

# Muviq S.r.l.

## CODE OF ETHICS

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## **1. MESSAGE FROM THE BOARD OF DIRECTORS**

Welcome to the most important document of Muviq: our Code of Ethics.

The Code of Ethics expresses the ethical commitments and responsibilities in conducting business and corporate activities and defines the set of values and principles, as well as the lines of behavior that must be followed by directors, employees, collaborators and all those who operate for the achievement of Muviq's objectives.

Compliance with the rules contained therein is essential for the proper functioning, reliability, reputation and image of Muviq, factors that constitute a decisive asset for business success, consistent with the principles of legality and social responsibility.

Our ethical principles show people what they can expect from us and contribute to the growth of our reputation as an ethical, reliable, respected company and, together, strengthen our common intention to contribute to building a better world.

Our actions, our words and our behaviors matter.

We must maintain our commitment to our stakeholders by never lowering our guard and ensuring that our words and actions are always the right ones.

For this reason, we believe that the Code of Ethics is the right tool through which to communicate our values: integrity, respect, responsibility, legality, transparency, sustainability.

## **2. RECIPIENTS OF THE CODE OF ETHICS**

The Code of Ethics is addressed to directors, control bodies, management, all employees and those who operate, directly or indirectly, permanently or temporarily, to pursue Muviq's objectives (hereinafter: "Recipients").

The Code of Ethics defines the rules of conduct to be respected in carrying out professional activities and provides the rules of conduct to be followed in relations with shareholders, colleagues, customers, suppliers, partners, public institutions and all other stakeholders with whom Muviq relates.

Muviq trusts that its stakeholders recognize themselves in the principles on which the Code of Ethics is based, that they share and apply them in order to build a relationship of mutual trust.

The Code of Ethics is recognized and approved by the Board of Directors of Muviq.

## **3. VALUES AND ETHICAL PRINCIPLES**

### **3.1 Legality, loyalty, honesty and fairness**

Muviq operates in compliance with the laws and regulations in force, professional ethics, internal procedures adopted.

The pursuit of Muviq's interests can never justify conduct contrary to the principles of legality, correctness and honesty.

All behaviors and operations carried out by Muviq and by subjects acting in the name and on behalf of it must comply with the law, professional correctness, the principles of transparency, verifiability, consistency and congruity, efficiency, loyalty, collaboration and professional rigor, and duly authorized, documented and recorded.

No unlawful or illegal, or even unfair, conduct can be justified or considered less serious even if committed in the interest or advantage of Muviq. To this end, the Recipients undertake to diligently acquire the necessary knowledge of the legal provisions, from time to time in force, applicable to the performance of their functions.

### **3.2 Transparency, reliability and completeness of information**

The Recipients are required to respect transparency, understood as clarity, completeness and relevance of information, avoiding misleading situations in the operations carried out on behalf of Muviq.

The Same, are also required to comply with the regulations, procedures and company instructions, as implementations of the principle of transparency.

The Recipients undertake to verify in advance that the information communicated externally and internally is clear, truthful and complete, also in relation to economic, financial and accounting data.

Muviq recognizes the fundamental value of correct information to the competent bodies and functions, in order of the significant facts concerning the corporate and accounting management and in no way justifies actions by its collaborators that prevent control by the entities or organizations in charge.

### **3.3 Confidentiality and use of information**

Muviq guarantees the confidentiality of the information in its possession, compliance with the legislation on the protection of personal data and refrains from seeking confidential data through illegal means.

The Recipients are required to keep confidential the information they become aware of and not to use it for purposes other than those authorized and related to their activity.

### **3.4 Impartiality and equal opportunities**

The relationships between workers are based on values of civil coexistence and take place in respect of the rights and freedom of people, as well as the fundamental principles that affirm the equal social dignity, without discrimination based on age, nationality, ethnicity, language, sex, sexual orientation, religious belief, political and trade union affiliation, health conditions - physical or mental - or on the state of pregnancy, as well as maternity or paternity. In Muviq, equal opportunities are guaranteed in professional growth paths: promotions are based on objective criteria for evaluating performance.

### **3.5 Conflicts of interest**

Without prejudice to the fact that all business negotiations and relations with institutional and commercial interlocutors of Muviq must be conducted in accordance with the law and in compliance with the principles of fairness, transparency, efficiency, loyalty, professional rigor and verifiability, the Recipients must avoid any situation and refrain from any activity that may conflict a personal interest with those of Muviq or that may, however, interfere and hinder the ability to make, in an impartial and objective way, decisions in the interest of the company.

In particular, conflicts of interest between personal and family economic activities and the tasks performed within the belonging structure must be avoided.

By way of example, but not limited to, the following are situations of conflict of interest:

- the co-interest - manifest or hidden - of one of the Recipients in activities of suppliers, customers, competitors;
- the instrumentalization of one's functional position for the realization of interests conflicting with those of Muviq;
- the use of information acquired in the performance of work activities for one's own or third parties' benefit and in any case in contrast with the interests of Muviq.

Any situation potentially capable of generating a conflict of interest, or in any case of prejudicing the ability of the Recipient to make decisions in the best interest of Muviq, must be immediately communicated by the Recipient to his/her hierarchical superior, for the evaluations of the case and the interested party must refrain from acting.

### **3.6 Prevention of corruption**

Muviq, in conducting its activities, prohibits any action towards or by third parties, aimed at promoting or favoring its own interests, deriving benefit from it, or capable of damaging impartiality and autonomy of judgment.

To this end, Muviq undertakes to implement all the necessary measures to prevent and avoid acts of corruption, extortion, fraud, scams and other illicit conduct. Therefore, the Recipients must never base their conduct in such a way as to attribute to themselves or to others any advantage in consideration of the position or role held in Muviq.

Finally, in no case is it allowed to ask or accept, for any reason, compensation, gifts or other utilities, in connection with the performance of their functions or the tasks assigned, except for gifts of use, provided they are of modest value (market value less than Euro 100.00) within the limits of normal courtesy relations.

### **3.7 Work safety and sustainability**

Muviq is committed to respecting all the regulatory provisions concerning the protection of health and safety of workers in the exercise of their activities in the workplace or in mobility.

In any case, the Recipients must scrupulously comply with the current company provisions and legal prescriptions on personal safety and health protection.

Muviq also pays extreme attention to creating and maintaining sustainable and environmentally friendly services: in this perspective, all the services offered by Muviq do not require personalized devices and do not use consumable resources such as paper or plastic.

The same commitment to respect for the environment is required of the Recipients who must pay attention to their activities when they may have environmental repercussions and, consequently, must carry out their work with awareness in compliance with laws and regulations in force.

## **4. RULES OF CONDUCT**

### **4.1 Relations with employees and collaborators**

Muviq has created and maintains a work environment based on mutual respect and the enhancement of human resources. The organization and roles are determined by knowledge, experience and competence and each Recipient has full autonomy in the organization of work in relation to their role and responsibility.

Muviq adopts principles of personnel selection exclusively based on knowledge, experience and competence, without any preclusion or discrimination for gender, sexual or religious orientations.

The employment relationship, defined as objectives and evaluation, is defined by shared processes within the organization of Muviq, which allows the involvement of each resource in every step of every administrative, commercial and technical process.

Muviq believes in the active participation of its collaborators and, in this sense, contrasts any form of oppression or violence or of discriminatory behavior in human relations.

The place and time of work are defined in compliance with the laws and rules and are designed to guarantee the physical and psychological well-being of each Recipient.

Muviq requires that each Recipient operate loyally and according to the principles of good faith, respecting the commitments subscribed with the employment contract and ensuring the required services, to guarantee their operational contribution with ideas, enthusiasm and proactivity.

Muviq provides all the IT tools and infrastructure, guarantees training and assistance for the performance of the assigned tasks.

Muviq requires respect for company assets and prohibits the use of such assets for personal purposes or such as to interfere with the company's productivity. In particular, it is expressly forbidden to install or use software that is not licensed and approved by the Management.

## **4.2 Relations with customers**

The relationships are regulated by the principles defined by this Code of Ethics and it is expressly forbidden to sign contracts that are not based on extreme clarity and sharing and devoid of vexatious and / or more or less hidden clauses.

Muviq expressly prohibits the offer of goods or services to employees and managers of the customer, aimed at reaching and agreeing on conditions of better favor for Muviq to the detriment of the customer. Likewise, it is forbidden to accept goods or services aimed at conditions of favor of the customer and to the detriment of Muviq.

## **4.3 Relations with suppliers, consultants, collaborators and commercial partners**

In carrying out our activities and in managing relations with suppliers, collaborators, consultants and commercial partners, we scrupulously adhere to the laws, the principles of this Code of Ethics and the internal policies and procedures. We select suppliers with absolute impartiality, autonomy and independence of judgment and manage relations with them according to criteria of transparency, fairness and integrity, avoiding situations of conflict of interest, even potential.

In this regard, we contractually oblige our suppliers to comply with the laws as well as to take note and adhere to the principles established by this Code of Ethics.

## **4.4 Relations with representatives of the Public Administration**

In relations with the Public Administration, with entities that carry out activities of public utility or public interest, we adopt the most rigorous observance of the applicable regulations and the internal procedures applicable in the matter of gifts, donations and sponsorships.

The management of negotiations, the assumption of commitments and the execution of relations, of any kind, with such entities are reserved exclusively to the company functions assigned and / or authorized to do so, ensuring maximum collaboration in full respect of their institutional role.

In relations with the Public Administration, the Recipients must not try to improperly influence the decisions of the interested institution, in order to obtain the performance of acts not in compliance or contrary to the duties of office, in particular by offering or promising, directly or indirectly, gifts, money, favors or utilities of any kind. It is also forbidden to try to remunerate the obtaining of advantages for the performance of office tasks by public officials. The Recipients who should receive indications to operate in this sense are required to report it through the dedicated communication channels indicated in the specific section of the Muviq website.

## **5. IMPLEMENTATION OF THE CODE OF ETHICS**

### **5.1 Adoption, promotion and dissemination**

The Code of Ethics is an act of emanation of the Board of Directors that formally approved it with a specific resolution.

All Recipients are required to apply the rules of conduct described in this Code of Ethics and it is the responsibility of the Management to verify its correct dissemination and knowledge.

Each Recipient, within the scope of his/her function and responsibility, is required to verify the correct implementation of the principles contained in the Code of Ethics, becoming an active part in the event that he/she becomes aware of behaviors contrary to it.

The Code of Ethics is made available to all stakeholders and can be consulted on the Muviq website.

### **5.2 Reports**

The Code of Ethics represents one of the reference tools for the effective implementation of the Organization, Management and Control Model ex D.Lgs.231 / 2001 adopted by Muviq.

For this reason, all Recipients are obliged to promptly report any and / or alleged violations of this Code of Ethics through the reporting channel available at <https://muviq.whistlelink.com/> also indicated on the Muviq website.

In compliance with the national reference legislation on whistleblowing, all reports are handled confidentially through a predefined process.

Muviq does not tolerate in any case any form of retaliation, discrimination or penalization against anyone who has reported in good faith and in any case ensures the confidentiality of the identity of the whistleblower and the information transmitted, without prejudice to the obligations of law and the protection of the rights of the Company or of the persons erroneously and / or in bad faith accused.

### **5.3 Disciplinary system**

The violation of the principles and rules of conduct provided for by the Code of Ethics, by the staff of Muviq, constitutes a breach of the obligations deriving from the employment relationship and a disciplinary offense.

With reference to the sanctions that can be imposed, it is specified that they will be applied in compliance with the provisions of the National Collective Labor Agreement of reference, on the basis of the relevance that the individual cases considered assume and will be proportionate to their gravity.

The verification of these infractions, the management of disciplinary proceedings and the imposition of sanctions remain the competence of the company functions and / or social bodies assigned and delegated to do so.

Any violations of the provisions of this Code of Ethics by collaborators, consultants, suppliers or by third parties in general connected to Muviq by a contractual relationship not of dependent work, may determine the contractual remedies provided for by law and for the effects of the applicable law.

#### **5.4 Final provisions**

The preparation, updating and distribution of the Code of Ethics are entrusted to the Management, while the relative approval is by the Board of Directors of Muviq.

The Code of Ethics can be consulted on the Muviq website and in the internal infrastructure for document management, in the Quality section.