



ETHICAL CODE

**Adopted by resolution of the
Board of Directors of TAS S.p.A. on
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introduction section**

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1. INTRODUCTION

1.1. Premise

This document applies to all the companies that belong to the TAS Group (hereinafter also "Group"), constituted - to the date of the present - by the *mother company* TAS S.p.A., and its subsidiaries Elidata S.p.A., TPPay S.r.l. and TAS International SA; the latter in turn controls the companies TAS France SASU, TAS Iberia SLU, TAS Germany GmbH, TAS Eastern Europe doo, TAS Brasil Ltda, TAS USA Inc., Infraxis AG and its subsidiary Infraxis Ltd. For the purposes of this Code (as defined below) and for its entire duration, the TAS Group identifies the companies on the list published on the website www.tasgroup.eu, to which reference is made.

TAS Group places at the center of its objectives the importance of ethical social responsibility in carrying out business activities to strengthen the trust relationship with its stakeholders.

The present Ethical Code (hereinafter "Ethical Code" or "Code") establishes the principles, corporate values, duties, rights, and responsibilities towards all those with whom the companies interact in the conduct of their business. Herein are expressed the reference standards, principles, and rules of conduct that must guide the behaviors and activities of those operating within the company.

The Ethical Code is composed of:

- general principles defining the reference values in relation with all the Parties involved in the TAS Group activities;
- behavioral criteria providing the guidelines and norms to follow for the respect of general principles and for the unethical behavior risk prevention against TAS Group reference values;
- the accomplishment mechanisms describing the control system for the compliance to the Code and its continuous improvement.

1.2. Scope and recipients

Principles and dispositions of this Ethical Code are valid, for all TAS Group companies, both in Italy and abroad, in the respect of cultural, social and economic diversity of the various countries.

The recipients are all the Group companies' stakeholders, including customers, shareholders, directors, statutory auditors, attorneys, employees, collaborators, suppliers, and more generally all those who, directly or indirectly, permanently or temporarily, establish relationships with the Companies (hereinafter the "**Recipients**").

2. GENERAL PRINCIPLES

2.1 Impartiality

In the decisions affecting the relations with the involved parties (choice of customers to serve, relations with the shareholders, human resources management or work organization, suppliers' choice and management, relations with the surrounding community and the institutions representing it), TAS Group companies avoid all kind of discrimination based on age, sex, sexuality, health conditions, race, nationality, political and religious views of its stakeholders.

2.2 Honesty

In the area of their professional activity, the Recipients are bound to respect with accuracy the laws in force, the ethical code and, for the Recipients who are employees of TAS Group, the internal regulations of the Group companies. In no case the pursuance of the interest of TAS Group will justify a dishonest behavior.

2.3 Prevention of potential conflicts of interest

In carrying out of any activity, situations in which the Recipients involved in the transactions may be or may only seem to be in conflict of interest must be avoided. This is the case, for example, when a Collaborator or an employee of TAS Group pursues an interest different from the company mission and from the respect of the rights and the balancing of the interests of the involved parties, or takes a "personal" advantage of business opportunities of the company.

Every situation of a conflict of interest, even indirect or partial, must be promptly communicated to the Internal Control Officer (hereinafter the "**Internal Control Officer**") in order for its existence and gravity to be assessed and the consequent effects could be excluded or mitigated.

2.4 Confidentiality and Privacy

TAS Group ensures the confidentiality of information in its possession, the compliance with current legislation on the processing of personal data, and abstains from researching confidential data, except in case of explicit and conscious authorization and conformity with the juridical norms in force. In addition, Recipients are bound not to use any confidential information for purposes not connected with the exercise of their activity, as is the case of insider trading.

2.5 Relations with Recipients

TAS Group promotes the information parity, safeguards the interest of TAS Group and of all the Recipients.

It also recognizes the fundamental value of correct information to shareholders regarding significant facts concerning corporate and accounting management.

2.6 Human resources value

People are an essential factor for the Company success.

For this reason TAS Group safeguards and promotes the value in order to guarantee respect for the individual and the physical and cultural integrity of the person, and ensures working conditions that respect individual dignity and safe and healthy work environments.

TAS Group, through compliance with the principles listed below and inspired by the main international standards, guarantees among others:

- the fight against forms of child labor;
- non-discrimination based on gender, age, ethnicity, religion, political and trade union membership;
- sexual orientation and gender identity, language or different ability (equal opportunity in recruitment, management, development and professional growth of personnel);
- the right to fair remuneration;
- freedom of association: trade union and association freedoms in representative bodies of collaborators;
- the right to family life through the promotion of policies and initiatives aimed at reconciling home-work, also inspired by the European Directive 2019/1158 on the balance between professional activity and family life for parents and careers, adopted by Parliament European Union and of the Council on 20 June 2019;
- freedom of association: trade union and association freedoms in representative bodies of collaborators.

Recipients are required to adopt behaviors that respect the rights and dignity of others as well as promote orderly coexistence in the workplace.

In the signing and management of contractual relationships that involve the establishment of hierarchical relationships - in particular with employees - TAS Group undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse.

2.7 Transparency and completeness of the information

Recipients are bound to give complete, transparent, comprehensive and accurate information, so that when determining the relation with the company, the involved Parties are able to take autonomous decisions, conscious of the effective interests, of the alternatives and the respective consequences. In particular, in case of formulation of eventual contracts, TAS Group is committed to specify to the contracting party the behavior to be assumed in each circumstance, in a clear and understandable way.

TAS Group implements a continuous and complete flow of information between the corporate bodies, the control bodies operating in the Group companies, the various company areas, the

Management, the various senior figures, and where necessary, towards the Public Authorities.

In any case, the information transmitted externally and within the organization itself complies with the requirements of truthfulness, completeness and accuracy, also in relation to economic, financial and accounting data.

2.8 Diligence and accuracy in carrying out tasks and contracts

Contracts and work assignments should be carried out diligently as agreed by the parties. TASGroup is committed not to exploit conditions of ignorance or incapacity of its counterparties.

2.9 Quality of services and products

TAS Group directs its activity to the satisfaction and protection of its own customers paying attention to the requests that may improve the quality of the products and the services.

For this reason TAS Group directs its activities of research, development and commercialization to high quality standards of its services and products.

2.10 Fair competition

TAS Group Intends to safeguard the value of the fair competition and refrains from any collusive or predatory behavior, or abuse of its dominant position.

2.11 Responsibility towards the community

TAS Group is aware of the influence, also indirect, that its activities can have on the conditions, the economic and social development and on the general welfare of the community, as well as of the importance of the social acceptance of the communities where it operates.

2.12 Environmental protection and sustainability

The companies belonging to TAS Group pursue a management that tends to preserve and regenerate the resources available to the community, be they natural, economic or social by reason of the principle of sharing and responsibility towards future generations. TAS Group pays the utmost attention to the environment and to the communities in which it operates, and is inspired by the objectives indicated by the international conventions on sustainable development and services.

TAS Group is continuously looking for solutions that allow to reduce the environmental impact of activities, products and services, including the reduction of its contribution to pollution by improving the efficiency of the use of natural resources (e.g. energy, water, paper). It is also committed to raising awareness and involving staff and its suppliers, in order to promote a sense of responsibility for respecting the objectives and programs defined in the environmental policy adopted.

In fact, managing the available resources efficiently and strategically, contributes to generating value for the company and to the growth, improvement and socio-economic development of the communities in which the Company operates.

3. BEHAVIOURAL CRITERIA

3.1 Transparency towards the market and Information control

TAS Group pursues its mission ensuring at the same time the full transparency of its choices. For this purpose it adopts organizational and managerial patterns in order to guarantee correctness and veracity of the social communications (balance sheets, periodic reports, informational prospectuses ecc..) and to prevent the commission of corporate crimes and market abuse.

In addition, TAS Group offers all the necessary information so that the decisions of the investors can be based on the company's strategic choices, the management operations and the expected profitability of the invested capital.

Personnel of the companies belonging to TAS Group avoid behaviors that might facilitate ***insider trading phenomena***.

Members of the board of directors of TAS Groups companies, supervisory bodies functional managers, executives, members of the auditing company and generally those who have access to information not available for the public and able to influence the value of the securities, cannot exploit this information for trading securities of listed companies whose performance can be influenced by one of the above-mentioned.

3.2 Relationships with the rest of the stakeholders

3.2.1 Information processing

The information of the involved parties is processed by TAS Group in the full respect of the confidentiality and privacy of data subjects.

Specific policies and procedures for the protection of the information are applied and constantly updated for this purpose.

3.2.2 Gifts, free offers and benefits

No form of gift which can even just be interpreted as exceeding the normal commercial or courtesy practices or in any way meant to acquire favorable treatments in the execution of any activity related to TAS Group is allowed. In particular, any form of gift is forbidden to Italian or foreign officials, auditors, statutory auditors, members of the control bodies, advisors of the Group companies, which can influence the independence of judgement or induce to ensure any advantage.

This norm, which does not allow derogations even in countries where the offering of gifts of value to commercial partners is a custom, concerns both promised or offered gifts as well as received ones; by gift is meant any kind of benefit, even if not economic. In any case, TAS Group refrains from practices not allowed by the law, from the commercial uses of the companies or institutions it has relations with

TAS Group's gifts are usually offered aimed at promoting the *brand image* of the Group.

The offered gifts – except for those of moderate value – must be documented in an appropriate way in order to allow verifications and must be authorized by the functional manager, who provides to give a preventive communication to the Internal Control Officer.

Personnel of TAS Group who receive gifts or benefits not belonging to the allowed cases is bound, according to the established procedures, to give communication to Internal control Officer which assesses the appropriateness and notifies the policy on the matter to the sender.

3.2.3 External communication

The communication of TAS Group (also by means of the mass media) is characterized by the respect of the right to information; it is by no means allowed to diffuse false or tendentious news or comments.

Every communication activity respects the law, the rules, the professional behavioral practices, and is done with clearness, transparency and promptness, safeguarding, among other things, price sensitive information and industrial secrets.

All the press releases are consultable on the parent company TAS S.p.A. website, in order to allow the maximum accessibility.

In order to guarantee the completeness and coherence of the information, the relations of TAS Group with the mass media are reserved exclusively for the functions delegated to do so, and information to the outside must be truthful and transparent.

TAS Group employees cannot provide information to media representatives or undertake to provide it without the authorization of the competent functions.

Employees called to externally illustrate or provide news regarding company objectives, activities and results through:

- participation in conferences and seminars
- the drafting of essay articles and publications in general
- participation in public interventions

are required to obtain preventive authorization from the general management.

3.3 Relationships with personnel

3.3.1 Human resources selection

The evaluation of the human resources to recruit is done on the basis of the correspondence of the candidates' profiles to the expected ones and to the company requirements, in the respect of the equal opportunities for all the interested parties.

The required information is closely related to the examination of the required aspects of the professional and psychological attitude profile, in the respect of the private sphere and of the candidate's opinions.

TAS Group companies adopt, within the limits of the available information, appropriate measures in order to avoid cases of favoritism, nepotism, or forms of patronages in the selection and recruitment phases (e.g. avoiding that the recruiter has family relations with the candidate).

3.3.2 Establishment of the Employment relationship

Personnel is hired or employed with regular contracts compliant to current legal requirements of the specific Country; no form of irregular work is tolerated. At the establishment of the working relationship, personnel receive accurate information concerning:

- characteristics of the functions and duties to perform;
- normative and remunerative regulations of the specific Country;
- norms and procedures to adopt in order to avoid possible health risks connected with the work activity.

This information is provided to personnel so that the acceptance of the assignment is based on its effective comprehension.

3.3.3 Human resources management

The access to roles and assignments is established considering the competences and the capacities; besides, consistently with the overall work efficiency, flexibilities in the working hours, facilitating the maternity management and childcare in general, are favored.

The research and selection of personnel takes place on the basis of objectivity, competence and professionalism. Everyone is guaranteed equal opportunities for employment and career

based on merit.

The evaluation of personnel is carried out guaranteeing impartiality, objectivity and non-discrimination.

Within the limits of the available information and the privacy protection, TAS Group works to prevent forms of nepotism (for ex. excluding hierarchical dependency relations between collaborators having family relations).

It is an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favors or any behavior which represents a violation of the present Ethical Code.

3.3.4 Safety and health protection

TAS Group is committed to spread and consolidate a safety culture, by developing risk awareness,

promoting responsible behavior on the part of all personnel; additionally, it operates for preserving the health and safety of the employees, as well as the interest of the other parties involved.

A TAS Group objective is the protection of its human resources, properties and financial assets, looking constantly for the necessary synergies, not only inside the Company, but also with the suppliers, the companies partners and the customers involved in its activities.

TAS Group operates in compliance with the health and safety regulations in the workplace in force in each country where the companies operate and adopts management systems suitable for this purpose.

3.3.5 Personnel Privacy protection

In carrying out its activities, TAS Group guarantees particular attention to the Privacy protection of its personnel by ensuring the adoption of operating methods that comply with the regulations on personal data protection.

Any investigation concerning the ideas, preferences, personal tastes and in general the private life of the employees is excluded. These standards also provide for the prohibition, except when required by the law, to communicate/diffuse the personal data without the previous consent of the concerned, and establish the rules for the control by each collaborator of the privacy protection standards.

3.3.6 Integrity and protection of the person

TAS Group adopts the principles set out in the Universal Declaration of Human Rights, the ONU Convention on the Rights of the Child and Adolescent, the International Labor Organization and the OECD Guidelines for Multinational Enterprises, therefore the Group undertakes to guarantee the right to working conditions that respect the dignity of the person. For this reason it protects its employees from psychological violence acts and it contrasts any discriminatory conduct or behavior damaging the person, his/her opinions and preferences, in compliance with the provision of art. 14 of the European Convention on Human Rights.

TAS Group is committed to prevent and suppress any form of sexual harassment; behaviors or remarks that might offend the sensibility of the person (e.g. the exposure of images with explicit sexual references, insistent and continuous allusions) must be avoided.

A TAS employee who retains to have been object of harassment or to have been discriminated for reasons related to age, sex, sexuality, race, health state, nationality, political and religious views etc. can notify the occurred to his own company which will assess the effective violation of the Ethic Code.

3.3.7 Employees Duties

The employee, consistently with the nature of the existing contractual relation must:

- act loyally in order to meet the obligations signed in the employment contract and the provisions of the Ethical Code, ensuring the required performances; he is bound to notify,

by means of the appropriate channels, any violation of the behavioral rules established by the internal procedures.

- know and observe the company policies concerning the information security, privacy, ethics, environmental protection and sustainability, workplace safety.

3.3.8 Integrity and protection of corporate assets

Each employee – consistently with the nature of the existing contractual relation – is bound to operate with diligence in order to safeguard the corporate assets, through responsible behaviors and aligned with the established operational procedures regulating their use and documenting their use with precision. In particular, every employee must:

- use with care and thrift the assets entrusted to him;
- avoid misuse of the corporate assets, which can be a cause of damage or of reduction of efficiency, or in any way be in contrast with the interest of the company.

TAS Group reserves the right to prevent misuses of its own assets and infrastructures to ensure data and information security as well as accounting, reporting, financial control and analysis and risk prevention systems, respecting the provisions of the laws in force (privacy law, workers' statute etc.).

Concerning the computer applications, every employee is bound:

- to scrupulously observe the provisions of the company security policy, in order not to compromise the functionality and the protection of the computer systems;
- not to use low-grade language, not to express inappropriate comments that can cause offence to the person and/or damage the corporate image;
- not to use the computer system for the commission of crimes or illegal actions of any kind;
- not to navigate on websites containing naughty and offensive contents.

3.4 Relationship with the customers

The relationship with customers is based on openness to dialogue, understanding of needs and seriousness in compliance with agreements, with a view to a collaborative relationship that can also be consolidated in the long term.

3.5 Contracts and communications with the customers

The contracts and the communications to TAS Group customers (including the advertising messages) are:

- clear and simple, formulated in a language near to the one used normally by the interlocutors (for ex. concerning the customers, avoiding clauses comprehensible only to

- experts, illustrating clearly every expense);
- in compliance with the norms in force, without recurring to elusive or dishonest practices (e.g. the insertion of unfair terms against consumers);
- complete, in order not to neglect any element relevant for the decision of the customer.

Finally, TAS Group shall communicate in due time every information concerning:

- possible contract changes;
- possible variations in the economic and technical conditions concerning the performance of the service and/or of the sale of the products;
- results of auditing, carried out in compliance with the standards requested by the auditing authorities.

3.5.1 Products and services, customer satisfaction

TAS Group is committed to guarantee adequate quality standards for the offered services/products on the basis of established levels and to periodically monitor the perceived quality.

3.5.2 Customers involvement

TAS Group is committed to always give feedback to the suggestions and complaints from customers and associations safeguarding them, using appropriate and fast communication systems (for ex. using electronic mail). TAS Group is responsible for informing the customers about the reception of their communications and the time needed for the responses, which in any case, must be short.

3.6 Relationships with suppliers and consultants

3.6.1 Choice of the supplier

The procurement process is characterized by the research of competitive advantage for TAS Group, in compliance with ethical, social and environmental policies described in this document; it is also based on pre- contractual and contractual behavior in view of an essential and reciprocal loyalty, transparency and collaboration.

The requirements include:

- the appropriately documented availability of means, also financial, organizational structures, capacities and project resources, know-how, etc.;
- the existence and effective use, where applicable, of certificated management systems for the quality of products and services and for data and information security corporate information;
- in the event that the supply includes know-how or rights of third parties, the obtainment

by the supplier of a significant share of added value;

- compliance with relevant legislation;
- commitment to the ethical, social and environmental principles of TAS Group.

However, where the supplier adopts behaviors not complying with the general principles of the present Ethical Code in carrying out its activities, TAS Group has the right to undertake appropriate measures which can lead to contract resolution and to preclude other potential collaboration opportunities.

3.6.2 Integrity and independence in the relations

In TAS Group the relations with the suppliers are regulated by common principles and are object of constant monitoring.

These relations include also financial and consulting service contracts.

The signing of a contract with a supplier must always be based on relations of extreme clearness, avoiding forms of dependency.

3.6.3 Protection of ethical aspects in the supplies

With a view to align the procurement activities with the adopted ethical principles, TAS Group is committed to evaluate, for particular supplies, the existence of ethical, social and environmental requirements.

3.7 Relationship with the community

3.7.1 Economic relations with parties, trade unions and associations

TAS Group doesn't finance parties neither in Italy nor abroad, neither their representatives or candidates, neither carries out sponsorships for congresses or parties having an exclusive aim of political propaganda. It refrains from any direct or indirect pressure towards political exponents (e. g. by granting facilities belonging to the Company, accepting recommendations for employment, consulting service contracts).

TAS Group doesn't give contributes to organizations where conflict of interests may be present; however, it's possible to cooperate, also financially, with such organizations for specific projects on the basis of the following criteria:

- objectives related with TAS Group mission;
- clear and documentable destination of the resources;
- express authorization by the functions responsible for managing these relationships within TAS Group.

3.7.2 Institutional relations

Any relationship with the public or International institutions is related exclusively with forms of communication aimed at assessing the implications of the legislative and administrative activity towards TAS Group, at responding to requests and acts of inspection (interrogations, interpellations etc.), or in any case to disclose the position concerning relevant issues.

For this purpose, TAS Group companies will undertake to:

- establish, without any kind of discrimination, sound communication channels with all institutional parties on international, community and territorial level;
- represent the interests and the positions of the controlled companies in a transparent, rigorous and coherent way, avoiding conducts of collusive nature.

In order to guarantee the maximum clearness in the relationships, the contacts with the institutional parties take place exclusively through representatives who have received explicit mandate by the TAS Group top management.

TAS Group adopts specific organizational models for prevention of crimes towards the public administration.

3.7.3 Antitrust and regulation bodies

TAS Group provides full and faithful compliance with the antitrust rules and with the regulating market *Authorities*.

TAS Group does not deny, hide, manipulate or delay any information requested by the antitrust authority and other regulatory bodies in their auditing functions and actively cooperates during the verification procedures. To ensure maximum transparency, the companies of the Group undertake to avoid situations of conflict of interest with employees of any Authority and their families.

4. IMPLEMENTATION METHODS

Each company of the Group undertakes to oversee and guarantee the adherence of its actions to the values and principles of this Ethical Code and each function is responsible for carrying out controls within its competence area, for detecting any non-compliance occurring internally and for the reporting of the same.

For the complete compliance and interpretation of the norms contained in the present Ethical Code, TAS Group personnel can contact their direct superiors or the Internal Control Officer (identified, for the purposes of this Ethical code, in the internal audit function of the parent company TAS S.p.A.).

4.1. Internal Control Officer tasks

The Internal Control Officer performs the following tasks:

- monitor initiatives for the dissemination of the knowledge and understanding of the Ethical Code;
- receive and analyze Ethical Code violation reports;
- take decisions regarding relevant violations of the Code;
- express binding opinions on the revision of the most relevant policies and procedures in order to ensure consistency with the Code itself;
- provide for the Ethical Code periodic review.

These activities are carried out with the support of the concerned company functions and having free access to all the documentation considered useful.

4.2. Communication and training

This Ethical Code is brought to the attention of the involved internal and external parties through appropriate communication activities.

In order to ensure the correct understanding of the Ethical Code by all the Recipients -in particular by all companies personnel, all Group companies provide a training plan with the purpose of favoring the knowledge and understanding of the principles and ethical norms.

4.3. Notifications

TAS Group provides a specific email address (ethics@tasgroup.eu) for sending the notifications that will be addressed to the Internal Control Officer.

The Internal Control Officer guarantees the interested party that it will not be victim of any retaliation meant as an act which can lead to a mere suspicion of being a form of discrimination or penalization (e.g. concerning the suppliers: interruption of the business relations, for the employees: adversarial relations, etc.). The confidentiality of the identity of the reporting subject is also ensured, except for cases when required by the law.

4.4. Ethical code violations

The Internal Control Officer reports the Ethical Code violations, emerged as a consequence of the notifications of the involved subjects or of the auditing activity, and, after an appropriate analysis, communicates to the managing director of the parent company TAS S.p.A., the violations and the actions to be taken.

In case of violation of the Ethical Code by the personnel, TAS Group adopts the most appropriate measures according to the existing contractual relationship (e.g. disciplinary measures – adopted according to the existing disciplinary code in force, in case of an employee, etc...).

5. FINAL PROVISIONS

5.1. Ethical Code conflicts

In case of conflict between these rules and other internal Group regulations, those of Ethical Code will prevail.

The Internal Control Officer is responsible for reviewing the most relevant policies and procedures in order to make them homogeneous and consistent with this Ethical Code.

5.2. Ethical Code amendments

The Ethical Code will be subject to periodic review by the Internal Control Officer. Any changes and / or additions to the Code will be approved by the Board of Directors of the parent company and promptly brought to the attention of the Recipients.