

ETHICAL CODE & GENDER POLICY

Document: Ethical Code
Classification: Public Document
Issued on: 03/08/2020
Revision: 6
Last Approval Date: June 19, 2024



Summary

Fundamental Principles

1. The Value of People: Diversity and Equal Opportunities.....	4
2. Steering Committee: CSR, Diversity, Equal Opportunities, Sustainability, and AI Ethics.....	4
3. Corporate Gender Equality Policy.....	5
a. RECRUITMENT	
b. COMPENSATION & CAREER and PERFORMANCE EVALUATION	
c. PROFESSIONAL TRAINING AND DEVELOPMENT	
d. CORPORATE WELFARE	
e. ACADEMY & EVENTS	
4. Passion and Innovation.....	7
5. Transparency and Sustainability.....	7
6. External Relations.....	8
7. Responsible and Inclusive Communication.....	8
8. Conflicts of Interest.....	8
9. Reporting and Sanctions.....	9
10. Publication and Validity.....	10

Fundamental Principles

"The growth of Synesthesia SB is founded on open innovation, sustainable development, and a focus on the well-being of our employees and collaborators. Our ambitious goal is to build a better future through innovation and the use of technologies that enhance the quality of work and life for all people." (Synesthesia Company Profile 2022).

Since January 2022, Synesthesia has been a benefit corporation¹. The company is managed in order to pursue both economic and financial interests and the interests of the common benefit, committing to generating a positive impact on the wider community.

The mission of the company is to drive technological progress through ethics, innovation, and research while promoting sustainability, inclusivity, equality, and well-being. As a benefit corporation, Synesthesia aims to balance profit generation with attention to its impact on the local community and the planet, considering not only the economic implications but also the environmental, social, and governance implications of its operations.

Promoting 360-degree sustainability is fundamental for Synesthesia: this translates into active involvement of staff in adopting behaviors respectful of the environment and people, as well as the voluntary application of transparency policies (adherence to the Transparency Decree).

The well-being of employees is a key element in Synesthesia's vision, which is driven by the belief that a healthy and happy workforce is key to effective productivity. The company is committed to ensuring a safe work environment and promoting policies of sustainable growth for future generations.

Synesthesia believes in the value of people and the value that each individual brings. Synesthesia therefore wants to ensure the same possibilities for professional growth for everyone in the company by formally committing to promoting a management policy that recognises diversity, gender equality (all genders), female empowerment, and equal opportunities.

The Ethical Code and Gender Policy of Synesthesia srl Benefit Company is the articulation of the values, norms, and behaviors that are to be respected and put into practice by all: administrators, partners, employees, and collaborators.

Synesthesia's reputation is considered a high-value asset, allowing the company to maintain trustful relationships with all stakeholders. Consequently, Synesthesia wants these declarative documents to be a guide in managing economic, financial, social, organizational, and interpersonal relationships, with particular attention to problems of conflict of interest, internal relations, competition, relationships with customers (private and public), and with suppliers.

This document is published on the Corporate Intranet and on the company website. When a new employee or collaborator is hired, the HR department is responsible for providing and explaining a copy of this document.

¹ in accordance with Article 1, paragraphs 377 and 380 of Law No. 208 dated December 28, 2015.

1. The Value of People: Diversity and Equal Opportunities

Synesthesia places people at the heart of its activity and respects the importance of their work. People are essential resources for business success, which is why Synesthesia aims to enrich and broaden the skills of each employee and collaborator, with high value placed on individual talent.

Relationships among people at Synesthesia, at any level, must be guided by principles of integrity, collaboration, cooperation, loyalty, trust, and mutual respect. All employees are expected to conduct themselves in a manner that respects others and is sensitive to others. Discriminatory behaviors of any kind based on gender, ethnicity, religion, opinions, nationality, physical conditions, age, social situation, or any other factor will not be accepted, nor will defamatory, intimidating, and disrespectful attitudes be tolerated. All employees and collaborators must act with impartiality, honesty, and fairness in relationships with others, ensuring fair and non-discriminatory treatment based on merits and equality, in order to create a respectful and dignified work environment in which each individual can contribute to the maximum with their abilities and characteristics to the progress and growth of the company.

Anyone who detects discriminatory behaviors has the duty to report the incident through the [Whistleblowing Portal](#) (see article 9 of this document). Offensive behaviors committed outside the workplace that may reasonably affect the reputation of Synesthesia and/or interfere with professional relationships are also considered relevant.

All those who work with Synesthesia, in any form or role, are required to respect the laws and regulations of the country in which they operate.

2. Steering Committee: CSR, Diversity, Equal Opportunities, Sustainability, and AI Ethics

In 2022 the Synesthesia Board established a Steering Committee for Equal Opportunities. In 2023 it expanded the Board to include CSR and sustainability. Participants are selected for the Steering Committee according to the following criteria:

- role within the organization and related functional oversight,
- skills in 360-degree Sustainability,
- ability to enact critical and analytical thinking,
- leadership skills,
- communication and interpersonal relationship skills.

The Committee is tasked with:

- guiding the adoption and implementation of Policies related to 360-degree Sustainability including the Gender Equality Policy,
- promoting initiatives on sustainability, diversity & inclusion themes,
- monitoring the drafting of impact reports and corporate welfare plans and HR policies,
- overseeing the application of the sustainability mission,
- overseeing the respect of the organization's ethical principles.

3. Corporate Gender Equality Policy

Synesthesia is committed to achieving the Goal Five of the United Nation Sustainability Goals: "Achieve gender equality, and empower all women and girls by 2030, ensuring full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life." (UN, Agenda 2030 - Goal No. 5).

Synesthesia wants to be a protagonist in the field of gender equality: corporate gender equality is not only an ethical choice but also a winning strategic asset for both the business of the company and the consolidation of its internal and external brand identity.

With the Gender Policy of Synesthesia and with the support of the Committee, the Management therefore offers guidelines to organizational practices and, in particular, to the approach to processes. In detail:

- **RECRUITMENT**

Synesthesia values diversity in recruiting, ensuring a selection independent of gender, sexual orientation, ethnicity, and religion. The presence of people of different gender, culture, generation, religion, and ethnicity is essential for creating an environment capable of producing new ideas, solutions, and positive performance. Synesthesia is committed to maintaining a neutral and objective selection process, and to avoiding prejudice in conclusions based on physical appearance or presentation style of a candidate. Synesthesia wants, therefore, to consolidate recruitment policies and plans that emphasize the importance of experiences, abilities, and skills as elements that guide the choice of the best candidates. The company also ensures that the people involved in the hiring processes receive adequate training related to gender equality and that they also have access to tools to counter stereotypes that could negatively impact the selection processes.

- **COMPENSATION, CAREER and PERFORMANCE EVALUATION**

Synesthesia's compensation policy contributes to the achievement of the company's mission, values, and business strategies, adhering to principles of diversity, equal opportunities, skill enhancement, and professionalism, while applying principles of equity and non-discrimination. Salary adjustments, short-term and long-term incentive processes and systems, considering the applicable market context and benchmarks, are anchored in recognizing responsibilities, achieved

results, and the quality of professional contributions, ensuring no lesser pay for the same work based on gender.

Synesthesia ensures mechanisms to protect job positions and maintain equal pay levels post-maternity and in light of parental leave policies. The company aims to create a balanced and diverse 'leadership pipeline'; hence, contributions from all genders are equitably assessed in internal decision-making processes. The company thus develops performance evaluation processes and systems that encourage ongoing dialogue between managers and employees and create development plans without any gender discrimination, placing meritocracy at the foundation of its choices.

- **PROFESSIONAL TRAINING AND DEVELOPMENT**

Synesthesia is committed to offering equal development opportunities without any gender discrimination, setting transparent standards consistent with Performance Management and Talent Development processes. This reflects Synesthesia's dedication to creating a fair and encouraging work environment, where training and professional growth opportunities are accessible to everyone, regardless of gender.

- **CORPORATE WELFARE**

Synesthesia is diligent in structuring a corporate welfare plan with a specific focus on gender equality policies. Specifically, to:

- Strengthen family welfare services and the valorization of parenthood, Synesthesia commits to ensuring that employees on maternity leave receive the same level of support and growth opportunities as any other team member;
- Consolidate and maintain work-life balance and flexible work policies with the goal of providing an environment that recognizes and respects all identities and experiences;
- Facilitate reintegration processes into the company after long periods of absence (maternity, paternity, illness), ensuring that such personal life conditions do not negatively impact an employee's position or compensation;
- Prevent sexual harassment in the workplace through awareness programs that educate people and guide daily behaviors to combat any form of discrimination and prejudice.

- **ACADEMY & EVENTS**

In all our events, roundtables, and conferences, Synesthesia promotes equal gender representation. Organising teams work with community partners to promote the events widely and to encourage participation from people of all backgrounds, gender and circumstances. This balanced approach aims to provide a wide range of voices and perspectives at the events. Moreover, Synesthesia is committed to promoting activities that foster gender equality and inclusion, also through posts and publications on its website and social media.

4. Passion and Innovation

Synesthesia is committed in its activities through various operational units, carrying out work with passion, dedication, and an open spirit towards innovation and a progressive vision.

Every employee is encouraged to operate with a proactive attitude focused on innovation (not just technological), facilitated by a path of continuous training and upskilling supported by the company.

The passion of Synesthesia and its constant search for innovative solutions to improve processes and technologies, in addition to attention to timeliness and respect for commitments, represents one of its main strengths.

In every project, Synesthesia and all its collaborators strive to maintain the highest possible quality standards, monitoring and measuring performance, selecting the most appropriate solutions and optimal work methodologies on each occasion, always with professionalism and commitment, in order to maximize customer satisfaction.

The corporate leadership must continuously promote a spirit of collaboration, trust, mutual respect, cohesion, and teamwork, in order to preserve and enhance the atmosphere, image, and reputation of the company. The information shared by Synesthesia must be clear, complete, transparent, easily understandable, and accurate, to allow recipients to make informed decisions regarding their interactions with the company.

5. Transparency and Sustainability

Synesthesia is committed in its field with well-defined growth objectives, considering the sustainability of its activities from an economic, labor, and environmental perspective.

The commitments of Synesthesia include a series of key actions:

- Social responsibility: Develops social responsibility activities, both directly and indirectly, to promote the progress and well-being of society. This is highlighted in the Impact Report.
- Eco-friendly solutions: Promotes the adoption of eco-friendly solutions where possible. This includes respecting all current pollution standards and focusing on low-impact environmental behaviors.
- Recycling and differentiated waste collection: Implements differentiated waste collection systems and recycling programs for reusable materials.
- Ecological transport and smart work: Promotes the use of ecological means of transport for its collaborators and the adoption of "smart" forms of work.
- Open source software: Supports the use and development of free and open source software, actively contributing to their progress.
- Avoiding vendor lock-in practices: Commits to avoiding vendor lock-in commercial practices in relationships with its customers, promoting a competitive and healthy environment.

6. External Relations

Interactions with institutions, media, and public communications in general (e.g., during events, demonstrations, etc.), essential for the development of Synesthesia's corporate projects, are reserved only for designated corporate departments. These relationships must be managed with the utmost transparency, clarity, and integrity, avoiding causing incorrect, misleading, or misleading interpretations among the private and public parties involved in various relationships. Moreover, such interactions must be consistent, uniform, accurate, and in line with corporate policies and plans.

Synesthesia cannot provide contributions, direct or indirect, of any kind, nor allocate financial resources to support public entities (e.g., political parties, committees, etc.), except as permitted and provided by law and current regulations.

Staff, in the exercise of their corporate responsibilities, must refrain from releasing any type of formal or informal communication to the public without prior approval from the responsible corporate department.

7. Responsible and Inclusive Communication

Synesthesia adopts a gender language policy in line with UNI/PdR 125:2022.

This policy aims to ensure that all forms of communication, both internal and external, reflect the values of equality and inclusivity, avoiding gender stereotypes and promoting language that respects all identities. Through the adoption of this policy, Synesthesia commits to making communication a tool for positive change towards greater awareness and respect for diversity.

8. Conflicts of Interest

Administrators, Partners, and all staff of Synesthesia are required to avoid any conflict of interest between their personal activities and professional activities. Any situation that could cause or determine a conflict of interest must be immediately reported to the Management. For illustrative purposes, the following situations may cause a conflict of interest:

- Economic and financial interests of the collaborator or their family in activities with suppliers, customers, and competitors.
- Carrying out work activities not authorized by the company at customers, suppliers, or competitors.
- Acceptance of money, gifts, favors, or advantages from individuals or companies that are or want to enter into a commercial relationship with Synesthesia or related companies.

9. Reporting and Sanctions

Synesthesia encourages anyone who identifies or suspects a violation of the Ethical Code and/or the Gender Policy to report it to Synesthesia's [Whistleblowing Portal](#) ².

Through the portal, it is possible to submit reports anonymously. Reports should include a detailed description of the events that represent a potential violation of the provisions of the Synesthesia documents previously mentioned, with details related to when and where such events occurred, and the people involved.

The company is committed to protecting its employees and third-party collaborators from any negative repercussions resulting from such reports, ensuring the confidentiality of the whistleblower's identity, unless required by law.

The violation of the principles established in the Ethical Code and the Gender Policy in corporate procedures compromises the trust relationship between Synesthesia and anyone involved in the violation (administrators, staff, customers, suppliers).

Once the violations have been verified, they will be addressed urgently through the adoption of appropriate and proportionate disciplinary measures, in compliance with current laws, regardless of the possible criminal significance of such behaviors and the initiation of criminal proceedings in case such acts constitute a crime. Disciplinary sanctions for violations of this Code are adopted by the company in accordance with existing laws and the collective labor agreement. These measures may also include separation from the company by the violators.

Synesthesia, in order to protect its reputation and safeguard its resources, will not establish any relationship with individuals unwilling to scrupulously respect the current law and/or the values and principles outlined by the Ethical Code and the Gender Policy.

² The Whistleblowing Portal is adopted for managing reports of behaviors, risks, crimes, and irregularities related or connected to the Company's activities, in accordance with the provisions of Legislative Decree March 10, 2023, No. 24 "Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons who report breaches of Union law and containing provisions regarding the protection of persons who report breaches of national regulatory provisions."

10. Publication and Validity

This policy is addressed to all employees of Synesthesia and shared with all its main stakeholders, consultants, suppliers, and customers with the aim of having a significant impact on its network.

Synesthesia annually reviews this policy.

Any changes or additions must be approved by the corporate Board and cancel and replace, from the date of their issuance, all previously issued versions. The Ethical Code does not replace current and future corporate procedures that continue to be effective to the extent that they are not in conflict with it. Synesthesia is committed to updating the Ethical Code and the Gender Policy, with the aim of continuous and constant improvement.