

CONFIGURATORI GROUP

ETHICAL CODE

*This Code of Ethics has been approved by the Board of Directors of
CONFIGURATORI.IT, group leader of Configuratori Group*

Summary

| | | |
|---|---|---|
| 1 | FOREWORD..... | 2 |
| 2 | GENERAL PRINCIPLES | 2 |
| | 2.1 Compliance with laws | 2 |
| | 2.2 Fairness | 2 |
| | 2.3 Confidentiality..... | 2 |
| | 2.4 Diligence | 2 |
| | 2.5 Loyalty..... | 3 |
| | 2.6 Non-Discrimination | 3 |
| 3 | RELATIONS WITH EMPLOYEES AND COLLABORATORS | 3 |
| | 3.1 Personnel management | 3 |
| | 3.2 WORKING ENVIRONMENT..... | 3 |
| | 3.3 Human rights and labor regulations | 3 |
| 4 | COMPANY MANAGEMENT | 3 |
| | 4.1 Compliance with internal procedures..... | 3 |
| | 4.2 Accounting management..... | 3 |
| | 4.3 Data protection | 4 |
| | 4.4 Communication | 4 |
| | 4.5 Relationship with customers and suppliers | 4 |
| | 4.6 Guidelines of the penalty system | 4 |

1 FOREWORD

This Code of Ethics defines the basic principles by which the companies of the Configuratori group (Configuratori.it, Configuratori Polska, Configuratori USA corp.) Conform to all stakeholders and to the environment by applying to all personnel, in their relationships with customers and suppliers.

Configuratori.it conforms its internal and external activities to the principles contained in this Code, a fundamental component of the organizational model and of the overall internal control system of the company, convinced that ethics in conducting business is also a condition for the success of company.

The corporate bodies, management and employees of all the Companies of the Configuratori Group, namely Configuratori.it, Configuratori Polska and Configuratori USA Corp, are required to comply with this Code - within the limits of their respective competences, functions and responsibilities.

2 GENERAL PRINCIPLES

Conduct, at all company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence, loyalty, training and innovation.

2.1 *Compliance with Laws*

CONFIGURATORI.IT observes all applicable regulations and constantly updates on legislative developments, also making use of training opportunities and consultants.

The Company considers the transparency of financial statements and accounting a fundamental principle for the exercise of its business and for the protection of its reputation.

2.2 *Fairness*

Correctness and moral integrity are an unshakable duty.

No privileged relationship is established with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

The intrinsic conviction of acting in the interest of the Company leads to timely compliance with the rules and principles of this Code.

2.3 *Confidentiality*

CONFIGURATORI.IT undertakes to guarantee the protection and confidentiality of the personal data of the Recipients and Stakeholders, in compliance with all applicable legislation on the protection of personal data.

Confidential information, learned as a result of one's work, is not used for purposes unrelated to the exercise of this activity, and in any case to always act in compliance with the confidentiality obligations assumed by CONFIGURATORI.IT towards all stakeholders.

2.4 *Diligence*

Relations between employees and collaborators are based on mutual trust: employees are therefore required to do their utmost to promote the interests of the company, in compliance with the values set out in this Code.

Employees and consultants must refrain from any activity that could constitute a conflict with the interests of CONFIGURATORI.IT, renouncing the pursuit of personal interests in conflict with the legitimate interests of the Company.

In cases where the possibility of the existence of a conflict of interest can be depicted, the Company Manager will assess and possibly authorize the potentially conflicting activity.

In case of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

2.5 Loyalty

CONFIGURATORI.IT undertakes to create fair competition, in compliance with national and EU legislation, in the awareness that virtuous competition is a healthy stimulus for innovation and development processes, it also protects the interests of consumers and the community.

2.6 Non-Discrimination

In relations with Stakeholders and in particular in the selection and management of personnel, in the organization of work, in the choice, selection and management of suppliers, as well as in relations with Bodies and Institutions, CONFIGURATORI.IT avoids and repudiates any discrimination on the subject: age, sex, race, sexual orientation, state of health, political and trade union opinions, religion, culture and nationality of its interlocutors.

CONFIGURATORI.IT at the same time favors integration, favoring intercultural dialogue, protection of the rights of minorities and vulnerable people.

3 RELATIONS WITH EMPLOYEES AND COLLABORATORS

3.1 Personnel management

CONFIGURATORI.IT protects and enhances its human resources, committing itself to maintaining constant the conditions necessary for professional growth, the knowledge and skills of each person, carry out adequate training for professional updating and any initiative aimed at pursuing this purpose.

The Company is firmly committed to combating episodes of mobbing, stalking, psychological violence and any behavior that is discriminatory or harmful to the dignity of the person inside and outside the company premises.

Interpersonal relationships must be conducted with loyalty, fairness and mutual respect, respecting the values of civil coexistence and people's freedom.

3.2 Working environment

CONFIGURATORI.IT undertakes to offer its staff a healthy, safe and respectful working environment for the dignity of workers.

Safety in the workplace is ensured both through the rigorous implementation of the laws in force and by actively promoting the culture of safety through specific training programs. Staff training is an important element of the management system adopted.

3.3 Human rights and labor regulations

CONFIGURATORI.IT does not employ child labor, it respects the regulations within the terms working hours. It favors Smart working where possible.

4 COMPANY MANAGEMENT

4.1 Compliance with internal procedures

CONFIGURATORI.IT believes that management efficiency and a culture of control are essential elements for achieving the objectives.

4.2 Accounting management

CONFIGURATORI.IT acts in compliance with the principles of truthfulness, accuracy and transparency and in compliance with accounting principles, planning its operational strategies on the basis of its real economic and financial situation.

4.3 Data protection

CONFIGURATORI.IT complies with the security provisions to protect hardware devices from unauthorized access, which could seriously damage the personal data protection rights of CONFIGURATORI.IT staff and customers.

4.4 Communication

CONFIGURATORI.IT promotes effective corporate communication able to put the company in contact with civil society, in order to understand the requests, needs and requirements of the community and to spread its values and its mission.

The information communicated to the Stakeholders is complete and accurate so that the recipients can make correct and informed decisions.

The advertising promotion of CONFIGURATORI.IT respects ethical values, protecting minors and repudiating vulgar or offensive messages.

4.5 Relationship with customers and suppliers

Configuratori.it deals with third parties with courtesy, competence and professionalism, in the belief that their conduct depends on the protection of the image and reputation of the company and consequently the achievement of corporate objectives.

In particular, refrain from any form of unfair or deceptive behavior that could lead customers or suppliers to rely on unfounded facts or circumstances.

Configuratori.it is constantly committed to offering punctual and high-quality services to customers, trying to limit any form of disservice or delay in order to maximize customer satisfaction, adding value with tools and methods.

Relations with suppliers are based on loyalty, correctness and transparency.

The choice of suppliers is made on the basis of objective criteria of economy, opportunity and efficiency.

4.6 Guidelines of the penalty system

The internal control system is oriented towards the adoption of tools and methodologies aimed at countering potential business risks, in order to ensure compliance not only with the laws, but also with internal provisions and procedures.

In fact, the violation of the principles established in the Code and in the procedures indicated in the internal controls compromises the relationship of trust between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

Such violations will therefore be immediately prosecuted by the management of CONFIGURATORI.IT in an incisive and timely manner, through the adoption of adequate and proportionate disciplinary measures.

The effects of the violations of the Code of Ethics and of the internal protocols must be taken into consideration by all those who, for whatever reason, have relations with CONFIGURATORI.IT. Depending on the seriousness of the behavior put in place by the subject involved in one of the illegal activities envisaged by the CONFIGURATORI.IT Code will immediately take the appropriate measures, regardless of the possible exercise of criminal action by the Judicial Authority.