

Code of Ethics

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Classification: public document

Synesthesia Srl Società Benefit's Code of Ethics represents the set of values, principles, lines of conduct recognized and applied by Synesthesia, its directors and shareholders, its employees and collaborators.

The Code of Ethics is the base tool for monitoring economic, financial, social and relational relations, with particular attention to issues relating to conflicts of interest, relations with competitors, relations with customers, suppliers and the Public Administration.

Synesthesia's reputation is an intangible asset of great value, which allows the company to create and cultivate trusting relationships with all its interlocutors. All the activities in the Company must therefore be carried out with commitment and professional rigor.

The Code of Ethics (hereafter, also just the "Code") is an integral part of the "Organization, management and control model" provided for by art. 6 of Legislative Decree 8 June 2001, n. 231 on the subject of "Discipline of the administrative liability of legal persons".

It is the responsibility of the Managers of the various company areas to disclose and monitor the principles contained therein.

In the case of hiring a new employee, it is the responsibility of the Human Resources Management (HR) function to provide, together with the Company Regulations, a copy of the Code of Ethics to the new resource.

1. The value of human resources: loyalty, respect and equal opportunities

Synesthesia focuses on people, a fundamental asset of the Company, on the respect for Human Resources and for their work. People are a key factor for the success of the Company, for this reason Synesthesia protects and promotes the value of human resources in order to improve and increase the wealth of knowledge of each employee and collaborator by enhancing individual talent.

Relations between Synesthesia collaborators, at all levels, must be based on criteria and conduct of **fairness, collaboration, cooperation, loyalty, trust and mutual respect**.

Everyone is required to maintain behaviour that is respectful of the sensitivity of others. Discriminatory behaviour based on gender, ethnicity, religion, opinion, nationality, physical condition, age, social status or any other nature, defamatory, intimidating and disrespectful behaviour will not be tolerated in any way. It will be the responsibility of each collaborator to report such behaviour to the Management if he becomes aware of them or is a direct witness.

Moral integrity is a duty of all those who work for Synesthesia and guides the behaviour of the entire organisation in all areas of activity. Behaviours outside work that are particularly offensive to civil sensitivity will also be considered relevant, if interpersonal relationships in the workplace are reasonably difficult.

Synesthesia believes in the value of people and their differences and wants to guarantee everyone the same opportunities for professional growth by committing to promote the construction of a professional environment and management policies attentive to diversity, gender equality (all sexes), empowerment, equal opportunities, fair pay, protection of parenthood and work-life balance.

Each employee is required to behave with **impartiality, honesty** and **fairness** in relations with others to ensure fair and **non-discriminatory** treatment based on **merit** and **equality** criteria in order to create a respectful and dignified work environment, in which each individual has the opportunity to best contribute to the development and growth of the company with its potential and characteristics.

People who collaborate with Synesthesia, in any form and role, undertake to respect the laws and regulations of the country in which they operate.



2. Passion and Innovation

Synesthesia, through its different operating units, carries out its activities with **passion, dedication** and with an **open mind** towards news and innovative scenarios.

Each employee is required to undertake to work proactively and with attention to innovation (not only technological), also through a path of continuous updating and training encouraged and supported by the Company.

Passion and the quest for innovative solutions aimed at improving processes and technologies and attention to deadlines and compliance with commitments characterize Synesthesia and represent one of its strengths.

As part of each order, Synesthesia and all its collaborators are committed to maintaining the **highest possible quality standards**, tracking and measuring performance, choosing the best solutions and working methods from time to time and dealing with professionalism and diligence, in order to maximize the satisfaction of customer requests.

3. Transparency and Sustainability

Synesthesia acts on the market with **clear and defined growth objectives**, taking into account the **sustainability of its activities** from a business, work and environmental point of view.

The top management, the management and the heads of the corporate structures must constitute an example and a reference model for all collaborators, showing impeccable conduct in the exercise of the activities of competence, constantly promoting the spirit of collaboration, trust, mutual respect, of cohesion and team spirit in order to protect and improve the climate, image and corporate prestige.

The information disseminated and shared by Synesthesia must be clear, complete, transparent, understandable and accurate, in order to allow recipients to make informed decisions regarding the relationships to be maintained with the Company.

The Company also undertakes to promote and carry out the following actions:

- create social responsibility activities, directly and indirectly, to contribute to the development and well-being of the community;
- encourage, where possible, environmentally friendly solutions, not only in compliance with all current regulations on pollution, but also with scrupulous



- attention to any conduct with a low environmental and ecological impact;
- implement programs for the separate collection of waste and recycling of reusable materials;
- favor and encourage “green” types of employee travel and “smart” work formulas;
- support the use of free and open source software, through its adoption and actively contributing to its development;
- avoid vendor lock-in commercial practices towards its customers.

4. External Relations

Relations with institutions, mass media and public activities in general (eg exhibitions, events, etc.), necessary for the development of Synesthesia's corporate programs, are exclusively entrusted to delegated corporate functions.

These relationships must be based on the utmost transparency, clarity, fairness and such as not to lead to partial, distorted, ambiguous or misleading interpretations by private and public subjects with whom relations are maintained for various reasons.

Furthermore, they must be consistent and accurate but also in compliance with company policies and programs.

Synesthesia cannot make direct or indirect contributions in any form, nor allocate funds and loans to support public entities (e.g. political parties, committees, etc.), except as permitted and provided for by the laws and regulations in force.

In carrying out their business functions, staff must refrain from issuing formal or informal communications to the outside world for any reason without prior authorization from the competent corporate function.

5. Conflicts of Interest

All Synesthesia employees and management are required to avoid conflicts of interest between personal and corporate business activities.

Any situation that may constitute or determine a conflict of interest must be promptly communicated to the Management.

As an example, the following situations determine a conflict of interest:

- economic and financial interests of the collaborator and / or his family in the activities of suppliers, customers and competitors;



- carrying out unauthorised business activities for customers, suppliers, competitors;
- acceptance of money, gifts, favours or benefits from persons or companies that have or intend to enter into business relationships with Synesthesia or with companies related to it.

6. Violation Reports and Sanctions

Anyone who becomes aware of a violation or suspected violation of the Code of Ethics is required to report it to ethics@synesthesia.it. The reports must be provided in a non-anonymous form, any anonymous reports will in any case be evaluated. Such reports must contain a description of the facts that constitute a violation, even presumed, of the provisions contained in the Synesthesia documents mentioned above, including information relating to the time and place of the events represented, as well as to the persons involved.

Synesthesia protects employees and third-party collaborators from any prejudicial consequences deriving from the report, ensuring the confidentiality of the identity of the reporting parties, without prejudice to legal obligations. The reports will be evaluated by the Management of Synesthesia.

The violation of the principles established in the Code of Ethics and in the company procedures compromises the relationship of trust between Synesthesia and whoever commits the violation (directors, company personnel, customers, suppliers).

Once ascertained, violations will be prosecuted promptly, through the adoption, compatibly with the provisions of the current regulatory framework, of adequate and proportionate disciplinary measures, regardless of the possible criminal relevance of such behaviours and the establishment of criminal proceedings. In cases where they constitute a crime.

Disciplinary measures for violations of this Code are adopted by the Company in line with the laws in force and with the national employment contract.

These measures may also include the removal from the Company of those responsible for such unlawful conduct.

In order to protect its image and safeguard its resources, Synesthesia shall not entertain relations of any kind with subjects who do not intend to operate in strict compliance with current legislation, and / or who refuse to behave in accordance with the values and



principles set out in the Code of Ethics.

7. Publication and Validity

Any variation or addition must be approved by the Board of Directors and cancels and replaces, from the date of its issue, all previously issued versions. The Code of Ethics does not replace current and future company procedures which continue to be effective to the extent that they are not in conflict with it.

Synesthesia undertakes to update the Code of Ethics, with a view to continuous and constant improvement.

This Code of Ethics has been in force since **3 August 2020**.

Latest update: **8 november 2022**.

