

ETHICAL CODE

*«All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood»
(Art. 1 - Universal Declaration of Human Rights)*

1. MISSION STATEMENT

C90 - Engineering & Consulting S.r.l. (hereinafter also C90 or the Company) is a company that deals with facility and building management, project management, and integrated multidisciplinary design.

The choice of the claim *Shaping an ethical world* as a tagline to associate with the C90 brand identity was not accidental. What makes the company the alternative to choose is precisely a business model oriented towards ethics and sustainability, ensuring a perfect synergy between quality and profit. Its values and services are primarily aimed at multinational corporations, real estate funds, and public infrastructure such as airports, air terminals, airport handlers, railway stations, travel retailers and shopping centres. The company's extensive experience in project management and business development, combined with excellent technical capabilities, integrated design, time and cost control, and problem-solving skills, allows the C90 team to successfully coordinate all professionals involved in a project. This enables C90, its partners, and its clients to achieve increasingly ambitious goals.

2. VISION STATEMENT

Below, the main targets and goals C90 is trying to achieve by 2030:

- Achieve a revenue of €2M with an EBITDA of at least 25%, while ensuring a satisfactory work-life balance for all employees and collaborators, and increasing the average annual workforce to 10 effective units.
- C90's goal is to enhance and streamline the information processes for the entire team, both within the company and across different business units. This aims to simplify information flow and communication among all stakeholders, minimizing project execution times and order management while maintaining and even elevating the quality standards of its services. Through the increasingly widespread introduction of digital technologies like artificial intelligence and BIM (Building Information Modeling) software for design and management, C90 seeks to simplify processes and information flows. This approach reduces the risk of human error and empowers all collaborators to perform their work more efficiently, cutting down on time, stress, and pressure. It puts them in a position to concentrate their energy and resources, fulfilling their responsibilities with greater serenity and passion.
- C90 is working to eliminate plastic use and fully transition from paper to digital documentation. This process is already underway where feasible, with the company primarily using recycled paper, minimizing printing, and properly disposing of used toner cartridges.

3. SUBJECTS

The recipients of this Code of Ethics are listed below:

- CEO, GOVERNING BODY
- EMPLOYEES
- INTERNAL COLLABORATORS WITH RESPONSIBILITY ROLES
- INTERNAL COLLABORATORS WITHOUT RESPONSIBILITY ROLES
- EXTERNAL COLLABORATORS WITH RESPONSIBILITY ROLES
- EXTERNAL COLLABORATORS WITHOUT RESPONSIBILITY ROLES
- SUPPLIERS
- STAKEHOLDERS OPERATING IN THE NAME AND ON BEHALF OF C90
- STAKEHOLDERS OPERATING UNOFFICIALLY FOR C90

All the figures listed above will be hereinafter referred to as Recipients or Subjects.

4. CORE VALUES

The Company's governing body, in establishing the corporate guidelines, has identified its core values.

- **PASSION:** This is the paramount value that allowed C90 to come into being. Passion for one's work and for the challenges that arise from it.
- **EQUITY:** All members of the organization have equal rights and dignity. This value is also reflected in how company guidelines, welfare programs, and general human resource treatments are defined and shared.
- **TEAMWORK:** C90 firmly believes that when people work together, they can create something greater than the sum of their individual abilities.
- **RESPONSIBILITY:** Each member of the company, as outlined in the organizational chart, has defined and clear responsibilities and must carry out their work by taking ownership of these responsibilities.
- **HONESTY:** Understood as the cornerstone value of individual and collective behaviour. This applies not only to clients and stakeholders in general but also, and above all, to colleagues, society in general, and oneself.
- **LIFELONG LEARNING:** Every member must pursue continuous training, both independently and with the company's support.
- **QUALITY:** Quality standards make the company recognizable and identifiable in the market. For these reasons, every resource must commit, within the scope of their assigned duties, to maintaining high quality standards that position the company at the top of the market.

Based on the mandatory guidelines set by management, the ethical and moral values identified by the Supervisory Body, on which this Code of Ethics is founded, are listed and described below:

- **COOPERATION:** C90 promotes mutuality, understood as free collaboration and sharing spirit aimed at common well-being. Cooperation is a key aspect for the Company's growth, both in terms of human capital and profit. It means not allowing personal or professional difficulties to compromise individual and collective serenity. A fundamental goal is the creation of a work environment where members actively cooperate with each other, each fulfilling their duties within the bounds of their obligations and responsibilities. The fulfilment of duty by all members allows for an equitable distribution of work within the team. From a human perspective, C90's goal is

to create a team whose communion transcends the professional aspect. A metaphysical space where everyone contributes their emotional baggage and empathy to foster a healthy and positive environment, based on principles of cooperation and sharing capable of dismantling the social indifference typical of our time.

- **INCLUSION:** The Company repudiates prejudice and the fear of diversity, considering the latter to be the greatest asset of our time. Global and continuous connection seems to have accentuated distrust towards diversity. We live in an era where everything is known, but little is understood. C90's goal is to eliminate all forms of prejudice, firmly believing that diversity is a formidable tool for personal and business growth, allowing us to observe reality, both professional and otherwise, through multiple and heterogeneous viewpoints. Premising that no term is more inclusive than "human being," Recipients are absolutely forbidden from using inappropriate terms to refer to any person based on their ethnicity or cultural and religious beliefs, gender identity and sexual orientation, ideals, physical traits, opinions and political affiliation, character, and emotional state. C90, instead, promotes every individual and collective attitude aimed at inclusion, tolerance, and understanding of diversity.
- **EXCELLENCE:** Every individual and collective behaviour, internal and external protocol, commercial operation, project, idea, and thought must necessarily be geared towards excellence; which is not to be understood as a finish line to be reached, an objective to be spasmodically pursued, or a guillotine ready to fall at the slightest error. Excellence is the North Star of business consulting, capable of indicating the course to follow and guiding the Company through any storm. Every individual and collective behaviour must be inspired by the value of excellence, pushing each Recipient to exercise the utmost care and professionalism in every activity, in order to elevate and maintain C90's quality standard.
- **SUSTAINABILITY:** There are two equally important topics to address within the scope of sustainability. Workplace sustainability is understood as the psycho-physical balance between the duties to which each Recipient is subject in performing their role and their private and personal lives. It is the Company's responsibility to promote this condition, allowing each Recipient, within the limits of their role and responsibilities, to freely manage their time while respecting mandatory deadlines linked to individual and common objectives. The second fundamental topic is environmental sustainability. C90, as a company operating in a critical sector like construction, responsible according to the WHO for approximately 38% of global pollution, is actively committed on multiple fronts to eco-friendliness and environmental respect. Energy efficiency is a priority in every project, as is the promotion of voluntary certification programs aimed at the sustainability of buildings and construction materials, in addition to particular attention to the energy efficiency of newly installed systems and the remediation and implementation of existing ones. The criteria by which C90 selects clients, partners, suppliers, businesses, and various stakeholders cannot disregard their commitment to environmental sustainability.

5. SUPERVISORY BODY

This Ethical Code is an integral part of the Organization, Management and Control Model prepared by the Company pursuant to Legislative Decree 231/2001. The latter describes the duties and

responsibilities of the Supervisory Body, such as overseeing the Code's operation and observance, as well as monitoring initiatives for the dissemination and awareness of this Code of Ethics.

It is the Supervisory Body's responsibility to monitor the Code's application, its observance by all Subjects, its updates and the control and sanction procedures.

6. DISSEMINATION

This Code of Ethics, as well as the Organization, Management, and Control Model, is published electronically on the Company's official website at: <https://www.c90.it/download/>.

7. SANCTIONS

Sanctions are stipulated for all recipients of this Code of Ethics, without exception, following an ascertainment of guilt or responsibility by the Supervisory Body. The criteria used to determine sanctions are as follows:

1. Relevance of the violated obligation
2. Extent of damage and seriousness of the danger created
3. Mitigating circumstances due to absence of intent (dolus), considering negligent responsibility for carelessness, inexperience, or regulatory ignorance
4. Co-responsibility for the fault
5. Aggravating circumstances due to intent (dolus) and personal or third-party interest
6. Aggravating circumstances due to the pursuit of an incorrect corporate interest, deliberately or unintentionally misunderstanding C90's corporate purpose.

The stipulated sanctions, which differ based on the level of severity determined by the previously outlined criteria, are as follows:

1. Verbal warning
2. Written warning
3. Monetary sanction determined by the Supervisory Body in relation to the offense committed
4. Termination of the employment relationship between the transgressor and the Company, whether they are an employee, freelance collaborator, supplier, or external consultant operating for and on behalf of C90, or officially or unofficially representing the Company or the registered C90 brand.

Recidivism, which is independent of the extent of the offense or damage caused and is applicable in cases of repeated unlawful conduct (whether the same as or different from previously sanctioned behaviour), punishes any recipient of the Model with the termination of the employment relationship.

8. CONCLUSIONS

This Code of Ethics is an integral part of the Organization, Management and Control Model that has been adopted by C90 - Engineering & Consulting S.r.l in compliance with the law (Legislative Decree 231/2001) and which forms the basis of the Internal Control System.

Roma, li 01/01/2025

Ing. Mirko Di Carlo

Amministratore Unico C90 S.r.l.

