

Code of Ethics

Ethical and sustainable digital innovation that values people,
delivering solutions that shape the future.



Classification: **Public Document**

CODE OF ETHICS OF LASCAUX S.r.l. a socio unico

Summary

CODE OF ETHICS OF LASCAUX S.r.l. a socio unico	2
Summary	2
1 WHO WE ARE	4
2 OUR VISION	4
3 OUR mission	4
4 SCOPE AND RECIPIENTS	4
5. OUR VALUES	5
5.1. Creating Value for the Customer	6
5.2. People First	6
5.3. Ethics	7
5.4. Enhancing and Sharing Knowledge: Lascaux Academy	8
5.5. Nurturing Our Talents: Lascaux Lab	9
5.6. Improve and Protect	9
6. RULES OF CONDUCT	10
6.1 Prevention of Conflicts of Interest	10
6.2 Occupational Health and Safety and Environmental Protection	10
6.3 Confidentiality, Information Handling and Privacy	11
6.4 Administrative and Accounting Management	12
6.5 Use and Protection of Company Assets	12
6.6 Management of Public Funding	13
6.7 Protection of Competition	13
6.8 Anti-Money Laundering Prevention	13
6.9 Anti-Corruption Prevention	14
6.10 Anti-Corruption Due Diligence	14
6.11 Prevention of Cybercrime	14
6.12 Protection of Intellectual Property	15
6.13 Sponsorships	15
6.14 Gifts, Hospitality and Benefits	16

6.15 Relationships with Third Parties	16
6.16 Relations with Public Administration.....	16
6.17 Relations with Public Supervisory Authorities and Judicial Authorities	17
6.18 elations with Political Parties and Trade Union Organizations	17
6.19 Relations with Customers and Suppliers.....	17
6.20 External Communications	18
7 EFFECTIVENESS OF THE CODE OF ETHICS AND DISCIPLINARY SYSTEM	18
8 ENTRY INTO FORCE, COORDINATION, UPDATES AND AMENDMENTS.....	19

1 WHO WE ARE

We are an excellence in software engineering and strongly believe in innovation and digital transformation. We work with dedication and passion to achieve our objectives and ensure customer satisfaction. Thanks to a team of talented professionals in the IT sector, we are committed to shaping the future by mastering new technologies and processes, offering innovative and competitive solutions to the market.

2 OUR VISION

We believe in digital transformation as a force capable of enriching everyone's work and creating new opportunities that were once unimaginable.

For this reason, we believe that our contribution to the digital evolution of the world can improve people's lives and work while respecting social values and the environment.

3 OUR MISSION

Our mission is to drive innovation in the software development and commercialization sector. We pursue this objective by:

- a. Working every day to be a sustainable and inclusive company, supported by a highly skilled, passionate, and creative team.
- b. Attracting and retaining young talent through strong collaboration with the education sector and by continuously promoting internal growth initiatives.
- c. Continuously investing in research and development to enhance our capabilities and leverage the benefits offered by emerging digital technologies.
- d. Helping our customers improve through our work, solutions, and products, making their organizations more efficient through digital transformation processes.

4 SCOPE AND RECIPIENTS

This Code of Ethics has been approved by the Board of Directors (BoD) of Lascaux. The purpose of this Code of Ethics is to clearly and unequivocally define the principles that must be observed by all those holding representation, management, or executive functions, employees, collaborators, and any other party maintaining relations with the Company, directly or indirectly, on a permanent or temporary basis, or otherwise acting in its interest or on its behalf (hereinafter also referred to as the "Recipients").

Accordingly, the following parties are Recipients of these rules of conduct:

- the Shareholder;
- the members of the Board of Directors (BoD);

- the corporate supervisory bodies (Board of Statutory Auditors);
- Employees under fixed-term or permanent employment contracts;
- External Collaborators;
- Consultants;
- Suppliers;
- Contractors;
- Customers.

Recipients are required to be familiar with the provisions set out in this Code of Ethics. In addition, employees are expected to actively contribute to its dissemination and to ensure its diligent observance within the scope of their responsibilities.

Department managers, in particular, are required to oversee its implementation, provide guidance to employees within their areas of responsibility whenever doubts arise, and, in their role as internal reference points, promote through their own example a culture of compliance with the provisions of this Code of Ethics.

In particular, Recipients are required to:

- diligently comply with the provisions of the Code of Ethics, refraining from any conduct contrary thereto;
- promptly report any violations;
- bring to the attention of the competent bodies any shortcomings in its provisions.

Lascaux, in turn, undertakes to:

- promote the Code of Ethics within the Company and ensure its widest dissemination among all Recipients through its publication on the notice board of each operational site;
- ensure its continuous updating and adaptation to the changing needs of the organization, regulatory developments, and the evolution of social awareness;
- carry out appropriate checks on compliance with the Code of Ethics, investigate any evidence of violations, and impose sanctions that are consistent, impartial, uniform, and proportionate to the violations, always in compliance with the applicable regulations governing employment relationships and the relevant national collective bargaining agreement;
- refrain from establishing, or terminate, any business relationship with parties that fail to comply with the provisions of the Code of Ethics.

5. OUR VALUES

5.1. Creating Value for the Customer

We support our customers with the best talents and consultants to accelerate innovation and competitiveness from within. Leveraging our IT expertise, we guide companies through their digital transformation journey by integrating market solutions with the development of custom components that enable them to achieve their objectives.

Through careful project management and the use of cutting-edge technologies, we design, implement, and manage valuable solutions capable of driving real change.

We deliver quality services, ensuring a proactive and long-lasting relationship that consistently generates tangible value.

However, we believe that this result can only be achieved by conducting our activities in accordance with values that we consider fundamental not only to ensure the efficiency and effectiveness of our work, but also to promote sound business practices, strengthen our success and reputation in the market, and create a harmonious working environment, both within the Company and in our relationships with Customers.

5.2. People First

We firmly believe in the value of the people who are part of our organization. We consider it essential to enable each collaborator to perform their work in an open and inclusive environment, where they can express their individuality and uniqueness, with the assurance of always having a mentor nearby and feeling part of a team.

Lascaux rejects any form of discrimination among its employees and provides equal opportunities to all workers, ensuring fair treatment based on merit and without discrimination on the grounds of race, gender, age, sexual orientation, physical or mental disability, nationality, religious beliefs, political affiliation, or trade union membership.

In compliance with the Conventions of the International Labour Organization (ILO), Lascaux is committed to respecting fundamental human rights, rejects the exploitation of child labor, and prohibits the use of forced labor or labor performed under conditions of slavery or servitude. To this end, the Company does not establish employment relationships with parties that fail to guarantee compliance with these principles.

Lascaux is therefore committed to ensuring that no form of discrimination or intimidating conduct is tolerated in the workplace. Any form of harassment and/or the reduction or maintenance of a person in a state of subjugation through violence, threats, deception, abuse of authority, situations of physical or psychological inferiority, or exploitation of conditions of need shall be condemned.

Accordingly, department managers and competent personnel are required to make decisions relating to human resources exclusively on the basis of professional and merit-based criteria.

These criteria shall enable the selection, hiring, training, remuneration, and management of personnel without any risk of discrimination. In the management of its people, Lascaux also guarantees respect for and protection of individual privacy and the right to work.

In any case, all Recipients are required to contribute to the promotion and maintenance of a safe, respectful, and positive working environment that fosters both interpersonal and professional relationships, based on equality, mutual fairness, and respect for individual freedom and dignity.

Furthermore, in addition to the value of people, we also believe in the “value of things.” For this reason, Lascaux conducts its activities with a view to protecting and safeguarding corporate assets. Recipients of the Code of Ethics are therefore required to act diligently and responsibly in protecting company resources, avoiding unnecessary consumption or irrational use of means and resources, as well as any improper use that may cause damage, reduce efficiency, or otherwise conflict with the interests of Lascaux and the environment.

The use of work tools is limited to institutional and business purposes. Recipients of the Code of Ethics are responsible for preventing their fraudulent or improper use, whether by themselves or by third parties.

5.3. Ethics

Legality: Lascaux promotes within the Company the strictest compliance with applicable laws and regulations, as well as the principles of transparency, fairness, and integrity, wherever it conducts its business activities.

The Company does not maintain relationships with organizations, associations, or movements that directly or indirectly pursue activities whose purposes are prohibited by law. In carrying out their work and professional activities, Recipients are required to conduct themselves in strict compliance with the laws and regulations applicable in the territories where they operate on behalf of Lascaux, always acting with honesty, fairness, loyalty, and integrity. Under no circumstances may the pursuit of Lascaux's interests justify dishonest or unlawful conduct.

Impartiality: All business activities carried out in any capacity by the Recipients of this Code of Ethics are based on the principles of impartiality and neutrality. Any related decisions are made rigorously in the sole interest of Lascaux, with independence of judgment, transparency, and according to objective, documented, and neutral evaluation criteria.

In carrying out their activities, Recipients shall avoid any situation that may give rise to conflicts of interest with Lascaux and that could interfere with their ability to make impartial decisions solely for the benefit of the Company. In this regard, employees shall not use their position within the Company or the information acquired in the performance of their duties in a manner that creates a conflict between their personal interests and those of the Company.

Transparency and Fairness: Every action, operation, and transaction carried out within Lascaux is guided by the highest standards of transparency, fairness, and reliability of information.

In particular, every action, operation, or transaction is properly recorded in the Company's accounting system in accordance with applicable laws and accounting principles, also in order to identify the persons who authorized, executed, recorded, and verified its basis, execution, and correctness.

To ensure that accounting records meet the requirements of truthfulness, completeness, and transparency of recorded data, adequate and complete supporting documentation is maintained for every accounting transaction. Such documentation shall be easily retrievable and archived according to logical criteria.

Accordingly, in carrying out activities within their area of responsibility, Recipients are required to provide transparent, truthful, complete, and accurate information, including externally, and to refrain from disseminating false information.

Loyalty and Good Faith: Recipients shall perform their work and professional commitments loyally and in good faith, contributing to the promotion of a spirit of mutual respect and cooperation, while fulfilling their contractual obligations and the required duties.

5.4. Enhancing and Sharing Knowledge: Lascaux Academy

Lascaux strongly believes in education and knowledge sharing.

From this vision, Lascaux Academy was created: a completely free training program offered by Lascaux to individuals wishing to pursue a career in the IT sector. Its objective is to provide young talents with the opportunity to deepen the skills acquired during their studies and develop new competencies, enabling them to enter the job market in a more structured and effective way.

Through the highly specialized training programs delivered over the years, we have trained and hired numerous talents, sharing with them expertise, development strategies, best practices, resources, and tools. We provide participants with access to the professionalism and experience of the Academy's instructors and tutors, whose role is to train, mentor, and support each participant, fostering learning, further study, and the consolidation of the competencies acquired during the courses.

Each specialized Academy program enables participants to acquire cross-functional and multidisciplinary competencies while developing specific skills, ensuring comprehensive training capable of meeting market needs.

Lascaux Academy also represents the way in which the Company leverages the value of its team, Partners, and Customers to develop relationships and collaborations that generate knowledge enhancement processes and, consequently, improve the quality of outcomes.

5.5. Nurturing Our Talents: Lascaux Lab

Continuously creating the conditions to attract talent, retain it, and grow our business together with our people. Providing space for creativity, supported by trust and guidance, while directing it toward the achievement of shared objectives.

These are the values that inspire our belief in the professional growth of people. For this reason, we created Lascaux Lab, the laboratory where we conduct research and experimentation, design and develop solutions, with the objective of nurturing talent and enabling people to grow through experience.

Our products are born from process analysis and collaboration among our teams, which come together in the Lab to identify the best solutions, enhance product performance, and continuously improve the user experience.

5.6. Improve and Protect

We have committed ourselves to building a better company, founded on expertise and designed to be stronger and more sustainable over time, so that the Lascaux brand represents a guarantee for our stakeholders, social development, and the environment.

For this reason, we have embarked on a journey of continuous improvement and internal protection aimed at ensuring and maintaining quality both in our work and in our relationships with Customers.

Lascaux recognizes confidentiality as an essential principle governing all conduct. Accordingly, the Company ensures the confidentiality and security of the information in its possession and refrains from using confidential data except where expressly and knowingly authorized and, in any event, always in strict compliance with the applicable legislation on personal data protection.

Likewise, Recipients shall not disclose externally any information belonging to Lascaux obtained in the course of performing their duties, nor shall they use such information to obtain undue advantages in a manner contrary to the law or detrimental to the Company's rights, assets, or objectives.

To achieve this objective, in addition to complying with the applicable legal framework, we have implemented an Information Security Management System (ISMS) aimed at ensuring the integrity, confidentiality, and availability of the information constituting the Company's information assets. Meeting security and compliance requirements has required the identification and implementation of organizational, regulatory, and technological measures based on a preventive approach to information security risks rather than merely managing them once they arise.

The results of our work and the effectiveness of the ISMS are demonstrated by the achievement of ISO/IEC 27001 certification within the scope of "Software development for proprietary and custom IT solutions. IT consultancy and support services to organizations in the field of Information Security".

This achievement is further strengthened by the certification of two extensions: ISO/IEC 27017 and ISO/IEC 27018, which establish control objectives, rules, and procedures for implementing appropriate protection measures for information stored in cloud environments.

In addition to certifications in the field of information security, and as evidence of our commitment to continuous improvement, we have achieved another important milestone: ISO/IEC 9001 certification, which attests compliance with the requirements for implementing a Quality Management System capable of consistently providing products and services that meet customer expectations and comply with applicable statutory and regulatory requirements.

6. RULES OF CONDUCT

We ensure that our values are properly and effectively implemented through specific Rules of Conduct that the Recipients of this Code are required to observe, not only to ensure compliance with applicable laws and regulations, but also to ensure that our mission and vision are pursued in accordance with our values.

6.1 Prevention of Conflicts of Interest

In carrying out their activities, Recipients shall avoid situations in which the parties involved in transactions are, or may reasonably appear to be, in a conflict of interest.

A conflict of interest shall mean any situation in which a Recipient pursues an interest other than the mission of Lascaux or carries out activities that may interfere with their ability to make decisions solely in the interest of Lascaux, or personally benefits from business opportunities belonging to the Company.

6.2 Occupational Health and Safety and Environmental Protection

Lascaux promotes and safeguards the health and safety of its employees in all locations where they are required to perform their work activities.

Lascaux is committed to ensuring working conditions that respect individual dignity and provide safe and healthy workplaces, also through the promotion of a culture of safety and risk awareness. The Company encourages responsible behavior by its employees and collaborators, who, within the scope of their roles and responsibilities, are required to actively participate in risk prevention processes, environmental protection, and the safeguarding of health and safety for themselves, their colleagues, and third parties.

With regard to environmental protection, Lascaux conducts its activities taking into account the need to protect the environment and ensure the sustainable use of natural resources, in accordance with applicable environmental legislation..

In particular, Lascaux:

- implements measures aimed at achieving energy savings in order to reduce pollutant emissions;
- promotes within the Company the reduction of waste, the prudent use of available resources, the reuse of materials, and waste separation and recycling practices;
- disposes of its waste through qualified suppliers, in compliance with applicable regulations, carefully verifying the existence of the registrations and authorizations required to perform such activities, while promoting process traceability and supply chain control;
- makes development and investment decisions taking into account and limiting potential impacts on the environment and the surrounding territory. Lascaux condemns any action or conduct that may potentially harm the environment or the territory.

6.3 Confidentiality, Information Handling and Privacy

Lascaux's databases may contain personal or corporate data that, due to legal obligations or contractual agreements, may not be disclosed externally. The improper, unlawful, or untimely disclosure of such information may cause damage to the Company's interests or to the owners of such confidential information.

For these reasons, Lascaux is committed to protecting information in compliance with applicable legislation and with the provisions issued by the Data Protection Authority.

Confidential information includes, by way of example only: technical information relating to products and procedures; purchasing plans; cost, pricing, marketing, or service strategies; financial reports not intended for public disclosure; and information relating to sales, mergers, and acquisitions.

All information obtained in connection with an employment and/or collaboration relationship is the property of Lascaux. Collaborators who become aware of non-public information shall exercise the utmost care and diligence in handling such information, avoiding its disclosure to unauthorized persons, both within and outside the Company. The obligation of confidentiality regarding confidential information also applies to parties with whom Lascaux maintains business relationships, through specific contractual clauses or the execution of non-disclosure agreements.

The disclosure of information to third parties may take place, for business or work-related reasons, only by persons expressly authorized by Lascaux and, in any case, in compliance with applicable regulations and with due regard to the principles of equal treatment and simultaneous disclosure of information.

When confidential information is disclosed externally, its confidential nature shall be expressly stated, and the recipient shall be required to observe confidentiality obligations.

No employee may derive any direct or indirect, personal or financial benefit from the use of confidential information, nor disclose such information to others.

6.4 Administrative and Accounting Management

Every operation and transaction carried out within the Company must be properly recorded.

Each operation shall be supported by adequate documentation in order to enable controls to verify the characteristics and reasons underlying the transaction and to identify the persons who authorized, performed, recorded, and verified the operation.

Financial statements, reports, declarations, and corporate communications required by law shall be prepared in compliance with the provisions of the Civil Code, tax legislation, and applicable Accounting Principles, with clarity and transparency, and shall fairly and accurately represent the assets, liabilities, and financial position of Lascaux.

Responsibility for these activities rests exclusively with the Sole Director of Lascaux, and they shall be carried out in a timely and truthful manner and in compliance with applicable laws and regulations.

It is prohibited to prevent or hinder the proper performance of the activities of corporate bodies and the Sole Auditor. All parties shall cooperate, where required, in carrying out any control and audit activities relating to corporate management as provided by law.

In particular, any concealment of documents or use of fraudulent means intended to influence such activities is prohibited.

6.5 Use and Protection of Company Assets

Tangible assets form part of the Company's assets, the integrity and protection of which are safeguarded by the Company. Recipients shall act diligently to protect the Company's assets through responsible conduct and in compliance with the operating procedures established to regulate their use, documenting such use where required.

In particular, the Company requires due care in the use of company vehicles, ensuring their cleanliness and integrity, in full compliance with the Highway Code and the provisions set forth in Company policies, as well as in the use of IT equipment and professional tools provided to enable the performance of work duties. This includes the proper use of email and Internet access, any abuse or use detrimental to the Company's interests being subject to disciplinary action in accordance with the regulations governing employment relationships and the applicable national collective bargaining agreement.

Company resources may not be used for purposes other than corporate purposes unless expressly authorized.

Recipients shall adopt all possible preventive measures against theft, damage, and improper use of Company assets.

6.6 Management of Public Funding

Recipients involved in the management of funding applications, as well as in the use and reporting of public funds, are prohibited by the Company from engaging in conduct contrary to the following principles, including, by way of example:

- producing untruthful information or omitting relevant facts, where required, that may mislead funding bodies in the assessment of the submitted documentation;
- allocating public grants, subsidies, or funding to purposes other than those for which they were obtained;
- providing funding bodies with information that is untruthful, incomplete, or intended to circumvent legal or regulatory obligations.

Recipients are also required to act in full compliance with applicable laws and regulations at every stage of the process, avoiding any improper conduct aimed at overcoming constraints or critical issues related to the granting of funding, including during meetings with officials of funding bodies in the course of the evaluation process.

6.7 Protection of Competition

In conducting its business activities, the Company complies with competition laws and regulations and therefore refrains from engaging in misleading conduct or any other behavior that may constitute unfair competition.

The Company recognizes the value of fair competition and undertakes not to engage in improper conduct toward its competitors. In this regard, all collaborators and employees are committed to strictly complying with applicable sector-specific legislation.

The production and commercialization of the Company's products are carried out in compliance with applicable laws protecting trademarks, patents, industrial models and designs, and distinctive signs in general.

6.8 Anti-Money Laundering Prevention

The Company is committed to ensuring that its business activities are conducted in full compliance with anti-money laundering legislation and with all provisions issued by the competent Authorities in this field. For this reason, all Recipients of this Code of Ethics are required to act in such a way as to avoid being involved, in any manner or under any circumstances, in activities connected with the laundering of money deriving from unlawful or criminal activities.

Before establishing business relationships or entering into contracts with suppliers and other partners, the Company and its employees and/or collaborators shall verify the moral integrity, reputation, and good standing of the counterparty.

The Company undertakes to comply with all national and international laws and regulations concerning anti-money laundering.

6.9 Anti-Corruption Prevention

In carrying out its activities, Lascaux S.r.l. with sole shareholder (“Lascaux”) adheres to the principles of loyalty and fairness, requiring all persons acting on its behalf to behave honestly, transparently, and in compliance with the law in every relationship they maintain, and does not tolerate corrupt or collusive conduct.

Recipients of this Code of Ethics, within the scope of the various relationships established with the Company, shall ensure the quality of services, the prevention of corruption, and compliance with the constitutional duties of diligence, loyalty, impartiality, and service.

The Company undertakes to comply with all national and international laws and regulations concerning corruption.

6.10 Anti-Corruption Due Diligence

Lascaux, firmly convinced that corruption, in addition to being an unlawful practice, may hinder economic development, distort fair competition, and undermine the Company's image and reputation, carries out assessments of the ethical reliability and reputation of its business partners prior to entering into a contract and before renewing any existing contractual agreement between the parties.

Such assessments include the evaluation of the counterparties' ethical and reputational background, as well as the potential risk profile associated with counterparties and with the relevant agreements, initiatives, or contracts.

6.11 Prevention of Cybercrime

The Company's IT equipment and resources shall be used in full compliance with applicable laws and Lascaux's internal policies.

Accordingly, any improper use of the Company's IT resources that may result in the following is strictly prohibited and entirely unrelated to the Company's activities:

- the commission of acts constituting unauthorized access to a third party's information system or telematic system;
- the unlawful interception, obstruction, or interruption of IT or telematic communications;
- damage to private information, data, or software programs, including those used by the State or other public entities or entities providing public services;

- damage to private or public information systems or telematic systems.

Furthermore, the unlawful possession or dissemination of access credentials to information systems or telematic systems is strictly prohibited, as is the dissemination of equipment, devices, or software designed to damage or disrupt an information system or telematic system, as well as the installation of devices intended to intercept, obstruct, or interrupt IT or telematic communications.

6.12 Protection of Intellectual Property

In accordance with the principle of compliance with the law, the Company ensures adherence to national, European, and international regulations protecting industrial and intellectual property rights. Recipients shall promote the proper use, for any purpose and in any form, of trademarks, distinctive signs, and all creative works, including software programs and databases, in order to safeguard the economic and moral rights of authors.

Conduct contrary to the above principles is prohibited, including, by way of example:

- the improper use of third-party trademarks, distinctive signs, and patents that have been duly registered in accordance with national or international regulations;
- the reproduction, promotion, or sale of third-party ornamental models and designs that may create confusion as to the identification or origin of the product;
- the reproduction or dissemination, in any form and without authorization, of third-party intellectual works in the absence of written contractual agreements with the relevant rights holders for their economic exploitation, or in violation of the terms and conditions set forth in such agreements;
- the dissemination through internal channels of music tracks, photographs, or videos used to support promotional activities without the express authorization of the author and in violation of the rules governing the payment of rights for the use of such works.

6.13 Sponsorships

Sponsorships, charitable contributions, and other forms of donations shall relate to matters of social value, such as, by way of example, solidarity, charitable initiatives, environmental protection, sports, and the arts.

In assessing requests for support, the Company verifies and prevents potential conflicts of interest, as well as circumstances relating to corruption and money laundering, by conducting appropriate due diligence on the sponsor before undertaking promotional or advertising initiatives.

6.14 Gifts, Hospitality and Benefits

No gifts or benefits exceeding normal business practices and customary courtesies may be considered acceptable, as such circumstances may easily give rise to corruption offences or to the pursuit of preferential treatment in connection with activities related to the Company's interests. Recipients shall therefore avoid giving and/or receiving gifts of this nature.

The Company refrains from supporting practices that are not permitted by law, commercial customs, or the codes of ethics of companies or entities with which it conducts business. Gifts offered, with the exception of those of modest value, may be managed and authorized through specific internal approval processes, supported by appropriate documentation.

All acts of liberality are subject to specific controls aimed at preventing the risk of corruption inherent in this particularly sensitive area. The Company also carries out appropriate checks on beneficiaries and on the relevant initiative before making any donation or granting any benefit.

6.15 Relationships with Third Parties

The Company places particular emphasis on developing relationships of trust with all its stakeholders and counterparties. In particular, the Company rejects the use of unlawful or otherwise improper conduct to achieve its economic objectives.

In carrying out its activities, the Company is guided by the principles of loyalty and good faith, transparency, and fairness, requiring all persons acting on its behalf to behave honestly, transparently, and in compliance with the law. The Company does not tolerate corrupt or collusive conduct, nor any form of favoritism.

Accordingly, in all areas of the Company it is prohibited to give, promise, receive, or accept, either directly or through an intermediary, compensation of any kind, gifts, economic benefits, or other advantages to or from any public or private individual, the entity directly or indirectly represented by such individual, including their family members.

6.16 Relations with Public Administration

All relationships with Public Administration, Public Authorities, and Public Institutions shall be conducted in strict compliance with applicable laws and with the specific directives approved by the Company. Such relationships may not and shall not in any way compromise the integrity and reputation of the Company.

The Company interacts with Public Administration in accordance with the general principles of transparency and fairness, honesty and legality, loyalty, and good faith. Documentation relating to activities carried out with Public Offices shall always be properly prepared, archived, and made available for any future consultation.

Any declaration made shall be truthful and accurate. Therefore, Company collaborators are required to exercise the utmost care in carrying out activities involving Public Administration.

The undertaking of commitments and the management of relationships of any kind with Public Administration are reserved exclusively to the relevant corporate functions and authorized personnel.

It is prohibited to promise or provide money or any other benefit for unlawful purposes or in order to obtain financial advantages or other benefits for oneself, third parties, or the Company. This rule of conduct applies not only to direct payments and/or promises, but also to those made indirectly through consultants or third-party intermediaries.

In the event of any doubt, Recipients shall consult their department managers or company contacts for clarification..

6.17 Relations with Public Supervisory Authorities and Judicial Authorities

Lascaux ensures that its relationships with Public Supervisory Authorities and Judicial Authorities are based on the utmost cooperation. The Company undertakes to avoid any conduct that may, in any way or to any extent, hinder, limit, or mislead the supervisory activities of such Authorities or of law enforcement agencies, promptly complying with any instructions or requirements issued by them.

6.18 elations with Political Parties and Trade Union Organizations

The Company does not promote political parties or trade union organizations within its organization, nor does it provide them with contributions of any kind, whether directly or indirectly, except where such contributions are required by specific legal provisions..

6.19 Relations with Customers and Suppliers

The Company pursues its objectives through the provision of quality products and services, under competitive conditions and in compliance with all regulations safeguarding fair competition. For this reason, the Company considers both customer satisfaction with its products and services and the quality of its business relationships with customers and suppliers to be key success factors, all in accordance with the principles of loyalty, fairness, professionalism, and the other rules set out in the general principles.

All Recipients shall comply with internal rules and procedures governing relationships with customers and suppliers, provide accurate and comprehensive information, disclose objective and factual data to the market, and ensure that no company meeting the required criteria is prevented from competing for the award of a contract. Selection processes shall be based on objective criteria and conducted according to transparent and declared procedures. Recipients shall also comply with contractual conditions and maintain relationships consistent with sound business practices.

In particular, the selection of new suppliers and the determination of purchasing conditions are based on objective and impartial assessments, taking into account quality, price, guarantees provided, and the requirements of necessity and economic value of the supply.

Prices, contractual terms, and assessments relating to customers and suppliers constitute confidential information. Therefore, the use of such information outside the Company is prohibited unless expressly authorized.

The Company undertakes to conduct business only with qualified companies and professionals of good reputation, requiring them to be aware of, apply, and expressly accept the principles contained in this Code of Ethics. In the event of a breach, the Company reserves the right to sanction the counterparty, including through termination of the contract and any resulting claims for damages.

6.20 External Communications

The Company recognizes the primary role of clear and effective communication in both internal and external relationships, as elements that directly and indirectly influence business development.

In particular, communication with the media plays an important role in shaping the Company's image. Therefore, all information concerning the Company shall be provided truthfully and consistently, and only by employees specifically responsible for media relations.

Employees shall not disclose non-public information relating to the Company to media representatives, nor engage in any form of contact with them aimed at disseminating confidential corporate information.

7 EFFECTIVENESS OF THE CODE OF ETHICS AND DISCIPLINARY SYSTEM

Compliance with the provisions of this Code of Ethics shall be considered an integral part of the contractual obligations of the Company's employees pursuant to Articles 2104 and 2105 of the Italian Civil Code governing employment relationships.

Any violation of the provisions of the Code of Ethics may constitute a breach of employment obligations and/or a disciplinary offence, in accordance with the procedures set out in Article 7 of the Workers' Statute, with all legal consequences, including those relating to the continuation of the employment relationship, and may give rise to claims for damages resulting therefrom.

Compliance with the principles of this Code of Ethics constitutes an essential part of the contractual obligations of those who maintain commercial relationships with the Company.

Accordingly, any violation of the provisions contained herein may constitute a breach of such obligations, with all resulting legal consequences.

Recipients who become aware of alleged violations of the Code of Ethics or conduct that does not comply with the rules of conduct adopted by Lascaux shall promptly inform their department manager or company contact so that the information may be timely reported to the competent corporate supervisory bodies. Such bodies may then verify the validity of the alleged violations, including, on a case-by-case basis, by consulting the reporting person and/or the alleged perpetrator of the unlawful conduct.

8 ENTRY INTO FORCE, COORDINATION, UPDATES AND AMENDMENTS

This Code of Ethics shall enter into force with immediate effect. Any update, amendment, or addition to this Code must be approved by the Company's Management.

This Code is available on the Company's website, among the documents available in the corporate information system, and is displayed on notice boards located on the Company's premises.

President and CEO

GIUSEPPE BISTONI