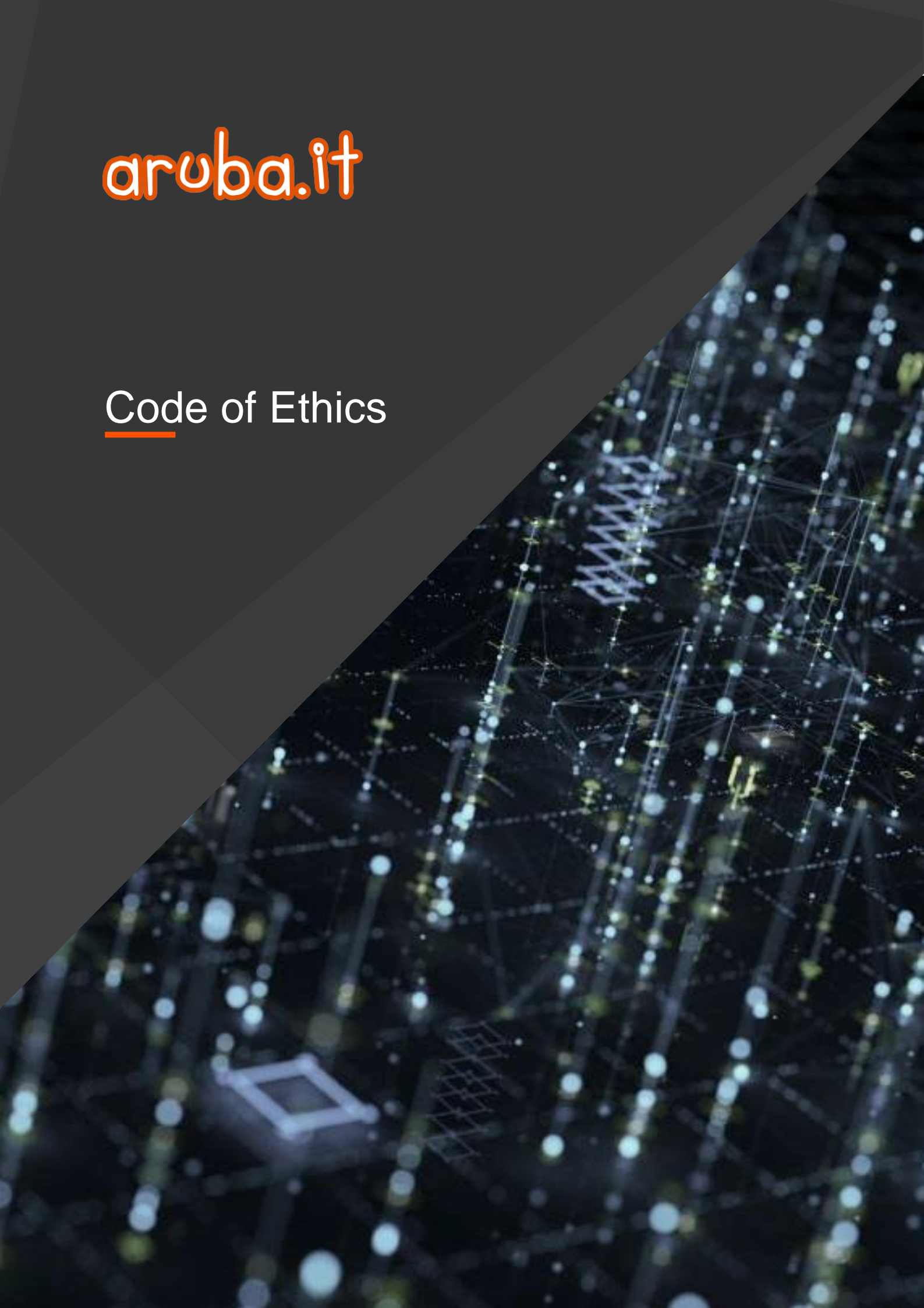


aruba.it

Code of Ethics



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## 1 WHEREAS

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This Code of Ethics and Conduct (hereinafter also "Code") sets forth the values and defines the principles of conduct that inspire the activities of Aruba.

The adoption of the Code constitutes a significant step for the structuring of Aruba's organisational model as it brings the pursuit of economic and business objectives into alignment with respect for ethical principles and the prevention of unacceptable behaviour. Respect for company values and their practical application contribute to the enrichment of the company's assets strengthen Aruba's image.

The provisions of the Code are part of Aruba's Internal Regulatory System and are complemented by internal regulatory documents and corporate certifications (<https://www.aruba.it/certificazioni.aspx>), which ensure their implementation, both internally and externally, presenting the rules for the correct performance of company activities.

## 2 RECIPIENTS

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The Code is addressed to shareholders, members of the management bodies, statutory auditors, all employees and external contractors as well as third parties, including suppliers and business partners (collectively the "Recipients").

All Recipients are required to familiarize themselves with the Code of Ethics and to contribute to its implementation, both in internal relations and in relations with third parties, and to its improvement and dissemination.

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## 3 COMPANY VALUES

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Aruba identifies and promotes the following values, which form the basis of commitments undertaken and the guiding principles of conduct:

### 3.1 Lawfulness, Integrity, Fairness and Transparency

Aruba recognises lawfulness as a founding principle for the conduct of any activity and therefore undertakes to respect and enforce - internally and in its relations with the outside world - current legislation, all company principles, procedures and protocols, as well as the general ethical principles commonly accepted and enshrined in national and international standards in the conduct and management of business activities.

In pursuit of its economic and business objectives, Aruba establishes relationships based on honesty, transparency and fairness, both in relations with the Public Administration and with competitors.

Aruba promotes and adopts systems to ensure the traceability of its activities and to guarantee transparency, both towards internal and external stakeholders, and combats bribery in all its forms - direct and indirect, active and passive - including through the adoption of a Bribery Prevention System compliant with ISO-37001.

### 3.2 Inclusivity and Protection of the Individual

Aruba values diversity as a fundamental resource for the company and ensures that everyone has equal opportunities to express their potential.

Selection, recruitment, evaluation and professional growth are based on merit and are not influenced by external factors (e.g. ethnicity, creed, sexual orientation, gender, political orientation, etc.).

Aruba protects the psychophysical integrity of workers by promoting active training and an appropriate work-life balance; Aruba counteracts any form of discrimination against its employees and contractors by respecting diversity and promoting inclusion.

### 3.3 Skills and Professionalism

Aruba is aware of its active role in fostering the digital transition and gears its activity towards customer satisfaction and the provision of quality services by defining suitable service standards and therefore provides adequate training to all staff. Aruba recognises that interdisciplinarity and awareness of business processes are a resource and promotes cross-cutting training pathways.

Aruba is committed to the constant improvement of the services it offers to customers and business processes, including through continuous improvement mechanisms, including constant improvement of the levels of physical and logical security of infrastructures and systems and their resilience, in accordance with the law and regulatory provisions.

### 3.4 Privacy and Confidentiality

Aruba protects the information and data acquired in the performance of company activities, and adopts suitable measures and protection in accordance with the current legal and regulatory provisions of the relevant sector authorities.

Aruba prohibits the disclosure to unauthorised parties of confidential information and its use for purposes unrelated to the business activities for which it was acquired.

### 3.5 Sustainability

Aruba also plans its activities so as to guarantee the environmental and economic sustainability of its business.

Aruba is particularly committed to protecting the environment and defining and adopting business models compatible with a rational use of resources. Aruba also promotes innovation, recognising its value for business success, and contributes to and participates in innovative projects that promote the efficiency of available resources.

Sustainability principles are integrated into decision-making processes and business strategies, promoting transparent, ethical behaviour. All activities are carried out in compliance with ESG (environmental, social and governance) criteria and in compliance with current regulations and international best practice.

## 4 GENERAL RULES OF CONDUCT

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### 4.1 Employee Relations

All phases of personnel management are carried out with professionalism, transparency and impartiality.

The search for and selection of personnel comply with the principles of non-discrimination, professionalism, transparency, impartiality, autonomy and independence of judgment, such as to ensure that the final decision is taken by the most suitable individuals, thus guaranteeing equal access to employment opportunities.

Aruba ensures that its employees receive training and refresher training, including training on the applications and software made available to them for the performance of their work through internal meetings and participation in external courses.

## 4.2 Relations with Third Parties

All phases of the management of relations with third parties are carried out with professionalism, transparency and impartiality, ensuring the traceability of the relationships and the information exchanged, with adequate documentary evidence maintained in accordance with the applicable company policies and procedures.

In particular, relations with the Public Administration and with the sector Supervisory Authorities are based on respect for the duties of good faith cooperation, in accordance with the legislative and regulatory commitments in force.

All relations with the Public Administration and Public Bodies comply with the law and with Company Policies and Procedures, exclusively by the duly authorized persons.

In relations with the Public Administration in particular:

- no opportunities that may directly or indirectly benefit employees of the Public Administration in a personal capacity are analysed or proposed;
- no gifts are offered or provided, including company promotions reserved for employees only or through, for example, the payment of travel expenses;
- no confidential information that could compromise the integrity or reputation of either party is provided or solicited.

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## 4.3 Combating Bribery

Aruba has implemented an Anti-Bribery Management System in accordance with the requirements of ISO 37001 in order to combat active and passive corruption in all its direct and indirect forms, involving public officials/officers or private entities.

To this end, any form of facilitation payment and/or unlawful payment in cash or other benefits for the purpose of gaining an advantage in relations with other parties (advantage may also be construed as facilitation, or guarantee of the performance of services however due), is prohibited. It is also forbidden to exert unlawful pressure, whether directly or indirectly, on political representatives, both in Italy and abroad.

Aruba's suppliers declare in the pre-contractual phase that all the legal representatives, the holders of proxies or powers of attorney and/or shareholders as well as the personnel with decision-making powers with respect to the deliverables in question:

- have not received any final criminal convictions for bribery offences in the last 5 years;
- are not subject to ANAC (Italian National Anti-Corruption Authority) sanctioning measures relating to the prevention of bribery, transparency and public contracts of a pecuniary and/or disqualifying nature, which have become unappealable or confirmed by a final judgment in the last 2 years;
- are not aware of being subject to criminal proceedings for bribery offences;

- have no 3rd-degree ties of kinship or affinity with Public Officials or public administration officials<sup>1</sup> who hold positions of responsibility in the sector affected by the service in question and who may influence the performance of the same;
- have no direct or indirect ties (including kinship or affinity relationships within the 3rd degree, economic and/or financial relationships) with Aruba personnel that might affect the performance of activities related to the deliverables.

All personnel and relevant third parties are required to report any situation that may constitute or lead to a Conflict of Interest between their business, personal and family activities and their duties at Aruba such as to influence (or fail to ensure) their ability to make decisions and manage a business activity or interest objectively, transparently and impartially.

#### 4.4 Management of Internal Administrative Activities

All phases of accounting management are carried out with professionalism, transparency and fairness in order to guarantee the traceability of transactions and the retention of the related documentary evidence.

Accounting records and related supporting documentation are also available to external parties responsible for the verification and review of financial reporting in accordance with the principles of impartiality and collaboration.

#### 4.5 Management, Development and Use of IT Systems

In providing ICT services, including Data Center services, Aruba is aware of the need to plan, implement, develop and manage efficient and secure IT infrastructures and systems, in full compliance with current legislation and capable of withstanding external threats in an extremely dynamic context.

To this end, Aruba undertakes not only to comply with current technical standards and the best current Guidelines – as required by the applicable Company Policies and Procedures – but also to develop its research and innovation activities in accordance with the ethical principles specified in this Code.

#### 4.6 Data protection

It is necessary to ensure the correct management of personal data in full compliance with current legislation, recognised best practice and the guidelines provided by the competent Authorities, in accordance with the principle of accountability. In the processing of personal data, the principles of lawfulness, transparency, fairness, purpose limitation, minimisation, accuracy, integrity and confidentiality are applied, in accordance with the provisions of the applicable Company Policies and Procedures.

Organisational and technical measures for data protection are adopted, which are aimed at promoting the training of personnel, constantly monitoring the data protection system and using only Suppliers and subcontractors who comply with applicable regulations.

#### 4.7 Environmental Protection

Aruba is committed to implementing energy efficiency solutions within its Data Centers, and has adopted a green-by-design approach for their implementation. In addition, Aruba participates in European-level projects and initiatives - such as the Climate Neutral Data Center Pact and the European Green Digital Coalition - aimed at monitoring environmental impact and activating processes for its minimization, thus demonstrating its commitment to long-term sustainability.

#### 4.8 Occupational Health and Safety Protection

Protecting the health and safety of its employees and reducing and preventing accidents are fundamental aspects of Aruba's ethical commitment.

Aruba is committed to protecting and promoting the psychophysical integrity of its employees and all those who work in the workplaces for which it is responsible, scrupulously adopting the provisions of current legislation on safety and health at work and periodically analysing its business processes to identify and eliminate or control risk situations.

## 5 COMPLIANCE WITH THE CODE OF ETHICS, PENALTIES AND WHISTLEBLOWING

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Each Recipient of the Code is required to observe it.

Violation of the principles set out in the Code compromises the relationship of trust between Aruba and its executives and employees, consultants, contractors in various capacities, customers, suppliers, business and financial partners.

Violations of the Code of Ethics are subject to the requirements provided for both in the disciplinary and penalties system, to which reference is made in full, and in the applicable contractual conditions.

Each Recipient is required to report violations of this Code and in general any illegal conduct of which he/she becomes aware, due to and specifically for the employment relationship with Aruba and/or the functions performed, using the reporting channel made available by Aruba at: <https://www.aruba.it/whistleblowing>.

Aruba guarantees that whistleblowers will not suffer any retaliation, discrimination or disciplinary action.

## 6 FINAL PROVISIONS

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This Code is approved by the Board of Directors of Aruba. Any changes and/or additions will be approved by the Board and promptly disseminated to the Recipients.

Aruba ensures the dissemination of this Code to all Recipients.

## 7 EXTERNAL REGULATIONS

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- [1] **Art. 318, 319, 319 ter, 319 quater, 320, 322, 322 bis, 346 bis** - Italian Criminal Code and related laws;
- [2] **Art. 2635** - Italian Civil Code and related laws;
- [3] **Italian Law 190/2012**: "Provisions for preventing and combating bribery and unlawfulness in Public Administration";
- [4] **Italian Legislative Decree 231/2001** - "Administrative liability of companies and entities";
- [5] **Italian Legislative Decree No. 165 of 30 March 2001** - "Provisions for the preventing and combating bribery and unlawfulness in Public Administration";
- [6] **Organisation for Economic Co-operation and Development** - "OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions" (1997);
- [7] **Council of Europe** "Criminal Law Convention on Corruption" "Civil Law Convention on Corruption" (1999);
- [8] **United Nations** - "UN Global compact" (2000) United Nations "UN Convention Against Corruption" (UNCAC) (2003);

- [9] **Organisation for Economic Co-operation and Development** - "OECD Guidelines for Multinational Enterprises (2011)";
- [10] **ISO/DIS 37001** - Anti-bribery management systems;
- [11] **ISO 37002** - Whistleblowing management systems;
- [12] **UK Bribery Act** - 2010;
- [13] **UNI EN ISO 9000** - "Quality management systems – Fundamentals and vocabulary";
- [14] **UNI EN ISO 9001** - "Quality Management Systems - Requirements";
- [15] **UNI EN ISO 31000** - "Risk management – Guidelines";
- [16] **National collective labour agreements applied;**
- [17] **Confindustria** – "Guidelines for the construction of Organisation, Management and Control Models pursuant to Italian Legislative Decree 8 JUNE 2001, No. 231";
- [18] **Confindustria** – "New" whistleblowing" regulation - Operational Guide for Private Entities.

## 8 VERSION HISTORY

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<b>VERSION</b> 1.0  OF 21/01/2025	<b>NATURE OF CHANGES: first draft</b>
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