

**Code
of ethics**

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1.1. Purpose and target audience

This Code of Ethics is a public statement from PhotoSi S.p.A. Unipersonale, with registered office in Riccione (Rimini), via Carpegna 22, VAT no. 03550860401 (hereinafter also referred to as the “company”), setting out the general principles and code of conduct with positive ethical value. The Code of Ethics complies with the regulatory framework that PhotoSi S.p.A. must observe and applies the provisions laid down in Article 6 of Italian Legislative Decree No. 231 dated 8 June 2001.

In fact, by implementing the Code of Ethics, essential values and principles, already inherent in the company’s actions, have been laid down in the form of basic rules of conduct for daily business.

The PhotoSi S.p.A. Code of Ethics is an official document, approved by the Board of Directors, which defines the company’s ethical commitments and responsibilities. This Code is a guide for all actions aimed at achieving the company’s objectives, respecting all stakeholders involved.

The purpose of the Code of Ethics is to direct how the company acts from an ethical perspective. Everyone, including shareholders, company directors, managers, employees, consultants and anyone collaborating with the company in any capacity whatsoever, is obliged to comply with these rules when carrying out any activities to achieve the company’s objectives. The Code shall be made available to anyone who deals with the company and shared internally, posted in places accessible to all. It is published on and can be downloaded from the company’s website.

The company undertakes to enforce compliance with the provisions laid down in this Code in all its economic relations.

1.2. PhotoSi S.p.A.’s mission

Our mission is to make it easy and fun to personalise quality photo products that are perfect for gifting emotions and telling a personal story. Furthermore, we are committed to ensuring a complete experience allowing people to tell their own story, as well as to acting ethically, responsibly and sustainably towards all those involved.

1.3. Stakeholder relationship

The Code is particularly intended as a guide to the company’s conduct with its stakeholders in terms of cooperation and trust. Stakeholders are defined as the categories of individuals, groups and institutions whose contribution is necessary for the company’s mission to be achieved and/or whose interests are directly or indirectly affected by PhotoSi S.p.A.

1.4. The value of the company’s reputation and credibility

Reputation and credibility are key intangible assets. A good reputation and company credibility foster investment, good relations with local institutions, customer loyalty, human resources development, fairness and supplier reliability. Unethical conduct when carrying out any kind of business compromises the relationship of trust established between the company and its stakeholders. Any actions performed and attitudes held by individuals or organisations, whether internal or external, that seek to obtain an undue advantage for themselves, for PhotoSi S.p.A. or for one of its subsidiaries or investees supervised by the same entity, are unethical and, conversely, foster

hostile and non-transparent behaviour towards PhotoSi S.p.A. Unethical conduct includes both conduct that violates legal regulations and conduct that conflicts with internal regulations and procedures.

1.5. The content of the Code of Ethics

This Code of Ethics covers:

- the general ethical principles that pinpoint the reference values for doing business;
- the code of conduct for the target audience of this Code of Ethics, i.e. shareholders, directors, managers, employees, suppliers, consultants and collaborators of PhotoSi S.p.A. in relation to each stakeholder;
- guidelines on how to check that the Code of Ethics is applied correctly, and how to make improvements in this regard.

1.6. The Code’s contractual value

Compliance with the rules laid down in the Code shall be considered an essential part of the contractual obligations for the company’s employees pursuant to Articles 2104, 2105 and 2106 of the Italian Civil Code. Serious and persistent breaches of the rules laid down in this Code damage the relationship of trust established with the company and may result in disciplinary action and compensation for damages, without prejudice to the fact that employees must comply with the procedures set out in Article 7 of Italian Law 300/1970 (Italian Workers’ Statute) and in collective labour agreements.

1.7. Updates to the Code

The Code may be amended and supplemented through resolutions from the Board of Directors, including on the basis of suggestions and recommendations from the Supervisory Body.

The Code of Ethics represents a set of principles and guidelines that must be observed for the company's objectives to be achieved and for business to be properly conducted, as well as for the reliability of management and the image of PhotoSi S.p.A. Actions, behaviours and relationships inside and outside the company should be based on these principles and guidelines. PhotoSi S.p.A. undertakes to promote the adoption of a Code of Ethics similar to its own in the companies that will eventually be supervised by or associated with it. Alternatively, PhotoSi S.p.A. will require them to act in accordance with this Code of Ethics.

2.1. Responsibility

In realising the company's mission, every member of the target audience of this Code must act based on the ethic of responsibility. One of the company's core principles is to respect the laws and regulations in force in Italy and **in all countries where the company operates**. The target audience of the Code is obliged to comply with the laws in force; under no circumstances are they permitted to pursue or realise company interests in violation of the law. PhotoSi S.p.A. undertakes to ensure that the parties concerned will have access to an adequate continuous training and information programme on the Code of Ethics.

2.2. Transparency

The principle of transparency is based on information being truthful, accurate, complete and shared, both inside and outside the company. When drawing up contracts with its customers and suppliers, the company will draft clauses that are clear and comprehensible, always ensuring that a level playing field is maintained.

2.3. Fairness

The principle of fairness requires respect for the rights of all parties involved in work and professional activities, including privacy and opportunities. This also requires any discrimination and any possible conflict of interest between employees and the company to be eliminated. Relationships with external parties, relations with its collaborators and collaborators' relationships between themselves, must be based on loyalty, responsibility, valuing and protecting the company's assets, and using good faith in all actions or decisions. PhotoSi S.p.A. is therefore committed to acting fairly and impartially, adopting the same behaviour towards all parties with whom it comes into contact, albeit in the different forms of relationship and communication required by the nature and institutional role of the different parties.

2.4. Trust

Trust entails giving and receiving clarity, for without clarity there can be no trust. Trust must be gained and reaffirmed on a daily basis.

2.5. Efficiency

The principle of efficiency requires economical management of resources and a commitment to offer services tailored to customers' needs, according to high standards. PhotoSi S.p.A. guarantees that business processes are effective and efficient through continuous improvement programmes for service quality, adopting technological and organisational solutions that meet customers' needs efficiently and economically.

2.6. Spirit of service

Each member of the Code's target audience should behave with a view to cooperating and sharing the corporate mission. This is the meaning of spirit of service.

2.7. Continuous improvement

Continuous improvement entails searching for the problem, paying attention to detail, fostering the idea that everything can be improved, constantly searching for metrics that highlight potential risks, having the courage to innovate and rejecting one's ego.

2.8. Passion

Passion is measured through the intensity of our everyday actions. It is the energy that we naturally give to others through the driving force pulsating in every beat of our heart. Passion is measured by what we do when we are tired, how we react after a defeat, how we behave after a mistake, after an injury, after an unfair move that threatened to make us lose everything. After all this, if the desire to continue is even stronger than before, then we know that we are passionate about what we do.

2.9. Courage

Courage is the ability to face fear or uncertainty, acting with determination, strength and confidence.

2.10. Competition

The company promotes competition by adopting principles of decency, fair competition and transparency towards all players on the market.

2.11. Community relations and environmental protection

PhotoSi S.p.A. is committed to safeguarding the surrounding environment and contributing to the sustainable development of the region. The company pays attention to sustainable development and environmental protection and is committed to continuously improving its production processes. This is carried out in compliance with current legislation, environmental requirements and common interests. The best economically feasible technology is used to minimise the direct and indirect environmental impact. In order to create a concrete environmental policy, PhotoSi S.p.A. undertakes to:

- raise awareness among management and collaborators;
- promote initiatives, actions and improvement programmes for widespread environmental protection;
- ensure that employees and company operating procedures are kept up to date.

2.12. Valuing human resources

Human resources are essential for company development. For this reason, PhotoSi S.p.A. protects and promotes the professional growth of its employees so as to enrich their range of skills.

03 Corporate Governance System

The company's governance system complies with current legislation and is in line with the most authoritative guidelines and best practices. It is aimed at ensuring the best and most balanced cooperation between members through a harmonious balance between the various management, strategy and monitoring roles. At present, the governance system for PhotoSi S.p.A. is made up as follows:

- Shareholders' Meeting;
- Board of Directors;
- Board of Statutory Auditors;
- Managing Directors.

This system is geared towards ensuring responsible and transparent company management vis-à-vis the market, with a view to creating value for shareholders and pursuing company objectives. The members of corporate bodies must act in line with the principles of fairness and integrity, refraining from involvement in situations where conflicts of interest exist in the context of the work carried out in the company. The members of the bodies are also required to conduct themselves based on the principles of autonomy, independence and respect for the guidelines that PhotoSi S.p.A. provides in their relations with public institutions and with any private party on PhotoSi S.p.A.'s behalf. They are required to stay informed and diligent in their involvement in the company's business, keep any information they become aware of through their work confidential and may not use their position to obtain gifts and personal advantages, whether direct or indirect. Any work related to communication must comply with laws and good conduct practices and be aimed at safeguarding information that needs to be

kept confidential. The Board of Directors shall perform its duties professionally, autonomously, independently and with a sense of duty and responsibility towards the company, owners and third parties. The Board of Directors must be aware of its role, its responsibilities and its position as an example to others in the company.

The Directors must not impede or obstruct monitoring activities from being performed by the designated bodies and, in addition to their own duties, shall be committed to strictly enforcing the values set out in the Code of Ethics, helping them to be shared and circulated, including to third parties. Members of company bodies are required to comply with the regulations in force.

They shall be bound by the obligations of loyalty and confidentiality even after their relationship with the company has ended. In view of its work and organisational complexity, PhotoSi S.p.A. has adopted a system for delegating powers and roles that stipulates, in explicit and specific terms, that tasks should be assigned to persons with suitable skills and expertise.

04 Internal Control System

In compliance with current regulations and with a view to planning and managing corporate activities aimed at efficiency, fairness, transparency and quality, PhotoSi S.p.A. adopts organisational and managerial measures to prevent anyone acting for the company from behaving unlawfully or contrary to the Code of Ethics. With regard to the extension of delegated powers, the company adopts organisation, management and control models that include appropriate measures to ensure that activities are carried out in accordance with the law and the rules of conduct laid down in the Code. These models are designed to promptly detect and eliminate any possible risk situations.

A special Supervisory Body has been established to verify and enforce the rules laid down in this Code. The Supervisory Body supports the Board of Directors in defining and updating the internal control system, and assessing whether it is adequate and works effectively, as well as in analysing corporate risks. It also performs the additional tasks set out in this Code. The organisational models, in order to prevent the risk

of offences occurring that could make the company liable under Italian Legislative Decree 231/2001, stipulate that:

- a) all company activities related to core and support processes are identified as potentially being at risk of offences;
- b) responsibilities have been defined for implementation and monitoring;
- c) the Supervisory Body has been tasked with performing audits and receives reports, information on possible violations and results of verifications performed.

The Supervisory Body periodically checks whether the internal control system is adequate and works effectively and carries out the interventions deemed necessary and appropriate to make sure that it works as well as it can.

Being aware of how important the role played by the sole shareholder is, PhotoSi S.p.A. undertakes to provide them with accurate, truthful information in a timely manner and to improve the conditions for their participation in company decisions, within the scope of their prerogatives.

The company is committed to protecting and increasing the value of its business, enhancing management, pursuing high production standards and maintaining a solid asset base, in recognition of the shareholder's investments. The company also undertakes to safeguard

and protect the company's resources and assets. In particular, the company undertakes to ensure that the Directors regularly participate in general meetings as well as to guarantee that meetings are orderly and functional, respecting the fundamental right of each shareholder to request clarifications on the various topics under discussion and to express their opinion.

06 Employee Relations

6.1. Employee relations

PhotoSi S.p.A. recognises the value of human resources and the importance of their contribution to the company, and respects workers' individuality. The company ensures compliance with collective labour agreements and the rules on social security, insurance and welfare in the sector. The employment relationship is managed with a view towards fostering professional growth and expanding each employee's skill set. Any discrimination based on race, sex, nationality, religion, language, trade union or political affiliation during recruitment or when determining pay, promotions or dismissal is prohibited. All forms of favouritism are also prohibited.

6.2. Health and safety

The company is committed to protecting the moral and physical integrity of employees, consultants and customers. To this end, it promotes responsible and safe conduct and adopts all the safety measures required as a result of technological developments to ensure a safe and healthy working environment, in full compliance with current legislation on prevention and protection. In particular, for the management of aspects relating to health and safety in the workplace, PhotoSi S.p.A. has adopted and implemented an organisational and management model in accordance with Article 30 of Italian Legislative Decree 81/2008, implementing a Management System for Health and Safety in the Workplace in accordance with Article 7 of Italian Legislative Decree 334/1999 updated by Italian Legislative Decree 238/2005 and the Italian Ministerial Decree of 9/08/2000.

6.3. Personal protection

PhotoSi S.p.A. is committed to ensuring compliance with the conditions necessary for the existence of a collaborative working environment that is non-hostile and free from any discriminatory behaviour regarding race, religion, sex, political and trade union opinions, sexual inclinations, age, origin, disability or other factors, which have nothing to do with employees' work performance. The company demands everyone's cooperation in order to maintain a climate of respect for the dignity, honour and reputation of all. To this end, it carries out periodic surveys on the atmosphere within the company and strives to continuously improve it. Harassment of any kind, including sexual harassment, is not allowed in working relationships. Other kinds

of behaviour that are prohibited because they would have a negative impact on the working environment are (non-exhaustive list of examples):

- threats;
- violence;
- possession of weapons of any kind;
- using recorders, including video telephones or cameras for purposes other than those approved by managers;
- use, distribution, sale or possession of drugs or other narcotic substances not prescribed for medical reasons.

Furthermore, employees may not be present on PhotoSi S.p.A. premises or in a PhotoSi S.p.A. working environment if they are under the influence of alcohol or drugs or other narcotic substances taken for reasons other than medical use. The company does not tolerate any intimidating or discriminatory attitudes and takes appropriate disciplinary measures against those who adopt such attitudes or abuse their position of authority within the company. Employees who believe they have suffered discrimination may report the incident to the appropriate Supervisory Body. Managers who become "aware of" or "suspect" a breach of the provisions laid down in this Code must "promptly" report it to the Supervisory Body. Managers must ensure that there is no retaliation against those who report violations of ethical standards and/or internal procedures or against those who cooperate in investigations.

6.4. Employee selection

In addition to complying with the regulations in force, employees are selected by checking that the candidates fully match the professional profiles the company requires, guaranteeing equal opportunities for all.

6.5. Recruitment

Employees are recruited with standard employment contracts, excluding any form of employment relationship that does not comply with or circumvents the provisions in force.

6.6. Employee obligations

Employees must comply with their obligations under this Code, perform their duties in accordance with the law and maintain their conduct based on integrity, fairness, loyalty and good faith. Employees who become "aware of" or "suspect" a breach of the rules laid down in this Code must report to their manager in the first instance, and in their absence or if the report is disregarded, directly (verbally or in writing) to the Supervisory Body.

PhotoSi S.p.A. has also promptly established an internal channel for the communication of potential conduct contrary to the law, in accordance with the provisions of Italian Legislative Decree No. 24/2023.

6.7. Additional obligations: accounting entries and records

Those entrusted with keeping accounting records must make all entries accurately, completely, truthfully and transparently, allowing any authorised parties, including external parties, to conduct audits. Accounting records must be based on accurate and verifiable information and must fully comply with internal accounting procedures. Each entry must allow the relevant transaction to be recreated and must be accompanied by adequate documentation. All actions concerning the company's business must be evidenced by adequate records that allow checks and monitoring to be performed on the decision making, authorisation and execution process. Anyone who becomes aware of any omissions, errors or falsifications is required to notify the designated Supervisory Body.

6.8. Conflict of interest

Employees must maintain autonomy and integrity, avoiding making decisions or carrying out activities that have or may appear to have a conflict of interest with the company's business.

Any activity that hinders an employee from carrying out their duties properly or that may harm the interests and image of the company must be avoided. Any situation of real or potential conflict of interest must be communicated to the Supervisory Body in advance. **Employees shall, for example, refrain from doing undue favours for relatives and friends when carrying out their work duties.**

6.9. Company assets

Employees shall use and diligently look after the property at their disposal for work reasons.

The misuse of company-owned assets and resources is not permitted. Each employee is directly and personally responsible for the protection and lawful use of the property and resources entrusted to them for the performance of their duties.

PhotoSi S.p.A., in compliance with the laws in force, shall adopt the necessary measures to prevent misuse.

6.10. Use of computer systems

Each employee is responsible for the security of the computer systems used and is subject to applicable regulations and the conditions of licence agreements. Without prejudice to the provisions laid down in civil and criminal legislation, the misuse of company assets and resources includes using network connections for purposes other than those inherent to the employment relationship or to send offensive messages or messages that may damage the company's image. Every employee must make efforts to prevent IT tools from being used for illegal activities.

6.11. Gifts, giveaways and other benefits

Employees may not ask for or accept gifts or benefits from anyone who has benefited or may benefit from the company's business, unless they are of modest value or in accordance with normal business and courtesy practices. **Employees may, therefore, only accept gifts or benefits from suppliers if their value is less than €200.00 per year and give gifts to these suppliers with a value not exceeding €100.00 per year.** Employees may not offer gifts or benefits to anyone who can guarantee them favourable treatment in business related to PhotoSi S.p.A. Undue advantages may not be given to public and private customers or suppliers. Gifts and advantages offered but not accepted, exceeding a modest value, must be reported to the company's Supervisory Body for proper evaluation.

6.12. Maintaining confidentiality

The company protects the confidentiality (privacy) of its employees in accordance with the relevant regulations, and undertakes not to communicate or disseminate personal data without a valid legal basis, without prejudice to legal obligations. This information is collected, processed and stored following specific procedures so as to prevent unauthorised persons from gaining knowledge of it and to ensure full compliance with privacy regulations.

6.13. Confidentiality and information management

Each employee is obliged to keep the information they learn in the course of their duties confidential, in accordance with laws, regulations and circumstances. This duty of confidentiality must be observed even after employment has ended, ensuring that the requirements resulting from the applicable regulations are met. Furthermore, each employee must exercise care in keeping the documents entrusted to them.

6.14. Information obligations

All employees must promptly and confidentially inform their manager of any violations of the law, the Code of Ethics or other company provisions of which they become aware during their work, if these could involve the company in any way. Managers must supervise the work of their assigned collaborators and inform the Supervisory Body of any potential breach of the aforementioned rules.

6.15. Collaborator obligations

The provisions laid down in the preceding paragraphs extend to all potential collaborators, consultants, agents and authorised representatives of the company.

07 Customer Relations

7.1. Equality and impartiality

PhotoSi S.p.A. undertakes to satisfy its customers by respecting contractual obligations, ensuring that it does not discriminate against any customer. Customer satisfaction is a fundamental objective for PhotoSi S.p.A. and, to this end, the company is committed to guaranteeing the quality of the services it provides. For this very reason, the company is committed to conducting itself towards its customers in a way that is characterised by efficiency, cooperation and courtesy. It also undertakes to provide accurate, complete and truthful information on the characteristics of the services offered in a clear and transparent manner and using simple, comprehensible language, ensuring that all customers are treated equally.

7.2. Contracts and communications

Contracts and communications with customers must:

- be clear and simple, formulated in language as close as possible to that used by the general public;
- comply with current regulations.

The company undertakes to communicate any information regarding any changes and variations in the service provided promptly and in the most appropriate manner.

7.3. Quality and customer satisfaction

The company is committed to ensuring that the quality and safety standards required are achieved and to regularly monitoring the quality of the service provided to customers.

7.4. Customer interaction

The company is committed to facilitating interactions with customers through handling and resolving any complaints promptly and/or by using appropriate communication systems. In order to systematically listen to customers, it prepares periodic customer satisfaction surveys to gain information in order to identify and verify objectives for improvement at service level. The company protects the confidentiality of its customers, in accordance with the relevant regulations, undertaking not to share or disseminate their personal, financial and consumer data, without prejudice to legal obligations.

08 Supplier Relations

8.1. Supplier selection

Suppliers should be chosen in compliance with the regulations in force and the company's internal procedures laid down for this purpose. Suppliers must be chosen, and goods and services of any kind procured, in accordance with the principles of competition and equal conditions for those submitting tenders, and on the basis of objective assessments regarding competitiveness, quality, usefulness and supply price. During the selection process, PhotoSi S.p.A. adopts objective and transparent criteria as specified in current legislation and internal regulations, and does not prevent any supplier who meets the required and requested requirements from competing for a contract with the company. When selecting suppliers, the company shall also take into account their ability to guarantee that adequate corporate quality systems will be implemented, where applicable, whether means and organisational structures are available and the requirement to meet confidentiality obligations. Any selection procedure must be carried out under the widest-reaching conditions of competition and any deviation from this principle must be authorised and justified. The company has adopted a list of qualified suppliers in accordance with internal procedures and **on the basis of their commitment to sustainability and care for the environment.**

8.2. Transparency

Relations with the company's suppliers, including financial and consultancy contracts, are governed by the rules laid down in this Code and are constantly and carefully monitored by the company, also from the point of view of how appropriate the services or goods supplied are with respect to the consideration agreed.

PhotoSi S.p.A. has appropriate procedures in place to ensure maximum transparency in supplier selection and the purchase of goods and services.

8.3. Fairness and diligence in contractual performance

The company and supplier must work together to build a collaborative relationship of mutual trust. PhotoSi S.p.A. undertakes to inform suppliers in a fair and timely manner regarding the characteristics of the work, the forms and times of payment in compliance with the regulations in force and the expectations of the counterparty, considering the circumstances, the negotiations carried out, and the content of the contract stipulated. Suppliers shall perform the contractual services in accordance with the principles of fairness, decency, diligence and good faith and in compliance with the applicable regulations.

8.4. Protection of the environment and ethics

The company undertakes to promote, within the framework of its supplier dealings, respect for environmental conditions, as well as to ensure that supply operations are carried out in accordance with the ethical principles laid down in the Code.

9.1. Corporate mission and general interest

The company pursues its objectives in line with its mission and collaborates effectively with the public bodies in charge of regulating and monitoring accounting, administrative and legal tax compliance. PhotoSi S.p.A. pursues these objectives by combining them with its own mission and with the requirement to have the organisational and managerial autonomy that any economic operator should have.

9.2 Integrity and independence in relationships

In order to ensure maximum clarity in institutional relations, these relations are handled exclusively by contact persons with an explicit mandate from company bodies, ensuring that there are no conflicts of interest with institution representatives. In interactions with institutions and public administrations, PhotoSi S.p.A. representatives must act with the utmost transparency, clarity and fairness, avoiding bringing institutional parties to partial, false, ambiguous or misleading interpretations.

10 Implementation and Control of the Code

10.1. Establishment of the Supervisory Body

A Supervisory Body has been established to monitor the implementation of and compliance with this Code and the organisation and management models, verifying whether they are effective, adequate and able to stay functional and sound over time as required by law. In particular, the Supervisory Body:

- is tasked with providing opinions on ethical issues that may arise in business decisions and on alleged violations of the Code of Ethics reported by managers;
- should regularly review the Code of Ethics and the mechanisms for its implementation, including by submitting suggestions for adaptation;
- is tasked with setting up and approving an ethical training and communication plan.

10.2. Supervisory Body

PhotoSi S.p.A. has set up an internal Supervisory Body with the task of supervising the implementation of and compliance with this Code of Ethics and the organisation, management and control models, pursuant to Italian Legislative Decree 231/2001, implemented in line with the Code. The Supervisory Body is an independent and autonomous body of the company, characterised by professionalism and impartiality. The Board of Directors issues a resolution to decide on appointment.

10.3. Auditing

The Supervisory Body should undertake audits. It shall prepare the audit calendar and may task external professionals or company managers/experts to carry out the audits. Company area managers who receive reports of possible breaches of the Code of Ethics from their unit must report them to the Supervisory Body. The Supervisory Body shall have free access to data, documents and information useful for carrying out its work. Company area managers are required to actively collaborate in the completion of the above-mentioned work.

10.4. Reports

All parties involved, both internal and external, are required to report any breaches of this Code verbally or in writing (depending on the nature of the breach) and non-anonymously. Internal parties who make clearly unfounded reports are subject to disciplinary sanctions, while external parties who make clearly unfounded reports are subject to the sanctions specified in the legislation in force. The company

protects whistleblowers against any retaliation they may face for reporting misconduct and keeps their identity confidential, without prejudice to legal obligations.

10.5. Disciplinary system

If the target audience of this Code of Ethics violates the code, this will damage the relationship of trust with the company and may lead to disciplinary sanctions proportionate to the seriousness of the violation, as well as possible claims for damages. For employees, complying with the rules laid down in the Code of Ethics is a fundamental contractual obligation, pursuant to Articles 2104, 2105 and 2106 of the Italian Civil Code, as well as the relevant collective labour agreements and individual contracts.

The sanctions system complies with the provisions laid down in Italian Law No. 300 dated 20 May 1970, specific sector regulations, collective labour agreements and current company regulations.

Parties who receive sanctions may include:

- chairperson or members of the Board of Directors, directors, auditors;
- employees (managers, middle managers, office workers, labourers);
- third parties included in the target audience of this Code (external collaborators consultants, partners, suppliers...);
- members of the Supervisory Body.

The Supervisory Body gathers disciplinary offences, either directly or indirectly. After verifying the infringements, it proposes the sanctions specified in the model to the competent body, which decides on the sanction to be applied.