



**ISAB S.r.l.**

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**ISAB SRL**

**Code of Ethics and Business Conduct**

## **Premise**

This Code represents our firm commitment to doing business with the highest standards of integrity, ethics and accountability. It serves as a guide for all employees, partners and stakeholders, outlining the principles and behaviours we support in our pursuit of excellence. By adhering to this Code, we promote a culture of trust, transparency and respect, ensuring that our actions are consistently in line with our core values. As an integral part of our organization, each individual has a crucial role to play in upholding these principles and contributing to our collective success.

Together, we embrace the spirit of this Code and build a stronger and more ethical future for ISAB and GOI Energy LTD.

## **1. ABOUT THIS CODE OF CONDUCT AND ETHICS**

1.1 The purpose of ISAB's Code of Ethics and Business Conduct is to establish a clear framework that guides our conduct, decisions and interactions in all aspects of our business. This code reflects our commitment to ethical behaviour, integrity and a responsible business community. It provides a set of principles and guidelines that not only ensure compliance with legal requirements, but also encourage a culture of trust, transparency and accountability. By adhering to this Code, we protect the interests of our stakeholders, maintain our reputation and foster an environment that fosters fairness, respect and professionalism. Ultimately, the purpose of this Code is to provide a solid foundation for our operations,

## **2. TO WHOM THIS CODE APPLIES**

2.1 This Code of Ethics and Business Conduct applies to all individuals and entities associated with our organisation, including, but not limited to, employees, contractors, consultants, agents and directors. Regardless of position or role, every person is expected to adhere to the principles and standards outlined in this code. This Code extends its reach beyond the confines of our physical locations, encompassing interactions that occur in the workplace, during business travel, or even in virtual environments.

## **3. PERSONS RESPONSIBLE FOR THE IMPLEMENTATION OF THE CODE**

3.1 The Board of Directors has primary and day-to-day responsibility for implementing this Code, monitoring its use and effectiveness, dealing with any doubts submitted to it regarding its application and verifying the internal control systems and procedures, to ensure that they are effective in managing ethics and conduct on behalf of ISAB.

3.2 Management at all levels is responsible for ensuring that those reporting to it understand and comply with this Code and receive adequate and regular training on it and the matters covered by it.

## **4. WORK ENVIRONMENT**

### **4.1 Diversity, equity and inclusion**

At ISAB, we recognize that embracing diversity, promoting equity and fostering inclusion are not just moral imperatives, but essential elements of a thriving and successful organization. We strongly believe that a diverse and inclusive workforce nurtures innovation, improves decision making, and enables you to better understand and serve our diverse customer base. Therefore, our Code of Ethics and Business Conduct unequivocally affirms our commitment to create a work environment that values and respects individuals regardless of their race, ethnicity, gender, age, sexual orientation, disability, or any other characteristic protected by law.

By incorporating the principles of diversity, equity and inclusion into our Code of Ethics and Business Conduct, we foster a culture where differences are celebrated and people feel valued for their unique perspectives and contributions. We encourage open dialogue, active listening and understanding, recognizing that diversity of thought and experience nurtures creativity and drives innovation. Through our collective commitment to diversity, equity and inclusion, we aim to create a workplace where all individuals can thrive and fulfil their potential, enabling us to be more successful as an organisation.

### **4.2 Discrimination, harassment and bullying**

At ISAB, we are committed to maintaining a work environment free from discrimination, harassment and bullying. Our Code of Ethics and Business Conduct unequivocally prohibits any form of discrimination or harassment based on race, colour, religion, gender, sexual orientation, age, disability or membership of any other protected category. We believe that every individual has the right to be treated with dignity, respect and fairness and we expect all members of our organization to respect these principles.

Discrimination in any form, direct or indirect, undermines the principles of equality and fairness that are close to our hearts. We do not tolerate actions, comments or behaviour that demean or marginalize individuals based on their personal characteristics or background. In fact, discriminatory practices not only harm the people directly affected but also erode the fabric of our organization, hindering collaboration, creativity and productivity.

To ensure a workplace free from discrimination, harassment and bullying, we encourage open communication, active listening and prompt reporting of any violations of this Code of Ethics and Business Conduct. We have established clear reporting mechanisms and procedures to our Supervisory Body that protect the confidentiality of the whistleblower and commit us to conduct thorough investigations of all complaints. Retaliation against individuals who report discrimination, harassment or bullying is strictly prohibited and will be treated as a serious violation of this Code.

### **4.3 Health and well-being**

At ISAB, we prioritize the health and well-being of our employees as an integral part of our commitment to responsible and ethical business practices. Our Code of Ethics and Business Conduct recognizes that a supportive and healthy work environment not only benefits individuals, but also contributes to our collective success as an organisation.

We are committed to providing a workplace that promotes physical, mental and emotional well-being. This includes keeping our employees safe, promoting a culture of work-life balance, and offering programs and resources that support their overall health. We believe that when people feel valued, supported and cared for, they can give their best work and contribute to the success of our organisation.

We are committed to complying with all applicable health and safety regulations, maintaining a risk-free work environment and providing adequate training and resources to protect the health and safety of our employees. We actively promote preventive measures to ensure compliance with ergonomic principles, carry out regular health checks and undertake welfare initiatives, to improve the general well-being of our workforce.

Recognizing the importance of mental health, we strive to create a tolerant environment that supports open dialogue, awareness and access to mental health support resources. We understand that mental health is an essential aspect of overall well-being and are committed to fostering an inclusive culture that prioritizes the emotional and psychological well-being of our employees.

ISAB, again in order to increase the personal well-being and work-life balance of employees as well as to improve the company climate, evaluates any requests to join smart working.

This way of working is based on the company-employee relationship of trust and the latter is required to maintain the same standards of productivity and responsibility in carrying out his/her activities.

#### **4.4 Violence in the workplace**

At ISAB, we are committed to maintaining a safe and secure working environment for all employees, visitors and stakeholders. Our Code of Ethics and Business Conduct unequivocally prohibits any form of workplace violence. We believe that every individual has the right to work in an environment free from threats, intimidation, harassment or acts of aggression.

We define workplace violence as any conduct, physical, verbal or psychological, that is likely to cause harm, create fear or compromise the safety and well-being of people within our organization. This includes, but is not limited to acts of physical aggression, threats, bullying, harassment or any other form of aggressive behaviour.

We are committed to preventing workplace violence through proactive measures, risk assessment and the implementation of comprehensive safety protocols. We encourage all employees to promptly report any incidents or concerns about workplace violence without fear of retaliation.

In the event that an episode of workplace violence occurs, we are committed to conducting thorough investigations, adopting appropriate disciplinary measures, in accordance with the provisions of the National Collective Labour Agreement, and providing the necessary support and resources to those affected. We prioritize the safety and well-being of our employees and take all necessary steps to prevent and address workplace violence.

## **4.5 Drugs and alcohol**

At ISAB, we are committed to maintaining a safe, healthy and productive work environment for all employees. Our Code of Ethics and Business Conduct strictly prohibits the illegal possession, use, sale or distribution of drugs and the abuse of alcohol in the workplace. We recognize that the abuse of these substances not only poses serious health and safety risks, but also compromises our ability to perform at our best and deliver outstanding results.

We expect all employees to be fit for service, free from the influence of drugs and alcohol during working hours. This includes arriving at work in a condition which enables them to carry out their responsibilities effectively and to ensure that their actions do not jeopardize the safety and well-being of themselves or others.

We are committed to complying with all applicable drug and alcohol laws and regulations in the workplace

Employees are expected to promptly report any cases of drug or alcohol abuse they become aware of in the workplace. Confidentiality will be maintained to the extent permitted by law and no employee will be retaliated for reporting such concerns.

By addressing drugs and alcohol in our Code of Ethics and Business Conduct, we reinforce our commitment to creating a safe, healthy and productive work environment for all. We strive to foster a culture in which employees are supported to make responsible choices about substance use and are encouraged to seek help when needed. Together, we can maintain high standards of professionalism, safety and well-being, ensuring ISAB remains a place where people can thrive and reach their fullest potential.

## **5. BUSINESS PRACTICES**

### **5.1 Conflicts of Interest**

At ISAB, we are dedicated to upholding the highest standards of integrity, transparency and ethical behaviour. Our Code of Ethics and Business Conduct outlines our commitment to avoid conflicts of interest that may arise and compromise our objectivity, fairness and the best interests of our organization and stakeholders.

A conflict of interest arises when one party's personal interests, relationships or activities interfere or appear to interfere with the ability to act in the best interests of ISAB. We recognize that such conflicts can undermine trust, damage our reputation and hinder our ability to be impartial in decisions. All employees are expected to disclose any actual or potential conflict promptly and in accordance with company policies and procedures.

This includes disclosing any personal, financial or professional relationships that could influence or create the perception of bias in business transactions, decision-making or any other aspect of our operations.

By addressing conflicts of interest in our Code of Ethics and Business Conduct, we emphasize the importance of transparency, accountability and those responsible for managing potential conflicts. We are committed to ensuring that conflicts of interest are appropriately managed.

## 5.2 Competition

At ISAB, we believe in fair and open competition as the cornerstone of a healthy market. Our Code of Ethics and Business Conduct underscores our commitment to conducting business in a manner that promotes fair competition, complies with applicable laws and regulations, and upholds the highest ethical standards.

We are committed to always competing fairly, based on the merits of our services and business practices.

We do not engage in anti-competitive behaviour, including collusion, market manipulation or any other action that distorts the free and fair functioning of the market. We recognize that healthy competition fosters innovation, customer choice and overall marketplace efficiency, benefiting both our organization and the wider business community.

In our pursuit of excellence, we respect the intellectual property rights of others and refrain from any infringement or unauthorized use of third-party protected information. We do not engage in unfair trading practices, false advertising, or any action that undermines the integrity of the competitive landscape.

We encourage our employees to stay informed about competition laws and regulations and provide training and guidance to ensure their understanding and compliance. Any concerns or potential violations relating to competition must be promptly reported through established channels, also to the Supervisory Body where a violation and/or significant criticality is found pursuant to Legislative Decree 231/01, allowing for in-depth investigations and appropriate actions.

## 5.3 Corruption

At ISAB, we are dedicated to upholding the highest standards of ethics, transparency and integrity in all aspects of our business. Our Code of Ethics and Business Conduct unequivocally prohibits corruption and any other crime against the Public Administration in any form. We recognize that corruption erodes trust, distorts justice, competition and undermines the values we stand for.

We define bribery - relevant under this Code - as the offer, giving, receiving or soliciting any benefit, even of a non-economic nature, with the intention of improperly influencing company decisions or obtaining an unjust interest or advantage.

On the other hand, the category of conduct that can constitute an offense against the Public Administration includes a wider range of unethical practices, including embezzlement, fraud, and so-called "nepotism" practices.

We strictly comply with all applicable anti-corruption laws in each jurisdiction in which we operate. We do not tolerate any form of corruption, whether it involves public officials, private entities or individuals within our organization. This includes refraining from giving or accepting inappropriate gifts, payments, favours or other incentives that could compromise our integrity or affect business transactions.

We maintain robust internal controls, policies and procedures to prevent and detect corruption. These measures include due diligence in our business dealings, financial reporting, auditing processes and regular training to educate employees about the risks and consequences of engaging in corrupt practices.

We expect all employees, contractors and business partners to abide by our zero-tolerance approach to bribery. We encourage individuals to report any suspicions, concerns or potential violations through established reporting channels ensuring that such reports are handled confidentially and without fear of retaliation.

Every employee has the obligation to report to the competent departments any attempts at extortion by public officials in the exercise of their duties.

By addressing bribery and corruption in our Code of Ethics and Business Conduct, we demonstrate our commitment to conducting business with integrity, fairness and responsibility. We strive to foster a culture where ethical behaviour is championed and individuals are empowered to make principled decisions in every business interaction.

#### **5.4 Gifts and Hospitality**

At ISAB, we recognize that gifts and hospitality play an important role in business relationships and professional interactions. However, we are committed to conducting our business with the utmost integrity, transparency and fairness. Our Code of Ethics and Business Conduct provides clear guidelines and expectations around the giving and receiving of gifts and hospitality to ensure they do not compromise our objectivity or create conflicts of interest.

We encourage employees to exercise discretion and common sense when giving or accepting gifts and hospitality. Gifts or hospitality should never be given or received with the intention of improperly influencing business decisions or obtaining an unfair interest or advantage. They should always align with applicable laws, regulations and industry standards.

In business dealings, we prohibit the acceptance of gifts and hospitality of a value in excess of relevant Company practices and regulations, which could create the perception of impropriety or compromise our independence. Likewise, we discourage employees from providing gifts or hospitality in excess of reasonable and customary business practices.

Transparency is essential to maintain ethical conduct in this regard. Employees are expected to document and disclose any gifts or hospitality given or received, in accordance with our established policies and procedures. This ensures that any potential conflicts of interest can be identified, assessed and addressed appropriately.

#### **5.5 Anti-Money Laundering**

At ISAB, we are committed to preventing and combating Money Laundering, a serious global concern that undermines the integrity of financial systems and contributes to illegal activities. Our Code of Ethics and Business Conduct establishes a strong position against money laundering, underlining our dedication to maintaining the highest standards of ethics, transparency and legal compliance.

Money laundering involves the process of concealing the origins of illicitly obtained funds, making them appear legitimate. We understand that money laundering can facilitate criminal activities such as fraud, bribery, human trafficking and terrorist financing.

We comply with all applicable laws, regulations and anti-money laundering rules and practices. We maintain robust internal controls, policies and procedures to detect, prevent and report any suspicious activity that could be indicative of money laundering. We also provide ongoing training and education to our employees, ensuring their awareness and understanding of the risks associated with money laundering and the importance of their role in its prevention.

Any suspicions or concerns regarding potential money laundering must be promptly reported through our designated reporting channels. We maintain confidentiality and protect whistleblowers in accordance with

the law. Through these reporting mechanisms, we ensure that appropriate investigations can be conducted, and necessary actions taken to address any identified cases of money laundering.

## **5.6 Trade Sanctions and Import/Export Controls**

We recognize that trade sanctions and import/export controls are crucial tools employed by governments to promote national security, foreign policy objectives and global stability. It is our responsibility to understand, comply with and enforce these measures, ensuring that our actions and transactions do not contravene trade restrictions and do not engage ISAB in unauthorized dealings with limited entities or jurisdictions.

To support our efforts, we have established robust internal controls, policies and procedures to prevent and detect any violations related to trade sanctions and import/export controls. We conduct thorough due diligence on our business partners to ensure their compliance with these measures. We also maintain ongoing risk monitoring and assessment processes to promptly identify and address any potential risks associated with trade restrictions.

We encourage employees to report any concerns or potential violations related to trade sanctions and import/export controls through the reporting channels. We treat all reports confidentially and no retaliatory action will be taken against people who make reports in good faith.

## **5.7 Slavery, human trafficking and child labour**

At ISAB, we unequivocally condemn slavery, human trafficking and child labour in all its forms. Our Code of Business Conduct and Ethics underscores our zero-tolerance approach to slavery, human trafficking and child labour.

We conduct thorough due diligence on our business partners to make sure they share our commitment to human rights and ethical working practices. We engage in risk assessments, audits and inspections to monitor and evaluate our supply chain, with the aim of identifying and addressing any red flags or vulnerabilities.

We maintain open channels of communication with our employees and stakeholders, and promote a culture of transparency and accountability. We encourage the reporting of any concerns or concerns through our designated reporting channels, ensuring confidentiality and protection from retaliation.

By explicitly addressing slavery, human trafficking and child labour in our Code of Ethics and Business Conduct, we demonstrate our commitment to ethical business, practices and social responsibility. We strive to create a working environment where human rights are respected, working conditions are fair and individuals are not subjected to exploitation or forced labour.

## **5.8 Environmental Operational Compliance**

At ISAB, we are committed to protecting and preserving the environment in which we operate. We recognize the importance of responsible stewardship of the environment and the role it plays in sustainable business practices. Our Code of Ethics and Business Conduct highlights our dedication to achieving and maintaining compliance with all applicable laws, regulations and environmental standards. We ensure that our operations best align with environmental best practices by conducting periodic environmental assessments and implementing mitigation measures to address potential risks and impacts. Our employees are trained in



environmental awareness and are encouraged to identify improvement and innovation opportunities that promote environmental sustainability.

We actively seek to incorporate environmentally conscious practices into our business operations, such as energy efficiency, waste reduction and responsible water stewardship. We promote recycling and the use of renewable resources wherever possible. We also encourage the adoption of sustainable practices by our business partners by fostering a culture of environmental responsibility throughout our supply chain.

In the event of an environmental incident or non-compliance, we take immediate action to correct the situation, mitigate the impact and prevent recurrence. We work closely with relevant authorities, local communities and stakeholders to ensure transparency, open communication and accountability in our environmental stewardship efforts.

## **5.9 Sustainability**

At ISAB, we are committed to integrating sustainability into every aspect of our business. We recognize that our long-term success is closely linked to the well-being of the planet, the communities we serve and the responsible use of natural resources. Our Code of Ethics and Business Conduct reflects our dedication to sustainable practices and our commitment to creating a positive impact on the environment, society and the economy.

We embrace the principles of sustainability, which include environmental stewardship, social responsibility and economic profitability. We strive to minimize our environmental impact by adopting sustainable technologies, reducing greenhouse gas emissions, conserving resources and managing waste responsibly. Our goal is to contribute to the conservation of biodiversity, the mitigation of climate change and the protection of ecosystems.

Through regular training, education and communication, we ensure that employees are aware of our sustainability commitments and the importance of their individual contributions. We encourage their active participation and involvement in sustainable practices and recognize and celebrate their efforts to promote sustainability within the company.

## **6. ASSETS AND COMPANY INFORMATION**

### **6.1 Intellectual Property**

At ISAB, we recognize that our intellectual property is a valuable asset, driving our innovation, competitiveness and overall success. Our Code of Ethics and Business Conduct underlines our commitment to protect and respect the intellectual property of our organization.

We define intellectual property as any creative and original work or invention, including, but not limited to, patents, trademarks, copyrights, trade secrets, software, designs, etc. We understand the significance of safeguarding our intellectual property rights to maintain our competitiveness and preserve the value of our innovations.

All employees are expected to respect and comply with intellectual property laws and regulations, both domestically and internationally. This includes understanding the importance of confidentiality and proper handling of proprietary information and trade secrets. Employees are required to protect and maintain the

confidentiality of our intellectual property in accordance with current regulations and National Labour Agreements.

We promote and protect our intellectual property from any unauthorized use, disclosure or infringement. These measures include the secure storage of confidential information, controlled access to intellectual property assets, the implementation of technical and organizational security measures, and the signing by our employees of "Commitments of Loyalty, Secrecy and Confidentiality". We are committed to respecting the intellectual property rights of others. We diligently conduct extensive research to ensure that our businesses operate free from infringements of the intellectual property rights of others. We promptly address any allegations of infringement and take appropriate actions to resolve such matters.

We believe in open and fair competition, which includes respecting the intellectual property rights of our competitors and industry partners. We do not engage in the unauthorized use, reproduction or misappropriation of the intellectual property of others.

By addressing the company's intellectual property in our Code of Ethics and Business Conduct, we demonstrate our commitment to responsible business practices, legal compliance, and respect for intellectual property rights. We strive to protect our intellectual property assets, foster an environment that values innovation and creativity, and maintain the trust of our stakeholders.

## **6.2 Confidential Information**

At ISAB, we recognize that confidential information is a critical asset that must be protected to maintain our competitive advantage, safeguard the interests of our stakeholders, and comply with applicable regulatory obligations. Our Code of Ethics and Business Conduct underscores our commitment to treat confidential information with the utmost care and underscores the responsibility of all employees to maintain confidentiality.

Confidential information refers to any non-public information that is disclosed or created by employees during their employment. This includes, but is not limited to, trade secrets, business plans, financial data, customer information, research and development projects, marketing strategies and proprietary technology.

All employees are required to handle confidential information with the utmost professionalism and discretion. This includes maintaining strict confidentiality, both during and after their employment with ISAB. ISAB employees are prohibited from disclosing, misusing or exploiting confidential information for personal gain or for the benefit of others.

When employees leave ISAB, they are required to return all confidential information and property entrusted to them during their employment and, in any case, to respect the duty of confidentiality and the prohibition of disclosure and/or use of the same. We maintain strict employee exit procedures to ensure the proper transfer of confidential information and to protect against any unauthorized retention or disclosure.

We respect the confidential information of third parties, including our partner business. We comply with contractual obligations regarding the use and protection of their confidential information and maintain a high standard of ethical behaviour in all interactions involving such information.

### **6.3 Data Protection**

At ISAB, we recognize the importance of personal data protection in compliance with applicable privacy laws and regulations (ref. EU Regulation of 27 April n. 2016/679 or GDPR and subsequent adaptation Decree n. 101 of 2018). Our Code of Ethics and Business Conduct underlines our commitment to safeguard the confidentiality and security of data entrusted to us by our customers, employees, business partners and other interested parties.

We define personal and sensitive data as any information that can be used to directly or indirectly identify an individual, such as names, addresses, contact details, financial information, medical records and any other data protected by privacy laws.

We adhere to data protection principles, including data minimization, purpose limitation, and ensuring the accuracy and integrity of the data we collect and process.

We collect and use personal/sensitive data only for legitimate purposes and with the appropriate legal basis.

We maintain robust technical, organizational and administrative measures to protect data from unauthorized access, loss, misuse, disclosure, alteration or destruction. We implement strict access controls, encryption, secure storage, and regular monitoring and testing of our information systems to ensure the confidentiality, integrity and availability of data.

We conduct privacy impact assessments to identify and mitigate potential data privacy risks, and we regularly review and update our data protection policies, procedures and practices to align with evolving legal requirements and industry standards.

Employees are trained on their responsibilities in handling personnel and sensitive data and are required to adhere to strict data protection protocols.

We limit access to personal data to authorized individuals who have a legitimate business need to access that information. Employees are obliged to promptly report any suspected violation or incident involving personal data through the appropriate communication channels set up by ISAB for this purpose.

We respect the rights of individuals regarding their personal data, including the right to access, rectify and delete their information as permitted by applicable laws. We provide clear channels for individuals to exercise their data protection rights and promptly respond to their requests in accordance with legal requirements.

We respect restrictions on cross-border data transfers and ensure that adequate safeguards are in place when transferring personal data to countries that may have different data protection laws. By addressing data protection in our Code of Ethics and Business Conduct, we demonstrate our commitment to defending privacy rights, maintaining the trust of our stakeholders, and meeting our legal and ethical obligations. We strive to be transparent in our data practices, give individuals control over their personal data, and continually improve our data protection measures.

### **6.4 Use of information and communication systems**

At ISAB, we recognize that our information and communications systems are vital assets that enable us to operate efficiently, communicate effectively and achieve our business goals. Our Code of Ethics and Business Conduct emphasizes the responsible and ethical use of these systems to protect Company assets, maintain data security, and ensure a productive work environment.

Employees are required to use the information and communication systems provided by ISAB in accordance with company policies and applicable laws. This includes, but is not limited to, computer systems, email, Internet access, software applications and other electronic resources.

We maintain a strong commitment to data security and privacy. Employees must exercise caution when accessing, handling and transmitting sensitive information through information and communication systems. They are expected to use appropriate security measures, such as strong passwords, encryption and secure connections, to protect Company data from unauthorized access, disclosure or loss.

Employees are prohibited from engaging in any activity that could compromise the integrity, availability or security of company information and communication systems. This includes, but is not limited to, unauthorized access, use of unauthorized software or hardware, introduction of malware or viruses, and any activity that may violate intellectual property rights or other applicable laws. We expect employees to use information and communication systems responsibly and in a manner that respects the rights and privacy of others. Employees must refrain from engaging in activities that could be offensive, discriminatory or harassing, including the transmission or dissemination of inappropriate content,

Employees also need to be aware of their use of company resources, including bandwidth, storage space and processing time. Non-work related activities that negatively impact productivity or consume excessive corporate resources should be avoided.

By addressing the use of information and communication systems in our Code of Ethics and Business Conduct, we demonstrate our commitment to promoting a safe, productive and respectful work environment. We strive to ensure that employees have the tools and resources they need to perform their duties effectively while protecting the integrity and security of our systems and data.

## **6.5 Use of Devices**

At ISAB, we understand that the use of devices, such as business laptops, smartphones, tablets and other portable electronic devices, play a crucial role in supporting our work, improving productivity and facilitating communication. Our Code of Ethics and Business Conduct outlines the responsible and ethical use of these devices to ensure the security of Company information, maintain a productive work environment, and protect the interests of our stakeholders.

Employees are expected to use company-provided devices and personal devices used for work purposes in accordance with company policies, applicable laws, and best practices. This includes adhering to device security guidelines, installing necessary software updates and security patches, and using appropriate security measures, such as passwords or biometric authentication, to protect access to devices.

Employees are expected to use company devices in a way that does not interfere with job responsibilities or compromise the security and integrity of company systems and data. Non-business related activities that negatively affect productivity or expose the company to potential risks should be avoided.

Employees are responsible for safeguarding Company devices from loss, theft or unauthorized use. Devices must not be left unattended in public places and necessary precautions must be taken to prevent unauthorized access to corporate data in the event of loss or theft. Employees must report any lost or stolen devices immediately to the appropriate authorities and IT department.

Employees must refrain from installing unauthorized software or applications on company devices, as well as downloading or accessing inappropriate, offensive or illegal content. This includes adhering to copyright and intellectual property laws when downloading or sharing digital content.

Employees should be aware of their device usage during meetings, customer interactions or other professional settings to ensure there is no interference with effective communication, productivity or respect for privacy. We have the right to monitor company devices, including electronic communications and device usage, to ensure compliance with company policies, legal obligations and to protect company assets. Such monitoring will be conducted in accordance with applicable laws and will respect the privacy rights of employees to the extent permitted by law.

By addressing the use of devices in our Code of Ethics and Business Conduct, we demonstrate our commitment to promoting responsible, safe and ethical use of devices within our organization. We aim to provide employees with the necessary tools and guidelines to use devices effectively and responsibly while protecting company information and assets.

## **6.6 Management of registration and archiving of company documents**

At ISAB, we recognize the critical importance of managing effective records to keep information accurate, reliable and accessible. Our Code of Business Conduct and Ethics underscores our commitment to accountable business record keeping and record keeping practices, ensuring compliance with laws, regulations and operational requirements, as well as preserving the integrity of our activities and operations.

Business record keeping and storage includes all forms of recorded information, regardless of format or medium, including physical documents, electronic files, emails, databases, and any other information that provides evidence of business, decisions, transactions, or other relevant issues.

Employees are responsible for creating, managing and retaining company data and records in accordance with established policies, procedures and legal requirements. This includes ensuring the accuracy, completeness and integrity of records throughout their lifecycle, from creation to disposal.

Employees must follow proper filing, archiving, and retention practices. This includes labeling business data and documents appropriately, organizing them logically, and storing them in secure, controlled environments to prevent loss, damage, unauthorized access, or disclosure.

Confidential and sensitive documents must be treated with the utmost care and in compliance with applicable privacy and data protection laws. Employees must comply with established protocols for the secure handling and storage of sensitive documents, including encryption, access controls, and limited disclosure to authorized individuals.

Company data and documents must be retained for the designated retention period, as determined by legal, regulatory, contractual, and business requirements. At the end of their retention period, corporate data and documents must be disposed of in a secure and appropriate manner, ensuring the protection of confidential information and compliance with applicable laws on privacy and data destruction.

Employees are expected to report any known or suspected Company records and data handling violations, including the unauthorized alteration, destruction or removal of records and/or archives. They should also report any concerns about the accuracy, integrity or accessibility of company data and records to the appropriate authorities or personnel responsible for managing them. By upholding the principles outlined in our Code of Ethics and Business Conduct, we contribute to the efficient and effective functioning of our organization, protect sensitive information, mitigate risks and demonstrate our commitment to transparency, integrity and compliance with applicable laws and regulations.

## **6.7 Contract Authorization**

At ISAB, we recognize that contract authorization is a critical process that ensures the integrity of our business relationships and mitigates the risks associated with contractual commitments. Our Code of Business Conduct and Ethics emphasizes the importance of proper contractual authorization and procedures to safeguard the company's interests and promote ethical business practices.

Employees must exercise diligence in verifying the accuracy and completeness of the contractual terms, including prices, results, payment terms, intellectual property rights, confidentiality provisions and any other relevant contractual provisions. Any deviations from standard contractual terms or exceptions to established policies must be documented and subject to proper review and approval.

Adequate registration practices of the authorization process must be maintained for the entire duration of the contract. This includes the documentation of all communications, approvals and changes related to the contract. Contracts and related documentation must be organised, kept securely and easily accessible for future reference or review purposes.

To avoid conflicts of interest, the employees involved in the contractual authorization must disclose to their hierarchical superior, as well as to the Supervisory Body in the event of significant critical issues pursuant to Legislative Decree 231/01, any personal or financial interest that could influence their decision-making process.

Such disclosures should be promptly reviewed and addressed by appropriate individuals or committees to ensure transparency, fairness, and compliance with applicable conflict of interest policies.

## **6.8 Social media**

At ISAB, we understand the growing influence and impact of social media on our business operations, reputation and stakeholder relationships. Our Code of Ethics and Business Conduct places emphasis on responsible and ethical use of social media platforms to protect the company's interests, promote positive engagement and maintain the highest standards of professionalism.

Employees who engage in social media activity, whether on behalf of the company or in a personal capacity, are encouraged to uphold the values and standards set forth in our Code of Business Conduct and Ethics.

We reserve the right to take appropriate actions in response to social media activity that violates company policies or applicable laws, consistent with applicable laws and respecting employees' right to privacy.

## **6.9 Competitive Information**

At ISAB, we recognize the importance of fair competition and the responsible handling of competitive information. Our Code of Ethics and Business Conduct emphasizes the ethical and legal handling of competitive information to ensure a level playing field, maintain the integrity of our business operations, and comply with applicable laws and regulations.

Competitive information refers to any data, knowledge or insights about competitors, their products, services, strategies, pricing, customers or other information that could provide a competitive advantage. This information may be obtained through legitimate means such as public sources, publications or authorized channels.

Employees are expected to handle competitive information with the utmost care, confidentiality and integrity.

By addressing competitive information in our Code of Ethics and Business Conduct, we demonstrate our commitment to fair competition, integrity and compliance with applicable laws and regulations. We strive to promote a culture of ethical conduct, in which employees are aware of their responsibilities in handling competitive information and respect the principles of fair competition.

## **7. COMMUNITY INVOLVEMENT AND SOCIAL RESPONSIBILITY**

### **7.1 Charitable Activities and Politics**

**Charitable Activities:** At ISAB, we believe in creating a positive impact on the communities in which we operate. We encourage and support charitable initiatives that align with our values and contribute to social welfare. Our employees are encouraged to engage in charitable giving, volunteering and community service, both individually and as part of Company-sponsored initiatives.

**Political Activity:** We recognize that individuals within our organization may have personal political beliefs and affiliations. However, as a company, we maintain a strict position of political neutrality. We do not engage in any form of direct or indirect support, including financial contributions or endorsements, to political parties, candidates or political campaigns. Our goal is to maintain our independence, integrity and avoid any form of undue influence. We respect the rights of our employees to engage in political activities outside of work, as long as such activities do not conflict with their job responsibilities or the Company's interests.

**Transparency and Compliance:** Our financial reporting and governance processes are designed to ensure accuracy and accountability in relation to any financial support provided to charitable organizations or other entities engaged in public affairs. We require our employees to adhere to these policies and to promptly report any potential conflicts of interest or violations.

**Conflict of Interest:** We recognize that engaging in political or charitable activity may present potential conflicts of interest. Employees must disclose any such conflicts that may arise from their involvement in political campaigns or charitable organizations, particularly if there is a potential impact on their impartiality, decision-making or the Company's reputation.

By incorporating these provisions into our Code of Ethics and Business Conduct, we seek to promote a culture of responsible citizenship and integrity. We believe that our charitable efforts and our political neutrality contribute to a sustainable and inclusive society by safeguarding the interests and reputation of our Company and stakeholders.

### **7.2 Volunteering**

At ISAB, we value your participation in volunteer activities and encourage our employees to actively engage in such activities. We recognize that volunteering not only benefits the communities in which we operate, but also contributes to the personal and professional growth of our employees.

We support and facilitate volunteer opportunities, both individually and through organized corporate initiatives, to address social issues, promote sustainability, and improve the well-being of those in need. We believe that by leveraging our collective skills, resources and passion, we can create meaningful change and inspire others to do the same.

When volunteering, we expect our employees to act in accordance with our Code of Ethics and Business Conduct, maintaining high standards of professionalism, respect and ethical behavior. We require employees to disclose any concerns or potential conflicts of interest that may arise during their volunteering. We are committed to ensuring compliance with applicable laws, regulations and guidelines governing volunteer activities and strive to mitigate the risks associated with such engagements.

### **7.3 Environmental action and sustainability**

At ISAB, we recognize the urgent need to address environmental challenges and embrace sustainable practices in all aspects of our operations. We are committed to reducing our ecological footprint, conserving nature and contributing to a more sustainable future. We seek to integrate environmental considerations into our decision-making processes, products and services and to encourage our employees to participate actively in our environmental initiatives. We are committed to complying with all applicable environmental laws, regulations and standards. We strive to go beyond compliance and actively seek ways to successfully exceed regulatory requirements. We monitor and evaluate changes in environmental legislation and adapt accordingly

We encourage our employees to adopt environmentally responsible behaviours both in the workplace and in their personal lives.

## **8. YOUR RESPONSIBILITIES**

8.1 You must ensure that you read, understand and comply with this Code.

8.2 You must also:

- Notify your manager/supervisor and/or the Supervisory Body as soon as possible if you believe or you suspect that a violation of this Code has occurred, or may occur in the future.
- Cooperate with any investigation that ISAB undertakes.
- Seek help or advice from your manager/supervisor and/or the Supervisory Body if you have questions about any aspect of the Code.
- Understand and comply with specific laws and regulations that apply to you specific role.
- Complete any mandatory training offered to you on the contents of this Code.

## **9. CONSEQUENCES OF FAILURE TO PERFORM**

9.1 Failure to comply with:

- This code;



- Applicable laws, rules or regulations;
- Any other policies of ISAB, GOI Energy Ltd or personnel policies and regulations;

involves the initiation of disciplinary measures in compliance with the CCNL, up to and including the dismissal and/or the establishment of judicial proceedings to protect the Company

## 10. REVIEW PROCESS

10.1 This Code will be revised as necessary following:

- Any legislative changes that may impact it.
- Any changes to any other associated internal policies, processes or procedures.
- Serious violations or other relevant critical issues relating to the issues dealt with in this Code, subject to careful assessment by the Top Management Body.