



PAGE EUROPA[®]

TRUSTED TO DELIVER

Standard of Business Ethics and conduct



PAGE MIDDLE EAST

TRUSTED TO DELIVER

PAGETEL



PAGE ASIA PACIFIC

TRUSTED TO DELIVER

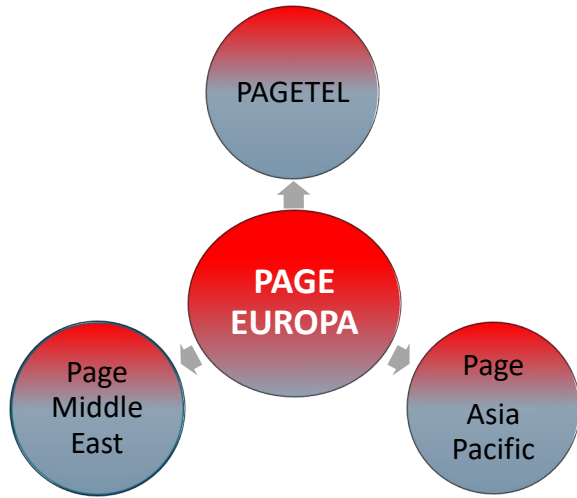
English

FIRST EDITION (Rev.0)

INDEX

1. THIS BOOKLET	5
1.1 A practical reference	5
1.2 Business Ethics & Compliance	5
1.3 Global reality of our work	5
1.4 Get answers	6
1.5 Making Tough Decisions	6
2. MANAGE OUR ACTIVITIES	7
2.1 Antitrust, sales procedures and competition information	7
2.2 Conflicts of interest	7
2.2.1 Personal Business Relationships	7
2.2.2 Organizational Relations	7
2.2.3 Outdoor use	8
2.3 Gather competitor intelligence	8
2.4 Gifts & Hospitality: Business Clients	8
2.4.1 Gifts	8
2.4.2 Receiving Gifts	8
2.5 International activities	9
2.6 Lobbying and political contributions	9
2.7 Observing the Law	9
2.8 Record-keeping	10
2.9 Quality and Control	10
2.10 Suppliers, consultants, and part-time, temporary workers	10
3. WORKING WITH GOVERNMENT CLIENTS AND PUBLIC OFFICIALS	11
3.1 Bribes	11
3.2 Billing & Pricing Policy	11
3.3 Gifts & Hospitality: Government Clients	12
3.4 Recruitment of former civil servants	12
3.5 Mandatory information	12
3.6 Procurement Integrity	12
3.7 Government Data Protection	12
3.8 Time Charges and Expense Reports	12
4. COLLABORATE WITH OTHERS	13
4.1 Community Relations	13
4.2 Equal Employment Opportunities	13
4.3 Drug-free professional environment	13
4.4 Harassment	14

4.5	Safety and Health.....	14
4.6	Violence in the workplace.....	14
5.	PROTECTING OUR ASSETS	15
5.1	Business Resources & Intellectual Property	15
5.2	Confidentiality and Data Protection	15
5.3	Confidentiality of customers	15
5.4	Environmental protection.....	16
5.5	Computer science	16
5.6	Use of the Internet and Monitoring	16
5.7	Our name and reputation	16
5.8	Right to inspection.....	16
6.	TAKE ACTION	17
6.1	Our Ethics Program.....	17
6.2	Global Realities	17
6.3	Managers & Supervisors	17
6.4	Employees, Contractors and Company Stakeholders.....	17
6.5	Tools & Resources	18
6.6	Confidential conversations	18
6.7	Direct e-mail address	18
6.8	Investigate suspected violations of our standards	18
6.9	Prohibition of retaliation and Whistleblower Protection	18
6.10	Disciplinary action	19



Dear Fellow Employee,

Allow us to introduce the Page Europa's manual of Conduct and Corporate Ethics Standards, which applies to all business units constituting the PAGE Group: Pagetel in Turkey, Page Middle East in Oman, and Page Asia Pacific in Brunei.

The Book serves as the bedrock for our behavior, both as a company and as individuals representing Page Europa. Every action we take reverberates through our values and contributes to our collective reputation.

Our company's overarching objective is to provide equitable profit to our shareholders. To achieve this, we must wield company resources judiciously and uphold the commitments we've made to clients, partners, and fellow employees. These ethical principles serve as our compass, guiding our conduct and shaping our decisions.

We encourage you to delve into the Book attentively, reflecting on our unwavering commitment to doing what's right each day. Page Europa has earned an outstanding reputation for its operations, and it falls upon us, as employees, to uphold this legacy by exemplifying integrity, honesty, and respect for others

1. THIS BOOKLET

1.1 A practical reference

Every day you will have to make decisions that are crucial to our success. This booklet is a practical reference that you can use to get the information you need to make the right decisions. You'll also learn when to contact your business unit's ethics officer.

The *Book* is intended for all full-time, part-time, and temporary officers, managers, and employees of PAGE Group. We expect all our stakeholders (our suppliers, vendors, entrepreneurs, and joint venture partners...) to develop ethics and compliance programs that are consistent with our values in all relevant aspects. Only the Board or an authorized committee may grant a modification or abandonment of this *Book* for the Company's executive officers. Any changes or waivers will be made public if required by law.

1.2 Business Ethics & Compliance

Business ethics refers to our commitments that make the company great, focusing on fair relationships with customers, suppliers, competitors, and colleagues. We commit to being:

- Respectful
- Honest & Trustworthy
- Responsible & Reliable

Loyal & Cooperative Compliance refers to adhering to laws, rules, regulations, and policies guiding our actions. The *Book* details the ethics and compliance aspects of business conduct.

1.3 Global reality of our work

We operate in many countries around the world. Our employees are citizens of different countries and belong to different cultural groups. We are subject to the laws and regulations of all countries, states and local authorities where we operate. Our worldwide presence is subject to the regulations and legal control of numerous jurisdictions at the same time.

We need to recognize the global reality of our work. In some cases, there may be a real or apparent conflict between the legislations of two or more countries. In such a case, you should get legal advice immediately, to understand how to properly resolve the conflict.

1.4 Get answers

This *Book* will not provide an answer to every situation. Each of us has faced a time when it has been difficult to establish the right course of action.

There are a number of resources available to you that can help you answer questions about ethics and compliance. If you know the answer to an ethics question and are confident in your decision, you can act with confidence. If this is not the case, you will have several options for seeking advice and guidance:


- Your supervisor or manager
- The Ethics Officers (per evitare di essere costretti a nominarne uno per ciascuna entità)
- The Human Resources Department of your business unit
- The Representative of Environmental Protection, Safety and Health
- The Security Department of your business unit
- Finance or Internal Controls departments of your business unit
- The Legal Department
- The PAGE Group Ethics email ethics.alert@pageeuropa.it

1.5 Making Tough Decisions

This Book guides you through tough business problems. If answers are unclear, take your time and follow our Ethical Decision-Making model:

- Examine the facts carefully
- Use available resources
- Consider all issues
- Think about your options
- Consider the consequences
- In case of doubts contact the Ethic Officers

2. MANAGE OUR ACTIVITIES



REGARDLESS OF WHO
THE CUSTOMER IS,
THERE ARE A FEW
RULES THAT GUIDE
HOW WE DO OUR
BUSINESS EVERY DAY.

2.1 Antitrust, sales procedures and competition information

Antitrust and competition laws prohibit agreements that eliminate or discourage competition. Violation of these laws carries both stiff fines and prison sentences. We fully comply with the antitrust and competition laws of each jurisdiction in which we operate.

We are committed to fair and competitive sales procedures. We will not engage in any procedure that could unfairly restrict trade or exclude competitors from the market.

We will not make false statements about our competitors, nor will we compete to acquire or misuse their confidential information.

With respect to antitrust and competition laws, you have the following responsibilities:

- Also avoid informal or casual conversations with our competitors' employees regarding pricing, products, or customers
- Never make inaccurate or malicious statements about our competitors

2.2 Conflicts of interest

A conflict of interest occurs when your private interests interfere or appear to interfere with the interests of PAGE Group. You should base your business decisions on the needs of our company, rather than your interests, those of your family, your friends, or for personal benefit. You should not do business with organizations in which you or your family have a substantial financial interest. Each of us will have to deal with suppliers, customers and others in a way that also avoids an apparent conflict between our personal interests and those of PAGE Group. Contact your business unit's chief ethics officer and disclose any situation that presents, or may present, a conflict of interest. The following situations can easily give rise to conflicts of interest:

2.2.1 Personal Business Relationships

You should disclose to the Ethics Officers any material interest you or an immediate family member may have with our suppliers, customers or competitors. Owning shares in a publicly traded company that is a competitor could create an actual or potential conflict of interest for you and us. Make sure that your personal business relationships do not influence the decisions you make on behalf of PAGE Group.

2.2.2 Organizational Relations

If you or an immediate family member act as a manager, officer or consultant for any company doing business with ours, you must disclose those relationships to the ethics officer of your business unit, even if this service is unpaid.

2.2.3 Outdoor use

Before accepting an external job, consider whether this second job could create a conflict of interest with your employment in the company or have a negative impact on your work skills. Acquiring a second job could complicate the situation, as you may not always see clearly how to manage your loyalty. Do not accept external employment with our competitors, suppliers or customers.

2.3 Gather competitor intelligence

Properly obtained business information is valuable. In any case, information about our competitors must come from public sources that are freely available to others. Never spy or steal in order to gain information about our competitors. Ask for advice if you think someone is giving you confidential information that you shouldn't have. Unless disclosure is authorized, you should protect all commercially sensitive information that you have obtained in the course of your work.

2.4 Gifts & Hospitality: Business Clients

2.4.1 Gifts

We compete solely on the merits of our products and services. When people exchange gifts in a business context, it may appear that these acts are intended to influence the business relationship. We may provide gifts, meals, beverages and entertainment of reasonable value in the course of business dealings with business customers or non-governmental personnel, provided that such a procedure does not conflict with our standards or those of the recipient's organization. You shall not give or offer any kind of gift if, in such circumstances, such a gift may appear improper.

2.4.2 Receiving Gifts

In general, you should not accept gifts, meals or entertainment from those with whom you are in business, unless this activity is intended for a legitimate business purpose and is appropriate for the relationship. You will only be able to accept small gifts of modest value.

In business dealings in some countries, it may be normal to accept gifts of substantial value. These gifts are the property of the company and should be disclosed to the ethics officer of your business unit to determine their use.

When it comes to giving and receiving gifts, you have the following responsibilities:

- Do not offer or provide gifts when not permitted by the beneficiary's regulations, rules, or policies.
- Avoid giving or receiving gifts above a modest value in business relationships with business customers
- Ensure that meals and entertainment are for sound commercial purposes
- Before offering or withholding any gift of non-negligible value, please consult with one of the Ethics Officers

2.5 International activities

As PAGE Group, we adhere to the laws and regulations of every country and jurisdiction in which we operate.

When we operate abroad, we sometimes have to encounter rules, regulations, habits, methods and cultures that are different from those to which we are accustomed. You need to familiarize yourself with the business practices of other countries so that you don't embarrass your business partners or yourself. In the event of a conflict between the laws of two or more countries, please contact the Legal Department for assistance.

We comply with laws and restrictions regarding the import and export of our products, information, and technical data, including the U.S. International Regulations on Trafficking in Arms ("ITAR"). Almost all countries have laws and regulations that control international movements (such as imports, exports, re-exports, and technology transfers) of certain products, technical data, and services. Such laws and regulations may also restrict the transfer of controlled technical data to certain entities, both domestically and abroad. Some countries have laws and regulations that prohibit contracting with countries, governments, companies, and individuals subject to "sanctions" or "embargoes". The Legal Department can offer further assistance.

If you do business in any country, you have the following responsibilities:

- Be aware of all laws and regulations related to the profession
- To be aware of and comply with the laws relating to the export and import of our products, technical data and services, including those restricting the publication of technical data
- Use caution when using consulting services to represent our interests. Consultants, sales representatives, distributors, and business owners are required to observe PAGE Group standards of conduct

2.6 Lobbying and political contributions

Do not allocate corporate funds or other resources directly or indirectly to any political party or campaign for or against any candidate for political office, if prohibited by law. Consult legal counsel before making contributions to charities affiliated with politicians. We encourage you to participate individually in political life according to your time and resources.

2.7 Observing the Law

PAGE Group operates in a highly controlled environment. Many government entities provide guidelines on how to conduct a business.

We scrupulously comply with the requirements of all governments and agencies with which we do business.

We cooperate in the case of government inspections and are courteous to inspectors. Communicate immediately with the Legal Department if you become aware of any inspection, investigation, or request for information from any outside organization.

In the course of an inspection, do not destroy or alter documents, make false statements, mislead an inspector or obstruct the collection of information. The Legal Department will assist you in reviewing data requested by an inspector before it is published.

2.8 Record-keeping

We keep accurate records of all financial and business transactions. Our record-keeping procedures are essential to ensure that all costs are billed accurately.

It is your responsibility to accurately document all expenses and follow all accounting procedures. False or misleading entries should not be included in the books and documentation.

You are required to carefully follow our policies on record keeping, including electronic documents and e-mail messages. Do not destroy documents that you believe may be relevant as evidence in civil, criminal, or regulatory proceedings. This could expose you and the company to serious penalties.

2.9 Quality and Control

The quality of our products is essential to our success. All our products and services must pass inspection and control and comply with quality criteria according to contractual and government requirements. We recommend that you complete all the inspection documentation carefully and on time. With regard to quality and control, you have the following responsibilities:

- Personal responsibility to ensure product quality
- Awareness of the checks to be carried out
- Awareness of control procedures
- Accurate recording of control results

2.10 Suppliers, consultants, and part-time, temporary workers

We select our suppliers based on objective criteria such as price, quality and performance in previous years.

As a condition of employment, all consultants and part-time or temporary employees must follow this *Book* and the company and business unit policies and procedures. When negotiating with suppliers or consultants, you have the following responsibilities:

- Request competitive bidding where appropriate
- Evaluate all job offers fairly
- When dealing with suppliers or consultants in Italy, or as appropriate in other jurisdictions, explore opportunities to encourage small or minority-owned companies to partner with us
- Do not accept gifts unless they are of modest value.
- However, even modest gifts are not allowed if they are intended to influence administrative decisions or obtain favors. Ensure that meals offered by a supplier or consultant fall within a policy of business objectives and are appropriate with respect to the relationships maintained

3. WORKING WITH GOVERNMENT CLIENTS AND PUBLIC OFFICIALS

AS A LEADING TELECOM
SYSTEM INTEGRATOR
COMPANY PROVIDING
SERVICES AND
PRODUCTS GLOBALLY,
WE STRICTLY ADHERE TO
COMPLEX LAWS AND
REGULATIONS IN OUR
DEALINGS WITH
GOVERNMENT CLIENTS
AND OFFICIALS TO
PROTECT OUR
REPUTATION.
COMPLIANCE WITH ALL
LAWS AND REGULATIONS
IS A DAILY BUSINESS
PRACTICE.

3.1 Bribes

We do not intend to be involved in wrongdoing or bribery. An offence or bribe consists in offering or accepting money, shares, commissions, credits, gifts, favors or any other offer of any value directly or indirectly given in exchange for preferential treatment. You must never offer, grant, ask for, or receive any form of bribe. Preferential treatment can sometimes be as naïve as the payment of an invoice before the due date. In any case, preferential treatment is illegal if offered in exchange for a gift.

3.2 Billing & Pricing Policy

We are clear and precise in every aspect related to billing and pricing policy. Our prices reflect design and manufacturing costs, our commitment, market conditions and other relevant factors. Invoices must be clear and comprehensible. Excess amounts will be refunded promptly as soon as they are identified.

Invoices to customers must be timely, accurate, and honest. It is illegal to make false or fraudulent claims against any government customer.

When invoicing and pricing, you have the following responsibilities:

- Be precise in your pricing
- Invoice suitable projects
- Don't split invoices to hide costs or avoid payment processes
- Ensure that invoices are accurate, timely, and complete Contract Compliance

We deliver goods and services to our customers as promised. We never substitute material, or change quality control requirements except where government procedures need to be observed. We never certify that something has been checked if the tests have not taken place.

When executing on contracts for our clients, you have the following responsibilities:

- Document how PAGE Group has fulfilled its contractual obligations
- Perform all checks according to the clauses of the contract

3.3 Gifts & Hospitality: Government Clients

We compete solely on the merits of our products and services. We do not seek to influence your purchasing decisions at PAGE Group by offering gifts, meals, or entertainment. Many governments have regulations that prohibit their employees from accepting valuables from contractors or suppliers. We scrupulously comply with these regulations and policies in our business dealings with government officials and their representatives. Such regulations can be complex, and you need to be sure you understand them. Rely on the guidance of our Ethics Officers who will consult with the Legal Department appropriately.

It is almost always forbidden to offer gifts, meals, or other valuable gifts to government and public officials. Do not offer money or other valuables to a government or public official for the purpose of improperly influencing an official decision or obtaining or maintaining a business relationship.

Consult with the Ethics Officers before offering any items of value to a government official or public official. Before making any payments to facilitate routine government action, you must obtain prior approval from the Legal Department. In addition, any gift offered to a government official or public official must be properly recorded in the books and records.

3.4 Recruitment of former civil servants

In some countries where we operate, the law restricts the hiring of government employees directly involved in the award or distribution of contracts to PAGE Group. Consult with the Legal Department before recruiting, interviewing, hiring, or assigning jobs to former government employees.

3.5 Mandatory information

We comply with all applicable regulations that require us to disclose to a government client suspected instances of wrongdoing involving fraud, conflict of interest, bribery or wrongful indemnity, certain billing or pricing errors, or customer overpayments. The consequences of failing to disclose these types of violations could be serious. If you suspect that violations have occurred, please contact the Ethics Officer or the Legal Department immediately about the mandatory disclosure requirements.

3.6 Procurement Integrity

We observe our clients' procedures for awarding contracts. We will not ask for information about our competitors' proprietary data, nor will we ask for documents related to the principles of selection — i.e. material used to evaluate competing bids. We do not discuss hiring or offer items of any value to those involved in the process of sourcing our products and services.

3.7 Government Data Protection


We have an ongoing obligation to protect confidential data. We will not seek access to data for which we do not have adequate authorization and which we do not need to collect.

It is your responsibility to follow all corporate and government procedures for handling confidential data.

3.8 Time Charges and Expense Reports

We issue honest invoices to clients for the work done. We charge for time and expenses in accordance with the company's accounting procedures. It is your responsibility to document time and expenses promptly and accurately. Employees, consultants or contract staff found to be invoicing unlawfully are subject to disciplinary action up to and including dismissal.

4. COLLABORATE WITH OTHERS



WE ARE PROUD OF THE
COMMITMENT AND
DEDICATION OF OUR
EMPLOYEES. WE ARE
PROUD OF THE
CONTRIBUTIONS WE MAKE
TO THE COMMUNITIES IN
WHICH WE LIVE AND
WORK. WE RECOGNIZE
THAT OTHERS DEPEND ON
US TO DO THEIR WORK
JUST AS WE RELY ON
THEM.

4.1 Community Relations

PAGE Group actively supports the communities in which it operates. Our civic work demonstrates the company's good participation in the community. We encourage you to participate as a volunteer in community events in your free time or in your professional life with the approval of management.

4.2 Equal Employment Opportunities

Our success depends largely on our working environment. We advocate for a positive environment where all individuals can grow, contribute, and participate free from discrimination. We aspire to create a company where Equality & Inclusion is achievable for all; where respect and inclusion are the cornerstones of our culture; where equal access and opportunity to learn, grow, succeed and thrive are available to everyone

We are committed to upholding human resources policies and practices in compliance with EU directives on equal employment opportunities and anti-discrimination in all aspects of employment including: recruitment, hiring, evaluation, training, discipline, assignment and service assignments, career opportunities, compensation, promotion, and termination. We do not tolerate illegal discrimination of any kind.

To ensure a respectful and fair environment we foster inclusion and diversity (regardless of race, color, religion, sex, maternity, ethnic origin, disability, age, seniority, sexual orientation, gender identity, or any other protected status as defined by EU law and any other local laws in the respect of the places where the Company operates).

Our Company comply with all company and business unit professional policies, procedures, and regulations relating to employment and fairness in the workplace.

4.3 Drug-free professional environment

We aim to maintain a professional environment free from the effects of drug abuse. We do not tolerate any illegal drug use or substance abuse when employees work for PAGE Group or at a corporate location. Illegal drug use or substance abuse is detrimental to our ability to serve customers. It compromises the safety of our employees, products, and services.

We recommend that you notify your supervisor or manager of any known or suspected violations of this policy.

4.4 Harassment

Harassment inhibits work performance based on race, color, religion, sex, maternity, ethnic origin, disability, age, seniority, sexual orientation, sexual identity, or any protected status. Everyone deserves a workplace free from inappropriate behavior. Unwelcome comments or actions are unacceptable. Responsibilities:

- Comply with all workplace conduct policies and procedures
- Use common sense in professional relationships

Sexual harassment includes:

- Requests for dates, sexual favors, or behavior affecting employment decisions
- Intimidating or abusive behavior or a hostile environment resulting from sexual advances, offensive jokes, or abusive behavior

4.5 Safety and Health

We comply with the laws and regulations of the jurisdictions in which we operate with respect to the safety and health conditions of the working environment. We prohibit the possession of any firearm or other type of weapon with or without a license on company property without authorization from the security bureau.

To maintain the safety of our working environment you have the following responsibilities:

- Communicate all safety hazards and accidents.
- Follow your business division's rules regarding smoking during business hours while on company property.
- Notify your supervisor or the safety and health department of any suspected violations of safety procedures.

4.6 Violence in the workplace

We do not tolerate violent behavior in any workplace, by or against our employees. The following behaviors are prohibited: threatening, causing injury to another person, intentionally damaging the property of others, or acting aggressively so that another person fears an injury.

Demonstrate common sense and immediately inform your supervisor, manager, Human Resources, or Security if you notice any behavior that could prove dangerous or violent.

5. PROTECTING OUR ASSETS



WE RELY ON COMPANY
RESOURCES AND
PROPERTY IN OUR
WORK. WE ARE
RESPONSIBLE FOR
SAFEGUARDING THE
COMPANY'S FUNDS,
DATA,
DOCUMENTATION,
TOOLS, AND PROPERTY

5.1 Business Resources & Intellectual Property

PAGE Group's assets should be used mainly for business. Resources include phones, email, internet, computers, machinery, and vehicles. Reasonable personal use of phone and email is allowed.

Managers can authorize personal use of resources outside working hours. This use should be brief and infrequent.

Business opportunities found using company resources must be used to benefit Page Europa.

We must protect intellectual property, including copyrights, patents, trade secrets, trademarks, ideas, inventions, and processes. PAGE Group owns all work-related intellectual property created by employees.

5.2 Confidentiality and Data Protection

Employee information and data are confidential and are used only for valid business purposes, in compliance with GDPR principles. This includes information on staff records, medical records, and private addresses.

GDPR Principles: Our data processing activities adhere to the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality.

Data Subject Rights: Employees have the right to access, rectification, erasure, restriction of processing, data portability, and objection concerning their personal data.

Legal Basis for Processing: Personal data will be processed based on legal grounds such as consent, contract necessity, compliance with legal obligations, protection of vital interests, public interest, and legitimate interests.

Data Breach Protocol: In the event of a data breach, we will promptly notify the relevant supervisory authorities and affected individuals, as required under GDPR.

You may have access to confidential or proprietary customer or business information that needs to be protected from disclosure. The duty to keep information confidential continues even after we leave our company. Always comply with the law when processing other people's personal data. Contact your Legal Department for assistance and advice

5.3 Confidentiality of customers

Our business is based on information. You may have access to sensitive, confidential or proprietary information about our customers and others with whom we do business. We earn their trust by protecting the confidentiality of their information.

5.4 Environmental protection

We protect the environment of the communities in which we work. In all jurisdictions in which we conduct business, we comply with environmental protection laws and regulations, including requirements relating to recycling and waste disposal.

To protect the environment, you have the following responsibilities:

- Follow all environmental guidelines and procedures for the management and disposal of waste and hazardous materials in the workplace
- Prevent and report any spills or losses
- Report to your supervisor or manager any actions that may have a negative influence on the environment

5.5 Computer science

Like all of our other business assets, our IT facilities are a business asset that should only be used to promote our business activities. You should never use our technology or systems to support a personal or political activity.

We protect our IT systems from unauthorized access by outsiders.

Most of the software we use is licensed for business use only. Unless explicitly permitted, you may not copy software programs for business or personal use, or share them with others.

You have the following responsibilities when using IT resources:

- Safeguard all computer equipment and data
- Don't use software that we don't have a license for
- Don't share computer passwords
- Do not copy or distribute software for business or personal use, unless specifically authorized by the software licensee

5.6 Use of the Internet and Monitoring

Supervisors and managers can allow the use of the Internet during non-working periods. However, Internet access should not be used to support personal or political activities or to violate any of the standards set forth in this Book or to embarrass PAGE Group. You should never use corporate Internet access or corporate telecommunications services to download, view, send, or transmit information that is sexually explicit, discriminatory, hateful, illegal, profane, or abusive.

Monitoring and Surveillance:

Any monitoring of employee internet usage will be conducted in compliance with EU data protection laws and regulations. Employees will be informed about the nature, scope, and purposes of monitoring, ensuring it is proportionate and respects privacy rights.

5.7 Our name and reputation

PAGE Group is proud of its name and reputation. Public perception is crucial to our continued success. We provide accurate and timely information about our activities to our investors, the media and the general public. We are very careful about what we say when releasing public information.

The employees of the PAGE Group cannot provide information to representatives of the mass media without the authorization of the Company's Communications Department.

5.8 Right to inspection

Where permitted by local laws and regulations, we may exercise our rights to inspect our property, electronic communications and all other business assets and resources.

6. TAKE ACTION



WE ARE ALL
RESPONSIBLE FOR
THE ETHICAL LEVEL
OF OUR ACTIONS. WE
MUST ACCEPT AND
FULFILL OUR DUTIES
TO ONE ANOTHER.

6.1 Our Ethics Program

At PAGE Group, we firmly believe that management and employees share responsibility for business ethics. The company provides the tools and resources to help all of us understand and maintain our standards of ethical business conduct. These three pillars, management, employees, and resources form the foundation of our Ethics Program.

6.2 Global Realities

In some jurisdictions there are different requirements and regulations where we communicate and manage ethical concerns. Seek assistance from your chief ethics officer or legal department to learn the rules that apply to your location.

6.3 Managers & Supervisors

Managers and supervisors are required to provide employees with timely advice and guidance on ethical and compliance concerns. The more openly we talk about business conduct and our standards, the clearer it will be what we expect. Managers and supervisors will:

- Lead by example
- Affirm the need to follow laws, regulations, and policies that govern our business.
- Encourage employees to ask questions and seek advice before taking action.
- Consult with your business unit's chief ethics officer.
- Apply control measures to detect compliance risks.
- Be ready to listen when employees raise ethical issues and concerns.
- Take immediate action to answer questions and to correct problems.
- Encourage an environment where trust reigns and where employees can speak freely without fear of being marginalized.

6.4 Employees, Contractors and Company Stakeholders

Employees, contractors and all the Company stakeholders are required are required to do the following:

- Read, understand, use the Book and confirm receipt of it.
- Learn the ins and outs of policies that have a specific impact on their job assignments
- Use the resources available for guidance and assistance
- Follow the training programs necessary to carry out their work
- Perform their work in accordance with our business ethics standards
- Hold their employees accountable for ethical labor standards
- Share concerns about possible ethical misconduct with their supervisor, ethics officer, another member of management, or the Ethics email: ethics.alert@pageuropa.it
- Cooperate with any internal investigations on related ethics or compliance issues

If you are unsure about the correct course of action, get answers before you act.

6.5 Tools & Resources

PAGE Group updates and distributes the *Book* to all employees. Through training and communication, we communicate our *Standards of Business Ethics and Conduct to employees*. We promote compliance with these standards.

We provide the following tools and resources:

- Policies & Procedures
- Training & Education
- Confidential resources where you can ask for information, get advice and run reports.
- The PAGE Group Ethic is available by email ethics.alert@pageuropa.it
- Ethics and compliance offices in business units and at corporate headquarters

All conversations, phone calls, and reports made in good faith will be taken seriously. We will investigate all reported concerns, expeditiously and confidentially, and resolve those concerns appropriately. If we become aware of a violation of our standards, we will take action, including imposing disciplinary action, applying changes across the company, or notifying the appropriate government office or agency, as appropriate. We will not only deal with a specific situation, but we will also make changes so that similar problems do not recur.

6.6 Confidential conversations

Conversations with your business unit's chief ethics officer are treated confidentially, consistent with our legal obligations and policies. You will be informed if your identity is necessary to satisfactorily address your question or concern.

6.7 Direct e-mail address

While most questions and concerns can be resolved by discussing them with your manager, the Ethics email provides an additional tool to get help. The email is not intended to replace conversations between employees and managers, but rather to provide an additional resource for employees.

You can send an email to our dedicated address: ethics.alert@pageuropa.it at any time to express a concern or report a possible violation of the law in the areas of finance, accounting, banking, conflicts of interest or corruption. If you have any questions about other business conduct issues, please contact your manager, your HR representative, or the ethics officer of your business unit.

6.8 Investigate suspected violations of our standards

If you believe that a person associated with PAGE Group has violated our standards, you must bring the matter to the attention of your supervisor or ethics manager in your business unit, the Legal Department, or the corporate ethics officer so that we can conduct a prompt and full investigation. You can submit reports by email (ethics.alert@pageuropa.it) or by appointment.

In many circumstances, you have a personal responsibility to report activities that appear to violate laws, regulations, policies, or this *Book*.

6.9 Prohibition of retaliation and Whistleblower Protection

PAGE Group will not retaliate against any person who brings to our attention in good faith an ethics or compliance issue. People who raise concerns or help us resolve related issues are protected against retaliation. This includes protection under the EU Whistleblower Protection Directive, ensuring individuals reporting breaches of EU law are safeguarded.

Anyone who uses the ethics and compliance program to spread falsehoods, threaten others, or damage other people's reputations will be subject to disciplinary action.

Discouraging other employees from filing a report or getting the help they need is prohibited and could result in disciplinary action.

If you need to report any violations or incidents that you've become aware of in the work context, you can forward the details via email to the address provided.

It's essential to ensure that the information you share is accurate and relevant to the context. Whistleblowing plays a crucial role in safeguarding transparency and accountability within organizations. If you have any further questions or need assistance, feel free to ask!

6.10 Disciplinary action

Violations of laws, regulations, principles, this *Book*, or our policies may have serious consequences for you and PAGE Group. Some violations may be criminal in nature and may be subject to civil or criminal prosecution. Violations may affect our relationships with our customers and suppliers and may result in the loss of your license to do business in the countries in which we operate. Employees who violate laws, regulations, this *Book*, or our policies are subject to disciplinary action, in accordance with applicable laws, which may include various measures as appropriate, up to and including termination.

All disciplinary actions are decided on a case-by-case basis