CERTIFIED MANAGEMENT SYSTEMS
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CODE OF ETHICS

Approved by the

Shareholders' meeting on 30/06/2026

DeltAcque S.r.l.
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1. Premise

The **Code of Ethics** is the document that establishes the general principles to be followed by the behaviour of each of its recipients in relations with DeltAcque S.r.l. Furthermore, it prescribes specific rules of conduct that will be considered binding for the Recipients, beyond and regardless of what is provided for by the law. DeltAcque S.r.l. follows as a principle of unavoidable behaviour compliance with the laws and regulations in force, and this **Code of Ethics** constitutes an essential element of the preventive control system adopted for the purpose of preventing crimes that may be committed in carrying out the activity and in particular predicate offenses provided by Legislative Decree n. 231/2001, laying down the regulations on the administrative liability of legal entities.

2. Recipients

The Code of Ethics is binding and applies to the directors and members of the other corporate bodies, to DeltAcque Srl employees, wherever they work, as well as to any collaborators and external agents acting in the name and/or on behalf of the Company, regardless of qualification legal relationship with the same, suppliers and anyone else who deals with business or has relations with DeltAcque Srl.

DeltAcque S.r.l. will distribute this **Code of Ethics** to the Recipients identified above, requesting the same to the commitment to respect and implementation of the principles contained therein, and undertakes not to undertake or continue any relationship with Recipients who demonstrate not to share the content and the spirit of this **Code of Ethics**.

3. Application of the Code of Ethics

Compliance with the rules of this **Code of Ethics** is an essential part of the contractual obligations of employees and therefore of their work performance, pursuant to and for the purposes of art. 2104[1] and/or 2105[2] of the Civil Code. The violation of the rules of the **Code of Ethics** may therefore constitute a breach of the obligations of the employment contract and a disciplinary offense.

The compliance with the rules of the present **Code of Ethics** is also an essential component of relations with the other Recipients, who will be obliged to comply with them by means of specific contractual clauses. In this case, failure to comply with the **Code of Ethics** may constitute a breach of the contractual obligations with the Recipient and entail the termination of the contract due to his/her fact and fault, also in this case the right of DeltAcque S.r.l. to compensation for any damage suffered as a result of the breach.

4. Ethical principes of DeltAcque S.r.l.

The Recipients are obliged to conform their conduct to the fundamental ethical principles that guide every activity of DeltAcque S.r.l., that is diligence, honesty, transparency, competence, compliance with the law, good faith, maximum correctness and integrity.

In pursuing its objectives, DeltAcque S.r.l. abides by the following general principles of behaviour:

- as an active and responsible member of the communities in which it operates, is committed to respecting and enforcing within itself and in external relations the laws in force in the country in which it operates and the ethical principles commonly accepted in the conduct of business: transparency, correctness and loyalty;
- refuses and condemns recourse to illegitimate or otherwise incorrect behaviour (towards the community, public authorities, customers, workers and competitors) to achieve its economic objectives, to the attainment of which it tends exclusively with services and products based on professionalism, experience, attention to the customer and innovation;
- implements appropriate organizational tools to prevent the violation of the principles of legality, transparency, fairness and loyalty of its employees and collaborators and supervises compliance with these tools and their updating;
- pursues excellence and competitiveness in the market, offering quality services to its customers and thus achieving their full satisfaction;
- protects and enhances the human resources it employs by ensuring professional growth of its staff, without any gender distinction, including the participation in specialist training courses
- promotes the creation of safe and healthy working environments and working conditions that are respectful of individual dignity as elements to promote the physical and moral integrity of employees and collaborators. It also favours the creation of a work environment in which personal characteristics and orientations cannot give rise to discrimination and can promote the serenity of all employees and/or collaborators.
- employs resources responsibly, taking as objective a sustainable development, respecting the environment and the rights of future generations.

5. General obligations of the recipients

The recipients of this **Code of Ethics**, in any business relationship and especially when their actions refer to DeltAcque S.r.l. or are suitable to have an impact on the same, are required to behave correctly, impartially, loyally and transparently, to know and act in compliance with the laws and regulations in force.

6. Rispetto delle persone e dei loro diritti fondamentali

DeltAcque S.r.l. and the Recipients commit themselves to respect the fundamental human rights and dignity of each person. In particular, DeltAcque S.r.l. and the Recipients commit themselves to the prevention of every form of child exploitation or of situations of necessity, of physical or mental inferiority of the workers, of forced labour or executed in conditions of slavery or servitude.

DeltAcque S.r.l. abstains from using foreign workers without a residence permit or with a revoked, cancelled or expired permit, for which renewal has not been requested.

DeltAcque S.r.l. requires its suppliers and third parties in general to comply with the principles set out above.

DeltAcque S.r.l. recognizes the primary role of human resources in the belief that one of the main success factors of every business is the professional contribution of the people who work there, in a framework of loyalty and mutual trust.

Deltacque S.r.l. protects and promotes the value of human resources, encouraging their professional growth, committing to avoid discrimination and ensuring equal opportunities, as well as offering working conditions that respect individual dignity and safe and healthy work environments, in compliance with applicable regulations and workers' rights. Relationships between the various hierarchical levels are based on loyalty, fairness, and correctness, in accordance with the principles set forth above.

7. Conduct in business and in relationships with third parties

In conducting any activity, situations must always be avoided where the parties involved in the transactions (including agents and third parties charged by DeltAcque S.r.l.) are, or may be, in a conflict of interest with the same. They may constitute a conflict of interest, by way of example and not exhaustively:

- personal economic and financial interests with suppliers or competitors of DeltAcque S.r.l.
- performance of work activities (not connected to tasks entrusted by DeltAcque S.r.l.), consistent with the duties of its office, with the nature and with the object of the particular contractual relationship with DeltAcque S.r.l., with suppliers or competitors of the same;

- acceptance of money or favours from people or companies that are or intend to enter into business with DeltAcque S.r.l.

The conflict of interest above-mentioned does no refer, of course, to the pursuit of its legitimate objectives by a supplier, a collaborator or another commercial partner, if there are loyalty, correctness and transparency in relations with DeltAcque S.r.l.
Anyone who finds himself operating in a conflict of interest is required to immediately notify their superior and/or legal representative (in the case of agents and external collaborators).

In the relationship with the suppliers of product and services, it is necessary:

- to verify in advance the information available on every possible supplier (including economic and reputation information) and avoid undertaking or maintaining business relationships with suppliers of whom the involvement in illegal activities is known or suspected;
- to select suppliers on the basis of objective criteria, as specified in the relative procedure;
- to obtain the collaboration of suppliers in constantly ensuring the satisfaction of the requirements in terms of quality, cost and delivery times at least equal to their expectations;
- to observe the contractually agreed conditions;
- to operate within the laws and regulations in force;
- to maintain a frank and open dialogue with suppliers, in line with good commercial practices;
- to promptly report to the legal representative any behaviour of the supplier that appears contrary to the principles of the Code of Ethics;
- This Code of Ethics must be made available to suppliers and collaborators so that they can take note of it. Resolutions clauses with reference to the hypothesis of serious violations of the precepts of this Code of Ethics may be included in the contract.

Any anomaly - including requests from third parties that do not fall under normal commercial practice - or suspected of irregularities must be promptly reported to the legal representative. In relations with suppliers, customers and third parties in general, it is forbidden to offer or promise money or other benefits, in any form and manner, to promote or favour the interests of DeltAcque S.r.l. and/or obtain undue advantages.

It is also forbidden, in relations with competing companies and third parties in general, to behave in violation of the principles of loyalty, correctness, transparency and legality in order to promote or favour the interests of DeltAcque S.r.l. and/or obtain undue advantages.

DeltAcque S.r.l. carries on its business in full compliance with anti-money laundering legislation and the provisions issued by the competent Authorities, refusing to carry out suspicious transactions in terms of fairness and transparency.

The recipients of this **Code of Ethics** undertake to operate in such a way as to avoid any implication in operations suitable to favour the laundering of money deriving from illicit or criminal activities, acting in full compliance with anti-money laundering legislation and internal control procedures.

In initiating business relationships with new customers and managing the existing ones, considering the information available, it is necessary to avoid engaging in relationships with subjects involved in arms and drug trafficking and terrorism and, however, with people without the necessary requisites of seriousness and commercial reliability.

8. Relation with the Public Administration

It is necessary to avoid any conduct that may exert illicit pressure or otherwise improperly influence the activities and independence of judgment and decisions of third parties, as well as any conduct aimed at acquiring favourable treatment in the conduct of any activity connected to DeltAcque S.r.l., with the aim of obtaining an advantage or interest of the same, or in any case, pursuing purposes prohibited by law or by this **Code of Ethics**.

It must be kept in consideration that some behaviours falling under normal commercial practice, can be considered unacceptable and even in violation of the law or regulation if they are held, even through an intermediary person or company, with the State, the Public Administration and public bodies (PA) - and therefore with managers, officers or employees of the Public Administration, or with persons performing similar functions in other States.

It is not permitted to offer, directly or indirectly, money, gifts or compensation to officials of P.A. or to their relatives, both Italian and in other countries, unless they are acts of commercial courtesy or gifts of modest value and in any case in compliance with the law. It is not permitted to offer or accept any object, service, performance or favour of value in order to obtain a more favourable treatment in relation to any relationship with P.A. Gifts offered or received, which do not fall within the normal custom, must be

authorized by a superior and adequately documented. In particular, during business negotiations, requests or business relations with P.A. the following actions must not be undertaken:

- propose employment opportunities, and/or commercial opportunities, which can benefit the employees of P.A. on a personal basis;
- solicit or obtain confidential information that may compromise the integrity or reputation of one or both parties.

When participating in public tenders and, in general, in any relationship with the Public Administration, the Judicial Authority and the Public Supervisory Authorities, it is necessary to always operate in compliance with the law and the correct commercial practice. Keep collaborative conduct in order to do not hinder or delay the exercise of the related functions, including in the event of inspections and investigations. It is also necessary to present the due communications and any documents requested by the aforementioned Authorities in a complete, truthful and timely manner.

Any public disbursements, grants or subsidized loans obtained will always be used in accordance with the purposes for which they were assigned.

The undertaking of commitments and the management of relations with the P.A. is reserved for the functions assigned and authorized. The principles and directives listed above also apply to agents and third parties of which DeltAcque S.r.l., if necessary, use it in relations with P.A. For this reason, the employees of DeltAcque S.r.l. must promptly report to their superior about doubts regarding possible violations of the **Code of Ethics** by external collaborators.

9. Relations with judicial authorities, law enforcement agencies and authorities with inspection and control powers

The recipients of this **Code of Ethics** must scrupulously observe the current legislation and the provisions issued in the sectors related to their respective areas of activity.

DeltAcque S.r.l. demands the maximum availability and collaboration towards the representatives of the Judicial Authority, the Police, the Public Official who has powers of inspection.

The recipients of this **Code of Ethics** are required to promptly comply with any request from the competent Institutions or Authorities.

It is strictly forbidden to destroy and/or alter records, minutes, accounting records and any type of document (paper or electronic) or to make false declarations to the competent Authorities in anticipation of a judicial proceeding, an investigation or an inspection.

All employees and/or collaborators are obliged to report to DeltAcque S.r.l. the request to make or produce before the Judicial Authority statements that can be used in criminal proceedings relating to the exercise of their functions. It is forbidden by DeltAcque S.r.l. to induce or favour the employees and/or collaborators not to make/produce the said declarations, or to make them false

It is not permitted to try to persuade, through the assignment of professional appointments or promises of gifts, money or other advantages (directly or through a third party) who carries out inspections or inspections that is the competent judicial authority.

10. Relations with political and trade union organizations

DeltAcque S.r.l. does not make direct or indirect contributions, in any form, to political parties, movements, committees and political and trade union organizations, to their representatives and candidates, except those provided for by specific regulations and on the condition that: they are regularly approved by the competent company departments; documented from an accounting and management point of view, do not place any Recipients in a position of conflict of interest.

It is forbidden to behave in any way with the aim of preventing, hindering or conditioning the free exercise of the right to vote during election consultations.

11. Transparency of accounting and internal controls

Each operation and transaction completed or put in place for DeltAcque S.r.l. or in its interest, also through other subjects, must be:

- inspired by the highest correctness from the management point of view, to the completeness and transparency of the information, to the legitimacy from a formal and substantial point of view and to clarity and truth in the findings according to the regulations in force. In particular, the financial statements, reports and other corporate communications required by law must be drawn up clearly and represent the Company's economic, equity and financial situation in a correct, complete and truthful manner;
- authorized, verifiable, consistent and congruous;
- managed in such a way as to guarantee an adequate level of segregation of responsibilities, so that the implementation of each process must require the joint support of various corporate functions;
- correctly recorded and supported by appropriate documentation; all internal documentation must be kept in an accurate and complete manner in such a way as to allow at any time the carrying out of

checks that certify the characteristics and motivations of the operation and identify who authorized, carried out, registered, verified the operation same.

The employees and collaborators of DeltAcque S.r.l. that become aware of the omissions, falsifications, negligence of the accounting or of the documentation on which the accounting records are based, are required to report the facts to their superior or to the relative contact person.

It is forbidden to falsify, hold, spend or otherwise put into circulation banknotes, coins, public credit cards, counterfeit or altered stamps. Those who receive banknotes or coins or public credit cards suspected of being false or stolen must inform their direct manager, so that they can provide the appropriate complaint.

An efficient and effective internal control system is a necessary condition for ensuring compliance with laws, internal procedures, protection of corporate assets, efficient management and administration ready to provide accurate and complete accounting and financial data.

All the recipients of the **Code of Ethics** are therefore called upon to contribute to ensuring the best functioning of the internal control system.

12. Protection of industry, trade and industrial and copyright property rights

Recipients must refrain from conducting behaviours aimed at preventing or disturbing the correct exercise of industrial or commercial activities and from performing acts that do not conform to professional ethics and good commercial practice, including the sale of non-original or counterfeit products, or other declared or agreed or likely to mislead the customer on the quality of the product.

Employees and/or collaborators undertake to comply with the laws relating to patents, copyrights, trademarks, trade secrets, etc. protecting the intellectual property rights of companies and individuals. Software protected by copyright and used by employees for the activities of the Company may not be reproduced, with the exception of copies made for the purpose of the back-up function, nor may they be reproduced for the personal use of the employee.

13. Access and use and confidentiality of data, information, documents and systems

The Recipients must respect the confidentiality, integrity and veracity, in the form and content, of any and all data, information, document and system, informatic and not, public or private, to anyone belonging. Therefore, access to and use of the previously mentioned data, information, documents and systems must be carried out strictly following the instructions given in any form, including tacit or implicit, by the holder of the relative rights.

It is forbidden to use unauthorized software and databases on DeltAcque S.r.l computers.

The employee/collaborator is not allowed to use corporate e-mail tools to send messages for purposes other than work and in any case such as to damage the corporate image or that of third parties; it is also forbidden to enter on websites with illicit content or otherwise unrelated to work.

Employees and/or collaborators are responsible for the assigned company assets and must work diligently to protect corporate assets from improper or incorrect use.

The Recipients shall also refrain from disclosing or using any of the news or confidential information pertaining to company activities to their own or third parties' profit. DeltAcque S.r.l. undertakes to keep total discretion about confidential information concerning its employees, customers, suppliers and collaborators, both in reference to personal data and to strategic information of the client or supplier company. DeltAcque S.r.l. also ensures the use of the abovementioned information only for strictly professional reasons and in any case following the consent issued by the employee, customer, supplier or collaborator, if necessary.

14. Use of equipment, devices and company structures

Each Recipient is required to operate with the diligence necessary to protect corporate assets through responsible behaviour. The corporate assets of DeltAcque S.r.l. consists on physical assets, such as computers, printers, equipment, cars, infrastructures and intangible assets such as, for example, confidential information, know-how, technical knowledge, developed and disseminated by collaborators. To this end, each Recipient has the responsibility to guard, preserve and defend the assets and resources of DeltAcque S.r.l. that are entrusted to him in the context of his activity and is obliged to use them in a manner consistent with the corporate interest as well as the law, preventing and avoiding their use by unauthorized third parties and their use for improper purposes. It is expressly forbidden to use company assets, for personal or extraneous requirements, for purposes contrary to the law, public order or morality. In case of loss or risk of loss of Company assets, report the fact to the management as soon as it becomes known.

15. Relation with the staff

Selection of the staff

The evaluation of the candidatures must be carried out, according to the provisions of the reference procedure, based on the correspondence of the candidates' profiles to the needs and requirements of the company, respecting equal opportunities for all the interested parties.

The information requested to the candidates must be strictly linked to the verification of the professional and psycho-aptitude profile of the individual, as well as the verification of compliance with national and international legal requirements and suitability in relation to the prevention of the offenses referred to in Legislative Decree no. 231/01, always in compliance with the principles of non-discrimination and protection of personal data, defined in this Code of Ethics and provided for by law.

Establishment of the employment relationship

Staff are hired under regular employment contracts; no form of irregular or "black" work is tolerated.

When the employment relationship is established, each employee must receive accurate information regarding:

• characteristics of the membership function, responsibility for their role and tasks to be performed;

• regulatory and remuneration elements, as regulated by the national collective labour agreement;

• rules and procedures to be adopted in order to avoid conduct contrary to the law and company policies.

This information is presented to the employee so that acceptance of the assignment is based on an effective understanding.

Management and exploitation of the employee

Each manager is required to enhance the working time of employees, promoting the conciliation between professional activity and private life, requesting services congruent with the performance of their duties and with the work organization plans.

It is an abuse of the position of authority, as an act due to the hierarchical superior, to request services, personal favours or any behaviour that constitutes a violation of this **Code of Ethics**.

The involvement of employees in the performance of the work is assured, also providing for moments of participation in discussions and decisions functional to the realization of the company objectives.

The employee must participate in such moments in a spirit of collaboration and independence of judgment.

The management of the employee must be carried out in compliance with current legislation, adopting tools to prevent any form of gender discrimination and to combat any act that is harmful to personal dignity, regardless of the role held and the level of responsibility.

Worker's rights: health and safety at work

DeltAcque S.r.l. undertakes to prepare and maintain safe and healthy work environments in compliance with the accident prevention regulations in force in the countries in which it operates and to spread and consolidate a culture of safety and health at work by developing awareness of risks, promoting responsible behaviour by all employees.

Operational management must refer to advanced criteria of environmental protection and energy efficiency pursuing the improvement of health and safety at work conditions.

More specifically, DeltAcque S.r.l. undertakes:

- To monitor all types of risks related to the work environment, combating risks at the source, eliminating avoidable risks and monitoring those that cannot be totally extinguished;
- to adapt work processes to people, as regards the concept of jobs, the choice of equipment and working methods;
- to monitor and adapt the structures to the technical evolution, thus promoting products and processes that are more and more compatible with the environment and characterized by an increasing attention to the safety and health of the operators;
- To give adequate and regular training processes to workers

DeltAcque S.r.l.'s employees and collaborators, as part of their duties, participate in the process of risk prevention, environmental protection and the protection of health and safety towards themselves, their colleagues and third parties.

Worker rights: protection of privacy

The privacy of the employee is protected by adopting standards that specify the type of information to be requested from the employee and the related methods of treatment and storage.

Any investigation of ideas, preferences, personal tastes and, in general, information of collaborators not pertinent to the purposes of personnel selection and management of the employment relationship according to the criteria indicated in this **Code of Ethics** is excluded.

These standards also provide for the prohibition, subject to the assumptions provided for by law, to communicate or disclose personal data without the prior consent of the interested party.

Worker's right: protection of the person

DeltAcque S.r.l. undertakes to protect the moral integrity of its employees by guaranteeing the right to working conditions that respect the dignity of the person.

For this reason, acts of physical or psychological violence, sexual harassment, any attitude or behaviour that is discriminatory or detrimental to the person, his convictions and his preferences are not tolerated.
An employee who considers himself or herself to be harassed or discriminated against due to age, gender, race, health, nationality, political opinions or religious beliefs etc. may report happened to your representative / legal representative who will evaluate the violation of the **Code of Ethics**.

Obligations of information

It is mandatory to report to the legal representative any anomalous situations or instructions received conflicting with the law, with the content of employment contracts, with internal regulations or with this **Code of Ethics**. Any retaliation against those who have made good faith reports of possible violations of the Codes or requests for clarification on the application methods of the Codes is an infringement. It is also a violation of the behaviour of those who accuse other employees of violations with the knowledge that such violations do not exist.

16. Implementation and control of the Code of Ethic

This **Code of Ethics** has been approved by the Board of Directors of DeltAcque S.r.l. on 30/06/2026.
Any changes and/or updates will be approved by the same corporate body and promptly disclosed to the interested parties.
The **Code of Ethics** is brought to the attention of the interested parties inside and outside the Company through specific communication and dissemination activities. The **Code of Ethics** is distributed to all employees during hiring and posted on the company website.
Internally, the adequate knowledge and understanding of the **Code of Ethics** by all staff is ensured through information programs.
It is the responsibility of each employee to consult their direct manager for any clarification concerning the interpretation or application of the rules of conduct contained in the **Code of Ethics**.

The serious and persistent violation of the **Code of Ethics** by its recipients damages the relationship of trust established with DeltAcque S.r.l. and may involve the imposition of disciplinary sanctions, compensation for

damages and in cases of serious non-fulfilment the termination of the contractual relationship in accordance with the provisions of the **Disciplinary Code**.

DeltAcque S.r.l.