

CODE OF ETHICS

2025

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Code of Ethics

Cartografica Galeotti S.p.A., is aware of the significance of its role in the economic and social advancement of the regions in which it operates and its conduct and actions are inspired by the principles outlined in the Code of Ethics. It puts these principles into effect with strategic initiatives and encourages its collaborators to embrace the values that the company upholds and to which it is committed.

This Code of Ethics reaffirms the Company's commitment to the guidelines established by the European Union Sustainable Development Strategy, acknowledges the principles outlined in the Fundamental Conventions of the International Labour Organization, endorses the principles of the Global Compact advocated by the UN, and complies with the ethical standards set forth by the OECD (Global Legal Standards). The company also adheres to the Charter of Environmental Sustainability Principles as defined by Confindustria.

The Code of Ethics serves as our identity card. It is an essential component in fulfilling our mission:

"to foster a more organized, clean, practical, safe, and enjoyable working environment, to encourage the professional enhancement of personnel, innovation, and conduct based on sustainability, commercial transparency, and adherence to rules and regulations aimed at generating value for customers, employees, shareholders, partners, and the community."

Cartografica Galeotti's new Code of Ethics has been drawn up to reaffirm the core principles that guide our approach to business and sustainability, and to share these values with our stakeholders. This document articulates our dedication to harmonizing economic development with the preservation and enhancement of our corporate identity. We are acutely aware of our environmental responsibilities and acknowledge the vital role our products play in tackling the challenges presented by climate change.

Objectives of the Code of Ethics

Certain rules and regulations must be adhered to by all citizens, as they are established by law. However unwritten rules exist that stem from ethics, culture, education, and human and moral awareness. These rules are not mandatory but they embody a conscious involvement. Our Code of Ethics aims at defining these fundamental principles, the lines of conduct, and the responsibilities that Cartografica Galeotti regards, respects, and embraces as essential values for its operations.

Cartografica Galeotti places significant emphasis on the acknowledgement and promotion of fundamental human rights, including personal freedom, equality, dignity, job protection, health, and safety. The company pays attention to the values and principles associated to environmental sustainability and to its responsible development. In this context, the company is dedicated to operating in accordance with the rules and regulations set out by the institutions and the principles decreed in international declarations.

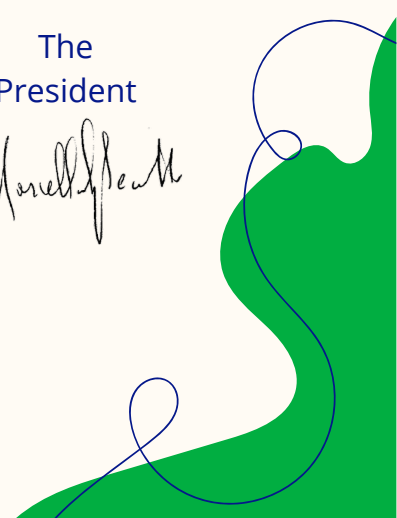
All individuals who engage and collaborate with Cartografica Galeotti are expected to adhere to these principles and standards of conduct. With the term "collaborators," we refer to directors, employees, and, more generally, all individuals who work on behalf of Cartografica Galeotti S.p.A. in any capacity, without distinction or exception, including those acting by virtue of mandates or proxies.

January 31,
2025

The
President



Manelli



I. Framework of the Code of Ethics and scope of application

The Code of Ethics consists of three components:

- Ethical Principles
- Standards of Conduct
- Implementation Guidelines

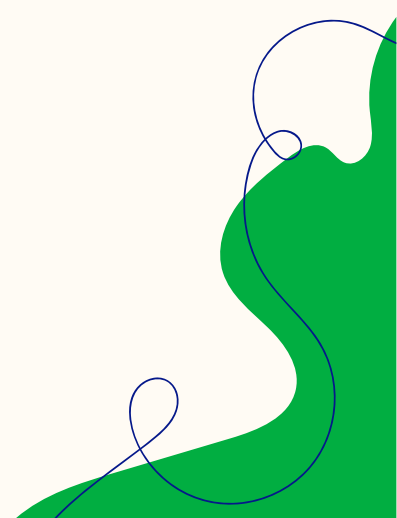
The Code of Ethics is applicable to Cartografica Galeotti S.p.A. and is consequently obligatory for the conduct of all collaborators.

Cartografica Galeotti S.p.A. is dedicated to ensuring that the principles of this Code gives shape to its relationships with all entities (companies, partners, customers, suppliers, external collaborators) with which the Company engages to fulfill its objectives.

II. Cartografica Galeotti's commitment in the diffusion, application and updating of the Code of Ethics

To all those engaged in the implementation of this Code of Ethics, Cartografica Galeotti S.p.A undertakes to:

- ensure its circulation, make it readily available on the company intranet for easy reference, as well as preparing the necessary tools so as to supply explanations concerning the interpretation and execution of the provisions of the Code;
- ensure periodical reassessments and amendments in order to realign it to any changes in the company's status, in social awareness and legislation;
- adopt a suitable sanctioning system to punish eventual violations identified through adequate procedures of report and investigation;
- protect the confidentiality of all the circumstances related to the collection of reports, without prejudice to legal obligations;
- Periodically assess compliance to the Code.



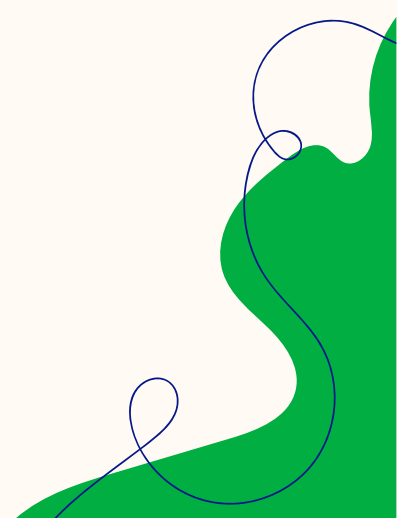
III. Employees' Commitment in compliance of the Code of Ethics

The Code of Ethics encompasses the company's values that constitutes the foundation of labour relations with officers or employees.

Compliance to the Code of Ethics constitutes a right that stems from labour relations.

All employees will therefore strive to comply and ensure compliance of this Code of Ethics within the scope of their roles and responsibilities, in the execution of both their professional and non-professional activities, even beyond the area of activity of Cartografica Galeotti S.p.A., and specifically:

- act and conduct oneself in accordance to the indications laid down in the Code of Ethics;
- Be proactive in ensuring that all collaborators comply to the Code of Ethics by undertaking opportune initiatives, even informative ones, to the hierarchical superior or, in the event of conflict, to the Board of Directors;
- collaborate in establishing and adhering to internal procedures designed to enforce the Code of Ethics;
- Consult your superior for explanations regarding the interpretation and application of the Code of Ethics.



1. Ethical Principles

1.1 in the execution of business and corporate operations

Legality

Collaborators must comply to the laws and regulations of the countries in which they operate, as well as the Code of Ethics and company policies. Under no circumstance should the belief that one is acting in the company's interest justify a conduct that contradicts these regulations.

Integrity

In its interactions with third parties, Cartografica Galeotti S.p.A. is dedicated to conducting itself in a manner that is both ethical and transparent, refraining from the diffusion of misleading information or conduct aimed at taking advantage of the weakness or lack of knowledge of others. In its pursuit of enhancing the company's value and fostering business growth, Cartografica Galeotti S.p.A. is resolute in its commitment to establishing fair commercial relationships with third parties and cultivating long lasting partnerships with customers and suppliers founded in the confirmation of the most favorable conditions put into practice and obtained, as well as ensuring appropriate recognition of the contributions made by its collaborators.

Loyalty

All of the Company's relationships with collaborators and third parties are guided by the principle of loyalty, which consists in the coherence and a sense of responsibility in the conduct, enhancement and safeguard of company assets, and good faith in decisions and actions.

Transparency

Cartografica Galeotti S.p.A. acts and engages with third parties in good faith to supply accurate, transparent, and opportune information according to each specific context.

Respect for dignity and appreciation of diversity

Cartografica Galeotti S.p.A. upholds the rights of individuals, safeguarding their moral and physical integrity while ensuring equal opportunities. Discrimination or harassment based on political and trade union beliefs, religion, race, language, nationality, age, gender, sexual orientation, health status, or any other personal characteristic is strictly prohibited. Varied opinions and diversity serve as valuable sources for reflection and enhancement.

Shareholder Relations and Assessment of Investments

Cartografica Galeotti S.p.A. undertakes essential measures to guarantee that shareholders are actively involved in decisions of their jurisdiction. The company is committed to protecting and enhancing its value.

1.2 The safeguard of labor relations and professional enhancement of employees

Dedication to professional enhancement

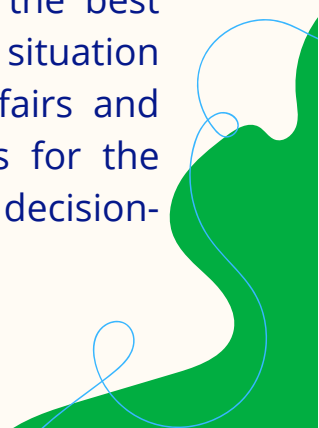
Employees commit to performing their duties to the highest standard of their professional capabilities and to enhancing their skills by taking advantage of the training opportunities provided by the Company.

Confidentiality

Employees commit to treating all information acquired in the course of their work activities as confidential and, consequently, will not disclose it except in accordance with the company's information security policy and only to the extent necessary for the proper execution of their work activities.

Lack of conflict of interest

Employees confirm that every business decision is made in the best interest of the Company, putting every effort into avoiding any situation that may present a conflict of interest between personal affairs and activities conducted in the execution of their responsibilities for the Company, which could compromise the clarity of judgment and decision-making.



1.3 Principles for the safeguarding of individuals

Dignity and Esteem

Ensure that the dignity of every individual is upheld, irrespective of age, gender, ethnic group, religion, sexual orientation, or social status.

Safe and healthy work environment

Cartografica Galeotti S.p.A. is dedicated to preserving a work environment that maintains the psychophysical well-being of its employees, thereby promoting positivity, assertiveness, teamwork, and taking on responsibility.

Equal opportunities

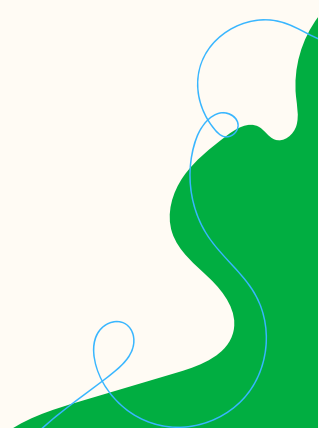
Professional development and the management of employees are the basis of the principles of equal opportunity. The acknowledgement of achievements, dedication, professional potential, and demonstrated skills are the factors taken into consideration for career and pay level advancement.

Protection Against Abuse

Intolerance against any form of abuse, harassment, or physical or psychological violence.

Privacy Policy

Respect and protection of personal and sensitive information of all employees and collaborators.



1.4 Values for the Enhancement of Individuals

Meritocracy

Cartografica Galeotti S.p.A acknowledges and rewards talent, dedication, and accomplishments, fostering both personal and professional development.

Training and Development

Cartografica Galeotti S.p.A. invests in training courses to improve skills and expertise.

Listening and Involvement

Cartografica Galeotti S.p.A is committed to encouraging an open and constructive dialogue, promoting the active involvement and ideas of its collaborators.

Collaboration and Inclusivity

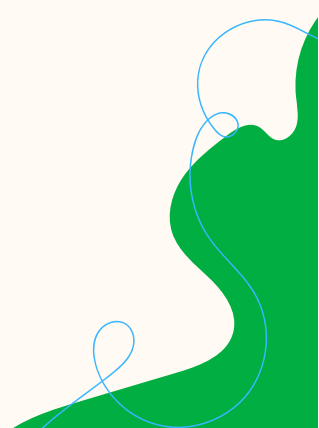
The company supports the development of a work environment based on mutual trust, inclusivity, and teamwork.

Work-Life Balance

Cartografica Galeotti S.p.A. favours policies and initiatives that permit employees to effectively reconcile their professional and personal lives.

Appreciation of Diversity

The company views cultural diversity and perspectives as vital assets for innovation and company success.



1.5 Social and Environmental Responsibility

Environmental sustainability

Cartografica Galeotti S.p.A. promotes initiatives so that the day to day development of its activities occur in respect of the external environment. The company is dedicated to reducing greenhouse gas emissions from its activities by embracing renewable energy sources and enhancing energy efficiency.

Responsibility to the community

Cartografica Galeotti S.p.A. engages with its local community and the broader world, recognizing that its activities, directed towards fulfilling its corporate objectives, can significantly contribute to economic, social, and civil development.

Dedication to local communities

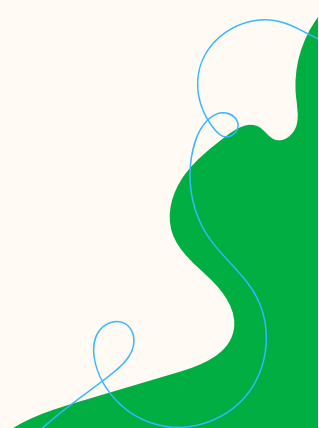
Cartografica Galeotti S.p.A. engages in sustainable development initiatives within its operational regions, fostering environmental education and awareness.

Responsibility in the supply chain

Cartografica Galeotti S.p.A. collaborates with suppliers and partners who uphold environmental values, prioritizing partnerships with companies certified for sustainable practices and striving to minimize the environmental impact of the supply chain.

Supervision and ongoing enhancement

The company is dedicated to continually monitoring the progress towards environmental objectives and reviewing the policies for constant improvements. Cartografica Galeotti invites employees, customers, and partners to give their feedback to guarantee a continual improvement of policies and products.



2. The code of Ethics

2.1 Ethical Considerations in Business and Corporate Management

Cartografica Galeotti S.p.A. requests that its collaborators conduct the Company's affairs in accordance with the principles outlined in the Code of Ethics, irrespective of specific conditions, constraints, and market circumstances.

STAKEHOLDERS

Clients

Cartografica Galeotti seeks to forge enduring partnerships with clients while adhering to competition and market regulations.

Collaborators commit to:

- Provide an efficient service and support throughout all phases, honoring commitments and delivering precise and truthful information.
- Refrain from discrimination or the misuse of authority;
- Operate in compliance with the law, ensuring that customers are informed about the existence of the Code of Ethics.

Suppliers

Cartografica Galeotti chooses suppliers and external collaborators based on quality, innovation, cost, service, continuity, and sustainability. The selection process adheres to objective and transparent criteria, ensuring equal opportunities for those who fulfill the requirements.

Collaborators and suppliers are required to:

- Adhere to internal protocols and the principles of the Code of Ethics.
- Conduct operations with transparency, autonomy, and in respect of the law;
- Be informed regarding the ethical expectations of the Company.

Shareholders

The company operates in accordance with the rights of shareholders, thereby enhancing their investments. It ensures transparency and participation, guaranteeing that shareholders are well-informed and able to exercise their rights knowledgeably. It upholds a governance framework that adheres to current regulations.

Civil servants

Civil servants are understood to be representatives of institutions, public authorities, political parties, associations, or similar organizations, operating at both local and international levels.

Interaction with public officials is limited to authorized corporate executives who must adhere to the principles of loyalty, transparency, and legality.

It is forbidden to:

- Offer or promise financial compensation, goods, or advantages to benefit the Company;
- Provide gifts or benefits except those of modest value and consistent with customary practices;
- Bypass these laws and regulations through sponsorships or assignments for unauthorized purposes

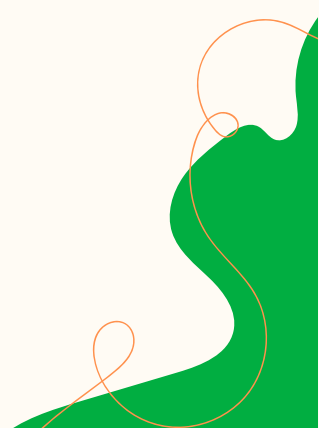
Gifts or benefits exceeding a modest value require authorization from a superior. Institutional collaborations for events, studies, or research are allowed, provided they adhere to legal standards and the ethical codes of all parties involved.

Additional categories

The Company and its employees adhere to the rules and regulations of competition and collaborate with regulatory authorities.

It is strictly prohibited to engage in contacts or agreements with competitors that violate market protection laws—such as those regarding pricing, quantities, or market allocation.

The Company adheres to data protection regulations, guaranteeing that sensitive information is handled legally and securely in all countries where it operates.



Financial Transparency

Cartografica Galeotti provides reliable, transparent, and accurate financial books that faithfully reflect company management and mitigate financial and operational risks. All collaborators play a vital role in the timely and accurate documentation of operations, thereby enhancing both internal and external oversight.

Product Safety

Product safety is a paramount priority for safeguarding users. The Company not only adheres to existing regulations but also regards safety as a core component of the overall quality of its products.

Prevention of money laundering

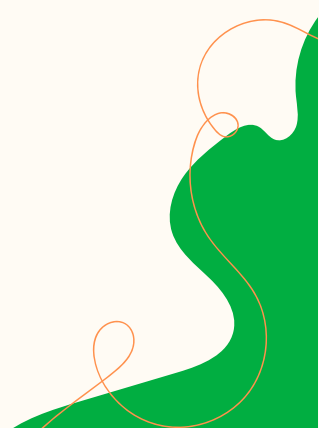
The Company implements measures to prevent involvement in money laundering activities by verifying the identity and reputation of business partners and monitoring operations to ensure compliance with established standards.

Workplace safety

The Company ensures a secure and healthy work environment, fostering a culture of safety, risk awareness, and responsible conduct. It educates and informs its employees, who bear direct responsibility for upholding the quality of labour and mitigating risks. Special emphasis is placed on safety, health, and adherence to company protocols to avert breaches of accident prevention regulations.

Environmental conservation

The Company implements an environmental management system that adheres to national and international regulations, eschewing activities detrimental to the environment and managing waste in a responsible manner. It is dedicated to minimizing the environmental impact of its operations while fostering ecological awareness and sustainable development. Environmental policies are regularly assessed, and documentation is prepared in accordance with the principles of legality and transparency.



2.2 Professional ethics, safeguarding, and enhancement of collaborators

The Company regards loyalty, seriousness, professionalism, and dedication of its collaborators as fundamental components of success. In adherence to international conventions (ILO, Universal Declaration of Human Rights, UN Convention on the Rights of the Child), it is committed in:

- the non use of child or forced labor.
- opposing any form of discrimination.
- Ensuring compliance with the law regarding collective bargaining, working hours, and wages.
- Safeguarding the health and safety of employees.

Recruitment and integration of personnel

Hiring is designed to fulfill business requirements while upholding equal opportunity and merit-based criteria, free from favoritism. All processes adhere to legal standards and collective agreements.

Corruption and unethical conduct

It is prohibited to offer or accept money, gifts, or benefits to gain undue advantages. Acts of commercial courtesy are allowed only if they are of modest value and do not compromise the integrity of the parties or influence decisions. Any instances of pressure or suspicious circumstances must be reported immediately to company management.

Confidentiality

The Company safeguards the security and confidentiality of its information and mandates that collaborators adhere to established procedures to ensure its protection.

Professional Advancement

The Company is committed to enhancing employees' skills through training and meritocratic policies, upholding equal opportunities and facilitating effective internal communication.

Use of corporate assets

Employees are required to safeguard company assets and utilize IT tools solely for professional purposes, adhering to company policies and relevant regulations.

Conflicts of Interest

Employees must refrain from engaging in situations that may compromise the impartiality of company decisions.

Any conflicts must be reported to company management for appropriate resolution.



3. Enforcing regulations

3.1 *The regulations for enforcing the code of ethics*

The Board of Directors of Cartografica Galeotti S.p.A. is responsible for overseeing the implementation and compliance to the Code of Ethics, recommending amendments as needed, including those prompted by received reports. Every employee is obliged to comply with the Code by reporting any infractions to their immediate superior or to the Board of Directors. The Company ensures the confidentiality of reports, except as mandated by law.

3.2 *Breach of the Code of Ethics and Sanctioning Framework*

Employees

A violation of the Code of Ethics by employees represents a breach of contract and results in disciplinary sanctions, which are applied proportionally to the severity of the infraction, in accordance with current regulations, the CCNL, and the Company Supplementary Contract. The responsibility for verifying and enforcing sanctions lies with the designated company managers.

Executives and administrators

Violations of the Code of Ethics by managers or directors will be evaluated by the Company, which will implement appropriate actions in accordance with the law and the CCNL. The Board of Directors will enforce the necessary legal measures in the case of directors.

External consultants

The actions of external collaborators, consultants, or third parties that violate the Code of Ethics may result, in severe cases, in the termination of the contract and claim for damages, irrespective of the contract's termination.

3.3 Formation and Communication

The Board of Directors will promote programmes of communication and internal training initiatives to diffuse and enhance awareness of the Code of Ethics, and its implementation assigned to the competent corporate managers.

