



**LEAFSPACE**

Code of Ethics

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the nature of their relationship, including temporary, with the Company (hereinafter, collectively, the “**Recipients**”)

The Recipients must additionally be available to undergo, according to and in line with the provisions of the laws applicable and the Company’s internal procedures, the checks and inspections arranged by the Company.

The Recipients are furthermore under obligation to

- a) abstain from conducts that are contrary to the provisions of the Code of Ethics;
- b) contact line managers and/or the Company's functions/bodies tasked with such duties in case of need for clarifications on how to apply the provisions of the Code of Ethics;
- c) promptly report to line managers and/or the Company’s functions/bodies tasked with the duty to receive reports on
  - any information, whether obtained directly or reported by third parties, concerning possible violations of the rules of the Code of Ethics;
  - any request they may have received to infringe the rules of the Code of Ethics;
- d) collaborate with the Company's functions tasked with the duty to verify possible violations of the provisions of the Code of Ethics, providing, to such end, the information requested.

The Recipients may not conduct personal investigations or report information to other parties other than the ones listed under point c) above.

Furthermore, Leaf Space asks all suppliers and partners to adopt a conduct consistent with the principles and provisions of this Code of Ethics.

## IV GENERAL PRINCIPLES

In the performance of daily activities, Leaf Space acts in compliance with the principles of liberty and dignity of the human person.

Leaf Space is committed to keep its environment free from any discrimination or harassment relating to gender, race, language, personal and social conditions, and religious and political beliefs.

Leaf Space recognises that human resources constitute a fundamentally important element to its development. The management of human resources is based on respect for individual personalities and professional skills, within the general framework of the laws and regulations in place.

### IV.1 BUSINESS ETHICS

In the performance of its daily activities, the Recipients must act with diligence, moral integrity, and fairness, making the best use of the tools in their possession.

In particular, Recipients are called to

- a. adopt at all times a *conduct in line with the principles of loyalty and good faith* towards the Company, superiors, colleagues, and collaborators, engaging in conducts based on mutual collaboration;
- b. ensure that every business transaction is taken *in the interest of Leaf Space* and not in one’s own personal interest or in the interest of third parties. In particular, any employees who should find themselves in a situation of conflict of interest, whether personal, financial, family-related, or of any other nature, including only potential, must inform their superiors, abstaining, thereafter, from engaging in any act that may harm the interests of the Company or that is liable to give rise to a conflict of interests.

In order to prevent situations where the individuals involved in a transaction have, or may appear to have, a conflict of interests with the Company, Leaf Space prohibits corrupt practices, unlawful favours, collusive behaviour, solicitations, either made directly and/or through third parties, to receive personal or career advantages for oneself or for others, and other similar behaviours.

- c. guarantee the *integrity of information*: the information handled within one's own sphere of responsibility must be processed and communicated in a complete, accurate, and truthful manner.
- d. safeguard the *confidentiality of news and information* learned in the performance of one's own functions, and prohibition from using or disseminating, to one's own advantage or to the advantage of third parties, the privileged information obtained in the performance of one's own duties.

## IV.2 RESPONSIBILITIES

Continuous improvement is first and foremost the result of responsible cooperation, which can be attained through personal and active cooperation between the various areas of the Company and between the collaborators and staff of each single division. Actions, at all levels and degrees of responsibility, must be mutually aimed at the attainment of the best possible product, fostering the sharing of the Company's mission.

Anyone who has a leading or managing position must lead by example, provide leadership and guidance in compliance with the principles contained in the Code of Ethics; their behaviour must furthermore demonstrate to their colleagues that observance of the Code of Ethics is a fundamental requirement for everyone's work and for the attainment of business results.

## IV.3 TRANSPARENCY AND HONESTY

Each Recipient has the duty to operate with transparency, providing their collaborators, superiors, and suppliers authentic, essential, and truthful information in regard to the performance of the tasks within their competence.

Honesty is the fundamental principle for all of Leaf Space's activities, its initiatives, reports and communications, and it constitutes an essential element in the Company's management.

## IV.4 PROFESSIONALISM

Leaf Space gives paramount importance to the value of professionalism, and consequently asks the Recipients to operate at all times with the professionalism and degree of diligence required by the nature of the duties entrusted and the functions carried out, making every effort towards the attainment of the objective assigned.

## IV.5 HUMAN RESOURCES

Leaf Space's focus on people is daily expressed in the creation of a positive working environment, where each has the chance to develop and grow in their skills and competences. Leaf Space bases its relationship with its employees on principles such as loyalty and trust.

Leaf Space is committed to spreading and consolidating a culture of safety by increasing every collaborator's awareness of risks and promoting responsible behaviour.

The Company pursues the objective of maintaining and fostering a positive working environment, inspired by the protection of liberty and the dignity and inviolability of individuals, and by fairness in interpersonal dealings.

The Company condemns the practice of hiring and consequently utilising workers from Third Countries without a valid residence permit, and

ensures that such practice is not pursued by its own suppliers and commercial partners.

#### IV.6 COMMUNICATION

The Company recognizes the primary role of *effective and clear communication* in dealings within and without the Company.

The information provided to parties outside the Company must be coordinated at Company level and handled exclusively by staff who are tasked with communication duties. Any conducts and actions contrary to this principle shall be subject to disciplinary measures as laid down in the Code of Ethics, contracts, and applicable laws.

#### IV.7 TRANSPARENCY AND TRACEABILITY

Leaf Space operates in compliance with the principle of transparency and traceability. Every action and transaction carried out by the Company must be supported by suitable records.

The activities and actions carried out by the Recipients within the scope of their working duties must be documented in compliance with the applicable provisions of law, through accurate, complete, and reliable documentation, and, where required by the law and the accounting principles applicable, they must be promptly and accurately represented in accounting records.

Said documentation must be such as to allow, when audits are carried out, the identification of the characteristics of and the reasons for a specific transaction and of the individuals who , respectively, authorised, carried out, and/or recorded the transaction.

In addition, to ensure compliance with the rules set out in the Code of Ethics, the responsibility to grant authorisation to carry out a specific transaction must be in the hands of a person other than the person who carries out, checks, and records the transaction.

#### IV.8 ANTI-MONEY-LAUNDERING

Leaf Space acts in compliance with national and international laws and provisions against money laundering, and asks the Recipients to abstain from carrying out any operation that may contribute to the transfer, replacement, or any other form of use of unlawful profits or which may in any way hinder the identification of money, goods, or other values originating from criminal activities.

#### IV.9 ANTI-CORRUPTION

Leaf Space considers corruption an obstacle to efficiency and healthy competition, and disapproves any form of behaviour that is in conflict with such values.

Therefore, observance of this Code of Ethics and of the laws in force constitute one of the key principles in the exercise of Leaf Space's activity. All Recipients are required to act with transparency, honesty, integrity, fairness, and loyalty.

### V RULES OF CONDUCT

#### V.1 LEAF SPACE AND THIRD PARTIES

In dealings with customers, suppliers, political institutions, the Public Administration, and , more generally, with Third Parties, the Recipients must not promise, accept, or offer any gifts, presents (whether direct or indirect) and acts of courtesy that have a quality or a value exceeding normal commercial practice, local customs, and ordinary courtesy, or that may in any way be aimed at obtaining preferential treatments or other undue advantages, in respect of the business activities ascribable to Leaf Space.

Should any gifts, presents, advantages or acts of courtesy or hospitality be offered or promised to the Recipients, the latter should inform without delay the competent Company's bodies, who will

decide whether or not what is being offered or promised may be accepted.

Recipients must not offer or promise - and when asked to do so they must without delay inform the competent Company's bodies of such circumstance - to any customer, political institution, Public Administration and Third Parties in general any gifts, presents, advantages (whether direct or indirect) and acts of courtesy or hospitality that exceed the above limits or have the above characteristics.

It is furthermore prohibited to hire as employees or stipulate consultancy or other type of contracts with public officials, or employees in the public or private sector (or their co-habitants, spouses, relatives or next of kin within the first degree of kinship) who personally and actively took part in a business negotiation that involved the Company or who participated in endorsing the requests made by the Company to the Public Administration or private undertaking.

V.1.1 DEALINGS WITH INSTITUTIONS AND PUBLIC OFFICIALS

Leaf Space's dealings with national, Community, and international public institutions (“**Institutions**”), and with public officials or persons entrusted with public offices, or with bodies, representatives, agents, spokespersons, members, employees, consultants, persons entrusted with public functions or services, of public institutions, public administrations, public bodies, including economic, of public entities or companies including local, national, or international (“**Public Officials**”) are handled by each Recipient, irrespective of their function or assignment, in compliance with the laws in place and the principles defined in this Code of Ethics, and based on the general criteria of fairness and loyalty.

The Recipients abstain from making false declarations to the Judicial Authority or to induce

third parties to make false declarations to the Judicial Authority for the purpose of steering said Judicial Authority’s decision to their advantage.

Each Recipient is therefore under obligation to operate in all conscience and render their declarations, where requested, accurately and without omissions.

V.1.2 DEALINGS WITH SUPPLIERS, COMMERCIAL PARTNERS, AND CONSULTANTS

Leaf Space asks his suppliers, Commercial Partners, and external consultants to comply with ethical and environmental principles consistent with those of Leaf Space, holding this aspect to be of fundamental importance for the creation and continuation of a business relationship. Every supplier, Commercial Partner or consultant must be informed without delay of the existence of the Code of Ethics and of the commitments and obligations imposed on third parties under said Code.

The selection of suppliers, Commercial Partners and consultants, and the laying down of the purchasing terms and conditions are based on an objective assessment of the quality, price, and ability to provide and guarantee the provision of goods and service at an adequate standard. Leaf Space’s reference requirements are

- the professionalism of the third party;
- the availability, suitably documented, of means, including financial, organised structured, planning skills and resources, know-how, etc.
- the existence and actual implementation of quality systems within the company, suitable to also ensure the capacity to operate safely.

In handling dealings with suppliers, Commercial Partners, and consultants, the Company undertakes to pay compensation exclusively based on the services indicated in the contract,



and to make no payments to persons other than the contractual counterparty.

## V.2 LEAF SPACE AND DEALINGS WITH EMPLOYEES AND COLLABORATORS

Acting with integrity towards Employees and Collaborators means recognizing that they represent a resource for Leaf Space.

To this end, the Company assesses the contribution of each single individual and is committed to treat each with due respect, and particularly

- by maintaining confidentiality on documents and information of the Recipients in compliance with privacy laws and regulations;
- by acting at all times with the intent of creating a working environment free from any form of discrimination based on race, ethnic origin, gender, political and religious beliefs, age, and sexual preference;
- by offering equal opportunities to all with respect to hiring, compensation, training, promotions, and other employment conditions;
- by not tolerating and punishing any form of harassment, including verbal or physical conducts that constitute humiliation or threat.

The Company asks each Recipient to carry out their work activity in suitable physical and mental conditions, and to personally contribute to maintaining a working environment that is respectful of the feelings of others. In the performance of work activities and within working spaces, any abuse of alcoholic substance, the assumption of psychotropic or narcotic substances or the exchanging, for any reason whatsoever, of any narcotic substances during the performance of the work activity shall be considered a deliberate violation of the principles of this Code of Ethics. The Company undertakes to

conduct the checks prescribed under the applicable laws and regulations.

### V.2.1 OBLIGATIONS OF THE EMPLOYEES AND COLLABORATORS OF LEAF SPACE

The Employees and Collaborators of Leaf space undertake to

- observe the provisions of law concerning the duties of workers and the collective bargaining agreements adopted within the Company;
- act in line with the values and principles of the Code of Ethics;
- adopt and maintain highly professional conducts with respect to the Company;
- protect the interests of the Company;
- be guided, in the performance of work duties, by principles of transparency, fairness, honesty, and professionalism, both internally and outside the Company;
- assume their role responsibly and comply with the directives imparted by superiors, adopting, in particular, all the health and safety measures indicated by the Company.

The failure to comply with or the breach of such obligations and of the principles contained in the Code may give rise to the application of disciplinary measures, as laid down in paragraph VII below.

### V.2.2 USING THE COMPANY'S ASSETS

Every Recipient must exercise all due care and diligence to protect the Company's assets, by acting responsibly and in line with the operating procedures laid down to regulate the use thereof, documenting their use, where required. Every Recipient is responsible for protecting the resources entrusted and has the duty to promptly inform the Company's structure assigned to such task of any threats or events that may be harmful to the Company or its assets.

The Recipients and other persons who are under obligation to abide by the rules of this Code of Ethics are prohibited from altering in any manner whatsoever the functioning of any electronic or telecommunication system or interfere in any way and without authorisation with the data, information, or programmes contained in one of the above systems.

### V.3 HEALTH, SAFETY, AND ENVIRONMENT

Leaf Space considers the issues connected to the environment and safety to have an essential value to the Company, including in consideration of the sector it operates, and contributes constructively to ecological sustainability.

In the awareness that it carries out an activity in the service of the environment, as an asset of collective interest, Leaf Space is committed to minimising the environmental impact of its services.

The operating management of all activities must be guided by criteria of environmental protection and energy efficiency, pursuing the improvement of the health and safety conditions in the workplace.

Technological research and development must be dedicated in particular to the promotion of products, services, and processes that are as compatible as possible with the environment and with the health and safety of operators.

The Recipients and other persons under obligation to comply with the provisions of this Article, each within the scope of their work duties and functions, take part in the process of risk prevention, protection of the environment and protection of the health and safety with respect to themselves, their colleagues, and third parties.

#### V.3.1 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE

With regards to protection of health and safety in the workplace, Leaf Space

- implements the measures required for the protection of the health and physical integrity of its employees and collaborators, adopting corporate organisation models based on the constant improvement of the health and safety of the workplace;
- complies with the principles of health and safety in the workplace in organising work, in designing work places, and in selecting work equipment;
- abides by the applicable safety laws and regulations;
- undertakes to eliminate risks, and where this is not possible, to minimise such risks on the basis on the knowledge in reference to technological process;
- in order to implement its workplace safety policy, Leaf Space curates on-going training and awareness-raising initiatives for its management and all the members of staff with regard to safety issues, undertaking to implement and spread a culture of safety.

Each Recipient must give great care in the performance of their work activity, strictly abiding by all the safety and prevention measures set out, in order to prevent any possible risk for themselves, colleagues, collaborators and the entire community.

#### V.3.2 ENVIRONMENTAL PROTECTION

With respect to the environment the Company

- adopts measures that are suitable to limit and - where possible - erase the negative impact of its business activity on the environment;
- plans the accurate and constant monitoring of the scientific progress and changes to the

legal framework concerning the environment;

- promotes production policies that harmonise the economic development and value-creation needs that characterise the Company's business activity, with the need to respect and protect the environment, spreading a culture of risk-prevention in regard to environmental risks.

#### V.4 ECONOMIC AND FINANCIAL RESOURCES

Leaf Space carries out its activity in full compliance with foreign currency provisions and existing laws. In particular, the Recipients and the other persons who are under obligation to comply with the rules of this Code of Ethics undertake to check beforehand the available information concerning commercial counterparties, suppliers, and consultants, in order to verify that they are reputable and that their activities are legal; the Recipients furthermore undertake to operate in manners such as to prevent being implicated in transactions that may even only potentially be liable to favour the laundering of money originating from unlawful or criminal activities, acting in full compliance with primary and secondary anti money-laundering laws and regulations.

In the management of economic and financial resources, the Recipients must adopt conducts inspired on the principles of transparency, accuracy, and completeness of accounting information, so that

- every transaction is recorded accurately, and that it is also authorised, verifiable, legitimate, consistent, and congruous;
- the economic and financial situation and the assets and liabilities published are truthful, accurate, and timely.

## VI IMPLEMENTING REGULATIONS

### VI.1 SUPERVISORY BODY

The Supervisory Body of the Company (hereinafter, the “**SB**”) is vested with the powers, tasks, and duties set out in the Organisational Model under Legislative Decree No. 231/2001.

The SB has the authority to receive requests for clarifications, complaints, or news of potential or actual violations of this Code. In line with the laws and regulations in place, any information obtained in such manner shall be maintained strictly confidential.

### VI.2 REPORTS AND WHISTLEBLOWING

The Company promotes the prevention and investigation of any unlawful conduct or any conduct conflicting with the Code of Ethics, and encourages the Recipients to promptly report to the SB any unlawful conduct or any conduct in conflict with the Code of Ethics they may learn on account of their dealings with the Company, following the process laid down in paragraph 9.6 of the General Part of the Company's Organisational and Management Model.

Except for cases of liability for slander or defamation, or for slander and defamation under Article 2043 of the Civil Code, a Recipient who reports in good faith to the SB any unlawful conducts, or conducts contrary to the Code of Ethics, of which they have gained knowledge on account of their dealings with the Company, cannot be subject to punishment.

### VI.3 PENALTY SYSTEM

This Code of Ethics contains principles and rules of conduct which compliance is considered fundamental by Leaf Space. The Company, through the bodies and functions assigned with such duties, will impose, coherently, impartially, and uniformly, disciplinary measures proportionate to the violation of the Code of Ethics, consistently with the penalty systems set out by the provisions of law applicable from time to time.

#### VI.3.1 EMPLOYEES AND DIRECTORS

the failure to comply and/or the violation of the rules of conduct laid down in the Code on the part of the Company's employees constitutes a breach of the obligations arising out of the employment relationship and gives rise to the application of disciplinary measures.

These measures shall be applied in compliance with the provisions of law and shall be proportionate to the seriousness and the nature of the facts.

In case of employment relationships, a violation constitutes a breach of the obligations laid down pursuant to and by effect of Article 2104 of the Civil Code and/or a criminal and/or disciplinary offence, with all consequences of law and arising out of the Collective Agreement.

In case of violation of the rules of this Code by employed workers, the Company shall adopt disciplinary measures proportionate to the violations committed and in line with the current provisions of law on the framework of employment relations, following the regular completion of the disciplinary procedure established under Article 7 of Law No. 300/1970.

In the most serious cases, and in compliance with the applicable provisions of law and under the

Supervisory Body of Leaf Space S.r.l.	
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terms and conditions of the Collective Contract, a violation may give rise to the termination of the employment relationship for just causes, when the violation was carried out by an employee.

The investigation of the above violations, the management of the disciplinary procedures, and the imposition of disciplinary measures are the exclusive responsibility of the Company's functions tasked with and delegated to such duties.

In case of violations of the Code of Ethics on the part of directors, this circumstance must be communicated to the Board of Directors so that it may take the opportune actions in accordance with the law.

#### VI.3.2 COLLABORATORS, CONSULTANTS, ETC.

Any conduct adopted by Collaborators, Consultants, or other parties who are parties to agreements in place with the Company, in violation of the provisions of this Code of Ethics, shall also lead to the termination of said contractual relationships, without prejudice to Leaf Space's right to claim compensation where such conduct gives rise to damages suffered by the Company.

**VI.4 COMMUNICATION OF THE CODE OF ETHICS**

Leaf Space informs all the Recipients of the provisions and the application of the Code of Ethics, and recommends the observance thereof.

The Company takes care to

- disseminate the Code of Ethics with the Recipients;
- interpret and clarify its provisions;
- check that the Code of Ethics is effectively implemented;
- update the provisions of the Code of Ethics in respect of any requirement that may emerge from time to time.

The Code of Ethics shall be brought to the knowledge of the third parties who receive assignments by Leaf Space or have any lasting relationship with Leaf Space, by publishing the Code on Leaf Space's website.

**VII VALIDITY OF THE CODE AND HARMONISATION WITH THE COMPANY'S PROCEDURES**

The Code of Ethics was approved by the Board of Directors of Leaf Space of 21 April 2021.

Any future updates, due to legislative changes or the evolution of public awareness, shall be approved by the Board of Directors and disseminated without delay with all its Recipients.

The Code of Ethics does not replace the current and future Company procedures, which continue to be valid to the extent that they are not in conflict with the Code of Ethics.

**Declaration of acknowledgement**

The undersigned declares to have received, read, understood, and accepted this Code of Ethics.

Signature

\_\_\_\_\_

Date

\_\_\_\_\_