



AUTOVICTOR srl

CODE OF ETHICS

This Ethics Code was approved by the Board of Directors on March 10, 2026.



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PREMISSE

THE VISION OF AUTOVICTOR SRL

Autovictor srl is aware that the authority of a company is recognized not only by the competence of its employees and the high quality of service provided to customers but also by the attention given to the needs of the entire community.

The principles that have always inspired the work of this Company are formally gathered in a Code of Ethical Conduct with the belief that reliability is built daily by respecting rules and valuing people.

This Code of Ethics therefore represents a distinctive and identifying element in relation to the market and third parties, the knowledge and sharing of which, required of all those who operate in or collaborate with the Company, constitute the foundation of our activity and the first step towards achieving our vision.

The objective of Autovictor srl is therefore to pursue excellence in the market in which it operates, through Sustainable Development, safeguarding the Environment and the Safety of the people involved by maintaining the coherence of behavior that respects Social Ethics, obtaining satisfaction and ensuring added value for the Employee, for the Customer, and, in general, for the Community.

PURPOSE AND RECIPIENTS

The Ethical Code, considered an integral part of the Organization and Management Model pursuant to Legislative Decree No. 231 of June 8, 2001, adopted by Autovictor on July 21, 2022, defines the values and principles of conduct relevant for the proper functioning, reliability, compliance with laws and regulations, and the company's image.

In addition, compliance with the principles and rules indicated contributes to the prevention of behaviors included in the list of administrative offenses pursuant to Legislative Decree 231/2001.

In particular, this Ethical Code (hereinafter, the "Code") illustrates the set of ethical and moral principles that are the foundation of the activities of Autovictor srl (hereinafter, "Company") as well as the lines of conduct adopted by the Company both within its activities (in the relationships among employees) and externally (in relations with institutions, suppliers, customers, business partners, the



political and trade union organizations as well as the information bodies (hereinafter, the "Interest Holders").

Compliance with these principles is fundamental to achieving the corporate mission of Autovictor srl and to ensuring its reputation in the socio-economic context in which it operates. It is emphasized that Autovictor srl firmly believes that every activity must be carried out ethically, affirming the principle established by Article 41 of the Constitution, according to which private economic initiative "cannot be carried out in conflict with social usefulness or in a way that harms safety, freedom, or human dignity."

The present Code is binding for the administrators and employees of Autovictor srl, as well as for all those who operate and collaborate, permanently or temporarily, on behalf of the Company (hereinafter, the "Recipients").

The Code will be widely disseminated within the internal governance structure and will be communicated broadly externally, including through its own website.

Autovictor srl also commits to adopting any further measures so that the principles and provisions of the Code can be promptly disseminated and applied.



1 GENERAL PRINCIPLES

The conduct of the Recipients, at all company levels, is based on the principles of legality, correctness, non-discrimination, confidentiality, diligence, and loyalty.

1.1 Legality

Autovictor srl operates in absolute compliance with the law and this Code.

All Recipients are therefore required to comply with all applicable regulations and to constantly update themselves on legislative developments, also taking advantage of the training opportunities offered by Autovictor srl.

The company considers transparency in financial statements and accounting a fundamental principle for the conduct of its activities and for the protection of its reputation.

1.2 Correctness

Fairness and moral integrity are an indefectible duty for all Recipients.

The addressees are required not to establish any preferential relationship with third parties, resulting from external solicitations aimed at obtaining improper advantages.

In carrying out their activities, the Recipients are required not to accept donations, favors, or benefits of any kind (except for items of modest value) and, in general, not to accept any consideration in order to improperly grant advantages to third parties.

In turn, the Recipients must not make monetary or in-kind donations to third parties or otherwise offer any illicit benefits or favors of any kind (except for items of modest value or business courtesy gifts authorized by the Company) in connection with the activity they provide for the benefit of Autovictor srl.

The intrinsic conviction of acting in the interest of society does not exempt the recipients from the obligation to faithfully observe the rules and principles of this Code.

1.3 Non Discrimination

In relations with Stakeholders and particularly in the selection and management of personnel, in organizational work, in the choice, selection and management of suppliers, as well as in relations with Entities and Institutions, Autovictor srl avoids and repudiates any discrimination concerning age, gender, race, sexual orientations, health status, political and trade union opinions, religion, culture, and nationality of its interlocutors.

Autovictor srl, at the same time, promotes integration by fostering intercultural dialogue, safeguarding the rights of minorities and vulnerable subjects.



1.4 Confidentiality

Autovictor srl is committed to ensuring the protection and confidentiality of the personal data of the Recipients and Stakeholders, in compliance with all applicable regulations on personal data protection.

The Addressees are required not to use confidential information obtained in the course of their work activities for purposes unrelated to the exercise of such activities, and in any case to always act in compliance with the confidentiality obligations undertaken by Autovictor srl towards all Stakeholders.

In particular, the Recipients are required to maintain the utmost confidentiality regarding documents suitable for revealing know-how, transport information, commercial information, and corporate operations.

1.5 Diligence

The relationship between Autovictor srl and its employees is based on mutual trust: employees are therefore required to work to promote the interests of the company, in compliance with the values outlined in this Code.

The addressees must refrain from any activity that may lead to a conflict with the interests of Autovictor srl, renouncing the pursuit of personal interests that conflict with the legitimate interests of the Company.

In cases where the possibility of a conflict of interest can be depicted, the Recipients are required to promptly address their hierarchical superior so that the company can evaluate, and possibly authorize, the potentially conflicting activity.

In cases of breaches, the Company will take all appropriate measures to cease the conflict of interest, reserving the right to act for its protection.

1.6 Loyalty

Autovictor srl and the Recipients commit to achieving fair competition, in accordance with national and community regulations, knowing that virtuous competition serves as a healthy incentive for innovation and development processes and also protects the interests of consumers and the community.



2 RELATIONSHIPS WITH EMPLOYEES AND COLLABORATORS

2.1 Selection of staff

The assessment and selection of personnel are conducted in accordance with fairness and transparency, respecting equal opportunities in order to reconcile the needs of Autovictor srl with the professional profiles, ambitions, and expectations of the candidates.

Autovictor srl is committed to adopting all necessary measures to avoid any form of favoritism in the personnel selection process by using objective and merit-based criteria, in respect of the candidates' dignity and in the interest of the company's proper functioning.

The hired personnel, also through the implementation of this Code, receives clear and correct information regarding the roles, responsibilities, rights, and duties of the parties.

2.2 Personnel management

Autovictor srl protects and values its human resources, committing to maintain the necessary conditions for the professional growth, knowledge, and skills of each person, providing appropriate training for professional updating and any initiative aimed at pursuing this goal.

Autovictor srl promotes the participation of workers in the life of the company by providing participatory tools capable of collecting the opinions and suggestions of workers, ensuring their broadest participation.

While ensuring maximum availability towards the Company, no worker can be required to perform duties, services, or favors not due based on their employment contract and their role within the company.

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

Employee relations must take place with loyalty, fairness, and mutual respect, in compliance with the values of civil coexistence and individual freedom.



3 WORK ENVIRONMENT

Autovictor srl is committed to providing its employees with a healthy, safe, and respectful work environment for the dignity of workers.

Workplace safety is ensured by strictly implementing the provisions provided by the current law, as well as actively promoting a safety culture through specific training programs. The training of staff is a central element of the adopted management system.

Autovictor srl protects the health of its workers, also ensuring compliance with hygiene standards and health prevention regulations.

4 BUSINESS MANAGEMENT

4.1 *Compliance with internal procedures*

Autovictor srl believes that management efficiency and control culture are essential elements for achieving objectives.

The recipients are required to strictly comply with internal procedures and instructions to the company.

The recipients must act according to their respective authorization profiles and must keep all appropriate documentation to track the actions taken on behalf of the company.

4.2 *Accounting management*

In the activity of accounting management, the Recipients are required to act in compliance with the principles of truthfulness, accuracy, and transparency, so that the reputation of Autovictor srl is protected both internally and externally.

The respect of these principles also allows the company to plan its operational strategies based on its actual economic and equity situation.

All items reported in accounting must therefore be supported by complete, clear, and valid documentation, avoiding any form of omission, forgery, and/or irregularity.

In the case of asset or economic elements based on valuations and estimates, the relevant recording must be inspired by criteria of reasonableness and prudence.



4.3 Protection of Heritage

The Addressees perform their functions by trying to rationalize and contain the use of company resources.

The recipients are required to correctly apply the provisions related to security to protect hardware devices from unauthorized access, which could severely damage the rights to the protection of personal data of the staff and customers of Autovictor srl.

4.4 Communication

Autovictor srl provides suitable communication tools for Stakeholders to interact with the company to submit requests, ask for clarifications, or make complaints.

Autovictor srl promotes effective corporate communication capable of connecting the company with civil society, in order to receive requests, needs, and demands of the community and to spread its values and mission.

The information provided to Stakeholders is complete and accurate in order to allow recipients to make informed and correct decisions.

The advertising promotion of Autovictor srl respects ethical values, protecting minors and rejecting vulgar or offensive messages.

5 RELATIONS WITH THE OUTSIDE

5.1 Relations with Authorities and Public Administrations

Relations with the Authorities and Public Administration must be based on maximum clarity, transparency, and collaboration, in full compliance with the law and according to the highest moral and professional standards.

The Addressees, unless expressly authorized, cannot relate on behalf of and in the name of Autovictor srl with the Authorities and with the Public Administration.

In relations with Public Officials, with Public Service Officers, and Public Administration in general, the authorized recipients adhere to the highest standards of correctness and integrity, refraining from any form of pressure, explicit or covert, aimed at obtaining any undue advantage for themselves or for Autovictor srl.

To that end, the authorized Recipients will be required to strictly observe the provisions of this Code, as well as, more generally, the directives issued by the management of Autovictor srl.



5.2 Relations with political and trade union organizations

Autovictor srl does not favor or discriminate against any political or trade union organization.

The Company refrains from providing any improper contribution in any form to parties, trade unions, or other social formations, except for specific exceptions and always within the limits of what is permitted by current regulations.

The addressees are required to refrain from any direct, indirect, or alleged pressure towards political representatives or trade union representatives.

5.3 Report with customers and suppliers

The recipients interact with third parties with courtesy, competence, and professionalism, believing that their conduct depends on the protection of the image and reputation of the company and consequently the achievement of the company's objectives.

In particular, the Recipients must refrain from any form of unfair or deceptive conduct that may induce customers or suppliers to rely on unfounded facts or circumstances. The Recipients are required to consistently commit to providing prompt and high-quality services to customers, striving to limit any form of disruption or delay in order to maximize customer satisfaction.

Supplier relationships are based on loyalty, fairness, and transparency.

The choice of suppliers is made based on objective criteria of economic efficiency, opportunities, and effectiveness.

The choice of suppliers on purely subjective and personal bases, or in any case, by virtue of conflicting interests with the company, is ruled out.

The recipients must implement every possible control so that suppliers and customers are also able to adhere to the fundamental ethical principles contained in this Code.

6 INTERNAL CONTROL SYSTEM

The compliance with the provisions of this Code is entrusted to the careful, reasonable, and attentive supervision of each of the Recipients, within the scope of their respective roles and functions within the company.

All Addressees are invited to report to their direct superiors any facts and circumstances that may be in violation of the principles and provisions of this Code.

The management of Autovictor srl and the relevant bodies take every necessary measure to put an end to the violations, being able to resort to any disciplinary action in compliance with the



law and the rights of workers, including trade union rights.

7 GUIDELINES OF THE SANCTIONING SYSTEM

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

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

Such violations will therefore be immediately pursued by Autovictor srl in a decisive and timely manner, through the adoption of appropriate and proportionate disciplinary measures.

The effects of violations of the Ethical Code and internal protocols must be taken into consideration by all those who, for any reason, have relations with Autovictor srl. Depending on the severity of the behavior exhibited by the person involved in one of the illicit activities provided for by the Code, Autovictor srl will proceed without delay to take appropriate measures, regardless of any prosecution by the judicial authority. Notwithstanding the above, behaviors in violation of the Ethical Code constitute: or serious breach for employees (workers, office staff, managers, and executives), with penalties,

applied according to the severity, provided for by the applicable CCNL (verbal warning, written warning, fine not exceeding three hours of pay, suspension from work and pay for a maximum of three working days, dismissal for just cause or justified reason); in the case of pending criminal action or the execution of a restrictive personal freedom provision issued against the employee, before adopting the disciplinary measure, the penalty of suspension from service and pay may be adopted, for a duration corresponding to the outcome of the criminal action or until the end of the duration of the restrictive personal freedom provision;

just cause for revocation of the mandate to the directors;

or immediate termination of the relationship, in more serious cases, for external and subordinate collaborators;

or immediate termination of the relationship, in the most serious cases, for suppliers, contractors, and subcontractors.

The identification and application of sanctions shall always take into account the general principles of proportionality and adequateness in relation to the contested violation.



In all the above hypotheses, Autovictor srl also reserves the right to take all actions it deems appropriate for the compensation of damages suffered as a result of behavior in violation of the Code of Ethics.

8 - GENDER EQUALITY AND INCLUSION (UNI/PdR 125:2022)

8.1 Commitment to gender equality

Autovictor Srl promotes gender equality and inclusion, in line with UNI/PdR125:2022, implementing policies aimed at ensuring equal opportunities for professional growth and appreciation of skills.

8.2 Specific objectives

The Company is committed to:

- a) Promote an inclusive and discrimination-free culture;
- b) Ensure pay equity and equal opportunities;
- c) Promote work-life balance and protection of parenthood;
- d) Monitor and report results through KPIs;
- e) Continuously improve gender equality policies.

8.3 Certification and transparency

Autovictor Srl has achieved certification according to UNI/PdR 125:2022 and guarantees transparency about the results obtained.