

Code of Ethics

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Havant s.r.l.

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Locations in Italy: Milan | Rome | Genoa | Novara | Reggio Emilia | Varese

Locations in Europe: Belgium | France | Germany | Ireland | Netherlands

Cap.Soc. € 250.000 i.v. | P.IVA 04513160962 | REA 1753575

Integrated Management System

UNI EN ISO 9001, UNI CEI EN ISO/IEC 27001, UNI EN ISO14001,

ISO/IEC 20000-1, ISO 37001,

ISO/IEC 42001 (AI), Ethical Certification SA 8000, UNI PdR 125,

AGID Accredited Conservator,

EcoVadis Silver Sustainability Rating

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Code of Ethics

1. Introduction

This Code of Ethics defines the principles and values that guide the activities and behaviours of all those who work on behalf of **HAVANT srl**.

The Code is an integral part of the organisation, management and control model adopted by Havant S.r.l. pursuant to Legislative Decree no. 231 of 8 June 2001.

It is an integral part of the organization's management system and is part of the requirements of **ISO 9001, ISO 27001, ISO 14001, SA8000, PdR 125:2022, ISO 37001, ISO 42001** and other voluntary standards to which the organization adheres.

2. Recipients of the Code of Ethics

Havant S.r.l. has adopted this Code of Ethics (hereinafter, the "Code") in order to affirm and promote, in daily practice, the values and principles that inspire the Company in carrying out its activities, both within the organization and in relations with the outside world, including the market, suppliers, employees and all stakeholders.

The recipients of this Code are, first of all, all natural and legal persons who, in carrying out their respective activities, act in the name and on behalf of Havant S.r.l. These Recipients include, but are not limited to, members of the Corporate Bodies, Management, Employees, as well as Collaborators and Suppliers who operate, in a significant and continuous manner, on behalf of or in the interest of the Company. Each of them is required to read this Code, to share its principles and to comply with them in the exercise of their functions and responsibilities.

The Company also undertakes to promote the dissemination of the Code and the values contained therein also to external operators and all other stakeholders (hereinafter, "Actors") who, although not part of the corporate structure, interact significantly with Havant S.r.l. and influence its quality, reputation and operational effectiveness.

The responsibility for promoting and disseminating the company's ethical culture is entrusted to all employees, with particular regard to those who hold managerial roles. The task of providing interpretative clarifications on the Code, receiving any reports of non-compliant conduct and proposing improvement measures is assigned to the **Supervisory Body**, established pursuant to Legislative Decree 231/2001. This body is also responsible for verifying the effective implementation of the Organisational Model and its constant review and updating.

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2. Fundamental principles

2.1 Legality

Regulatory references

This Code of Ethics is adopted in accordance with the following national and international regulatory references, which regulate ethical conduct, the liability of legal persons, the protection of fundamental rights and the prevention of crimes:

- **Legislative Decree 231/2001** – Regulation of the administrative liability of legal persons, companies and associations, including those without legal personality;
- **Civil Code and Criminal Code**, with regard to obligations of diligence, fairness, loyalty and prevention of crimes;
- **Legislative Decree 81/2008** – Consolidated Law on Health and Safety at Work;
- **Legislative Decree 196/2003**, as amended by **Legislative Decree 101/2018**, and **Regulation (EU) 2016/679 (GDPR)** – On the protection of personal data;
- **Law 190/2012** – Provisions for the prevention and repression of corruption and illegality in the public administration;
- **Law 123/2007** – Safety at work, linked to Legislative Decree 231/2001 for crimes of serious injury or death;
- **Legislative Decree 152/2006** – Consolidated Environmental Act, for the prevention and management of environmental crimes relevant for the purposes of Legislative Decree 231/2001;
- **Law 68/2015** – Environmental crimes, with direct relevance for the purposes of liability 231;
- **Legislative Decree 24/2023** – Implementation of Directive (EU) 2019/1937 on whistleblowing, on the protection of whistleblowers;
- **Legislative Decree 254/2016** – Non-financial reporting and sustainability obligations;
- **Legislative Decree 231/2007** – Anti-money laundering legislation and subsequent amendments;
- **Applicable UNI and ISO standards**, in particular:
 - **ISO 9001** – Quality management systems;
 - **ISO 14001** – Environmental management systems;
 - **ISO/IEC 27001** – Information Security Management Systems;
 - **ISO 37001** – Management systems for the prevention of corruption;
 - **ISO/IEC 42001** – Artificial Intelligence Management Systems;

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- **SA8000** – Social responsibility;
- **PdR 125:2022** – Guidelines for gender equality in organizations.

The Company undertakes to keep its ethical governance system and this Code constantly updated in relation to the evolution of the regulatory and jurisprudential framework

2.2 Integrity and Honesty

Every professional relationship is based on honesty, fairness, loyalty and good faith. The organization is committed to preventing any form of corruption, favoritism, abuse or conflict of interest, in accordance with **ISO 37001**.

2.3 Respect for the Person

HAVANT srl protects the fundamental rights of the person and guarantees an inclusive, fair and respectful environment of human dignity. Any form of discrimination, harassment or violence is prohibited. This principle is also implemented according to the requirements of **SA8000** and **PdR 125:2022**, with particular attention to gender equality, work-life balance and the enhancement of diversity.

2.4 Social and Environmental Responsibility

The organization adopts ethical and sustainable behavior, committing itself to reducing the environmental impact of its activities in accordance with **ISO 14001**, and to ensuring fair, safe and respectful working conditions, as required by **SA8000**.

2.5 Protection of Health and Safety

HAVANT srl takes all the necessary measures to ensure a safe, healthy working environment that respects human dignity, in accordance with national legislation and the requirements of **SA8000**. Accident prevention, physical and mental health protection and continuous training are an integral part of the organisation's social responsibility.

3. Internal Stakeholders

3.1 Employees and Collaborators

Human resource management is based on fairness, transparency, merit and professional development, in compliance with the principles of **ISO 9001**, **SA8000** and **PdR 125:2022**. The organization promotes continuous training, organizational well-being and work-life balance.

3.2 Use of Company Resources

Company resources must be used responsibly, efficiently and for business purposes, avoiding abuse or waste. The security of data and IT infrastructures is ensured through the application of the measures provided for by **ISO/IEC 27001**.

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4. External stakeholders

4.1 Customers

HAVANT srl operates towards customers with honesty, transparency and quality orientation, in line with **ISO 9001 and all other voluntary certifications in place**, ensuring compliance with needs and effective management of complaints. The confidentiality, availability and integrity of information is guaranteed, including the processing of personal data in accordance with the **ISO27001 and the GDPR**.

4.2 Suppliers and Partners

The selection of suppliers is based on objective, ethical and sustainable criteria, in compliance with **ISO 9001, ISO 37001, PdR125 and SA8000**. Clear commitments are required in terms of legality, safety, social and environmental responsibility. Commitments are also required with reference to the confidentiality, availability and integrity of information, including the processing of personal data

4.3 Public Authorities

Relations with public bodies and institutions are based on principles of fairness, legality and transparency, in accordance with the 231 Organizational Model and **ISO 37001**, with an absolute prohibition of corruption, favoritism or undue influence.

5. Anti-Corruption and Conflicts of Interest

HAVANT srl prohibits any form of corruption and implements a prevention and control system compliant with **ISO 37001**. Any situations of conflict of interest must be declared promptly.

6. Confidentiality and Data Protection

The confidentiality of company, personal and sensitive information is protected in accordance with **the GDPR and ISO/IEC 27001**. Each employee is obliged to treat data securely and confidentially.

7. Communication and Transparency

Internal and external communications must be truthful, transparent and consistent. The organization is committed to promoting inclusive and respectful communication, in line with **PdR 125:2022**.

8. Violations of the Code of Ethics

Violations of this Code can be reported through dedicated channels (also anonymously), according to the principles of **ISO 37301** standards and Legislative **Decree 24/2023** – Implementation of Directive (EU) 2019/1937 on whistleblowing, on the protection of whistleblowers. The organization protects the whistleblower from retaliation and adopts consistent sanctions in the event of an ascertained violation.

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Reports can be made through the link <https://whistleblowing.havant.com/WhistleBlowing/>

9. Ethical Use of Artificial Intelligence

HAVANT srl promotes a responsible use of Artificial Intelligence, in accordance with **ISO/IEC 42001**, by adopting the following principles:

- transparency and traceability of algorithms and automated decisions;
- absence of discrimination or bias in systems;
- data protection (in accordance with **GDPR** and **ISO/IEC 27001**);
- human supervision in critical activities;
- assessment of ethical and social risks and impacts, in line with the principles of **SA8000** and **PdR 125:2022**.

The use of AI must always be aimed at improving business processes and never to the detriment of people, fundamental rights or social balance.

10. Adoption and Dissemination

The Code of Ethics is approved by the Board of Directors and represents a reference for all interested parties. It is integrated into internal communication and training processes, in line with the requirements of the voluntary certification standards for which certification has been achieved.

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