



# leaf space

Organization, Management and Control Model

pursuant to Legislative Decree no. 231/2001

## CODE OF ETHICS

REV.	DATE	APPROVED	NOTES
01	21/04/2021	Board of Directors	
02	04/08/2023	Board of Directors	
03	10/12/2025	Board of Directors	

## SUMMARY

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### INTRODUCTION

---

What is the Code of Ethics and why do we adopt it?

Who is the Code of Ethics aimed at?

### GENERAL PRINCIPLES

---

Ethics in business

Responsibility

Honesty

Professionalism

Communication

Transparency and traceability

Anti-money laundering

### RELATIONS WITH STAFF

---

How we operate

What we ask of our employees and collaborators

- *Rules on the use of company assets*

Diversity and inclusion

Human rights

Harassment and bullying

Whistleblowing

### RELATIONSHIPS WITH THIRD PARTIES

---

Corruption and gifts

Conflicts of Interest

- *Relations with Institutions and Public Officials*
- *Relations with Suppliers and Consultants*

### HEALTH, SAFETY AND THE ENVIRONMENT

---

Health and safety protection in the workplace

Environmental protection

Economic and Financial Resources

### CORPORATE GOVERNANCE

---

Corporate bodies

Relations with shareholders

Economic and Financial Resources

### IMPLEMENTING RULES

---

Penalty system

- *Employees*
- *Collaborators, consultants, etc.*
- *Corporate bodies and supervisory body*

Publicity and communication of the Code of Ethics

### ENTRY INTO FORCE AND COORDINATION WITH COMPANY PROCEDURES

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## INTRODUCTION

### WHAT IS THE CODE OF ETHICS AND WHY DO WE ADOPT IT?

The Code of Ethics can be defined as a company's constitution, a charter of rights and duties that defines the ethical and social responsibilities of every individual involved in the company.

By adopting the Code of Ethics, we are committed to ensuring that all our activities are inspired every day by values such as **commitment, transparency, business ethics, reliability, innovation, respect** and **a sense of responsibility** towards ourselves, others and the environment, setting ourselves the goal of preventing irresponsible or unlawful behaviour by those who work in the name and on behalf of the Company, as well as establishing the relevant system of sanctions.

Through this Code of Ethics, we therefore intend to implement Leaf Space's ethical principles and provide a means of ensuring fair and effective management of human relations and transactions, with the aim of increasing the trust of both our employees and internal collaborators and our customers and partners.

It is for this reason that the provisions contained in the Code of Ethics apply to everyone, without distinction, regardless of position or hierarchical level, and any violation of them will result in the adoption of sanctions and measures.

### WHO IS THE CODE OF ETHICS AIMED AT?

Our Code of Ethics is intended for all persons who have professional relationships with our Company: employees, directors, collaborators, consultants, affiliates and partners, hereinafter referred to as 'Recipients'.

With this Code of Ethics, we also intend to share our principles with our customers, inviting them to respect our values and internal policies, and with our suppliers, whom we require to adopt conduct consistent with the principles and provisions contained herein.

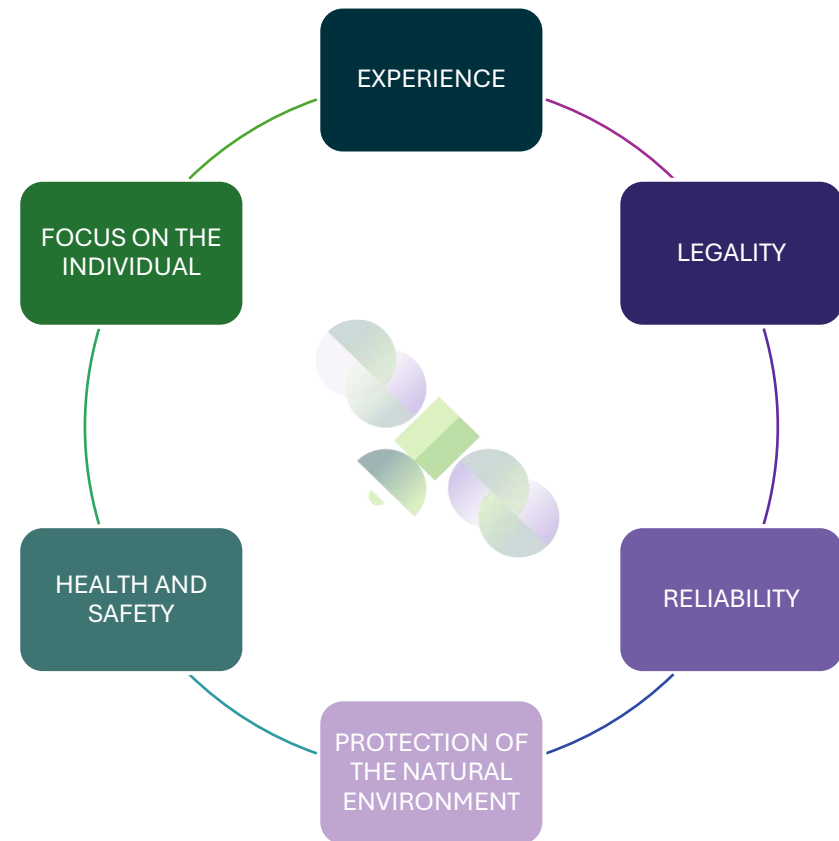
Recipients shall be subject, in compliance with and in accordance with the provisions of current regulations and any internal procedures of the Company, to the checks and controls arranged by the Company in relation to the correct application of the principles contained in this Code of Ethics, and shall also be obliged to:

- refrain from behaviour contrary to the provisions of the Code of Ethics;
- contact their line managers and/or the Company's departments/bodies responsible for this matter if clarification is needed on how to apply the provisions of the Code of Ethics;
- promptly report to their superiors and/or to the Company departments/bodies responsible for this:

- any information, directly observed or reported by others, regarding possible violations of the rules of the Code of Ethics;
- any request to violate the rules that has been made to them;

➤ cooperate with the Company departments responsible for investigating possible violations of the provisions of the Code of Ethics, providing any information that may be requested for this purpose.

None of the Recipients may conduct personal investigations or report the information to anyone other than the persons referred to in point c) above.



## GENERAL PRINCIPLES

Leaf Space has made the principles of **freedom** and **dignity** of the human person the cornerstone and backbone of all its daily activities.

We are constantly committed to maintaining a working environment free from any discrimination or harassment based on gender, race, language, personal and social conditions, religious and political beliefs.

We are also aware of the extreme importance of human resources for the development of a company; therefore, human resource management is based on respect for individual personalities and professionalism, within the general framework of current legislation.

## BUSINESS ETHICS

In carrying out their daily activities, Recipients must act with diligence, moral integrity and fairness, making the best use of the tools at their disposal.

In particular, Recipients are required to:

- always behave in accordance with the principles of loyalty and good faith towards the Company, their superiors, colleagues and collaborators, basing their conduct on mutual cooperation;
- ensure that every business transaction is undertaken in the interests of Leaf Space and not in their personal interests or those of third parties. In particular, employees who find themselves in a situation of personal, financial, family or

other conflict of interest, even if only potential, must inform their managers and refrain from any action that could be prejudicial to the interests of the company or likely to cause a conflict of interest.

- Ensuring the integrity of information: information managed within one's area of responsibility must be treated and communicated in a complete, accurate and truthful manner.
- preservare la riservatezza delle notizie e delle informazioni apprese nell'esercizio delle proprie funzioni e divieto di utilizzo o divulgazione a vantaggio proprio o di terzi delle

In order to avoid situations where those involved in a transaction are, or may appear to be, in conflict with the interests of the Company, **Leaf Space prohibits practices of corruption, illegitimate favours, collusive behaviour, solicitation, directly and/or through third parties, of personal and career advantages for oneself or others**, and other similar behaviour.

informazioni privilegiate ottenute nello svolgimento delle proprie funzioni.

## RESPONSIBILITY

Our goal is the continuous improvement of our experience, our skills and our offering, and through personal collaboration between professionals in different areas of activity, as well as between colleagues and employees within the same division, we foster responsible cooperation, which we believe is a necessary condition for the growth and development of the Company. Our goal is that actions, at all levels and degrees of responsibility, are always mutually aimed at creating the best possible product, promoting the sharing of the company's mission.

Anyone in a managerial role within the company must set an **example**, provide **leadership** and **guide** the team in accordance with the principles contained in the Code of Ethics. Through their behaviour, they must also demonstrate to their colleagues that compliance with the Code of Ethics is a fundamental requirement for everyone's work and for the achievement of business results.

## HONESTY

Honesty is the fundamental principle for all Leaf Space activities, initiatives, reports and communications. It is therefore an essential element of corporate management.

It is the duty of each Recipient to operate with transparency, providing their colleagues, superiors and suppliers with authentic, essential and truthful information regarding the performance of their duties.

## PROFESSIONALISM

Leaf Space recognises the fundamental importance of professionalism; for this reason, it requires Recipients to operate consistently with the professionalism and diligence required by the nature of the tasks entrusted to them and the functions they perform, making every effort to achieve the objectives assigned to them.

## COMMUNICATION

The Company recognises the primary role of clear and effective communication in internal relations within the Company itself and in relations with group companies.

External information must be approved internally by the Company and managed exclusively by employees responsible for communications.

Behaviour and actions contrary to this principle will be sanctioned in accordance with the Code of Ethics, contracts and applicable laws.

## TRANSPARENCY AND TRACEABILITY

Leaf Space operates in accordance with the principle of transparency and traceability. Every action and operation of the Company must be supported by adequate records.

All actions carried out by Recipients in the course of their work must be documented in accordance with applicable laws, through accurate, complete and reliable documentation and, if required by applicable regulations and accounting principles, must be correctly and promptly represented in the accounts.

Such documentation must be such as to allow, when checks are carried out, the identification of the characteristics and reasons for the transaction, as well as the persons who authorised and executed and/or recorded the transaction.

Furthermore, in order to ensure compliance with the rules set out in the Code of Ethics, authorisation to carry out a specific transaction must be the responsibility of a person other than the person who executes, controls and records the transaction itself.

### **ANTI-MONEY LAUNDERING**

Leaf Space acts in compliance with national and international anti-money laundering regulations and provisions; as such, it requires Recipients to refrain from carrying out any transaction that may contribute to the transfer, replacement or use of illicit proceeds or that may in any way hinder the identification of money, goods or other benefits of criminal origin.

## RELATIONS WITH STAFF

Our focus on people is reflected in our daily work through the creation of a positive working environment in which everyone can develop and enhance their skills and abilities. Leaf Space bases its relationships with its employees on principles such as **loyalty** and **trust**.

Leaf Space is committed to spreading and consolidating a culture of safety, developing risk awareness and promoting **responsible behaviour** on the part of all employees.

We aim to maintain and encourage a positive working environment, inspired by the protection of freedom, dignity and the inviolability of the individual, as well as fairness in interpersonal relationships.

We combat and invite everyone to combat all forms of discriminatory behaviour and to report any inconsistencies they may witness, first through dialogue with the people concerned and then through the internal **whistleblowing** process.

### HOW WE ACT

Acting with integrity towards employees and collaborators means recognising that they are a resource for the company: Leaf Space carefully evaluates the contribution of each individual and is committed to treating each of them with the respect they deserve.

### OUR COMMITMENTS

- We maintain the confidentiality of documents and information belonging to Recipients in compliance with privacy laws;
- We constantly strive to create a working environment free from any form of discrimination based on race, ethnicity, gender, political and religious beliefs, age or sexual preference.
- We offer equal opportunities to all in relation to recruitment, remuneration, training, promotions and other conditions of employment.
- We do not tolerate and punish harassment of any kind, including verbal or physical behaviour that constitutes

### WHAT WE ASK OF OUR EMPLOYEES AND COLLABORATORS

To ensure compliance with our policies and values, we ask our Leaf Space employees and collaborators to commit to:

- comply with the regulatory provisions concerning workers' duties and the collective agreements applied in the company;
- comply with the values and principles of the Code of Ethics;
- adopt and maintain a highly professional attitude towards the Company;
- protect the interests of the Company;



- be inspired, in the performance of their work, by principles of transparency, fairness, honesty and professionalism both inside and outside the company;
- be inspired, in the performance of their work, by principles of transparency, fairness, honesty and professionalism both inside and outside the company;
- assume responsibility for their role and comply with the directives issued by their superiors, adopting, in particular, all health and safety measures indicated by the Company.

Failure to comply with or violation of these commitments and the principles contained in the Code may result in disciplinary measures, as provided for in the following paragraph on the Rules of Implementation.

Abusing **alcohol**, consuming **psychotropic** substances or **narcotics**, or supplying narcotics for any reason during working hours is considered a **conscious violation** of the principles of this Code of Ethics.

## RULES ON THE USE OF COMPANY ASSETS

All Recipients are required to act with due care and diligence to protect company assets, through responsible behaviour and in line with the operating procedures established to regulate their use, documenting their use where appropriate. Each Recipient is

responsible for protecting the resources entrusted to them and has a duty to promptly inform the relevant company departments of any threats or events that may be harmful to the Company or its assets.

In particular, each recipient is required to:

- avoid improper use that may cause undue costs, damage or reduced efficiency or that is in any way contrary to the interests of the Company;
- always operate in compliance with the safety regulations provided for by law and internal procedures, in order to prevent possible damage to property, people or the environment;
- use company assets of any type and value in accordance with their correct use and in compliance with the law and internal company regulations;
- operate, as far as possible, to reduce the risk of theft, damage or other threats to the assets and resources assigned to or present in the Company, promptly informing the relevant departments in the event of abnormal situations.

## DIVERSITY AND INCLUSION



At Leaf Space, we constantly strive to promote equal opportunities and the inclusion of all employees through internal policies and practices, recognising and celebrating the importance of diversity and **not tolerating any form of discrimination** based on, but not limited to, age, gender, disability, gender identity, sexual orientation, cultural background or belief.

## HUMAN RIGHTS

Relationships with and among employees are based on **respect for individuals and their human rights**. and Leaf Space operates and promotes respect for all internationally proclaimed human rights, including the International Bill of Human Rights and the principles relating to fundamental rights set out in the International Labour

'**Harassment and bullying**' refers to unwanted behaviour by another person that is **intimidating, malicious, offensive, disparaging, humiliating or degrading**.

These incidents may be related to, but are not limited to, age, sex, gender identity, sexual orientation, race, disability, religion or personal beliefs.

Such incidents may be verbal or non-verbal, physical or non-physical, and do not always occur in person.

More generally, it refers to **any inappropriate or unwelcome conduct**, including words, gestures or actions that may offend or humiliate another person, including sexual harassment, which may occur between members of the same sex or opposite sex, and may happen once or on a continuous basis.

Organisation's Declaration on Fundamental Principles and Rights at Work, and is committed to avoiding complicity in situations of human rights abuse.

Leaf Space, therefore, does not tolerate any form of child labour and condemns the hiring and subsequent use of workers from foreign countries with invalid residence permits, and also discourages their use by its suppliers.

We believe that it is the responsibility of governments to protect the human rights of their citizens; however, we also believe that companies, in their daily operations, have a responsibility to respect human rights by ensuring that they do not violate them wherever they operate.

## HARASSMENT AND BULLYING

Leaf Space **does not tolerate inappropriate behaviour, including harassment, bullying or abuse of authority**, and will take disciplinary or legal action against individuals who harass, bully, intimidate or abuse their authority.

People employed by the Company treat each other with mutual respect and oppose any misconduct, and every employee is responsible for ensuring that this does not happen within the Company.

## WHISTLEBLOWING

The company has adopted internal policies to ensure the whistleblowing mechanism required by current legislation, and has appointed a Case Manager, as detailed in the dedicated policy. Whenever an employee witnesses behaviour that violates the principles and values set out in this Code of Ethics, perpetrated within the company and during work activities, they will have the opportunity to report it in one of the following ways:

- using the link: <https://leafspace.integrity.complylog.com/>
- by sending a letter to the attention of the Case Manager
- requesting a meeting with the Case Manager

## RELATIONS WITH THIRD PARTIES

### CORRUPTION AND GIFTS

Corruption, in any form or expression, is prohibited by law, and Leaf Space considers corruption to be an obstacle to efficiency and healthy competition and disapproves of any behaviour that conflicts with these values.

If gifts, gratuities, benefits or acts of courtesy or hospitality are offered or promised to Recipients, they must immediately inform the relevant corporate bodies, which will decide on the admissibility of what has been offered or promised.

*In relations with customers, suppliers, political institutions, public administration and, in general, with third parties, Recipients shall not promise, accept or offer gifts, gratuities, benefits (whether direct or indirect) and acts of courtesy or hospitality that exceed normal commercial practices, local customs and ordinary courtesy or, in any case, that are intended to obtain favourable treatment or other undue advantages in relation to Leaf Space's business operations.*

### CONFLICTS OF INTEREST

Company policies are designed to prevent situations of conflict of interest involving employees: for this reason, it is prohibited to hire **public officials, public or private employees** (or their cohabitants,

spouses, relatives or relatives by marriage up to the third degree) as employees of the Company or to enter into consultancy or other types of contracts with them if they have personally and actively participated in business negotiations involving the Company or have participated in endorsing requests made by the Company to the **public authorities**. relatives or relatives by marriage up to the third degree) who have personally and actively participated in business negotiations involving the Company or who have participated in endorsing requests made by the Company to the Public Administration or to a private company.

At the same time, we ask our employees and collaborators to inform us if they find themselves in a position where their personal interests could conflict with those of the company: in case of doubt, they can discuss this with the HR department or with their line manager.

### RELATIONS WITH INSTITUTIONS AND PUBLIC OFFICIALS

Leaf Space's relations with national, EU and international public institutions ("Institutions"), as well as with public officials or public service employees, i.e. bodies, representatives, agents, spokespersons, members, employees, consultants, public officials or public service employees, public institutions, public administrations, public bodies, including economic bodies, local, national or international public bodies or companies ("Public Officials") are maintained by each Recipient, regardless of their function or position, in compliance with current legislation and the

principles defined in this Code of Ethics, based on the general criteria of fairness and loyalty.

Recipients shall refrain from making false statements to the Judicial Authorities or inducing third parties to make false statements or ones to the Judicial Authorities in order to influence the decisions of judges to their own advantage.

Each Recipient is therefore required to act according to their conscience and to give their testimony correctly and without omission when requested.

## RELATIONS WITH SUPPLIERS AND CONSULTANTS

Leaf Space requires its suppliers and external consultants to comply with ethical and environmental principles corresponding to its own, considering this aspect to be of fundamental importance for the establishment or continuation of a business relationship. All suppliers and consultants must be promptly informed of the existence of the Code of Ethics and the commitments and obligations it imposes on external parties.

The selection of suppliers and consultants, as well as the determination of purchasing conditions, are based on an objective assessment of quality, price and the ability to supply and guarantee goods and services of an adequate standard. Leaf Space therefore considers the following to be essential requirements:

- the professionalism of the interlocutor;
- the availability, suitably documented, of resources, including financial resources, organised structures, design capabilities and resources, knowledge, etc.;

- the existence and effective implementation of company quality systems, which are also adequate to guarantee the ability to operate safely.

In managing relations with suppliers and consultants, the Company undertakes to pay remuneration exclusively commensurate with the service specified in the contract and not to make payments to parties other than the contractual counterparty.

Recipients and other persons required to comply with the provisions of this Code of Ethics are expressly prohibited from altering in any way the functioning of a computer or telecommunications system or from interfering without authorisation in any way with data, information or programmes contained in any of the aforementioned systems. In particular, all Recipients are required to:

- comply with all applicable regulations and the terms and conditions of the licence agreements signed by the Company;
- to behave correctly and transparently when using any of the Company's IT resources or systems;
- refrain from any activity that could result in the modification, deletion or fraudulent creation of public or private computer documents that could have probative value and, in any case, refrain from illegally accessing the company's computer or telecommunications system in order to modify or delete data, documents and information stored therein;
- always and only use their own access codes to the Company's IT or electronic systems or tools, avoiding disclosing them to third parties.

## HEALTH, SAFETY AND THE ENVIRONMENT

Leaf Space considers environmental and safety issues to be essential values for the Company, particularly in view of the sector in which it operates, and contributes constructively to ecological sustainability.

Aware that it carries out activities that serve the environment, which is a collective asset, Leaf Space is committed to minimising the environmental impact of its services.

The operational management of activities must refer to criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work.

Research and technological innovation must be dedicated in particular to promoting products, services and processes that are as compatible as possible with the environment and with the health and safety of operators.

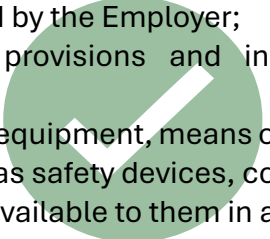
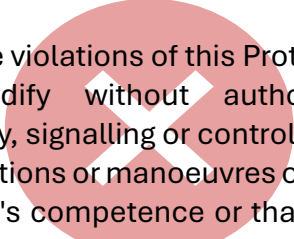
The Recipients, as well as all other persons required to comply with the provisions of this paragraph, shall participate, within the scope of their duties and functions, in the process of risk prevention, environmental protection and health and safety protection for themselves, their colleagues and third parties.

### HEALTH AND SAFETY PROTECTION IN THE WORKPLACE

With regard to the protection of health and safety in the workplace, the Company:

- implements the necessary measures to protect the health and physical integrity of its employees and collaborators, adopting business organisation models based on the continuous improvement of workplace safety and health;
- complies with the principles of workplace health and safety in the organisation of work, the design of workplaces and the choice of work equipment;
- also complies with current safety regulations;
- is committed to eliminating risks and, where this is not possible, minimising them in relation to the knowledge acquired on the basis of the technological process;
- in order to implement its workplace safety policy, it provides ongoing training and awareness-raising for its management and all staff on safety issues, undertaking to apply and promote a culture of safety.

Each Recipient is required to pay the utmost attention in carrying out their activities, strictly observing all safety and prevention measures, in order to avoid any possible risk to themselves, their colleagues, collaborators and the entire community.

WHAT TO DO	WHAT NOT TO DO
 <ul style="list-style-type: none"> <li>➤ Take care of their own safety and health and that of other persons present in the workplace who may be affected by their actions or omissions, in accordance with their training and the instructions and means provided by the Employer;</li> <li>➤ Comply with the provisions and instructions given by the Employer;</li> <li>➤ Use machinery and equipment, means of transport and other work equipment, as well as safety devices, correctly;</li> <li>➤ Use the PPE made available to them in an appropriate manner;</li> <li>➤ Immediately report to the Employer any deficiencies in the means and devices, as well as any other dangerous conditions of which they become aware;</li> <li>➤ Undergo the required health checks;</li> <li>➤ Contribute, together with the Employer, to the fulfilment of all obligations imposed by the competent authority or otherwise required necessary to protect the safety and health of workers in the workplace.</li> </ul>	 <ul style="list-style-type: none"> <li>➤ Engage in, collaborate in or cause the implementation of conduct which, taken individually or collectively, directly or indirectly constitutes a criminal offence in relation to the health and safety of workers;</li> <li>➤ Engage in or cause violations of this Protocol;</li> <li>➤ Remove or modify without authorisation or otherwise compromise safety, signalling or control devices;</li> <li>➤ Carrying out operations or manoeuvres on one's own initiative that are not within one's competence or that may compromise one's own safety or that of other workers.</li> </ul>



## ENVIRONMENTAL PROTECTION



Leaf Space recognises environmental protection as a primary value in the running of the business, from the management of daily activities to strategic decisions. Investment and business decisions are geared towards respect for the environment and the regulations put in place to protect it, as well as the implementation of preventive measures to avoid or at least minimise environmental impact.

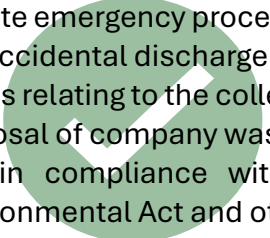
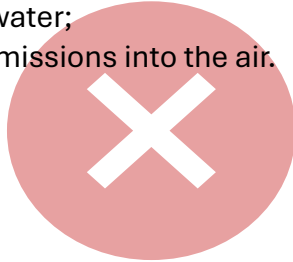
In particular, with regard to the environment, the Company:

- takes measures to limit and, where possible, eliminate the negative impact of economic activity on the environment;

- plans accurate and constant monitoring of scientific progress and regulatory developments in the environmental field;
- promotes production policies that balance the needs of economic development and value creation, specific to the Company's business activities, with the needs of respect for and protection of the environment, spreading a culture of environmental risk prevention.

Recipients are asked to actively collaborate in environmental management and the continuous improvement of environmental protection, in line with the Company's policy.



WHAT TO DO	WHAT NOT TO DO
 <ul style="list-style-type: none"> <li>➤ Scrupulously comply with environmental legislation;</li> <li>➤ Assess potential risks and develop appropriate prevention programmes to protect the environment;</li> <li>➤ Establish and update emergency procedures in order to minimise the effects of any accidental discharge into the environment.</li> <li>➤ Manage all activities relating to the collection, temporary storage, transport and disposal of company waste, even when carried out by third parties, in compliance with the provisions of the Consolidated Environmental Act and other relevant regulations;</li> <li>➤ Monitor the management of ozone-depleting substances present in the air conditioning systems of the factory and offices.</li> </ul>	 <ul style="list-style-type: none"> <li>➤ Illegally abandoning or depositing waste on or in the ground;</li> <li>➤ Illegally discharge waste of any kind, whether solid or liquid, into surface or groundwater;</li> <li>➤ Release harmful emissions into the air.</li> </ul>

## CORPORATE GOVERNANCE

### CORPORATE BODIES

The appointment of members of corporate bodies must be carried out through transparent procedures.

Corporate Bodies shall act and make decisions with full knowledge of the facts and independently, pursuing the objective of creating value for the Company in accordance with the principles of legality and fairness.

The decisions of the members of the Corporate Bodies must be independent, i.e. based on free assessment and in the interests of the Company.

Independence of judgement is a requirement for decisions made by corporate bodies and, therefore, members must ensure maximum transparency in the management of transactions in which they have a particular interest. In such circumstances, the relevant laws and company regulations must be complied with.

In particular, members of the Board of Directors are individually required to perform their duties with seriousness, professionalism and presence, thus allowing the Company to benefit from their skills.

### RELATIONS WITH SHAREHOLDERS

The Company promotes transparency and periodic disclosure to shareholders, in compliance with applicable laws and regulations.

The interests of all shareholders are promoted and protected by rejecting any particular or partisan interests.

The Company promotes accurate and constant disclosure to shareholders regarding any action or decision that may have an effect or consequence on their investments.

The Company promotes the conscious and informed participation of shareholders in corporate decisions.

The Company encourages:

- the regular participation of Directors in shareholders' meetings;
- the regular functioning of shareholders' meetings in accordance with the right of each shareholder to obtain clarification, express their opinion and make proposals.

The Company promotes the utmost confidentiality of information relating to extraordinary transactions.

The Recipients involved must keep such information confidential and not misuse it.

### ECONOMIC AND FINANCIAL RESOURCES

Leaf Space conducts its business in full compliance with currency regulations and applicable laws. In particular, Recipients and other parties required to comply with the provisions of this Code of Ethics undertake to verify in advance the information available on commercial counterparties, suppliers and consultants in order to

verify their respectability and the legitimacy of their activities. they also undertake to operate in such a way as to avoid involvement in transactions that could potentially facilitate the laundering of money derived from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation.

In the management of economic and financial resources, the Recipients are required to behave in accordance with the principles of transparency, accuracy and completeness of accounting information so that:

- every transaction is not only correctly recorded, but also authorised, verifiable, legitimate, consistent and appropriate;
- the economic, equity and financial situations produced are true, correct and timely.

Each Recipient must also:

- behave in a correct, transparent and collaborative manner, in compliance with the law and generally accepted accounting principles, in all activities aimed at keeping accounts and preparing financial statements (and other corporate communications), in order to provide shareholders and third parties with truthful and accurate information on the economic, equity and financial situation of the Company;
- pay the utmost attention, timeliness and accuracy in the acquisition, processing and presentation of data and information for the purposes of accounting and preparing the financial statements;

- pay the utmost attention, timeliness and accuracy in the management and fulfilment of obligations aimed at complying with tax and fiscal regulations.

## IMPLEMENTING RULES

### PENALTY SYSTEM

- This Code of Ethics contains principles and rules of conduct that Leaf Space considers essential to comply with.
- The Company, through the bodies and functions specifically designated for this purpose, is responsible for imposing any penalties provided for by current regulations or collective agreements, ensuring that such penalties are applied consistently, impartially and uniformly, are proportionate to the seriousness of the violation committed, and are never such as to undermine human dignity.
- With regard to non-compliance with the provisions of this Code of Ethics by consultants, agents, managers, partners, collaborators in general, and suppliers of goods or services, the relevant sanctions are contained in the respective contractual agreements that determine the conditions of the relationship.

### EMPLOYEES

- Failure to comply with and/or violation of the rules of conduct set out in the Code by Company employees constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions.
- Sanctions will be applied in accordance with the law and will be proportionate to the seriousness and nature of the facts.

- In the case of employment relationships, any non-compliance constitutes a breach of the obligations provided for in accordance with and for the purposes of Article 2104 of the Civil Code and/or a disciplinary and/or criminal offence, with all the consequences provided for by law and the Collective Agreement.
- In the event of violation of the rules of this Code by employees, the Company will adopt disciplinary sanctions proportionate to the violations committed and in accordance with the provisions in force governing employment relationships, following the regular completion of the disciplinary procedure referred to in Article 7 of Law No. 300/1970.
- In cases deemed to be more serious, in compliance with the applicable provisions of law and the Collective Agreement, the violation may result in the termination of the employment relationship for just cause, if committed by the employee.
- The investigation of the above infringements, the management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company departments designated and delegated for this purpose.

### COLLABORATORS, CONSULTANTS, ETC.

Any conduct by Collaborators, Consultants or other persons having business relations with the Company that violates the provisions of the Code of Ethics may also result in the termination of the

contractual relationship, without prejudice to any claim for compensation by Leaf Space if such conduct causes it damage.

#### **CORPORATE BODIES AND MEMBERS OF THE SUPERVISORY BODY**

Compliance with the Code of Ethics by the members of the Corporate Bodies and the Supervisory Body supplements and clarifies the obligations of diligence in the performance of the duties assumed.

Violation of the rules of the Code of Conduct and the operating protocols of the Organisation, Management and Control Model referred to in Legislative Decree 231/2001 therefore constitutes a breach of the obligations arising from the relationship of organic representation, with the consequent application of the sanctions provided for by law and/or by the sanctioning and disciplinary system.

#### **PUBLICITY AND DISSEMINATION OF THE CODE OF ETHICS**

This Code of Ethics is made available to employees on the company intranet and is published on our website, or otherwise brought to the attention of third parties, so that it is visible to customers, suppliers and any other interested third parties.

In particular, the Company shall:

- disseminate the Code of Ethics to the Recipients;
- interpret and clarify the provisions;
- verify effective compliance;
- updating the provisions in line with the needs that arise from time to time.

In order to ensure the effectiveness of the Code, the Company shall set up information channels through which anyone who becomes aware of any conduct that violates the principles and provisions of the Code of Ethics can report it freely, directly and in complete confidence to the relevant departments of the Company.

Leaf Space shall ensure the confidentiality of the identity of the whistleblower and shall protect the whistleblower from retaliation, unlawful coercion, harassment and discrimination of any kind in the workplace for having reported a violation of the Code.

## ENTRY INTO FORCE AND COORDINATION WITH COMPANY PROCEDURES

The update to the Code of Ethics was approved by the Leaf Space Board of Directors on 10 December 2025.

Any future updates, due to regulatory changes or developments in civil awareness, will be approved by the Board of Directors and promptly communicated to all Recipients.

The Code of Ethics does not replace current and future company procedures, which continue to be effective to the extent that they do not conflict with the Code itself.