



CODE OF ETHICS

INTRODUCTION

LEXIA Law Firm (hereinafter "**LEXIA**" or the "Firm") has adopted this Code of Ethics which identifies the values and criteria of conduct to which each member of the Firm must adhere.

This Code of Ethics has been drawn up to ensure that the ethical principles to which all the Firm's professionals must be inspired are clearly defined and constitute the standard of conduct in the conduct of professional activities.

LEXIA recognizes legality, fairness, transparency and integrity as fundamental pillars. The Code is also an instrument for applying the provisions of Legislative Decree no. 231 of 8 June 2001.

LEXIA's people identify with the values of professional ethics and the pursuit of excellence: for this reason, the Firm is committed to safeguarding and developing an environment in which everyone can express their skills to the fullest, combining the search for personal inclinations with professional development.

ARTICLE 1 - SCOPE

This Code applies to all members of the Firm - partners, professionals and employees of all offices - as well as to any other person acting in the name and in the interest of the Firm (the "**Recipients**").

All Recipients, without distinction or exception, are obliged to observe the principles of this Code within the scope of their functions and responsibilities, in the knowledge that compliance with the Code is an essential part of professional and work performance.

This Code is without prejudice to the application of the law, the provisions of the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 adopted by the Firm and internal procedures.

ARTICLE 2 - GENERAL PRINCIPLES

Recipients must operate with the utmost integrity and honesty in all circumstances and areas in which they carry out their business. The principle of legality requires compliance with national and international regulations; the Firm rejects and does not tolerate unlawful conduct even when it is carried out with the intention of pursuing the interest of the Firm itself.

LEXIA and all its professionals act in respect of fundamental human rights and avoid any unlawful discrimination on the basis of gender and sexual orientation, race, nationality, political opinions and religious beliefs.

ARTICLE 3 - PROFESSIONAL INDEPENDENCE

The Recipients are required to maintain autonomy of judgment and intellectual freedom in the provision of advice, resisting pressure from clients, partners or third parties that may compromise its objectivity. It is

forbidden to take on positions in situations that prejudice or may prejudice independence, even in terms of appearance.

For professionals in the tax area, independence must be guaranteed in certificates, appraisals and tax opinions, with a prohibition to express complacent opinions aimed exclusively at satisfying the client's expectations.

Any circumstance that may affect independence must be promptly communicated to the file manager and the referring partner.

ARTICLE 4 - DUTIES OF DILIGENCE AND PROFESSIONAL COMPETENCE

The Firm's professionals are required to carry out their professional duties with diligence, as well as to constantly take care of their professional preparation, preserving and increasing their knowledge, with particular reference to the sectors in which they carry out their activities. Professionals are also required to comply with the requirements of continuous professional training provided for by the Order to which they belong, with timely documentation of training requirements.

The Firm is committed to supporting the continuous training of its professionals, including training in ethics, compliance and technological innovation, and to promoting mentoring as a tool for transmitting values and skills to junior professionals and trainees.

In carrying out their duties, the Recipients must act with honesty, decorum, discretion, fairness, transparency and loyalty.

ARTICLE 5 - RELATIONSHIP WITH THE CUSTOMER

Professionals are required to provide the client, before taking on the mandate, clear information on how the assignment is carried out, the risks involved and the foreseeable implications, including economic ones. During the assignment, the client must be promptly updated on the evolution of the case and must be informed of any new facts that may affect his decisions.

Professionals are responsible for maintaining and maintaining the client's file and returning the documents at the end of the mandate.

It is forbidden for legal professionals to take on mandates that involve the defense of conflicting interests, even in different proceedings.

ARTICLE 6 - PROFESSIONAL REMUNERATION

Before taking on the assignment, professionals are required to formulate written and understandable cost estimates. Agreements on fees that may compromise the independence of the professional or give rise to a conflict of interest with the client, as well as the invoicing of services not actually rendered or the artificial increasing of the calculation of hours worked, are prohibited.

ARTICLE 7 - DUTY OF CONFIDENTIALITY

The Recipients are required to maintain the utmost confidentiality with regard to the information of which they become aware and undertake not to disclose information not in the public domain relating to clients and assignments entrusted to the Firm.

The Recipients are required to comply with the obligation of professional secrecy and to ensure the utmost confidentiality in relation to the news and information learned, directly or indirectly, from customers and subjects with whom they come into contact in the course of their professional activity.

Professionals who, in the exercise of their duties, become aware of inside information pursuant to Regulation (EU) 596/2014 (MAR) are bound to the utmost confidentiality and are absolutely prohibited from using it for personal purposes or on behalf of third parties. It is absolutely forbidden to buy, sell or recommend financial instruments on the basis of inside information acquired in the course of professional activity. The Firm adopts internal procedures for the segregation of information in transactions in which parties with opposing interests assist. Any situation in which there is a risk of a mixture of sensitive information between distinct practices must be reported to the responsible shareholder and to the Supervisory Body.

The Firm guarantees the protection of information relating to all Recipients and third parties and excludes any improper use of the same, thanks to the adoption of appropriate security measures for all databases that collect and store personal data.

ARTICLE 8 - HONESTY AND CONFLICTS OF INTEREST

All Recipients must carry out their professional activities with rectitude and honesty, refraining from unlawful conduct such as corrupt practices, illegitimate favours, collusive behaviour and solicitation of undue personal advantages.

It is strictly forbidden to pay or offer, directly or indirectly, payments, benefits or other advantages to bodies or companies, public officials, public service officers, public or private employees, to influence or compensate for the obtaining of assignments or acts in favor of the Firm.

The acceptance of money or other benefits not due from persons or companies that are or intend to enter into business or professional relations with the Firm is prohibited.

All Recipients must avoid situations in which conflicts of interest may arise and refrain from personally taking advantage of business opportunities of which they have become aware in the course of carrying out their duties. The identification, management and prevention of conflicts of interest are governed by the specific internal Policy adopted by the Firm, to which all Recipients are required to comply.

The professional who detects a potential conflict must promptly report it to the responsible shareholder and, if the conflict is unresolved, to the Supervisory Body, in accordance with the procedures set out in the Internal Policy.

ARTICLE 9 - COOPERATION

LEXIA believes in teamwork, in the ability to listen and in the power of confrontation. It is with this spirit that the Firm acts as a partner of its interlocutors, even externally.

The Firm is aware that each person is the bearer of experiences, sensitivity and skills, not only professional but above all personal, unique in their kind. The enhancement of these uniqueness as strengths of a varied and inclusive workplace is one of the cornerstones of LEXIA.

ARTICLE 10 - ENHANCEMENT OF DIVERSITY AND GENDER EQUALITY

LEXIA believes in a culture based on respect for diversity from every possible point of view: of origin, social, religious, political ideas, gender, age, psychophysical abilities, identity and sexual orientation.

The Firm is committed to protecting the physical and moral integrity of its professionals and employees, guaranteeing the right to working conditions that respect the dignity of the person and safeguarding them from acts of physical or psychological violence.

The Firm counteracts any discriminatory or harmful attitude or behavior of the person. Recipients must therefore refrain from any discrimination based on age, sex, sexual orientation, state of health, race, nationality, social origin, political opinions or religious beliefs.

The perpetrator of harassing behaviour in the workplace, whether sexual or related to personal, cultural, religious, political and racial differences, incurs the sanctions provided for by the disciplinary system of Model 231 adopted by the Firm.

The Firm is committed to promoting the professional well-being of its employees, adopting balanced workload policies and fostering an environment that allows professional and personal needs to be reconciled.

ARTICLE 11 - COMPLIANCE WITH THE LAW AND REGULATIONS

All Recipients are required to comply with the law and regulations in force, as well as all the provisions of the Firm's Model 231.

The Recipients act in such a way as to guarantee independence and the absence of conflicts of interest in the performance of their functions and responsibilities, refraining from any use of inside or otherwise confidential information.

The Recipients comply with the regulations in force and the Firm's directives on anti-money laundering, processing of personal data and protection of privacy.

In particular, the Recipients are required to carry out adequate verification of the customer, including identification, identity verification and identification of the beneficial owner, before taking on any assignment that falls within the scope of application of Legislative Decree 231/2007. In the event that it is impossible to complete the due diligence, the Recipients must refrain from establishing or continuing the professional relationship. The Recipients are required to report suspicious transactions to the Financial Intelligence Unit (FIU), in compliance with professional secrecy and within the limits of the law, and to be absolutely prohibited from communicating the report to the customer or third parties. It is the professional's responsibility to periodically update himself on the types of risk and anomaly indicators published by the FIU.

The Recipients may not establish or continue professional relationships with persons included in the European Union sanctions lists or in the OFAC lists, unless specifically authorised by the competent authorities. If, during the course of an assignment, circumstances arise that can be traced back to sanctions, the professional must immediately report it to the responsible partner and to the Supervisory Body.

ARTICLE 12 - RELATIONS WITH THE AUTHORITIES

Relations with the judiciary, public officials or persons in charge of public service and all other authorities must be marked by the dignity and respect befitting each other's functions.

The Recipients are required to offer, in compliance with professional secrecy and the laws and deontological rules in force, the utmost collaboration with the Judicial Authority and other public authorities.

ARTICLE 13 - GIFTS AND GIFTS

You may not accept, pay or offer, directly or indirectly, gifts, payments, material benefits or other benefits of any entity to any third party, whether public or private, to influence or compensate for their act or to obtain any advantage.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties and cannot be interpreted as aimed at acquiring advantages improperly.

ARTICLE 14 - SAFETY AND HEALTH IN THE WORKPLACE

LEXIA is committed to creating and maintaining a work environment that protects the physical integrity and moral dignity of its professionals and employees, also through compliance with current legislation on safety and risks at work.

All professionals and employees are required to use company assets appropriately and safely in order to maintain a healthy and safe environment.

The Recipients have the duty to comply with the safety directives and to immediately report accidents, dangerous conditions or behaviour and potentially harmful work situations to those responsible.

ARTICLE 15 - TAX OFFENCES AND RESPONSIBLE TAX ADVICE

Professionals in the tax area must operate in compliance with current tax legislation and may not participate, even indirectly, in tax planning schemes that constitute abuse of the right pursuant to art. 10-bis of the Taxpayer's Statute or criminally relevant cases pursuant to Legislative Decree 74/2000.

LEXIA's professionals distinguish between lawful tax planning, tax avoidance and tax evasion, and cannot assist clients in conduct that falls into the latter two categories. The professional is required to clearly represent to the client the legal and reputational risks associated with the most aggressive tax planning operations, before making them operational.

It is forbidden to participate as a consultant in carousel tax fraud schemes or to interpose the Firm in financial transactions without economic substance.

ARTICLE 16 - USE OF COMPUTER SYSTEMS AND PROTECTION OF ASSETS

The use of the Firm's computer systems, databases and the Internet must take place in compliance with the internal regulations, current legislation and on the basis of the principles of fairness and honesty. Professionals and employees are required to immediately report any cybersecurity incidents, including the loss of devices, unauthorized access to systems, and the receipt of phishing communications, to the Privacy Coordinator and the IT manager, even if they are not yet confirmed suspicions. It is forbidden to delay or conceal a security incident: any omissive conduct in the event of a *data breach* is considered a serious violation of this Code. The Recipients are required to comply with the IT security procedures defined in the Privacy Organisational Model and in the other internal regulations; the Firm undertakes to ensure operational continuity and the restoration of systems in the event of an incident, in the interest of data protection and ongoing professional assignments.

Each Recipient is responsible for the correct use of the IT resources assigned to him as well as the access codes to the systems themselves. It is forbidden to illegally enter computer systems protected by security measures, as well as to illegally obtain or disseminate access codes and damage information, data and computer programs.

Each Recipient must feel responsible custodian of the company assets that are instrumental to the activity carried out, must refrain from misusing them and comply with the provisions of the internal regulations.

ARTICLE 17 - RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

LEXIA professionals may use generative artificial intelligence tools in the exercise of their professional activity exclusively in compliance with the Policy on the use of Generative Artificial Intelligence adopted by the Firm and in a manner compatible with the confidentiality obligations towards the client.

Any output produced by AI tools must be verified, validated and assumed under the personal responsibility of the professional before being delivered to the client or used in a proceeding. Professionals cannot invoke the *output* of an AI tool to decline their professional liability: the responsibility for the document remains with the professional regardless of the tools used.

The Firm is committed to providing specific training on the responsible use of AI tools and to periodically updating the Policy in light of regulatory and technological developments.

ARTICLE 18 - RESPECT FOR THE IMAGE OF THE FIRM

The Recipients must also protect the image and name of the Firm through a conscious use of their private profiles on each social networking platform.

The Firm, while acknowledging the full right of its professionals and employees to use *social media*, invites all Recipients to be extremely careful in evaluating the contents and materials to be disseminated, which must not: (i) represent violations of the laws and regulations in force; (ii) mislead as to whether these positions are taken or attributable to the Firm; offending the freedom, integrity and dignity of persons; (iii) damage, even indirectly, the image, reputation and credibility of the Firm.

ARTICLE 19 - REPORTING AND WHISTLEBLOWING

The Recipients must promptly report - in the manner provided for by the Firm's Model 231 - to the Supervisory Body or to the Managing Partner any violations or instigations to violate the law, regulations, as well as the provisions of the Firm's Model 231 or this Code.

No negative consequences arise for those who have made a report in good faith. In any case, the confidentiality of the identity of the whistleblowers is ensured, without prejudice to legal obligations.

ARTICLE 20 - VIOLATION OF THE CODE OF ETHICS

Without prejudice to the sanctions provided for by law and/or by the professional association to which you belong, failure to comply with this Code of Ethics constitutes a violation of the relationship of trust with the Firm.

The Firm may consequently adopt the measures provided for by the disciplinary system of Model 231 against the Recipients who are responsible for violations.

ARTICLE 21 - ENVIRONMENTAL SUSTAINABILITY AND SOCIAL RESPONSIBILITY

LEXIA is committed to reducing its environmental impact through policies of dematerialization of documents, reduction of energy consumption in offices and promotion of sustainable ways of working, including remote working and videoconferencing instead of transfers.

The Firm undertakes to carry out *pro bono* activities for the benefit of poor subjects, non-profit organizations or causes of general interest, in implementation of the principle of access to justice. The Recipients are invited to contribute personally to the social responsibility initiatives promoted by the Firm.

ARTICLE 22 - EXTERNAL COLLABORATORS AND SUPPLIERS

LEXIA adopts criteria for the selection of collaborators and suppliers that take into account, in addition to professional skills, also their integrity profile and compliance with ethical standards equivalent to those of this Code.

Contracts with professionals and external collaborators include a clause adhering to the fundamental principles of this Code, in particular with regard to legality, confidentiality, absence of conflicts of interest and anti-money laundering.

It is forbidden to use collaborators or suppliers if there are well-founded reasons for their involvement in illegal activities, corruption or violations of fundamental rights.

ARTICLE 23 - UPDATING OF THE CODE OF ETHICS AND DISSEMINATION

This Code may be subject to periodic verification and possible updating by the Firm.

The Firm undertakes to promote knowledge of the Code of Ethics and to ensure compliance with the provisions contained therein: to this end, the full version of the Code of Ethics is available on the Firm's website and is delivered to all Recipients.