

Code of

Ethics

Airbank

Organization Profile

Taken over by the Mazzoni family in 2008, Airbank Srl (hereinafter also referred to as "Airbank", "Company", "Company" or "Company") offers a wide range of products and services for the management of spills and for the correct storage of hazardous substances, helping companies and public bodies to carry out their activities while protecting the environment. Airbank provides its customers with a team of highly specialized environmental consultants and a wide range of solutions, diversified and customized according to needs.

Prevention is always better than cure; this is why Airbank invests time and resources daily to raise awareness among customers, partners and retailers on the correct procedures for managing spills and storing hazardous substances, on new regulations and on innovative products through the website, social networks and newsletters. In addition, with the Green4Future division, Airbank carries out tailor-made sustainable projects and events, supporting customers in communicating their commitment to sustainability.

Our values

Reliability

We are loyal and serious, we do not make promises that we cannot keep. The quality and safety of our products and services are our guarantee.

Proactivity

We take the initiative, committing to identifying new needs and issues before they emerge. We face challenges with promptness and flexibility.

Responsability

We always take responsibility for our actions towards companies, public bodies and the environment. For us, this commitment is synonymous with professionalism.

Sharing

To improve, we constantly discuss with customers and suppliers, to find new solutions, and with the community to raise awareness and educate about environmental responsibility.

Ethics

We build relationships based on respect and transparency, fundamental qualities that guide all our actions and collaborations.

Sustainability

We care about people's well-being and environmental protection. We promote sustainable practices that safeguard the environment and improve people's quality of life.

By adopting this **Code of Ethics and Conduct** (hereinafter the "Code" or "Code of Ethics"), Airbank aims to make its values explicit and to consolidate its strategic orientation.

The company wants to live up to its past but at the same time projected into the future, guaranteeing continuity and the ability to adapt to changes. In addition to basing its activity on research, innovation and consistency with regulatory requirements, it is committed to spreading a model of sustainable entrepreneurial growth in the territory in which it operates.

The Code is adopted in the belief that acting responsibly and transparently is the basis of the success of the Company.

It is part of a broader project of sustainable business management, reporting and alignment with the United Nations Sustainable Development Goals (SDGs).

Preliminary Note

The Code of Ethics and Conduct contains the set of ethical principles and outlines the rights and duties that all employees, collaborators and business partners of Airbank – in any capacity and at all levels – must comply with in their actions, as the reputation and corporate image are based on the full ability to align with the values indicated therein.

The Code is inspired by the main national and international legislation, guidelines and regulations in force on corporate social responsibility, corporate governance, human rights, labour and the environment. In particular, the Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the ILO Conventions on Workers' Rights were taken as references.

In this framework, compliance with the Code is considered an essential prerequisite for the purposes of effective, prudent and correct business management, as well as for the proper functioning, reliability and reputation of the company, in addition to the provisions of civil, administrative and criminal legislation, current regulations and collective bargaining.

The Code also aims to base the values of loyalty, integrity, diligence, impartiality, fairness and transparency on operations and the way of acting in internal and external relations within the company, placing compliance with laws and regulations at the centre of attention, as well as compliance with company procedures. The Code also aims to recommend, promote or prohibit certain behaviours – even beyond the regulatory provisions – providing for sanctions proportionate to the seriousness of any violations committed.

All those who work in and for Airbank and all the company's business partners are committed to observing and ensuring compliance with the principles of this Code, which represent a **common and mandatory value base**, within the scope of their functions and responsibilities.

In no way can the belief that you are acting to the advantage or in the interest of Airbank justify the adoption of conduct contrary to the principles illustrated below.

In order to ensure maximum visibility, the Code is disseminated in a widespread manner through both internal and external corporate communication tools.

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airbank
PROJEKT INVESTIČNÉ PRÁCE

General Principles 01

1.1 Scope and Recipients

This Code is adopted by Airbank and governs all decisions and actions at the Company's premises, in all countries in which the Company operates.

The Code applies to and guides in a binding manner the conduct of directors and members of corporate bodies, as well as all employees who work to pursue company objectives (including fixed-term or part-time workers, workers with leasing contracts, etc.).

Airbank also requires suppliers, contractors, consultants and all partners and collaborators external to the Company, understood as those who act in the name and/or on behalf of Airbank or in its interest regardless of the legal qualification of the relationship, to comply with the ethical principles set out in this Code. The Recipients, in carrying out their activities, adopt the principles of the Code of Ethics, drawing inspiration from the values of impartiality, fairness, legality, diligence, efficiency, basing their conduct on mutual cooperation and collaboration, complying with current legislation and maintaining transparent relations with their stakeholders and with economic entities in general.

1.2 Obligations of the Recipients

Compliance with this Code must be considered an essential part of the contractual obligations of the Recipients, who are required to know and comply with its provisions both in internal relations and in relations with third parties.

By contributing to the concrete implementation, promotion and dissemination of the Code, the Recipients shall refrain from any contrary behaviour, in order to avoid situations that could lead to conduct that does not comply with the Company's values.

The Company's directors and top management guide the management of the Company to the principles of this Code, consistently defining the Company's objectives, the implementation of projects, investments and partnerships.

The Function Managers have the following additional responsibilities:

- Promote a positive climate within their work team, through leadership in accordance with the principles contained in the Code;
- Work proactively to ensure full compliance with the Code, so that workers are aware that the performance of their duties is not separated from compliance with the relevant provisions and current legislation;
- Ensure that they adequately handle any violations and/or suspected violations of the Code or applicable legislation of which they become aware.

1.3 Compliance with laws, regulations and industry standards

Airbank orients its actions to the principles of legality and legitimacy. Consequently, compliance with the laws in force in all the countries in which it carries out its activity is an inalienable and peremptory principle.

It also ensures compliance with company procedures and this Code at all levels.

1.4 Valuing people and the community

Airbank recognizes and protects the inalienable rights of all women and men who collaborate with the Company, in any capacity.

The Company ensures equal opportunities, safeguards physical, cultural and moral integrity and is committed to guaranteeing a safe, healthy, fair, productive, non-discriminatory work environment, in which everyone is evaluated according to their personal contribution, in a cohesive climate based on professionalism, collaboration, trust and transparency.

In addition, the Company supports the social, cultural and economic development of the community in which it operates, actively promoting various forms of support and solidarity.

On the contrary, it condemns participation in associations whose purposes are prohibited by law and/or contrary to public order.

1.5 Respect for the Environment

Airbank considers **the environment as a primary asset to be safeguarded**. The commitment to the environment is strongly shared and promoted by the company's top management and all employees. **Since the company's core business is linked to environmental protection, we naturally feel involved in any action that can help protect it.** The company focuses on consulting activities to help its customers reduce environmental risks and comply with current regulations, offering customized solutions for each need.

To this end, **the Company offers services such as the HSE safety check-up, the Environmental Prevention Plan, the Airbank Academy and the Environmental Safety Points, through which it carries out a real technical and practical training activity on anti-pollution issues.** Airbank intends to be a concrete point of reference for companies that wish to operate in a more conscious way.

1.5 Respect for the Environment

Airbank believes that sustainability goes beyond the boundaries of the company: **we believe that change also comes from the territory in which we operate, from dialogue with people and from the construction of a shared environmental culture.** For this reason, Airbank is actively present with concrete awareness-raising initiatives, aimed at citizens, schools and local realities. The company organizes waste collection days, supports public and promotional events designed to involve adults and children, and educational moments in which **important issues such as pollution, recycling, environmental protection and the effects of climate change are addressed in a simple but effective way.**

Airbank, even when it sponsors an initiative, does not limit itself to doing so with an economic contribution, but does so by bringing content, tools, activities, which can contribute to environmental training and awareness. To make the commitment to environmental protection even more concrete, a new division, GREEN4FUTURE, has been launched, dedicated to the organization and implementation of sustainable events and projects, with the aim of putting Airbank's skills at the service of companies that want to return value to the territory and convey the values of sustainability. This also translates into a series of daily practices: the selection of suppliers is also based on their commitment to the environment, the aim is to reduce waste in internal processes, the waste that is produced is managed responsibly and logistics solutions with a lower impact are preferred, whenever possible.

1.6 Certifications and quality policy

Quality and reliability of the products and services offered are the essential conditions of Airbank's operations, which aims to **maintain a high level of customer satisfaction at all times**. For this reason, Airbank has always been committed to certifying **the quality of its processes and the products/services offered**. For Airbank, customer satisfaction is a fundamental indicator of the quality of the service offered and a strategic lever for **continuous improvement**.

Actively listening to customer needs, collecting timely feedback and intervening promptly allows the company not only to consolidate relationships of trust, but also to **effectively adapt its offer, guaranteeing solutions that concretely meet expectations**. Airbank aims to create a positive experience.

1.6 Certifications and quality policy

The achievement of the **ISO 9001 certification goes in this direction**, which certifies Airbank as a reliable and competent business partner, being compliant with the requirements of the international standard for a **Quality Management System**. The company has a **Quality Management Manual** that describes the structure of Airbank's Management System through a schematic representation of the processes, their interactions and related documentation.

The path of continuous improvement is verified and documented in the review reports issued by the Management at least annually on the occasion of the Quality System Review.

All the people involved in the organization are aware of the value of their role within the system and the objectives related to their process thanks to the widespread involvement of the persons in charge and suitable bulletin boards made available for consultation. The **general objectives for quality** are documented through the **QHSE Integrated Policy**, signed by the Management.

1.7 Impartiality, conflict of interest and independence

Honesty, fairness, independence and impartiality are fundamental principles in accordance with which Airbank conducts its business and bases its image and reputation. Therefore, in the management of corporate activities and in all related decisions, the Recipients must operate with **expertise and professional rigor**, according to objective and neutral evaluation criteria.

There is a relationship of full trust and loyalty between the Company and the Recipients, within which it is everyone's duty to use their work skills and the company's assets for the realization of the company's interest and to avoid circumstances in which a conflict of interest may arise^[1] between personal economic activities and the tasks held within the Company.

The Recipients therefore comply with the **prohibition of subjecting their functional position within the Company to personal, family or friend interests or to the interest of other companies.**

¹A conflict of interest is considered to exist when an employee, collaborator or director pursues an objective other than that of the company, or even to the detriment of the company's interests or carries out activities that may, in any case, interfere with his or her ability to take decisions in the exclusive interest of the Company or voluntarily procures or attempts to obtain a personal/family advantage when carrying out activities carried out in the interest of the Company, or procure it for third parties.

1.8 Prevention of money laundering and receiving stolen goods

Airbank scrupulously complies with national and international legislation aimed at preventing money laundering, self-laundering, receiving stolen goods and financing criminal activities and/or terrorism. To this end, the Recipients are required, with the utmost professional diligence, to:

- **carefully verify the information available on counterparties** (especially if occasional), assess their identity, integrity and reputation;
- **to avoid engaging in or maintaining commercial or financial relationships** in cases where there are reasonable doubts about the respectability and legitimacy of the counterparties' business;
- **immediately report** irregularities (including potential irregularities) of which they are aware, in order to facilitate the prevention and fight against crimes;
- make and accept **cash payments only within the limits and for the amounts permitted by law** and ensure the traceability of payments;
- ensure maximum **collaboration with the competent authorities** in the prevention, contrast and repression of crimes.

1.9 Fight against corruption

Airbank **does not tolerate any form of corruption (active or passive)**, undertakes to comply with the anti-corruption laws in force in all the countries in which it operates and requires all Recipients to act honestly and integrity.

Gifts, gifts or favours are prohibited, except within the limits of normal courtesy relations and provided that they are goods of modest value, expressly permitted by the laws in force, which do not place any of the Recipients in a position of conflict of interest.

No recipient shall be discriminated against or punished for refusing to carry out a corrupt or potentially corrupt act, even if such refusal has resulted in the loss of a business or other detrimental consequence to Airbank's business.

1.10 Protection of free and fair competition

Airbank recognizes free and fair competition as a decisive factor for growth and constant business improvement, therefore it acts in full compliance with national and European antitrust legislation , as well as similar non-EU regulations. In addition, it undertakes to cooperate effectively with the authorities in charge and not to deny, hide or delay the disclosure of any information requested in the context of any inspection activities or investigation procedures.

Any action or omission aimed at altering the conditions of fair competition is contrary to company policy. Under no circumstances can the pursuit of the Company's interest justify conduct that does not comply with the principles of fair competition.

Consequently, each Recipient acting for the Company must refrain from engaging in and/or incentivizing unfair commercial practices in order to obtain competitive advantages and anti-competitive behavior.

Protection of resources and information 02

A background image showing three business professionals in a meeting. A man in a light-colored suit is in the foreground, gesturing with his hands while speaking. Two other people, a man and a woman, are seated behind him, listening attentively. The image is overlaid with a semi-transparent dark blue filter.

2.1 Respect for company assets

Airbank owns a plurality of company assets, both **tangible** (equipment, machinery, supplies, computers, etc.) and intangible (image and reputation, data, information, intellectual property, software, etc.).

The Company makes various company assets available to each employee for the **performance of their duties**. These assets must be used appropriately and improper use that may cause damage or reduce their efficiency or in any case conflict with the interest of the company is not allowed.

Each Recipient has the duty to use the tangible and intangible assets of the Company **exclusively for the intended purposes**, adopting the appropriate precautions to safeguard the resources from any form (even attempted) of theft, loss, damage, abuse or illegal, inadequate or unauthorized use, intrusion, sabotage, or destruction.

2.2 Protection of industrial and intellectual property

The Company promotes and protects research, development and innovation activities and acts in full compliance with the intellectual property rights legitimately held by Airbank itself and third parties, as well as laws, regulations and conventions protecting these rights.

All Recipients are therefore required to respect and protect the Company's intellectual property and to prevent any infringement of the intellectual property of others, ensuring the widest observance of the rights acquired, including through due licensing and/or non-disclosure agreements.

It is also **forbidden to use any computer or telematic program** on which copyrights are held by third parties and which has not been previously licensed to the company.

2.3 Correctness, reliability and transparency of company information

In light of their internal and external verification function, the Company ensures that the accounting documentation and the financial statements faithfully represent the balance sheet, financial position and economic result. In this sense, it actively and punctually collaborates with the Board of Statutory Auditors, facilitating periodic checks.

The Company implements rigorous, punctual, reliable and effective processes, procedures and IT information and IT systems, in compliance with accounting principles. To this end, it provides that all documentation is **properly archived and ordered, in order to ensure maximum transparency and avoid false, misleading or deceptive information.**

The Company employs, at all levels, the utmost commitment to providing correct and truthful information regarding the company's activities, assets and operations, as well as to facilitating the internal and external control processes of the competent bodies. The Recipients are required, within the scope of their competence, to actively collaborate in the correct and effective functioning of the internal control system.

Airbank does not tolerate conduct that may prejudice the transparency and traceability of financial statements.

2.4 Correct use of IT tools

All data and information stored in the company's computer and telematic systems, including e-mail messages, are the property of Airbank and must be used **exclusively for the performance of company activities**, in the manner and within the limits indicated by the same.

The Company, aware of the importance of guaranteeing the confidentiality of data, also understood as **the protection of information from unauthorized access or the integrity of the data itself**, requires all Recipients to behave correctly, in order to avoid any form, even attempted, of undue intrusion or damage to data and computer or telematic systems of the Company and others and to comply with the regulations aimed at preventing or repressing computer crimes.

2.5 Secrecy, confidentiality and privacy

Airbank, in terms of personal data protection, currently operates in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, also known as "GDPR").

By virtue of the general duty of loyalty referred to in Article 2105 of the Italian Civil Code, the Recipients must **refrain from using or disclosing (even indirectly) confidential information** that is not in the public domain, of which they have become aware by reason of their office and/or profession, except when the disclosure of such information is authorized or required by law.

Since these notions may characterize the organization and strategy of the Company, the most complete confidentiality must be maintained for the entire duration, and beyond, of the employment contract (regardless of the type of collaboration) and it is forbidden to derive advantages of any kind, direct or indirect, personal or patrimonial.

The communication of any information to third parties must take place exclusively by **authorized parties** and in any case in accordance with company provisions and confidentiality agreements in place.



Criteria of conduct

03

3.1 Responsibility towards employees

3.1.1 Non-discrimination

The Company opposes and sanctions any form of discrimination against the people with whom it interacts, internal or external, on the basis of: ethnic origin, skin colour, gender, sexual orientation, religion, nationality, age, political opinion, trade union affiliation, marital status, different physical or mental ability, any other state or personal characteristic.

Disparaging or harassing treatment, whether physical or verbal, is not tolerated in any way.

3.1.2 Enhancement of human capital

The Company protects legal work, carried out in a healthy and safe environment. The use of forced, minor, illegal, clandestine or undeclared labour, as well as the use of labour derived from human trafficking, is abhorrent.

The staff is hired with a regular employment contract, in the ways and times provided for by the legislation and collective bargaining in force. Before the establishment of the employment relationship, each employee receives adequate information relating to the contract and the remuneration parameters, so that the acceptance of the assignment is based on the actual knowledge of this information.

During the course of the employment relationship, the Company promotes the growth of the skills of its staff, promoting participation in training courses.

The work environment is based on dialogue and active participation, also through rapid and efficient communication tools with managers or top management

3.1.3 Inclusion and diversity

The Company recognizes diversity, in its many expressions, as a success factor and a strategic advantage, as a harbinger of cultural enrichment and openness.

Airbank therefore promotes an inclusive work environment, oriented towards collaboration and full integration.

The Company encourages every person to express themselves freely in order to realize their potential and increase their motivation. In the recruitment process, Airbank is committed to applying gender equality and not perpetrating discrimination of any kind.

3.1.4 Fair pay

Airbank complies with all applicable laws and regulations on labour law. **Employees are remunerated fairly and in a timely manner, in accordance with national collective agreements.** The company also requires all its business counterparts to pay their employees fairly and promptly.

3.1.5 Freedom of association and the right to collective bargaining

Airbank respects and recognizes the right of every employee to associate, organize, or join a trade union organization without experiencing interference, sanctions, retaliation, discrimination, or harassment. The company believes that only through free expression and discussion can everyone realize their potential and that the company itself can derive significant benefits from it. Airbank maintains good relations with the trade unions, not favouring or discriminating, either directly or indirectly, against any trade union organisation.

3.1.6 Health and safety

For Airbank, safety at work is not only a regulatory obligation, but a founding value of its way of doing business. The protection of people's physical and psychological health is an indispensable prerequisite for a healthy, productive and sustainable work environment. For this reason, Airbank, with a view to continuous improvement, constantly strives to effectively manage all risk factors **by pursuing the objective of ensuring the health and safety of personnel**, in full compliance with current legislation on prevention and protection. The Company regularly organizes training and refresher courses for all staff, so that everyone is informed, prepared and aware of their role in safety management. In addition to the training obligations required by law, periodic information moments are promoted, with clear operating instructions and the direct involvement of internal managers. It is a valuable opportunity to collect ideas, reports, ideas for improvement and to strengthen the culture of prevention as a shared responsibility.

Airbank is also ISO 45001 certified: this certification demonstrates the company's commitment to protecting the health and safety of workers, reducing risks in the workplace. It helps prevent injuries, improve legal compliance, and strengthen your company's reputation with customers and employees. On a technical level, it is based on the Plan-Do-Check-Act (PDCA) cycle and requires the systematic identification of hazards, risk assessment and the adoption of effective control measures, with the involvement of leadership and workers.

On a periodic basis, the company draws up the **Risk Assessment Document (DVR)**, pursuant to Legislative Decree no. 81/2008. This Document aims to carry out a global and documented assessment of all risks to the health and safety of workers and to prepare adequate prevention and protection measures as well as to plan measures to ensure the improvement of health and safety levels over time.

3.1.6 Health and safety

The Document is constantly updated and is revised in the event of changes in the company organization and whenever the implementation of the company security system, aimed at a continuous improvement of the degree of security, makes it necessary.

Airbank employs a competent doctor with whom it collaborates for the purpose of assessing health risks, carrying out regular medical health surveillance examinations for workers. The company also makes use of an RSPP in the figure of an external consultant who supports the Employer in the management of OSH at company level and who assists him in the preparation of the DVR.

The company also refers to the indications of the **Workers' Safety Representative (RLS)**, designated to represent workers with regard to aspects of health and safety at work.

Airbank is committed to **disseminating and consolidating the culture of safety at work** and requires the Recipients to diligently adhere to legal obligations and internal procedures regarding risk prevention, health protection, safety and hygiene in the workplace. **Airbank also expects all its commercial counterparties to act and operate in compliance with current legislation on health and safety at work.**

3.2 Responsibility towards the environment

3.2.1 Environment management

For the **benefit of the community and future generations, Airbank is committed to ensuring continuous improvement of its performance**, aware of the impact that the company's activities can have on the environment.

To this end, Airbank has certified its environmental management system according to ISO 14001, which allows the company to monitor and reduce the environmental impact of its activities. This certification aims to improve the efficiency in the use of resources, ensure compliance with environmental regulations and enhance the company's image towards stakeholders and the market.

Technically, ISO 14001 provides for the definition of environmental objectives, the assessment of significant environmental aspects, the management of environmental emergencies and constant monitoring of performance through internal audits and periodic reviews.

Airbank operates in alignment and in **full compliance with all applicable environmental regulations and expects all its commercial counterparties to do the same.**

3.3 Responsibility towards external stakeholders

3.3.1 Customer Relations

In their relations with Customers, all Recipients maintain an attitude inspired by the highest professional standards and internal guidelines and management systems, aimed at fully satisfying their needs, with the aim of create a solid and lasting relationship.

Obtaining the certification goes in this direction ISO 9001 which certifies Airbank as a competent and reliable business partner, complying with the requirements of the international standard for a Quality Management System. In a logic of ever better adherence to customer expectations, Airbank monitors customer satisfaction on an annual basis through the administration of a Customer Satisfaction Survey.

3.3.2 Supplier Relations

Airbank only uses suppliers who operate in accordance with applicable law and the rules set out in this Code; commercial relations are based on the principles of fairness, integrity, professionalism, transparency, legality and impartiality, in order to **create solid and lasting relationships of trust and business.**

Airbank ensures its suppliers timely payment methods, in accordance with commercial agreements. In conducting economic negotiations with its suppliers, Airbank bases its activity on the principles of proportionality and reciprocal consideration of services, avoiding imposing - directly or indirectly - unjustifiably burdensome contractual conditions.

For each supplier, an accurate assessment of the levels of quality, convenience and cost-effectiveness of the services is carried out, as well as an analysis of the integrity and reliability, so as to always guarantee excellent products and workmanship to the end customer, together with a **fair quality/price ratio.**

3.3.3 Relations with the Public Administration and local institutions

Airbank has always maintained excellent relations with local institutions and is committed to ensuring that relations with the Public Administration are based on maximum transparency, fairness, impartiality and legality, according to an approach of maximum collaboration and in the strictest compliance with the applicable legal provisions.

Over the years, the company has **carried out various projects and initiatives in partnership with local institutions, both environmental and social.**

The management of relations with the public administration must always take place without damaging the integrity and reputation of the Company, as well as always guaranteeing the traceability and documentability of the operations/relations with the institutions.

3.3.4 Relations with the Judicial Authority

The **management of relations with the Judicial Authorities, the control bodies for compliance with current legislation and other comparable institutions** is based on the principles of correctness, completeness and truthfulness and reserved exclusively for the corporate functions and figures in charge and authorized for this purpose.

The company responds correctly and collaboratively to legitimate requests and orders from the Authorities, issued during any legal proceedings, investigations or inspections. The Recipients are therefore prohibited from: engaging in reticent or omissive behaviour, showing false documents, providing false data, altered and falsified declarations or engaging in misleading behaviour. It is not permitted to conceal or destroy information related to an investigation, whether it is proceedings that are ongoing or proceedings that could presumably commence.

It is forbidden to exert pressure, of any kind, on the person called upon to make statements before the Judicial Authority, in order to induce him or her to give or not to give false testimony.

3.3.5 Institutional relations with associations

Airbank interacts, at different levels, with bodies and institutions of an associative nature in relation to issues of corporate interest and in respect of reciprocal roles and prerogatives.

The company, **in its institutional relations, acts as an authoritative, independent and autonomous interlocutor, with a view to contributing to the definition of development and growth policies and strategies.**

3.3.6 Donations and Sponsorships

Cooperation with bodies or associations (including third sector entities), other than trade unions, is possible if **the allocation of resources is clear and documentable and there is express authorization from the company functions in charge of it.** The Company carefully evaluates which initiatives to support, based on criteria of **reliability, compliance with company values and policies**, paying attention to avoid possible situations of conflict of personal or corporate interest.

If there are donation or sponsorship activities, they must be carried out, subject to the definition of specific agreements and verification of the integrity of the beneficiary and the event or initiative promoted, avoiding granting donations or sponsorships in favor of counterparties who are even suspected of belonging to criminal organizations or the commission of crimes and **must be correctly and adequately documented and traceable.**

3.3.7 Relations with the media and external communication

Communication with the outside world plays an important role in the creation and enhancement of the Company's public image. This activity, for Airbank, is mainly divided into:

- Articles in local newspapers;
- Company website in constant renewal;
- Paper brochures with company presentation;
- communication on social channels;
- newsletter;
- webinars, seminars, trainings;
- Participation in national or international conferences, events or fairs.

All the above-mentioned activities are based on the principles of **truthfulness, fairness, transparency and prudence**, in compliance with the laws, in particular on privacy, and this Code.

The Company's website and social media channels are developed and maintained in compliance with this Code, with a commitment not to publish false information.

Relations with the press, the media and information are handled exclusively by persons expressly delegated to do so, in accordance with the procedures or regulations adopted by Airbank.

Any request for news from the press or the media and information received by the Company's personnel will be communicated to the persons responsible for external communication, before making any commitment to respond to the request.

3.3.7 Relations with the media and external communication

The Company prohibits:

- the disclosure of "sensitive" information and/or false or tendentious news relating to the company, or to other parties with whom the Company relates in the performance of its activities;
- any form of pressure aimed at acquiring favors from the media or information to the public.

Finally, the Company undertakes to communicate with Customers in an accurate, clear, truthful and transparent manner, correctly informing them about the characteristics of the products or services offered, using a language that is understandable and adhering to industry standards, avoiding the use of any misleading, elusive or incorrect practice.

3.3.8 Use of social media by the Recipients

Airbank, aware that social media represent an important communication tool, which can also be a factor in business development, hopes for the optimization of the opportunities deriving from these platforms and **the commitment, on the part of each Recipient, to minimize the potential risks that may derive from improper, careless or unconscious use of the same, damaging the reputation of the Company.**

Implementation rules

04

4.1 Dissemination of the Code

To ensure full knowledge and compliance, Airbank undertakes to ensure the widespread dissemination of this Code, through:

- display on bulletin boards accessible to all staff and company visitors;
- publication on the company website making the document accessible to all stakeholders;
- sharing of the document when hiring new employees;
- subscription by new suppliers.

All Recipients are required to be aware of this Code, share its principles and implement it, contributing to its observance, promotion and dissemination.

4.2 Approval of the Code and related amendments

This Code was approved on 22/05/2025 by the Board of Directors of Airbank.

Any changes and/or updates to the same will be approved by the Board of Directors and promptly communicated to all Recipients.

4.3 Reports of violations of the Code or laws

All Recipients, in the event that they become aware of violations of this Code (actual or potential, provided that they are well-founded) or actions that do not comply with the rules of conduct set forth herein, including omissions or attempts to conceal violations, must report without delay to the Company, which will carry out the necessary checks and assessments to take appropriate measures.

The whistleblower must have reasonable grounds, in light of the circumstances and the information available to him at the time of reporting, to believe that the facts he or she reports are true.

4.4 Reporting methods

The whistleblower is allowed to transmit reports by reporting them to the person directly responsible or by making a report through the following channels:

- Internal box positioned in the company
- Mail to: segnalazioni@airbank.it

4.5 Procedures for following up and verifying the report received

All reports received will be the subject of investigations, which will be conducted, as appropriate, also with the help of qualified personnel or experts in the subjects in question, who guarantee independence, professionalism and professional diligence.

Under no circumstances shall the Recipients independently investigate known or alleged violations of the Code.

4.6 Management methods

The Company guarantees that all cases will be handled until the final solution and undertakes to provide feedback on the outcome of the investigation to anyone who makes a report.

4.7 Sanctioning system

Compliance with the rules contained in the Code must be considered an essential part of the contractual obligations to which all Recipients are bound.

Violation of the provisions of this Code compromises the relationship of trust between the Company and the Recipients, constituting a disciplinary offence and breach of contractual obligations deriving from the employment relationship or professional collaboration and/or disciplinary offence, with all consequent legal and contractual effects.

To protect Airbank, the senders of reports made with intent or gross negligence that prove to be false or unfounded will be sanctioned.

Within the limits of the provisions of the National Collective Agreements and the regulations in force, any violations may also constitute just cause for dismissal and may legitimize the request for compensation for damages deriving from the same.

I declare that I have read the Code of Ethics and I undertake to share, adopt and fully respect the principles and provisions contained therein

Name and surname:_____

Agency:_____

Role:_____

Date:_____

Signature:_____

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