

Code of Ethics & ConductCustomer Focus. Collaboration. Innovation. Success.

These are the core values that guide Unika.

As a leading industrial group, our commitment is to build a working environment based on these principles, strengthening our success and reinforcing the trust of our customers and partners. We recognize that our results stem from shared engagement and teamwork that values internal collaboration and relationships with our commercial partners.

This Code of Ethics & Conduct is a practical guide to ensure that we act with integrity and respect in every aspect of our work. It represents a collective commitment to professional ethics and sustainable growth.

1. Compliance with Laws

At Unika, all activities must fully comply with the applicable laws and regulations.

We believe that legal compliance is a non-negotiable requirement, regardless of the economic results involved.

Every employee is responsible for acting in accordance with the regulations governing their specific area of competence.

It is strictly prohibited to encourage third parties to engage in unlawful conduct.

Violations may result in legal consequences, reputational damage, or economic losses.

2. Workplace Relationships

Unika operates in compliance with international human rights, the principles of the International Labour Organization (ILO), and local regulations, promoting relationships based on integrity and mutual respect.

a. Respect and Dignity

Our corporate culture is grounded in mutual respect. We treat all employees fairly, recognizing the importance of an inclusive work environment free from discrimination.

We do not tolerate harassment, intimidation, or any form of denigration.

b. Child and Forced Labor

Child labor and forced labor are prohibited in any form.

If such practices are identified in our supply chain, immediate corrective action must be taken.

c. Recruitment and Development

We foster a merit-based work environment in which hiring and promotions are based exclusively on individual qualifications and competencies.

We offer opportunities for training and continuous development to support employees' professional growth.

3. Managing Conflicts of Interest

Personal interests must always be kept separate from corporate interests.

In the event of a conflict of interest, every employee must manage the situation transparently and consult their direct supervisor to ensure the fairness of business decisions.

a. External Activities

Any secondary activity must be authorized in advance in writing.

In particular, employees may not collaborate with competing companies, clients, or suppliers without prior written consent from the company.

b. Business Relationships

Business relationships with companies in which employees or their family members hold personal interests must be declared and approved by the company.

4. Protection and Management of Information

Correct and transparent management of corporate information is essential to Unika's success. All statements and records must be accurate, based on recognized accounting principles, and compliant with applicable regulations.

a. Accuracy of Information

All statements and records must be accurate, based on recognized accounting principles, and compliant with applicable regulations.

Information must be used exclusively for legitimate business purposes.

b. Confidentiality

Confidential information must be handled with the utmost caution and kept confidential, unless required by law or explicitly authorized by the company.

c. Personal Data Protection

We manage personal data in full compliance with applicable regulations, including the European GDPR.

We guarantee maximum protection of data belonging to customers, employees, and partners.

5. Relationships with Business Partners and Third Parties

Our commercial relationships are based on ethics and transparency.

We comply with competition regulations and are committed to promoting a free and competitive market.

a. Fair Competition

a. Unika rejects any anti-competitive behavior, such as price-fixing or market division.

b. Corruption and Improper Practices

a. Corruption, in any form, is strictly prohibited.

b. Exchanges of gifts, invitations, or favors with business partners must always be transparent and limited to reasonable circumstances.

c. Donations and Sponsorships

a. Donations and sponsorships must be managed transparently and with proper authorization, avoiding any conflict of interest or personal benefit.

6. Quality, Workplace Safety, Environment, and Sustainability

Operational excellence, the protection of employees, and respect for the environment are fundamental pillars for Unika.

a. Quality

We are committed to continuously improving our quality standards and ensuring that our products and services meet customer expectations.

b. Workplace Safety

We ensure a safe workplace for all employees, minimizing risks to health and safety and complying with all relevant regulations.

c. Environment and Sustainability

Unika operates in a sustainable manner, minimizing the environmental impact of our activities and complying with environmental laws.

7. Responsibility and Compliance

Every employee of Unika is responsible for complying with this Code of Ethics & Conduct.

Management must ensure that these principles are communicated and respected within their teams.

The following sections detail the actions and behaviors that individuals, groups, or organizations with direct or indirect interests in the company's activities, decisions, and outcomes must adopt to effectively implement this Code of Conduct.

The goal is to define rules, procedures, principles, and control tools to equip the Company with a management model capable of preventing behaviors that may lead to civil or criminal liability.

The Company requires all those who interact with it to comply with the laws in force in the countries where the Company operates. Any violation of the Code must be reported and handled with maximum seriousness.

(*) Throughout this Code, the name "Unika" refers to:

- **Unika S.p.A.**, Via Lombardia 13/15, 37044 Cologna Veneta (VR), VAT/C.F. 02840160234
- **KU Distribution S.r.l.**, Via dell'Euro 2, 46031 Bagnolo San Vito (MN), VAT/C.F. 03206790234

A. Introduction

Unika, in line with corporate policy and in compliance with Legislative Decree 231/2001, has adopted a Code of Conduct and management model consistent with the decree's requirements.

This Code applies to:

- Corporate Bodies, Employees, Parasubordinate Personnel
- Parent Company, Subsidiaries, External Professionals, Business Partners, Suppliers (Third Parties), and all those performing activities in the name and on behalf of Unika

B. Application of the Code of Ethics and Conduct

The rules and principles of this Code must be adopted and respected by: Employees, Managers, Consultants, Collaborators, Directors, Auditors, Members of the Supervisory Body, Agents, Attorneys, and Third Parties acting on behalf of the Company in Italy or abroad.

Company personnel, within their areas of responsibility, must:

- provide adequate information about the obligations imposed by the Code
- require compliance from third parties
- take internal and, where applicable, external actions in case of non-compliance, including contract termination under Article 1456 of the Italian Civil Code

C. Contractual Value of the Code

The Code constitutes an integral part of the employment relationship. Compliance with the provisions of the Code must be regarded as an essential component of the obligations of the employees of the Group Companies, including for the purposes and effects of Article 2104 of the Italian Civil Code.

Violation of the provisions of the Code may constitute a breach of the primary obligations arising from the employment relationship or a disciplinary offence, with all legal consequences, including with regard to the continuation of the employment relationship, and may give rise to actions for the compensation of damages caused by such violation.

For non-employee Recipients, compliance with the Code constitutes a prerequisite for the continuation of the existing professional/collaborative relationship with the Company.

D. Dissemination of the Code of Ethics and Conduct

Unika undertakes to:

- ensure the dissemination of the Code of Conduct among Employees, Officers, Consultants, Collaborators, Directors, Statutory Auditors, Members of the Supervisory Body, Agents, Attorneys, and Third Parties in general, through the following procedures:
 - posting the Code on company notice boards;
 - implementing a dedicated information and training plan;
 - providing every possible tool for understanding and clarification regarding the interpretation and application of the provisions contained in the Code;
 - conduct investigations into any reported violation of the provisions of the Code, assessing the facts and adopting—where a violation is confirmed—appropriate disciplinary measures.

E. Proper Functioning of the Company

To ensure oversight of corporate management by the competent supervisory bodies, the coordination principles set out in the Model are disseminated throughout the entire corporate organisation, so that directors, management, and all employees may provide the supervisory bodies with maximum cooperation, transparency, and professional integrity.

F. Activities Subject to Supervision

With regard to the Company's activities that are subject to supervision by public authorities under applicable legislation, and in order to avoid the risk of committing offences relating to false statements to authorities or obstruction of supervisory functions, such supervised activities must be carried out in accordance with the following fundamental principles:

- timely submission of periodic reports to the authorities as required by laws and regulations;
- transmission of the documents required under laws and regulations (financial statements and minutes of meetings of corporate bodies);
- transmission of data and documents specifically requested by supervisory authorities;
- correctness, professionalism, and transparency in conduct during inspection activities, in particular by making available—promptly and in full—the documents deemed necessary by the inspectors;
- quality and timeliness of communications to supervisory authorities;
- implementation of all organisational and accounting measures necessary to extract the data and information required for the correct preparation of reports and their timely submission to the supervisory authority, in accordance with the procedures and deadlines established by sector regulations;
- the existence of a reliable information system and effective internal controls, capable of ensuring the accuracy and reliability of the information provided to supervisory authorities;
- preparation of appropriate tools to ensure that the Supervisory Body has access to such documentation for the periodic verifications it is required to perform.

G. General Principles of Conduct

Ethically proper conduct is one of Unika's primary objectives; therefore, the provisions contained in this Code are intended to provide the Company and its collaborators—whether directors, freelance professionals, consultants and/or business partners, employees, or any shareholders—with the general principles and behavioral guidelines to be followed in internal and external relations, as well as in the conduct of business activities.

These principles and behavioral rules, by their nature, may not be interpreted, waived, or considered as limiting the provisions governing individual relationships or specific specialist matters.

Every Employee/Parasubordinate Worker must act loyally in order to comply with the obligations undertaken in the employment contract, ensuring the performance required.


The Employee/Parasubordinate Worker is required to comply with the following:

- the prohibition against communicating, disclosing to third parties, using or exploiting, or allowing others to use for any reason not connected with the performance of work activities, any information, data, or news acquired during or as a result of the employment relationship with the Company;
- the specific corporate policies on information security, adopted to ensure the integrity, confidentiality, and availability of such information;
- the prohibition against receiving, for oneself or for others, the giving or promise of money, gifts, or any other benefit, including, by way of example and without limitation, forms of entertainment, gifts, travel, and other items of value, in exchange for carrying out or omitting acts—even potential ones—in violation of the obligations inherent in one's position or the duty of loyalty towards Unika.

To safeguard corporate assets, every Employee/Parasubordinate Worker must act diligently and with responsible behavior.

In particular, every Employee/Parasubordinate Worker must:

- use with care and economy the assets entrusted to them;
- avoid improper use of corporate assets that may cause damage or reduced efficiency, or that may otherwise conflict with the Company's interests;
- avoid improper use of corporate assets for purposes and ends unrelated to their duties and work

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activities, especially where such use may damage the Company's image or decorum.

Each Employee/Parasubordinate Worker is responsible for the protection of the resources entrusted to them and has the duty to promptly inform their Supervisor of any events that may be harmful to the Company.

Furthermore, every Employee/Parasubordinate Worker must:

- consult their superiors when clarification is needed regarding the application of the provisions of the Code of Conduct;
- promptly report to their superior any information—directly obtained or reported by others—regarding potential violations, as well as any request received to violate the Code.

H. Integrity in the Event of Potential Conflicts of Interest

In the performance of any corporate activity, situations of conflict of interest—even merely potential—must always be avoided. Such situations arise when a Collaborator or a member of the Corporate Bodies pursues an interest other than that of Unika, or derives personal benefit from business opportunities belonging to the Company.

I. Integrity in the use of IT Systems

Unika requires all personnel to comply with the provisions of the corporate policy for the use of IT tools, as improper use may cause data security issues.

Accordingly, users of the Company's IT systems are prohibited from:

- fraudulently intercepting communications or information belonging to third parties through IT systems;
- damaging in any way information, data, or software programs, including those used by the State or by any other public entity or entity providing a public service;
- damaging in any way information, data, software programs, or IT or telematic systems, including those used by the State or by other public entities;
- illicitly accessing an IT or telematic system;
- unlawfully disclosing access codes to IT or telematic systems.

The Company prohibits the possession, reproduction, commercialization, distribution, or sale of copies of software protected under intellectual property law without authorization from the rights holder.

J. Integrity in the use of Company Assets

Each Recipient is responsible for the protection of the resources entrusted to them and has the duty to promptly inform the relevant corporate functions of any threats or events that may be harmful to the Company. In particular, each Recipient must:

- act with diligence to safeguard company assets, adopting responsible behavior and complying with the operating procedures established to regulate their use;
- avoid improper use of company assets that may cause damage or reduced efficiency, or that may in any way conflict with the Company's interests;
- obtain the necessary authorizations in the event that company assets are to be used outside the corporate environment.

K. Transparency, Completeness and Truthfulness of Information

Internal and external Collaborators of the Company are required to provide information that is complete, transparent, truthful, clear, and diligent, so that, in establishing relationships with Unika, the Company and any other party interacting with it are able to make autonomous and informed decisions regarding the interests involved, the possible alternatives, and the relevant implications.

L. Occupational Healthy and Safety Management System

Unika complies with the legislation in force regarding workplace health and safety and with the standards relating to the corresponding prevention and protection measures.

The processing of personal and sensitive data by Unika is ensured in compliance with EU Regulation 2016/679 (GDPR) and Legislative Decree 196/2003, as amended by Legislative Decree 24/2023. Unika acts as Data Controller and provides clear information notices to data subjects.

The processing of personal and sensitive data by Unika is therefore carried out in full compliance with the legislation in force on the protection of personal data, and thus in full compliance with Legislative Decree No. 196/2003, as coordinated and most recently amended by Legislative Decree No. 24/2023. Unika is the Data Controller.

Accordingly, Unika has drafted specific standard contractual clauses intended to inform the data subject about the methods of processing personal data collected by Unika and/or, where required by applicable legislation, to obtain the data subject's authorization for such processing.

Unika guarantees equal opportunities without any discrimination, in accordance with Legislative Decree 198/2006. The employment relationship is based on competence and merit, regardless of sex, age, or other personal characteristics.

Unika offers equal employment opportunities to all employees on the basis of their specific professional qualifications and performance capabilities, without any discrimination. The employment relationship shall therefore be guided by the criteria of competence and merit, without any consideration of race, religious belief, sex, age, ancestry, or personal disabilities, in full respect of individual rights and of the laws and regulations in force. Access to positions and assignments is determined exclusively on the basis of competencies and abilities.

M. Children's Rights

Unika does not employ any form of forced labour, compulsory labour, or child labour, nor does it employ individuals below the minimum age for employment as established by Italian law. The Company also undertakes not to establish or maintain business relationships with suppliers that employ child labour as defined above.

N. Protection of Competition

Without prejudice to the general rules set out in this Code of Conduct, the selection of suppliers must be carried out in such a way as not to preclude any party possessing the required qualifications from the opportunity to compete for the award of contracts, by adopting objective and documentable criteria in the selection of candidates and ensuring adequate competition. The Company, in any case, reserves the right to establish preferential relationships with those parties that adopt ethical commitments and responsibilities consistent with those set out in this Code of Conduct.

O. Relations with Suppliers and Third Parties

In the selection of suppliers and in the assignment of professional engagements, objective and transparent selection mechanisms must be adopted, inspired by the principles of competence, cost-effectiveness, transparency, and fairness.

All phases relating to the establishment, management, and termination of relationships must be documented.

It is prohibited to:

- grant compensation to external Collaborators that is not adequately justified in relation to the type of engagement to be performed and to local practices;
- submit untruthful statements to national or EU public bodies in order to obtain contributions or subsidised financing, or that may mislead or cause damage to the State or to any other public entity;
- use funds received from national or EU public bodies as contributions or financing for purposes other than those for which they were granted.

P. Environmental Conduct

Unika is ISO 14001 certified.

Every employee must contribute to the protection of the environment by operating in accordance with the legislation in force and, in particular, must refrain from any actions that could cause harm or endanger their own safety or that of colleagues.

The following are prohibited:

- abandoning waste, or storing waste on a temporary basis for periods exceeding those permitted by applicable legislation;
- discharging liquid or solid waste into surface or groundwater;
- using a false certificate during the transport of waste;
- making false declarations regarding the nature, composition, and chemical-physical characteristics of waste;
- preparing a waste analysis certificate containing false information.

In the event of an occurrence that may cause pollution, it is mandatory to report it to the Production Manager, who will notify the competent public authorities.
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Q. Protection of Share Capital

All transactions that may, even indirectly, affect the share capital of Unika—such as the distribution of profits and reserves, the acquisition or sale of shareholdings, mergers, demergers, or spin-offs—must be carried out in compliance with the law.

It is prohibited to:

- engage in simulated or fraudulent conduct;
- distribute profits that have not actually been earned or that are required by law to be allocated to reserves;
- artificially increase the share capital by significantly overvaluing contributions in kind or receivables, or by allocating shares for amounts lower than their nominal value;
- act in a manner that causes harm to shareholders or creditors.

R. Accounting Records

All corporate accounting activities and operations must be properly recorded, and the related paper documentation must be accurately archived in accordance with legal requirements.

All accounting operations of the Company must be duly recorded and supported by adequate documentation, enabling the identification of the individuals who authorised, carried out, and verified the respective accounting entry.

The electronic transmission of data must take place in such a way that the path of the data is traceable and that the individuals who entered the data into the system can always be identified.

The preparation of the annual financial statements, as well as the management report, must be carried out in accordance with internal procedures and in compliance with legislative requirements, and must provide a correct and truthful representation of the Company's financial and accounting situation.

Appropriate measures must be implemented to ensure that, whenever requests are made—by any party—for quantitative changes to data already recorded, or for changes to the criteria used for accounting recognition, recording, or representation, the competent body is duly informed.

S. Prevention of Corruption

No form of gift, gratuity, or benefit is permitted if it may—even only in appearance—be interpreted as exceeding normal commercial or courtesy practices, or as being intended to obtain preferential treatment in the conduct of any activity connected with the Company.

In particular, **any form of gift, gratuity, or benefit to Italian or foreign public officials, or to their family members, is strictly prohibited if it may influence their independence of judgment or induce them to grant any kind of advantage.**

The behavioral rules set out in this paragraph are intended to promote the proper development of the Company's business activities by ensuring that Company Officers act to prevent corruption relating to the Company's operations.

T. Prevention of Corruption in Dealings with Institutions and Public Administration

Relations with Institutions, Public Administration, and any entities in which they hold an interest, of any nature, must be conducted in a transparent manner, consistent with the Company's policies, and handled exclusively by the corporate functions formally delegated for such purposes.

In particular, Company Officers must comply—not only with the applicable Italian and foreign rules governing the predicate offences underlying liability pursuant to Legislative Decree 231/01—but also with the anti-corruption legislation in force in Italy (Articles 318 to 322 of the Italian Criminal Code and Law No. 190/2012).

They must also consider that, under the U.S. **Foreign Corrupt Practices Act (FCPA)**, the U.K. **Bribery Act**, and the anti-corruption legislation of other foreign countries, the act of bribing a foreign public official abroad, committed by an individual or entity operating abroad—including a company having its operational headquarters in Europe—is broadly punishable, and that such laws impose severe sanctions.

The Company will endeavour to gather information on the anti-corruption rules applicable in the relevant countries and, where necessary, to adapt its internal policies and procedures to such rules and related regulations.

These rules apply to all corporate activities carried out by Company Officers. For better understanding, the following definitions are provided:


- **“Bribe for corrupt purposes”** means any Benefit granted as an unlawful consideration for the performance of an official duty by public officials, etc.
- **“Benefit”** means any type of advantage, tangible or intangible, not solely of a financial nature, that satisfies a person's request or desire, including, by way of example and without limitation: money, property or financial benefits, use of homes or buildings, entertainment, gifts, travel, debt repayments, provision of deposits or guarantees, office-related professional status, and other items of value.
- **“Public official”** means a member of an assembly or committee, or any other official performing public functions under any applicable law or regulation, including, by way of example and without limitation: government officials and officials of local administrations. The term also includes any individual responsible for a public service.
- **“Foreign public official”** means not only an individual performing public functions for a foreign government or foreign public body, or for any ministry, agency, or semi-public entity thereof, or performing official duties for public entities and vested with relevant authority; individuals exercising public functions for international organisations; and individuals delegated with authority by a foreign government—but also political party staff, candidates for public office, and any other individual considered a foreign public official under the anti-corruption legislation of the relevant country.
Given that in some cases—for example, employees of state-owned enterprises—it may be difficult to determine whether an individual falls within the category of “Foreign public official,” the scope of this expression must be carefully assessed in accordance with the anti-corruption legislation of the country concerned.
- **“Public official, etc.”** refers collectively to both Public officials and Foreign public officials.

The Company also considers as acts of corruption any unlawful payments made directly by Italian entities and/or individuals, or by their employees, as well as payments made through individuals or entities acting on their behalf, in Italy or abroad (including, by way of example: subsidiaries, subcontractors, contractors, consultants, business partners, or other third parties).
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U. Concrete Forms of Corruption

In particular, it is strictly prohibited to:

- **make (including authorising, offering, promising, or giving; the same applies throughout this section) payments in money to public officials or to persons entrusted with a public service;**
- **offer money or gifts**, except where such gifts or customary courtesies are of *nominal value* and, in any case, such as not to compromise the integrity or reputation of either party, nor be construed as intended to obtain improper advantages;
- **grant other advantages of any kind** (such as promises of employment for the official or their close relatives, assigning engagements to individuals recommended by them, etc.) in favour of representatives of the Public Administration, where such advantages may result in the same

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consequences described above.

The behaviours described above are prohibited **even when they result from coercion or inducement by the Public Official or the person entrusted with a Public Service.**

In such cases, the Employee has the duty to report the circumstance to their hierarchical superior, who must in turn report it to the Supervisory Body.

When a business negotiation, request, and/or relationship with the Public Administration is underway, the personnel involved (at any level) **must not attempt to influence the decisions of the Counterparty**, including officials who negotiate or make decisions on behalf of the Public Administration.

In the specific case of participating in a tender with the Public Administration, all activities must be conducted in full compliance with the law and with proper commercial practice.

V. Prevention of Private Corruption

Private corruption (as set out in Article 2635 of the Italian Civil Code) occurs when money or any other benefit is given or promised to a person belonging to a private entity so that, in breach of their duty of loyalty towards that entity, they perform or omit an act connected with their role within that entity.

Under Italian law, this offence requires that the conduct of the corrupted party causes harm to the entity to which they belong.

It is strictly prohibited to:

- give or promise to anyone, for themselves or for others, money in exchange for the performance or omission—by the recipients—of acts in violation of the obligations inherent in their position or their duty of loyalty towards the entity for which they operate, resulting in actual or potential harm to that entity;
- grant or promise any other advantages, including, by way of example and without limitation, entertainment, gifts, travel, and other items of value, under the same conditions described above.

Unika considers as acts of corruption both unlawful payments made directly by individuals and/or Italian entities or their employees, and those made through persons acting on their behalf in Italy or abroad. To ensure full understanding of the above, the definition of the duty of loyalty—the breach of which constitutes a key element of the criminal offence of private corruption under Article 2635 of the Civil Code—is provided below, as regulated by Article 2105 of the Civil Code:

“The employee must not engage in business, on their own behalf or on behalf of third parties, in competition with the employer, nor disclose information relating to the organisation and production methods of the enterprise, nor use such information in a manner that may cause harm to the enterprise.”

The breach of the obligations inherent in one’s position also constitutes an element of the criminal offence of private corruption. These obligations include all duties imposed on the corrupted person by law or by any other regulatory, statutory, or ethical provisions. **deontologica.**

W. Violation of the Code of Conduct

In order to render all the rules contained in the Code of Conduct, as well as in the procedural and organisational protocols, fully binding, a **Disciplinary System** has been established, containing predetermined sanctions for the violation of each specific provision of the Code that could expose the Company to liability for the offences set out in Legislative Decree 231/2001.

The Disciplinary System applies to Consultants, Collaborators, Employees, Directors, and, more generally, to all parties having contractual relations with the Company.

It should be noted that violations of the Code of Conduct and of company procedures differ from—and remain distinct from—violations of the law that constitute criminal offences.

The employer’s assessment must therefore **not coincide** with the assessment of the criminal judge, nor is the employer required to wait for the outcome of any criminal proceedings before imposing the disciplinary sanction provided for.

The principal violations of the rules contained in the Code of Conduct are listed below:

- violations of the prohibitions and obligations set out in the Code of Conduct;
- commission of actions—whether or not completed—that constitute offences capable of giving rise to the Company’s liability under Legislative Decree 231/2001;
- commission of actions that expose the Company to the risk of committing offences provided for under Legislative Decree 231/2001 and its subsequent amendments;
- retaliation against individuals who, in good faith, have submitted reports of possible violations of the Code of Conduct;
- providing false or unfounded information with the intent of unjustly accusing other employees of violating the Code.

X. Sanctions for Employees

Le Sanctions shall be imposed in compliance with the principles of **progressiveness and proportionality**, in relation to the seriousness of the behaviour, taking into account the following circumstances:

- the employee’s duties;
- the timing and methods by which the violation was committed;
- the circumstances in which it occurred;
- the presence and degree of intentional intent;
- the level of negligence, imprudence, or incompetence demonstrated, considering the foreseeability of the event;
- any mitigating factors;
- the significance of the violated obligations and the extent of the damage or risk caused.

The disciplinary sanctions that may be imposed—depending on the type and seriousness of the violation—are:

- verbal warning;
- written warning;
- fine;
- suspension of remuneration;
- dismissal.


The disciplinary system applicable to employees has been developed in compliance with **Article 7 of the Workers’ Statute**, and is therefore characterised by the principle of typification of sanctions, alongside the typification of violations.

In addition to the provisions of the applicable National Collective Bargaining Agreement (CCNL), it is specified that an employee commits a disciplinary offence when, including through omissions:

- they violate the procedures set out in this Code of Conduct through failure to comply with duties and obligations;
- they violate the procedures of this Code of Conduct by acting negligently and disregarding laws or regulations in a manner that compromises safety or the regularity of the service, causing serious damage to the Company’s assets or those of third parties;
- they engage in conduct clearly in breach of this Code, resulting in the application to the Company of the measures provided for under Legislative Decree 231/2001, which extends liability for offences committed in Italy and abroad by individuals acting on behalf of the Company;
- they engage in conduct aimed at committing an offence, or which constitutes an offence pursuant to Legislative Decree 231/2001.

Y. Sactions for Business Partners, Consultants and External Collaborators

The Company requires that all parties who have relations with it comply with the laws in force in the countries where Unika operates, as well as with the provisions contained in this Code, and encourages them, within their respective areas of responsibility, to adopt corporate procedures and/or behaviours

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capable of preventing the commission of offences.
Failure to comply with this obligation constitutes a violation that entitles Unika to suspend the execution of the contract and to unilaterally terminate it, without prejudice to the third party's obligation to compensate any damages incurred.
Anyone who becomes aware of a violation by collaborators, consultants, or other third parties must report it to the designated body.
The Code of Conduct is issued by the Company's governing body and will be updated and amended in accordance with business needs or following changes in applicable legislation.
The acting Director is authorised to make formal amendments or additions.

This Code of Conduct was issued in its first edition in August 2023.