



Code of Ethics

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Introduction and general principles

The Unieuro Group (hereinafter "Unieuro" or "the Group") pursues its mission and business objectives in compliance with ethical principles, recognizing it as an essential condition for the sustainable growth of the group in the long term, as well as for the establishment of its reputation. Given Unieuro's presence in the national market, its operations, and the multitude of stakeholders involved, the management of relationships with stakeholders (customers, suppliers, public administration, etc.) is of paramount importance.

In pursuing these objectives, consistently with the provisions of Legislative Decree n° 231/2001, the Group has chosen to formalize the Code of Ethics (hereinafter referred to as the "Code") in order to share with its employees the values, principles, and behavioral rules, and to communicate them to all other stakeholders. This is done with the aim of building a transparent reality that is committed to upholding ethical and behavioral standards. The Group firmly believes that the success of the company cannot be separated from the ethical conduct of business, and that competitiveness must be inseparably accompanied by ethical sensitivity, social engagement, and environmental respect.

In light of the foregoing, the Group:

- guarantees the timely dissemination of the Code to all recipients;
- ensures that all updates and changes are promptly brought to the attention of all recipients of the Code;
- provides adequate training and information support, providing adequate support in case of doubts regarding the interpretation of the Code;
- ensures that employees who report violations of the Code are not subject to any form of retaliation;
- The Group implements fair and proportionate disciplinary measures, tailored to the type of Code violation, and ensures their consistent application to all employee categories, in accordance with applicable laws, contracts, and internal regulations in the jurisdictions where it operates.

1. Recipients

The provisions of the Code apply to anyone operating or collaborating in any capacity with the Group, particularly:

- **to subjects who are in an apical position within the Company Organization** (members of corporate bodies, managers); the Members of the Board of Directors of the Companies are required to be guided by the principles of the Code, as identified here; Likewise, Managers, in implementing their management activities, must be guided by the same principles, thus strengthening cohesion and the spirit of Mutual Collaboration;
- **to subjects who within the company organization hold a subordinates position with respect to the former** (Eg. employees): Actions, Operations, negotiations and in general any other activity, carried out by employees in the performance of work, must be based on correct management, transparency and completeness of information and compliance with internal Procedures;
- **to Collaborators** who carry out, directly or indirectly, activities connected or interesting to the company's activities (consultants, external Professionals);
- **to Partners and Interlocutors**, who have a role in projects and operations.

Each Recipient has the duty to:

- Be aware of the rules outlined in the Code and has the obligation to refrain from engaging in behaviors that go against the provisions of the Code;
- report to their superiors any information relating to violations of the Code;
- collaborate with the internal control structures to verify violations;
- not to undertake other types of initiatives that are inconsistent with the contents of the Code.

2. General principles

The Code is founded upon a collection of general principles, the adherence to which is of utmost significance for the smooth operation, trustworthiness of management, and reputation of the Group as a whole.

These general principles constitute rules of conduct that govern internal and external business relationships, thereby serving as guiding principles that every recipient within the Group is obligated to respect.

2.1. Transparency

Unieuro guarantees complete transparency to all stakeholders regarding its activities, employing a language that is simple and easily understandable. However, this commitment does not compromise the confidentiality required for conducting business or the need to safeguard the competitiveness of its operations. Moreover, the Group is diligent in providing accurate information to consumers, including through commercial communications that are designed not to unduly influence consumers' judgment.

2.2. Fairness and honesty

The Group operates in compliance with applicable laws, professional ethics and internal regulations. Pursuing the Group's interest should never justify behaviors that contradict principles of fairness and honesty can never justify conduct contrary to the principles of fairness and honesty.

Employees and other individuals bound by the code commit to upholding the highest standards of integrity, honesty, and fairness in all internal and external relationships of the Group.

No employee shall directly or indirectly accept, solicit, offer or provide monetary or non-monetary benefits (including gifts or presents, except for those of nominal value commonly accepted in business practices), even under undue pressure.

Unieuro strictly prohibits any form of corruption involving public officials or any other party connected to or associated with public officials, regardless of the jurisdiction, even in cases where such activities might be commonly accepted or not prosecuted judicially.

In light of the above, employees and other individuals are strictly forbidden from offering business courtesies, gifts, or other benefits that may violate laws or regulations, contravene the Code, or harm the Group's reputation, even if only perception-wise.

Similarly, employees (including their family members) are prohibited from accepting gifts, presents, or other benefits that could compromise their impartiality. To ensure this, every employee and individual should avoid situations where personal interests may conflict with the

Group's interests.

Any improper requests or offers of money or favors, from or to those acting on behalf of Unieuro, must be immediately reported to the Compliance Officer.

2.3. Protection of competition

The Group recognizes the fundamental importance of a competitive market, in which free competition is a decisive factor in ensuring growth and ongoing business improvement. Consequently, Unieuro refrains from practices that would violate competition laws.

All situations that could have a distorting effect on competition, especially agreements containing exclusivity clauses, price-fixing constraints, and so forth, are subject to antitrust law.

In every potential conflict with antitrust regulations, it is essential to seek prior legal advice from experts.

2.4. Prohibition of corrupt practices

The practice of corruption, whether directed towards public or private entities and individuals, constitutes a criminal offense. Apart from being harmful to the overall economic system, it poses significant risks to the Group due to the severe legal implications and potential harm to its reputation.

Hence, Unieuro condemns and actively combats any form of corrupt behavior, whether originating from its employees or from third parties, towards both public officials and/or individuals entrusted with public service, as well as private entities, whether domestic or foreign.

The Group explicitly prohibits the giving or acceptance of money or any other form of benefit (goods, services, favors, or performances of value) to or from any party (a partner, a customer, a supplier, a public entity, etc.) for an undue interest or advantage.

In particular, when engaged in any business transaction, request, or interaction with a public or private entity, the following actions are prohibited:

- Providing privileges to the party involved or their family members, such as employment and/or commercial opportunities;
- Supplying, pledging, accepting, or promoting money, favors, gifts, or any form of utility to the party involved or their family members. Where it is customary to present gifts to clients or others, this may be permissible under the condition that the gifts are of an appropriate nature and modest value, without any implication of seeking favoritism, and always in accordance with the relevant laws;
- Offering or receiving confidential information that may provide personal advantages to the involved party or violate the principles of equal treatment and the established negotiation procedures;
- Providing donations or complying with any requests for contributions/sponsorships that may influence business negotiations;
- Encouraging the party to manipulate the outcome of inspections or audits conducted by authorities.

Real estate activities aimed at acquiring new premises for the Company's operations (e.g., opening new retail stores, upgrading logistics facilities) and/or adapting existing locations where the company operates (e.g., renovating existing stores) are strategic endeavors for the Group. Therefore, the **management of negotiation/commercial transaction activities** and the undertaking of commitments for real estate purchases or leases, including related investments, must be conducted by duly authorized individuals and in compliance with principles of fairness and transparency. This entails ensuring the traceability of agreed-upon commercial agreements with counterparties and the underlying economic reasons.

It is prohibited to offer or pledge money or any other form of benefit to an employee or representative of a counterparty, and likewise, it is prohibited to request or accept money or other benefits in the context of negotiations involving real estate activities, with the aim of obtaining or granting an undue advantage. The relationship with any real estate intermediaries acting on behalf of the Group must be conducted in compliance with legal principles and must not be used as a means for engaging in corrupt practices.

2.5. Prevention of conflict of interest

In the course of their activities, recipients must avoid situations in which the parties involved in transactions are, or may appear to be, in a conflict of interest.

A conflict of interest arises when the recipient pursues an interest that differs from the mission

of the Group or engages in activities that could interfere with their ability to make decisions solely in the best interest of the Group, or personally benefit from the Group's business opportunities.

In particular, recipients are explicitly required to inform their immediate hierarchical supervisor in advance, who in turn has the obligation to promptly communicate the conflict to the Compliance Officer, regarding the existence of financial interests in a supplier or competing company that could lead to conflicts of interest.

If potential conflict situations are present or may arise, employees must inform their supervisor in advance in order to resolve the issue.

2.6. Confidentiality and protection of privacy

The Group recognizes the strategic value of information and establishes precise confidentiality rules to prevent improper disclosure.

In particular, Unieuro requires specific caution in handling information related to business activities, employee data, and third parties in general (including customers). The Group is committed to protecting the information generated or acquired within the corporate structure and/or in the course of business relationships.

The Group's databases may contain personal data which, due to negotiation agreements, cannot be disclosed to external parties, and data whose inappropriate or untimely disclosure could harm the company's interests.

Therefore, Unieuro takes measures to handle such information in compliance with regulations and prescriptions provided by the Privacy Authority for the protection of privacy.

The disclosure of information to third parties should only occur by authorized individuals for official or work-related reasons and in compliance with applicable provisions, ensuring equality and contextual relevance in the communication. In cases where confidential information is shared with third parties, the confidential nature of the information must be explicitly stated, and the third party must be requested to observe the obligation of confidentiality.

All information obtained in relation to one's employment or collaboration is the property of the Group. The obligation of confidentiality regarding acquired confidential information also applies to parties with whom Unieuro has business relationships, through specific contractual clauses or the signing of confidentiality agreements.

No employee may derive any direct or indirect personal or financial benefits from the use of confidential information, nor may they communicate such information to others.

2.7. Compliance with current regulations

Unieuro sets the objective of pursuing its purposes and operating in strict compliance with the laws and regulations in effect in Italy and in all countries where the Group operates.

Unieuro does not endorse or engage in relationships with organizations, associations, or movements that directly or indirectly pursue purposes prohibited by law.

3. Employee relations

Unieuro Group acknowledges the professional contribution of individuals as one of the primary success factors for any enterprise. It establishes a framework of loyalty and mutual trust, building its competitive advantage on the competence and commitment of each individual. The assessment of personnel is conducted based on the alignment of candidates' profiles with the expected requirements and the company's needs, while upholding equal opportunities for all relevant parties.

Unieuro extends equal opportunities to all employees, ensuring that each individual receives fair treatment based on merit. Any form of discrimination, whether in the selection phase or in the management and career development of personnel, is actively avoided.

Therefore, the competent functions will:

- Adopting criteria based on merit and competence for decisions regarding employees;
- Selecting, hiring, training, and compensating employees without any discrimination;
- Complying with labor laws and regulations.

The physical and moral integrity of employees is considered a primary value.

For this reason, the Group is committed to protecting the moral integrity of employees by ensuring the right to work in conditions that respect human dignity.

Unieuro also prohibits any organization, association, movement, or group whose purposes include incitement to discrimination or violence based on race, ethnicity, nationality, or religion. Those who participate in such organizations, associations, movements, or groups, or provide assistance to their activities, are subject to punishment solely for their participation or assistance.

Therefore, the Group prohibits individual behaviors aimed at committing violence or acts of provocation to violence for the purpose of discrimination based on nationality, gender, race or ethnic origin, religion, political opinions, age, sexual orientation, disability, or health status of its interlocutors, and, in general, any characteristic of the human person.

4. Human resource management

The following are fundamental principles of human resources management:

- offer Equal employment opportunities;
- Censorship fair and meritocratic Treatment;
- Spread and Consolidated a Cultures of safety in the workplace and operate to Preserve, in particular through Preventive Actions, the health and safety of Workers both from a physical and psychological Point of view ;
- Censorship the protection of employees' privacy and their right to work without being unlawfully influenced;
- Censorship that employees work together to maintain a Corporate Climate of Mutual respect and do not Engage in attitudes that could Harm the dignity, Honor and Reputation of each person.

The Group is committed to providing equal employment and career development opportunities to all employees and helps them maximize their potential through training and development.

Unieuro is committed to offering equal career opportunities to those who possess the qualifications required for higher positions, without any discrimination, solely based on meritocratic criteria and acquired professional competence.

4.1. Impartiality

Unieuro operates in a fair and impartial manner by adopting the same behavior towards all stakeholders who come into contact with the Group. Indeed, it is necessary to be impartial, in form and substance, in all decisions that must be taken objectively, avoiding any form of discrimination based on nationality, sex, racial or ethnic origin, religion, political opinions, age, sexual orientation, disability, state of health of his interlocutors and in general any characteristic of the human person.

4.2. Group commitments

Unieuro, in compliance with the Conventions of the International Labour Organization, undertakes:

- to respect fundamental human rights;

- the prevention of child exploitation;
- ensuring that forced or coerced labor in conditions of slavery or servitude is not employed.

Unieuro strictly prohibits the following in both internal and external labor relations:

- Any form of harassment, including creating a hostile work environment for individual workers or groups of workers, unwarranted interference with the work of others, and imposing obstacles or hindrances to the professional advancement of others.
- Sexual harassment, which encompasses linking opportunities for career growth or other benefits to the provision of sexual favors or unwelcome proposals for private relationships that would disrupt the recipient's peace of mind.
- Subjecting individuals to violence, threats, deception, abuse of authority, exploitation of physical or mental vulnerability, or situations of need, or using promises or providing monetary or other advantages to exert control over them.

5. Alcohol and drug abuse, smoking and other prohibitions

Each employee, as well as anyone who, under any contractual agreement, provides professional services in the Group's workplaces, must refrain from performing their duties under the influence of alcoholic beverages or drugs, or substances that have a similar effect, and from consuming such substances during working hours.

Chronic dependency on alcohol and drugs that significantly affects work performance and disrupts its normal course will be treated as equivalent to the aforementioned cases.

Furthermore, Unieuro is committed to ensuring the safety and health of its employees, while maintaining smoking prohibitions in areas where it may pose a danger to people's safety and the cleanliness of the environment.

It is strictly prohibited to use company facilities to facilitate the circulation of drugs and pornographic material, as well as to possess them on the premises of the Group's companies, warehouses, or any other location associated with the Group. It is also strictly forbidden to support in any way "organized and transnational crime" in any form.

6. Safety at work and environmental protection

The Group promotes and ensures the health and safety of its employees in all locations where its personnel are engaged in work activities.

It also commits to providing working conditions that respect individual dignity and safe and healthy work environments. This includes fostering a culture of safety and risk awareness, promoting responsible behavior among employees and collaborators who, within their roles and responsibilities, participate in risk prevention, environmental protection, and the safeguarding of health and safety for themselves, colleagues, and third parties.

In this regard, every employee is called upon to personally contribute to maintaining a safe work environment and to act responsibly for their own and others' well-being.

In terms of environmental protection, Unieuro conducts its activities with consideration for the need to safeguard the environment and promote the sustainable use of natural resources in accordance with applicable environmental regulations.

Specifically, regarding environmental respect and protection, the Group:

- Manages waste generated in compliance with current regulations through selected suppliers, ensuring that third parties have the necessary permits, registrations, or notifications for their operations, and strives for traceability and control throughout the supply chain.
- Makes development and investment choices by considering and limiting potential impacts on the territory and the environment.

The Group condemns any actions or behaviors that may potentially harm the environment and the territory.

7. Media Relations

Relations between the company and the *mass media*, in general, are the exclusive responsibility of the relevant company functions and delegated responsibilities and must be conducted in accordance with the communication policy defined by the Company.

Employees and Collaborators may not provide information to media representatives without the authorization of the relevant competent functions. In any case, information and communications intended for external audiences must be accurate, truthful, complete, transparent, and internally consistent.

The participation of Employees, on behalf of the Company or representing the Company, in committees and associations of any kind, whether scientific, cultural, or professional, must be duly authorized in accordance with internal procedures.

Employees who are invited to participate, on behalf of the company or representing the company, in conferences, congresses, seminars, or to write articles, essays, or publications in general, are required to obtain approval from their immediate supervisor regarding the texts,

reports, and any other documents prepared for such purposes.

8. Relations with shareholders and the financial market

Unieuro acknowledges that interactions with shareholders and the financial market should be founded upon not only the principles of impartiality and legality, but also those of integrity, transparency, and timeliness. These relationships are overseen by the Investor Relations function, which strives to ensure adherence to these principles.

It is required to:

- promote the dissemination to shareholders and the Financial Community of Communications, which may have weight in decisions relating to investment or divestment by them, in a manner that aims to give complete information to interested parties, without generating any asymmetry of information between the Parts;
- create and develop a constant dialogue with shareholders and the financial community to increase knowledge and understanding, among others, of the Group's results and future Development plans;
- update the website promptly in compliance with the current regulations.

To anyone, whether an employee or a collaborator of the Company, who, due to the performance of their professional duties, becomes aware of information that, if disclosed, could significantly impact the price of the financial instruments issued by the company (so-called insider information), it is prohibited to:

- Communicate such information to others outside the normal course of work, profession, function, or office;
- directly or indirectly engage in transactions, on one's own behalf or on behalf of third parties, involving the financial instruments issued by the company, using the same information.

9. Relations with consumers

Unieuro's activities, in line with its vision, are focused on the satisfaction and protection of its customers by listening to requests that can promote an improvement in the quality of products and services.

Unieuro aims to be quick in seizing market opportunities, with the objective of anticipating its customers' needs and promptly fulfilling their requests through behavior that is always informed by fairness, courtesy, and maximum collaboration.

The Group requires that customer relationships be characterized by:

- Full transparency, fairness, and professionalism;
- Compliance with the law, with particular reference to anti-money laundering, anti-usury, and transparency provisions, as well as regulatory requirements;
- Independence from any form of internal or external influence.

To this end, employees are obliged to:

- Provide accurate, truthful, and comprehensive information about the products and services offered by the Group, enabling customers to make informed decisions;
- Deliver high-quality products and services that meet the reasonable expectations of customers and safeguard their safety and well-being;
- Adhere to truthfulness in advertising, commercial, and any other form of communication.

10. Relations with suppliers and external collaborators

Unieuro's relationships with its suppliers and external collaborators, in pursuit of maximum competitive advantage, are generally based on compliance with applicable rules and the principles set forth in this Code.

In particular, new potential suppliers and/or collaborators are evaluated and selected using objective methods that consider not only quality, cost, and services offered but also requirements of integrity, honorability, and professionalism, as well as the absence of any past or present suspicion of involvement in terrorist or subversive activities against public order.

In **contractual, purchasing, or procurement** relationships, as well as in the general **supply of goods and services**, employees are required to adhere to the principles of this Code, as well as internal procedures.

In any case, the selection of suppliers must be carried out in a manner that ensures compliance

with requirements of quality, price, affordability, capability, and efficiency.

In their dealings with the Group, suppliers are expected to commit to ensuring the protection of child labor and workers' rights, as well as the safety of the environment and workplaces.

In particular, employees Must:

- scrupulously observe current legislation and internal Procedures relating to the selection and management of relations with suppliers;
- adopt Objective and transparent evaluation Criteria in the selection of suppliers, in Possession of the required requirements;
- obtain the Collaboration of suppliers in ensuring the satisfaction of customer needs in Terms of quality, cost and Delivery Times;
- observe and comply with the applicable Legal provisions and contractual conditions in supply relationships;
- be inspired by the principles of fairness and good faith in correspondence and dialogue with suppliers, in line with the strictest commercial practices.

If the supplier, in carrying out its activities for the Group, adopts behaviors that are not in line with these principles, Unieuro is entitled to take appropriate measures, including the possibility of discontinuing any further collaboration opportunities.

11. Relations with counterparts and business partners

Any relationship with stakeholders or business partners must be based on principles of utmost fairness and transparency.

Each business partner will be assessed based on subjective criteria of integrity and professionalism (e.g., their institutional history as derived from elements such as criminal records and chamber of commerce registration) as well as objective criteria (e.g., the usual activities carried out by the client/partner and the consistency between these activities and the type of operation requested from the company).

In general, relationships with partners of any kind should not be established if exceptions regarding reliability, integrity, and professionalism are identified with reasonable diligence.

The Group condemns and sanctions any corrupt behavior (including, for example, the provision or promise of money or other benefits - whether in the form of gifts, facilitations of any kind,

hiring of individuals, etc.) in relationships with stakeholders or partners.

In all cases, employees, in their dealings with any party, shall not:

- Receive money or any form of compensation (in any form or utility) from anyone for the performance of an official act or in violation of their official duties.
- Give or receive, under any form, whether directly or indirectly, goods, gifts, favors, hospitality, and other benefits, except for gifts or utilities of nominal value and in compliance with the procedures related to representation expenses.
- Be subject to any form of influence from third parties in making decisions and/or carrying out actions related to their work activities.

An employee who receives gifts, or other forms of benefit, not directly attributable to normal courteous relations shall take all appropriate steps in order to refuse said gift, or other form of benefit, and inform his or her supervisor without delay.

12. Relations with competitors

Unieuro aims to safeguard the value of fair competition by refraining from collusive and abusive behaviors, recognizing that collaboration and dialogue can be an opportunity for improving its own quality standards.

Therefore, individuals are free to take into account the actions of competitors (if known independently, without direct or indirect communication with them), but it is strictly prohibited to agree or establish prices together with them. It is also prohibited to divide or allocate markets among competitors based on geography or product, as well as to set purchasing and selling quotas among competitors.

Communicating any information regarding prices, costs, or other sensitive commercial information to competitors is absolutely forbidden.

13. Relations with the Public Administration

13.1. General principles

Relations with the Public Administration by employees and the Group as a whole must strictly adhere to applicable laws and regulations and must not in any way compromise the integrity and reputation of the Group itself.

In particular, all relationships involving business functions, including through Collaborators, with the Public Administration must adhere to principles of diligence, transparency, and honesty, and must be conducted with the utmost fairness and integrity.

The assumption of commitments and the management of relationships, of any kind, with the Public Administration are exclusively reserved for the designated and authorized business functions.

If the Group utilizes a consultant or third party to represent it in relations with the Public Administration, the same directives given to employees apply to that party.

13.2. *Duties and Prohibitions in relations with the Public Administration*

- **Representation expenses and gifts** towards public employees and officials, provided they are of modest value, must comply with the procedures for expenses, as well as the laws and regulations of the involved public entities. However, it is not allowed to offer money or gifts to directors, officials, or employees of the Public Administration or their relatives, whether they are Italian or from other countries, unless they are gifts or utilities of modest value.
- It is prohibited to offer or accept any object, service, performance, favor, or other benefit in order to obtain preferential treatment, and it is also forbidden to grant abnormally high discounts, undue discounts, or discounts contrary to normal commercial practice and company procedures, for the benefit of public entities or persons designated or connected to them.
- Unieuro promotes and supports the **surveillance and control activities of public authorities**, including investigative authorities, and requires its employees and/or collaborators to provide them with maximum collaboration and ensure strict compliance with laws and regulations. Therefore, it is prohibited to deny, conceal, or delay information requested by public authorities or make false statements under oath. It is not allowed to make untrue statements in order to obtain public disbursements, contributions, or facilitated financing, or to obtain concessions, authorizations, licenses, or other administrative acts. It is also prohibited to allocate funds received from national or community public bodies, as grants, contributions, or financing, for purposes other than those for which they were assigned.
- Any information and/or communication intended for public entities must be accurate, truthful, correct, complete, clear, timely, and always strictly compliant with applicable provisions.

- In relations with the Public Administration, the Group must not improperly seek to influence the decisions of the relevant institution.

In the specific case of participating in a **tender with the Public Administration**, the law and proper business practice must be respected, with an explicit prohibition on engaging in behaviors that, for the benefit of the Group or to pursue its interest, would constitute offenses.

- All employees and collaborators of Unieuro are prohibited, in any capacity, directly or indirectly, from accessing computer or **telematic systems of the Public Administration** and altering their functioning by unauthorized interventions on data, information, and programs, using any means.

All the aforementioned rules of conduct regarding relations with members of the Public Administration must also be observed with regard to the European Union and foreign states.

14. Relations with the Guarantor and Control Authorities

Unieuro is committed to fully and diligently complying with the rules set by any Regulatory Authority for the respect of the applicable regulations in sectors related to its business activities.

Employees shall comply with any request from Regulatory Authorities in their supervisory functions, cooperating with the relevant investigative procedures.

Therefore, the Group does not deny, conceal, or delay any information requested by Regulatory and Supervisory Authorities in their supervisory functions, actively cooperating during any investigative procedures, and ensuring utmost attention to ensure that the information and data provided in the prepared documentation are accurate, complete, truthful, and difficult to misinterpret.

15. Taxation, Control and Accounting Transparency

Unieuro pledges, in line with its respective roles and responsibilities, to ensure the accurate and truthful representation of management-related information in its financial records. Each accounting entry will be supported by appropriate and comprehensive documentation, allowing for the identification of the underlying transaction and its proper authorization.

Tax declarations will be duly signed by authorized individuals and submitted to the relevant regulatory authorities in accordance with applicable laws, upholding the principles of transparency, accuracy, and veracity of information.

The supporting documentation, encompassing both accounting and tax records, will be readily accessible and systematically archived in adherence to appropriate criteria, facilitating easy retrieval and consultation by authorized internal and external entities entrusted with oversight.

All **mandatory complaints, communications, and filings with the companies register** will be diligently executed by individuals designated by applicable legislation, ensuring timely, accurate, and compliant submissions in accordance with prevailing regulatory requirements.

16. Relations with shareholders and Control Bodies

Unieuro is committed to making information and/or documents requested by shareholders and Control Bodies available to them, as well as those necessary for the performance of their assigned control activities, while ensuring compliance with the relevant regulations.

Furthermore, the Group pledges to support the Risk Control Committee (CCR) during the execution of control activities that require collaboration and assistance from designated points of contact within the various relevant Functions for information/document requests. These provisions entail that any specific issues arising during the verification process will be discussed with the responsible manager of the corresponding Function.

17. Protection of company assets

The Group safeguards and protects its corporate assets, including by implementing measures to prevent misappropriation, theft, and fraud to its detriment.

Each individual must act as a custodian and take responsibility for the Group's assets (both tangible and intangible) that are instrumental to its operations, and adhere to the provisions outlined in the internal regulations.

Employees are required to use the assets and company resources to which they have access or control with efficiency, responsibility, and reasonableness, employing methods that are suitable for preserving their value and in the best interest of the Group.

Any use of these assets and resources that contradicts the interests of the Group or is driven by professional motives unrelated to the employment or contractual relationship is strictly prohibited.

18. Litigation Management

If the Group receives a citation or appeal notification, it is promptly transmitted to the Legal Department, which is dedicated to ensuring the accuracy and veracity of the information and data presented in the prepared documentation, with utmost diligence.

Unieuro is dedicated to preparing a semi-annual periodic report containing information on ongoing, closed, and upcoming legal disputes, which will be transmitted to the Supervisory Body. In particular, as mentioned in the "*Parte Speciale O - Induction not to make false statements to the judicial authority*" of the Model 231 pursuant to Article 25-decies of Legislative Decree n° 231/01, the relevant company functions will be requested to provide statements or evidence for use in criminal proceedings before the Judicial Authority. It is strictly prohibited for the receiving area of the notification to induce or assist the individuals who are required to make the statement.

19. Prevention of money laundering

The parties involved in various relationships with the Group are strictly prohibited, under any circumstances, from engaging in activities related to money laundering arising from illegal or criminal actions.

Prior to establishing relationships or entering into contracts with non-occasional suppliers and other business partners, the Group, its employees, and/or collaborators must thoroughly assess the moral integrity, reputation, and good standing of the prospective party.

Unieuro is committed to adhering to all applicable national and international regulations and provisions regarding anti-money laundering.

20. CSR campaigns and "non-profit" initiatives

The Group actively promotes corporate social responsibility (CSR) campaigns and non-profit activities as a testament to its commitment to address the diverse interests that hold ethical, legal, and social value within the communities it operates in.

Employees, in line with their respective responsibilities, are expected to actively participate in defining individual initiatives, ensuring coherence and compliance with Unieuro's intervention policies, while adhering to transparency and honesty criteria.

In accordance with the principles outlined in the Code of Ethics, contributions may be made to non-profit organizations of national significance, provided their statutes and articles of

incorporation have been duly verified, and they exhibit high cultural or charitable value.

Sponsorships, which may encompass social, sports, entertainment, art, and cultural activities, will exclusively be allocated to events that meet stringent quality standards.

Furthermore, careful consideration must be given to any potential personal or business conflicts of interest when evaluating proposals for participation.

21. Prevention of cybercrime

Unieuro's IT department must be used in full compliance with applicable laws and internal company directives. Therefore, any improper use of the Group's computer tools that may lead to the commission of acts constituting unauthorized access to third-party computer or telecommunications systems, interception, illegal obstruction, or disruption of computer or telecommunications communications, damage to private information, data, and computer programs, whether used by the State or any other public or utility entity, as well as damage to private or public utility computer or telecommunications systems, is strictly prohibited and entirely unrelated to the Group. Furthermore, the unauthorized possession and dissemination of access codes to computer or telecommunications systems, the dissemination of equipment, devices, or computer programs intended to damage or disrupt a computer or telecommunications system, as well as the installation of equipment designed to intercept, prevent, or disrupt computer or telecommunications communications, are absolutely prohibited as well.

22. Protection of intellectual property

Unieuro ensures compliance with internal, EU, and international regulations for the protection of industrial and intellectual property, as part of its commitment to adhere to the principle of legal compliance. The recipients are responsible for promoting the proper use of trademarks, distinctive signs, and all creative works, including computer programs and databases, in any form and for any purpose. This is done to safeguard the author's moral and economic rights.

The Group strictly prohibits any conduct that contradicts the following principles, including, but not limited to:

- Reproducing, promoting, or selling the models and ornamental designs of others in a manner that causes confusion regarding the identification or origin of the product;
- Reproducing or distributing the intellectual works of others without proper rights, in the absence of written contractual agreements with the respective owners for economic exploitation or in violation of the terms and conditions specified in such agreements;
- Sharing music, photos, and videos through internal channels to support promotional activities without obtaining explicit authorization from the author and without complying with the regulations pertaining to the payment of royalties for the right to exploit the respective works.

The Group is committed to upholding these principles and ensuring respect for intellectual property rights.

All recipients, with particular reference to those involved in marketing and communication activities (e.g., in the use of images for the Group's interests), must pay utmost attention to fully respecting the copyrights of others.

23. Effectiveness of the Code of Ethics and sanctioning consequences

Compliance with the provisions outlined in this Code of Ethics is considered an integral part of the contractual obligations of Unieuro employees, in accordance with Articles 2104 and 2105 of the Civil Code. Any violation of the Code of Ethics may be considered a breach of the employment relationship obligations and/or a disciplinary offense, subject to the procedures specified in Article 7 of the Workers' Statute. Such violations carry legal consequences, including potential termination of the employment relationship and liability for resulting damages.

Similarly, adherence to the principles outlined in this Code of Ethics is a fundamental aspect of the contractual obligations of those who have business relationships with the Group.

Therefore, any breach of the Code's provisions may constitute a violation of these obligations and carry legal consequences.

This Code of Ethics is approved by the Board of Directors of Unieuro and any amendments to it require approval from the governing body.