

TRANSPARENCY

"Sincere and clear towards all interlocutors"

The Intarget Group undertakes to provide all its interlocutors with information relating to the actions carried out in a clear, complete and timely manner. For Intarget, being transparent means adopting a management policy open to dialogue with its interlocutors, with the aim of finding increasingly better solutions. The Intarget Group aligns relationships with its employees, collaborators, partners and suppliers with the principles of integrity, honesty, correctness, respect and mutual trust.

Relationships with employees, collaborators, partners and suppliers are based on compliance with current laws and regulations. All recipients of the Code have the precise duty to know the laws, company procedures and technical directives that concern the performance of their activities.

CONSISTENCY

"Focus on doing what we say"

The Intarget Group implements the mission, values and operating principles of the company on a daily basis, in all its actions. They are considered the founding basis of the strategic planning, objectives and operational management of all Group companies.

RESPECT

“Respect for every form of work as well as for the individual as such”

The Intarget Group undertakes to provide everyone with the utmost respect regarding the characteristics of each worker and each task assigned to them; any form of discrimination based on sex, religion or sexual orientation is prohibited.

SUSTAINABILITY

“Environmental, social and economic well-being”

The Intarget Group works to guarantee constant and preferably growing environmental, social and economic well-being for everyone with the prospect of leaving future generations with a better quality of life than the current one.

05.

Business operating principles:

that is, the lines of conduct that the Intarget Group intends to maintain to achieve the strategic objectives it has set itself

Creation of value and social and environmental responsibility

The Intarget Group wants to be a group of companies built to last over time, therefore it is committed to combining economic and social value with the aim of satisfying over time the legitimate expectations of all those who enter into relationships with it: customers, workers, suppliers, institutions and so on.

Quality and excellence of service

It is necessary that all members of the Intarget Group, employees and collaborators, are focused on the customer and always show him only one side. Customer satisfaction represents a fundamental element for the growth of the Group which intends to be perceived as a provider of solutions, capable of understanding needs and offering high quality services. In the Intarget Group, daily action aims to provide a unique and reliable response to customer expectations. Intarget's organisation, professionalism and culture evolve with listening and customer service as a point of reference, all within a corporate ecosystem aimed at developing the best sustainability linked to maximum attention to quality, respecting the main values of continuity, in compliance with the provisions relating to the implementation of the benefit plan.

Efficiency

Enhance and not waste available resources; the Intarget Group is committed to quickly pursuing the objectives set by introducing the principle of optimization into every activity: in the management of human resources, time, financial and technological resources.

Innovation, growth and continuous improvement

Feeling part of a team that generates ideas and improves things; the Intarget Group aims to introduce all aspects of "useful and possible" innovation at different organizational levels: technological, organisational, management and process.

Intarget intends to act every day for the maintenance and concrete improvement of its activities. It is the Group's desire to support and promote the attitude towards change.

Involvement and valorization of resources

Share knowledge to improve and improve. the Intarget Group is committed to enhancing the experience and developing the skills of all workers, to promoting cooperation and the exchange of knowledge, so that work is a source of satisfaction, pride for people as well as a relevant factor for the success of the business. We want to reward behaviors consistent with the mission and values.

Intarget intends to promote, through the culture of dialogue, the dissemination of information and the spirit of belonging to a single and integrated group.

Willingness to choose

Choose the most useful solution for growth. In pursuing its mission, the Intarget Group will select the business areas and development plans to increase its value and to be increasingly competitive on the market. Differentiation on the basis of merit will characterize the process of recognition and valorisation of workers.

06.

Relationships with employees and collaborators

The Intarget Group avoids any form of discrimination, whether it refers to physical condition, disability, opinions, nationality, religion, sex, sexual orientation and gender identity, or any other condition that may give rise to discrimination. The Intarget Group develops work-life balance practices.

The Intarget Group, where this is compatible with company and production needs, favors flexibility in the organization of work activities, in order to facilitate the care of children by working mothers and working fathers. The Intarget Group guarantees a work environment in which everyone can collaborate by expressing their professional attitude, where responsibility is manifested and shared rules are respected and promoted. The company, in the employment relationship, enhances skills, potential and commitment, using clear and homogeneous evaluation criteria. The Intarget Group is also committed to valuing all diversity.

The Intarget Group guarantees constant training for its Intargeters and collaborators, combining the needs of company growth with the training needs expressed by the workers and making available the suitable tools for professional updating and development. All those with responsibilities are required to make the most of the working time of their collaborators, from whom they exclusively request performance consistent with the performance of their duties and with the needs of the company.

Likewise, all workers have the duty to pursue, in the use of their time, the maximum efficiency of the organization.

The Manager will not ask his collaborators for personal favors or any other behavior not foreseen by the law, by the Ccnl, by the existing company regulations, by this Code and by individual employment contracts.

The companies of the Intarget Group, starting from the Administrators, executives, and managers, promote a work environment based on information and engagement of people. In particular:

- they clearly define business roles;
- they solicit the contribution of all professional figures to problem-solving, with particular regard to those who work closely with the customer;
- they organize periodic meetings to share company objectives;
- they develop appropriate corporate communication tools;
- they periodically activate surveys on the company climate and work to constantly improve it.

Every Intargeter and collaborator is required to operate with the diligence and efficiency necessary to protect and enhance corporate resources, ensuring their use is consistent with the interests of the company. Likewise, it is the responsibility of individuals not only to protect such assets but also to prevent their fraudulent or improper use, to the advantage of themselves, third parties, or even the companies of the Group.

Every Intargeter and collaborator is called upon to adopt a respectful attitude towards their colleagues, safeguarding the dignity of the individual, fostering collaboration, and expressing human solidarity.

The Intarget Group respects the private sphere of its Intargeters and collaborators, identifying ways to pay attention to their needs in situations of difficulty that may hinder the normal conduct of work activities.

07.

Relationships with customers

In the provision of services, the Intarget Group guarantees fair treatment between actual and potential customers.

The Intarget Group works to achieve the highest possible level of service in all its areas of expertise, compatibly with the different territorial characteristics and with the rules issued by the regulatory bodies.

The Intarget Group does not provide services that operate in areas such as: gambling, adult content, services that generate addictions that are harmful to the person. The Intarget Group does not provide services to companies that exploit child labor and discriminate based on gender, race, politics and religion.

The Intarget Group bases its relationship with customers on availability, respect, courtesy and participation and is committed to their satisfaction. Recognizing the value of listening and dialogue, it establishes tools and channels aimed at ensuring customers the timeliness and quality of information and communication.

The Intarget Group undertakes to inform the customer in a complete and timely manner on the characteristics, functions, costs and risks of the service offered. In particular, communications, contracts, documents and any other information released by the Group must be:

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- clear and simple, formulated in the most direct and commonly used language possible;
- complete and truthful, so as not to overlook any element relevant to the decision for the current or potential customer;

respectful of privacy provisions.

The Intarget Group aims to simplify procedures, committing itself to limiting the obligations required of customers as well as providing them with any clarification requested. The Intarget Group guarantees its customers the appropriate quality and safety standards. The Service Charters constitute a formal declaration of commitment by the Group towards its customers and represent an integrative element of the supply contracts.



The Intarget Group, aware of the differences between the markets in which it operates, guarantees correctness in contracts and commercial relationships. Intarget undertakes to ensure that the mandated agencies conform their behavior and that of those in charge of them to the same rules of correctness that Intarget adopts towards customers.

The Intarget Group guarantees that the processing of customers' personal data takes place in compliance with current legislation and the inspiration of this Code. It also ensures that data and information are recorded and processed in a complete, timely manner and with due confidentiality.

All employees and collaborators of the Group must not share in any way (except explicit requests from the customer or the Group companies) data of any kind relating to work in progress, customers, suppliers, and so on. For any need to show numbers (even in blind), example cases, etc., it is mandatory to ask for authorization from your hierarchical superior, or, failing that, from company management.

The Intarget Group encourages dialogue and collaboration with customers and favors the non-judicial resolution of possible disputes, promoting conciliation procedures to prevent judicial disputes between the company and the customer.

08.

Relationships with suppliers

The conduct of the Group Companies in the procurement phases of goods, services and works is based on the pursuit of quality and cost-effectiveness and the recognition of equal opportunities for each supplier.

The Intarget Group is committed to developing cooperative relationships with suppliers based on communication aimed at the mutual exchange of skills and information and which encourages the creation of common value. Situations of dependence must be avoided, both for the Group and for the supplier.

The Intarget Group undertakes to monitor, in the forms and methods established by the contracts, to preserve the health and safety of the workers of the companies involved in its supplies. Intarget ensures that the requirements of these companies correspond over time to those required by the company's procedures and qualification systems.

The supplier selection and qualification criteria are based on correctness and equity. These criteria are also the guiding principles to guarantee the best possible result for the Client (independence).

The selection is based on the evaluation of the quality and cost-effectiveness of the services, technical-professional suitability, respect for the environment and social responsibility, according to the rules dictated by specific regulations, procedures and certifications. The signed acceptance of this Code by the supplier represents one of the selection criteria and becomes an integral part of the contractual relationship. The Intarget Group adopts specific procedures that make it possible to evaluate:

- their behaviors;
- their skills;
- their commitment to adapt and improve their performance.

The Group's commitment is to reconcile the search for the most advantageous offer by taking into consideration the correct expectations of profitability and cost-effectiveness of the supplier.

The Intarget Group gives anyone who meets the required requirements the right to participate in tenders, creating adequate conditions of competition, transparency and cost-effectiveness.

The management of contracts with suppliers is based on correctness, avoiding any possible form of abuse. This means that the Intarget Group:

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- informs - during the stipulation of the contract - comprehensively on the characteristics and risks of production, on the methods and times of payment, on the other aspects of the relationship of greatest importance for the supplier;
- uses complete, clear and comprehensible information, avoiding clauses that do not make a unambiguous interpretation possible;
- avoid exploiting your position in the event that eventualities arise that imply a renegotiation of the contract, especially with small suppliers.

09.

Treatment of sensitive data and protection of **privacy**

The Intarget Group protects the personal and particular data of which it is aware in accordance with current legal provisions.

Administrators, Intargeters and collaborators are required to use the data exclusively for purposes related to the exercise of their respective duties, observing the security measures adopted. The Intarget Group guarantees respect for people's private sphere.

10.

Prevention of potential conflicts of interest

In conducting any activity, the Intarget Group intends to avoid situations in which the Intargeters and collaborators involved are, or may even appear to be, in a conflict of interest.

Employees and collaborators must avoid any situation and refrain from any activity that could pit a personal and/or family interest against those of the Group or that could interfere with work performance and the ability to make decisions in an impartial and objective manner. in the interests of the Group itself.

Any situation of conflict of interest, even if indirect or potential, must be promptly reported to the company management, so that it can evaluate its existence and severity and can intervene to avoid or mitigate the consequent effects.

Since, in principle, any work activity outside of those carried out for the Group can be a harbinger of situations of possible conflict of interest, each employee has the obligation to communicate to the company management their intention to carry out such activities.

The company management may or may not authorize the specific activity, with a view to preventing conflict of interest and protecting the image of the Intarget Group.

11.

Protection of the company image and reputation

The image and reputation of the Intarget Group represent a corporate asset, which each employee and collaborator must protect with their own behavior.

Given the freedom of opinion of each Intargeter or collaborator and the choices made by the company, everyone's behavior must conform to safeguarding the Group's reputation.

If behavior or situations occur that could lead to the Group's image being compromised, it is necessary to promptly notify company management.

The Intarget Group requires particular attention in relationships with customers, with colleagues and collaborators and with superiors, in the use of communication tools and in relationships with the media, with the Public Administration and with the authorities.

12.

Relationships with the territory, communities and institutions

The Intarget Group manages its activities while respecting the environment. To this end, it is committed to using the most suitable technologies to prevent environmental risks and reduce direct and indirect environmental impacts.

- To this end, it undertakes to:
- operate for the prevention of environmental risks;

define specific environmental objectives and improvement programs, aimed at minimizing significant environmental impacts. The directors, employees and collaborators of the Group act towards institutions with integrity.

The Group adopts a specific organizational model for the prevention of crimes against the public administration.

The Intarget Group undertakes to provide the national and local authorities responsible for the control and regulation of services with all the information requested, in a complete, correct, adequate and timely manner. The Intarget Group is committed to contributing to and supporting the local community through the creation of the Benefit Program which also includes the possibility of investing in the territory and training young people.

In supporting social and cultural initiatives and in sponsorships in general, Intarget follows a specific procedure, taking into consideration only initiatives consistent with its strategic objectives, with the principles of environmental and social responsibility, with the guidelines adopted by the top management bodies of the Group. The Intarget Group does not make contributions of any kind to political parties and election candidates and abstains from any undue form of pressure on public representatives aimed at providing advantages to the company.

In any donations and in the granting of donations, the Intarget Group adheres to the principles defined by a specific procedure, favoring initiatives that offer a guarantee of quality, which stand out for the ethical message transmitted and which - in line with its mission - contribute to social development.

The Intarget Group recognizes the value of communication as an indispensable factor for sharing and exchanging skills and for increasing the sense of belonging to the company; however, any information on company activities not yet made public that the directors, Intargeters and collaborators of Intarget have in relation to their respective roles is confidential and for the exclusive interest of the company.

13.

Violation of the code of ethics and related consequences

All collaborators of the Group, direct or indirect, have the duty to verify that the recipients of this Code of Ethics respect the rules contained therein and report any alleged violations to the company management, which will evaluate the actual existence of the violation and the consequent actions to take.

Compliance with the rules of the Code constitutes an essential part of the contractual obligations of the Group's employees and collaborators pursuant to and for the purposes of articles 2104, 2105 and 2106 of the Civil Code.

The serious and persistent violation of the provisions of this Code undermines the relationship of trust established with the Company of which one is an employee or collaborator, and may lead to disciplinary actions and compensation for damages, without prejudice, for employees, to compliance with the procedures foreseen by the art. 7 of the law. 300/1970 (Workers' Statute), collective labor agreements and disciplinary codes possibly adopted by Group companies.

In the event of violations of the Code, the Group Companies adopt disciplinary measures against those responsible for the violations, where deemed necessary for the protection of company interests and compatibly with the provisions of the law and the National Collective Bargaining Agreement, which may go as far as dismissal.



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