



CODE OF ETHICS

R•PIERRE DIGITAL SPA

R•PIERRE DIGITAL SPA

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Certificazioni

Qualità ISO 9001:2015
Ambiente ISO 14001:2015
Salute e Sicurezza ISO 45001:2018
Sicurezza informazioni ISO 27001:2022
Parità di genere - UNI PdR 125:2022

Rating di Legalità ★★+

Codice LEI - 815600780D40E5225428
DUNS Number - 447010299

ESG Assessment

Ecovadis - Medaglia Oro
Synesgy - Score A Ottimo
Open-es - Score sostenibilità 98/100

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INTRODUCTION

Founded in 1994, R.Pierre Digital SpA (*R.Pierre* or *the Company* in this document) is a company attentive to innovation and offers professional solutions with high technological content. Over the years it has become a **point of reference** for the market of Telecommunications, ICT and security companies and for the b2b market, more generally, thanks to the creation of tailor-made solutions and projects, in which the use of the most advanced technology is essential. To date, R.Pierre operates in the circular economy with end-to-end projects and eco-sustainable activities for the management of the life cycle of products and the regeneration of electronic equipment and devices. On the strength of experiences and collaborations with international partners, R.Pierre consolidates its activity year after year also in the video surveillance, security and Artificial Intelligence sector by developing and distributing solutions for the collection, management and intelligent analysis of data and images.

An ambitious mission that of R. Pierre who, investing for years in research and development, has made the company, just outside Milan, a **pioneer of GREEN IT and of the digital transition**. Today R. Pierre, in his fields of action, is one of the main players involved in spreading a business culture based on economic, social and environmental sustainability.

R.Pierre has an Integrated Management certified: Information Security ISO 27001:2022 - Quality ISO 9001: 2015 - Environment ISO 14001: 2015 - Safety at work ISO 45001: 2018 – Gender equality UNI PdR 125:2022.

This Code of Ethics, adopted by the Board of Directors of R. Pierre, represents the expression of the overall vision that the Company has of its entrepreneurial activity and the related social function.

With this document, R.Pierre intends to spread the values of correctness, loyalty, integrity and transparency, respect for people and the environment. Values and principles that are not abstract words or concepts, but guide and direct conduct and influence the daily experience of all those involved with R. Pierre.

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1. ADDRESSEES AND SCOPE OF APPLICATION

The relationships that R. Pierre establishes in carrying out his business are essential for the well-being and success of the company. It is therefore essential that these relationships are supported by the founding values of R. Pierre and that all recipients understand them and make them their own.

The Code contains the rules of conduct that must always be respected in the context of the activities carried out for R. Pierre and constitutes the guideline in relations with colleagues, customers, suppliers, other companies or associations and towards public entities and institutional, as well as the communication bodies.

Recipients of R.Pierre's Code of Ethics are, by way of example and not limited to, its Director, Statutory Auditors, Employees, collaborators, Consultants and all Professionals who work for R.Pierre. Each recipient of the Code of Ethics is required to know it and to comply with its provisions, is responsible for it, for the part that belongs to him, contributing to the dissemination and compliance with it for the entire period of relationship with R. Pierre.

Compliance with company rules and procedures, as well as with the contents of this Code is an essential part of the contractual obligations of employees pursuant to and for the purposes of the relevant articles of the Civil Code.

In consideration of this importance, R.Pierre undertakes to promote and disseminate its knowledge, as well as to ensure that the provisions contained therein are respected by virtue of current regulations, employment contracts, internal procedures, intervening, if necessary, with the corrective actions deemed most appropriate.

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2. MISSION, VISION AND REFERENCE PRINCIPLES

R.Pierre works to create value and to improve the quality of life through the use of the most advanced technology with a **strong propensity for Twin Transition which it promotes (GREEN + DIGITAL)**

R.Pierre works every day to ensure continuity and growth to its own reality, for collaborators and shareholders, to interpret and satisfy the needs of customers, while safeguarding the solidity, transparency and professionalism of the company. R.Pierre is continuously guided by and to its own CSR (Corporate Social Responsibility, in English CSR Corporate Social Responsibility) with three main purposes: economic competitiveness; social cohesion and inclusiveness; environmental protection. Corporate strategies and consequent operational conduct are oriented towards this, inspired by **trust, creativity, innovation and efficiency** in the use of resources.

The subjects who act to pursue the company's objectives operate in compliance with inspiring principles.

SOLIDITY: be sure of the method, safe, solid and reliable, a firm POINT for your interlocutors

ATTENTION and PASSION: only with an attentive approach to reality it is possible to be respectful and incisive in the context in which one acts. Only with the passion for the work of every moment is it possible to build and collaborate for oneself and for all, with the renewed and proud belonging to the Italian country in which we operate.

INNOVATION and CREATIVITY: intelligently use valuable technology to open horizons always aimed at innovation with solid anchoring to the goodness of the past!

TRUST, LOYALTY and TRANSPARENCY: build relationships that are always respectful and unambiguous, formulate clear services and offers, well focused on what is being done.

GENDER EQUALITY: promoting equal opportunities and valuing merit, ensuring conditions of equity, respect, and inclusion in every area of the organization. Gender equality represents a fundamental principle for sustainable and responsible growth, capable of strengthening the quality of work, the well-being of people, and the solidity of professional relationships.

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The Management assumes responsibility for the effectiveness of its "management system", making all the necessary resources available and making sure that the planned objectives are compatible with the context and strategic guidelines. Particular attention is paid to:

- **Approach for processes and purposes of common benefit:** Organize and plan company processes so that the objectives to be pursued are univocal and the related responsibilities and adequate resources are established. "Beyond" the lucrative purpose R.Pierre sets up the activities and resolutely pursues "also" purposes of benefit for the community, operating in a responsible, sustainable and transparent way towards all stakeholders.
- **Evaluation of risks and opportunities:** Promote at all levels an adequate sense of proactivity in the assessment and management of one's own risks
- **Involvement of staff and interested parties:** Promote the development of internal professional skills and an adequate selection of external collaborations, involving staff and all interested parties.
- **Compliance with mandatory regulations and laws:** Operate in compliance with safety, the environment and current regulations
- **Improvement:** Implement constant monitoring of performance improvement.
- **Respect and inclusiveness:** Adopt practices that guarantee the total absence of any form of discrimination, slavery and human trafficking in your supply chain or in any other part of your business, in compliance with article 54 of the Modern Slavery Act 2015. For this R.Pierre supports a system of internal values and numerous policies, procedures and tools in order to ensure that the company's activities are conducted in a legal, ethical and transparent manner.

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2.1 Corporate Social Responsibility CSR

When the reflection on ethics shifts from individual action to a broader organizational and business environment, the concept of individual responsibility and awareness is inevitably linked to that of CSR (Corporate Social Responsibility)

Responsibility towards the person and towards the community. R.Pierre wants to be a safe and inclusive context in which people can proudly express their uniqueness. In R. Pierre we are sure that in the encounter of diversity a new value is born and develops because we believe that diversity is the engine of evolution, of improvement.

R.Pierre operates taking into account the needs of the communities in which it carries out its activity and contributes to their economic, social and civil development.

R.Pierre conceives CSR as a commitment to society and the environment. The practical declination of these values is based on the concepts of responsibility and ethics in full compliance with company procedures and relations with each interlocutor of the company itself, regardless of the place where it operates.

The aim is to contribute to the development of a more just and equitable society, in which everyone's work is aware of the common good and of the value of the environment that it collaborates to respect and protect.

Promotion of sustainable development. R.Pierre believes that environmental protection is a fundamental value of the community, and is convinced of the compatibility between "business development" and "respect for the environment". The Company undertakes to operate in compliance with current regulations, applying the best technologies available, to promote and plan the growth of its activities aimed at enhancing natural resources, preserving the environment for future generations, and promoting initiatives for shared environmental protection.

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For R.Pierre speaking of sustainability means starting from

Profit (**Profit**), the lifeblood of every company, obtainable only with the active and proactive involvement of

People (**People**), without any form of discrimination and with the essential respect for the uniqueness of each one paying attention and respect to the equal gender opportunities.

Planet (**Planet**), starting from the place where we work every day and with a look at wider horizons.

In other words, R.Pierre's action is aimed at pursuing its business according to an "ethical" way of doing things, that is, respecting and protecting both living beings and the value of intangible things, data and information, as the aim of own action and not solely as a means to achieve profit.

For this reason, R. Pierre, in every project and business decision, intends to be an advocate of acceleration towards achieving the objectives of the UN Agenda 2030 (Sustainable Development Goals).

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3. RULES OF CONDUCT

The above represents the criteria and principles that must be systematically and scrupulously applied in every company area and with reference to all the activities and initiatives undertaken.

A series of relevant situations are listed below - without any claim to be exhaustive - in which the principles set out above must be rigorously applied.

3.1 Compliance with laws and regulations in force

R.Pierre is committed to ensuring that any activity carried out in the name and on behalf of the company is carried out in compliance with the laws and regulations in force. Legal liability, compliance with the law and fairness in business relations are essential conditions (a precondition) for the real existence of the Company and the network to which it belongs. Therefore, unlawful behaviors or behaviors that may integrate offenses included in the Legislative Decree 231 of 8 June 2001, and its subsequent amendments and additions, will not be tolerated in any way.

Recipients are required to comply with the laws and in general with the regulations in force in the countries in which they operate, as well as with internal company regulations. R.Pierre also aims to reconcile the search for competitiveness on the market with compliance with competition regulations and to promote, with a view to sustainability, social responsibility and environmental protection, the correct and functional use of resources in compliance with the objectives dictated by a Sustainable Strategic Innovation.

3.2 Human resources

Human Capital represents a strategic resource for R.Pierre, thanks to which it is able to develop and guarantee products and services and create value. R.Pierre bases its choices for personnel selection on pre-established procedures and protocols directly assessed by the Personnel Department. Upon establishment and for the entire duration of the employment relationship, the Personnel receives clear information on the regulatory and remuneration aspects and receives all the information necessary to adequately carry out their duties, also in relation to workplace safety and workers' health.

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The collaboration of motivated and highly professional people is a strategic factor and for this reason the Company **promotes the professional growth of employees and collaborators**. R.Pierre's human resources management and development system is based on continuous improvement, promoting the updating and training of employees and collaborators through specific training courses and the sharing of technical and commercial knowledge within the company. R.Pierre intends to guarantee working conditions that favor the establishment of relationships between colleagues inspired by the principles of respect for the person and the particular needs of each one, inclusiveness, correctness, loyalty and collaboration, guaranteeing a real system of equal opportunities for all actors involved.

Confidential information concerning collaborators is treated in compliance with applicable laws on the subject and with methods suitable for ensuring maximum transparency to those directly involved and inaccessibility to third parties, except for justified and exclusive business reasons.

All the collaborators of the company undertake to carry out their business with transparency, diligence, professionalism and customer orientation, in compliance with the corporate values of the Code of Ethics. To this end, the Employees and collaborators undertake to formally communicate to the Management any assignment in favor of third parties, existing or offered by companies or individuals, in order to allow the assessment of potential conflicts of interest.

Each Company Function Manager must, with his own behavior, represent an example for his direct collaborators and work to ensure that they understand that compliance with the rules included in the Code of Ethics is an essential part of the quality of work performance.

R.Pierre considers **internal communication** and the exchange of information and experiences as essential for the effective functioning of the company. For this reason, each employee and collaborator has internal communication as their primary responsibility as part of the proper management of interpersonal relationships with the whole team and with partners

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3.3 Gender Equality and Zero Tolerance for Abuse and Harassment

For the promotion of gender equality, R.Pierre has set the following objectives:

- Ensure equal access and career growth for both male and female employees within the company
- Guarantee gender pay equity to reinforce the application of the principle of equal pay for equal work between men and women
- Promote a work environment that rewards meritocracy regardless of gender
- Promote a work environment that supports and ensures work-life balance
- Support parents in their maternity/paternity experience

To achieve the objectives listed above, R.Pierre is committed to:

- Strengthening work-life balance tools
- Reinforcing governance and monitoring of diversity and gender equality within the company
- Encouraging the dissemination of gender equality culture at all levels through awareness activities, training, and by setting an example from those in managerial positions
- Promoting language that fosters dialogue and the elimination of non-inclusive expressions or behaviors

In particular, within the gender equality management system, **the prevention of any form of harassment and violence in the workplace plays a crucial role**. R.Pierre is committed to ensuring a safe, respectful, and inclusive work environment for all employees and stakeholders, based on the values of mutual respect, individual dignity, and the appreciation of diversity.

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The **zero tolerance policy** is founded on the objective of promoting well-being and safety in every work context, firmly rejecting any form of discrimination, violence, or harassment.

Any incident of discrimination, harassment, or mobbing must be reported through the designated channel and will be managed by the Steering Committee. To this end, R.Pierre has made available a locked mailbox located in the building's lobby. Reports, including anonymous ones, must be placed in a sealed envelope and deposited in the mailbox. Every report will be handled confidentially by the Steering Committee in accordance with the principle of Zero Tolerance.

3.4 Relations with Customers

The customer and the satisfaction of his needs are a primary objective for R. Pierre: the achievement of this goal must be pursued in full compliance with the established rules of conduct. Relationships with customers must be based on loyalty, legality and transparency, as well as characterized by courtesy and professionalism, and this both to consolidate the relationship of trust with customers, and to promote the image and reputation of R. Pierre at the public.

R.Pierre acts guaranteeing professionalism and quality of work, ensuring continuous improvement, also thanks to the constant updating of collaborators and professionals used by the Company in order to offer satisfactory answers to the customer and encourage informed choices. To this end, the Company undertakes to favor the correct and full understanding of the characteristics of the services offered. In order to verify the degree of customer satisfaction, which represents a fundamental asset, R. Pierre carries out, through internal functions, monitoring activities with a view to making customers an integral part of the value chain and of its ethical supply chain. In addition, the Company always guarantees the legality of the proposed solutions in the execution of the services and maximum confidentiality of information learned during the development of projects.

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3.5 Suppliers - Service Providers

Any form of discrimination against customers is prohibited.

Any complaints received are handled quickly and correctly and represent the starting point for organizational and procedural improvements.

The procurement of services is carried out on the basis of projects, as well as on the basis of the ability of the Suppliers to guarantee effective ongoing assistance. The selection of suppliers is based on principles of legality, fairness and transparency and on objective and impartial criteria in terms of quality, innovation, cost, value-added services.

R.Pierre undertakes to favor commercial relations with suppliers having a Code of Ethics that is consistent and compatible with that of the Company.

All supplies, including service contracts and consultancy engagements, are duly and proactively formalized and documented in a dedicated electronic archive, in compliance with the provisions of Legislative Decree No. 196 of 30 June 2003 and EU Regulation No. 2016/679 (GDPR), as well as with the requirements set out by ISO 27001 certification.

3.6 Relations with Shareholders, Auditors and Statutory Auditors

The relationships of the directors of the company, with the Shareholders and the Statutory Auditors are inspired by maximum collaboration, correctness and transparency.

To this end, it is absolutely forbidden to provide false or misleading statements to Shareholders and Statutory Auditors.

The Employees and Directors of the Company undertake to provide the data necessary to ensure correct and adequate information to the persons indicated.

3.7 Relations with the Public Administration and the Supervisory Authority

The relations of R.Pierre with the representatives of public and supervisory institutions are based on criteria of transparency and professionalism, in a spirit of maximum collaboration.

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The Company condemns all corruption and undertakes to adopt all the most appropriate measures to prevent and avoid the commission of the crimes against the Public Administration referred to in the D. Lgs. N. 231/2001.

Recipients are not allowed to offer money or gifts to managers, officers or employees of the Public Administration and Public Institutions, or to their relatives, except in the case of gifts or utilities of modest value.

Negotiation and bargaining with the Public Administration is reserved exclusively for resources authorized for this purpose, in compliance with the most rigorous observance of the applicable laws and regulations, with abstention from any form of pressure - explicit or not - aimed at obtaining undue advantages. and this also in order not to compromise the integrity and reputation of R.Pierre

In particular, in consideration of the nature of relations with public entities and in order to guarantee the conditions for respecting the above principles, R. Pierre promotes lawful and correct relationships within the framework of maximum transparency and rejects any form of promise or offer of payments or goods to promote or favor any interest or benefit

All documentation relating to business relationships with the Public Administration is stored and appropriately archived in accordance with the law.

The keeping of company accounts is based on criteria of correctness, transparency and completeness.

Only truthful entries must be made in the accounting records, corresponding to the real nature of the transactions entered. All company functions are required to provide the utmost cooperation so that the management facts are correctly and promptly represented in the company accounts..

For each accounting entry that reflects a corporate transaction, adequate supporting documentation must be kept. This documentation must make it possible to identify the reason for the operation that generated the survey and the related authorization.

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3.8 Administrative and Accounting Management



3.9 Gifts, presents and benefits

Gifts of modest value are allowed as long as they comply with company procedures which provide for adequate forms of authorization by the relevant functions. In any case, these expenses must be documented.

The gifts must in no way be considered as aimed at acquiring advantages in an improper way. For their part, the Employees and all the subjects who work to pursue the interests of the Company must not accept gifts or services of any kind from subjects with whom they have relationships connected with their work, if these exceed the limits established by customs or if they are in any case contrary to the legislation currently in force. To this end, each employee or collaborator undertakes not to accept or return the gifts received.

Anyone who becomes aware of any form of violation of this precept must promptly inform the Management.

The above cannot be circumvented by resorting to the intermediation of third parties.

3.10 Communication to the outside

Relations with the means of communication are reserved for the company functions in charge of this.

Without prior authorization from the Board of Directors, Employees and collaborators must refrain from issuing statements or interviews to the media concerning the Company's activities or its corporate organization.

Similarly, all employees and collaborators of R.Pierre undertake not to contact formally or informally, directly or indirectly, competing companies or persons connected to them or to issue statements regarding the Company's activities and undertake to inform the Management.

All R.Pierre employees and collaborators undertake not to disclose any corporate information to third parties, to manage all information received as part of their business on behalf of the Company according to its procedures and within the specific dedicated protocols. They also undertake to use the means of communication made available to the company exclusively for service reasons and in compliance with applicable laws.

R.PIERRE DIGITAL SPA

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www.rpierre.it

Cap.Soc. €200.000 int.vers.
CF/P.IVA/Reg. Imp. MI 11127100151
R.E.A. MI 1438077
RAEE IT08020000001310

Certificazioni

Qualità ISO 9001:2015
Ambiente ISO 14001:2015
Salute e Sicurezza ISO 45001:2018
Sicurezza informazioni ISO 27001:2022
Parità di genere - UNI PdR 125:2022

Rating di Legalità ★★+

Codice LEI - 815600780D40E5225428
DUNS Number - 447010299

ESG Assessment

Ecovadis - Medaglia Oro
Synesgy - Score A Ottimo
Open-es – Score sostenibilità 98/100



3.11. Health and Safety and Environmental Protection

R.Pierre considers the safety and physical and moral integrity of all those who work to achieve the company's strategic objectives a fundamental value. To this end, it undertakes to promote compliance with current regulations and compliance with company provisions on safety and hygiene at work, guaranteeing scrupulous compliance with the principle of effectiveness in the adoption of prevention and protection measures and striving to improve, according to the best available technologies, the conditions of the workplace. All the subjects who work in R.Pierre are responsible, each according to their own skills and for the related area of activity, in guaranteeing the safety of the workplace and the health of workers, respecting the law and the prescriptions given, avoiding to engage in conduct that is risky for themselves or others or by promptly reporting a risk situation.

All measures taken and actions undertaken must be assessed and implemented in compliance with the following criteria:

- avoiding risks and assessing risks that cannot be avoided, favoring suitable solutions to combat risks at source;
- adapt the work of man, in particular with regard to the conception of workplaces and the choice of work equipment and methods of work and production;
- take into account the degree of evolution of the technique;
- replace what is dangerous with what is not dangerous or less dangerous;
- planning prevention, also in relation to activities that are carried out externally by third parties, verifying the effective implementation of the principles of coordination and cooperation between the various parties involved;
- give adequate instructions to workers;
- counteract the spread of viruses during pandemic events, also by means of suitable organizational working methods (smart working).

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3.12. Confidentiality and protection of corporate assets

The Company recognizes the **protection of the environment** as a primary value in the operation of the company starting from the management of daily activities up to strategic choices. The investment and business choices are therefore informed about the respect of the environment and the legislation placed for its protection

Confidentiality is considered a fundamental value for R.Pierre.

The Directors, Employees, Consultants and Professionals and all those who work to achieve the objectives of the Company may not disclose or abuse confidential or privileged information acquired in the performance of their duties.

Confidential corporate information is managed according to specific procedures, which guarantee its disclosure only to interested parties and for exclusively corporate purposes.

Those who work on behalf of R. Pierre are responsible for the protection and conservation of company assets in any capacity entrusted for the purpose of carrying out their work or professional assignment.

R.Pierre requires the commitment of all Recipients for the protection of corporate trademarks, whether registered or not, which represent an invaluable asset for the Company and for business continuity, as well as for all other intellectual property rights.

As part of fair competition, R.Pierre respects the intellectual property rights of third parties; therefore it is forbidden for the Recipients to commit violations of these rights (trademarks, designs and models, patents, copyrights) or acts of unfair competition.

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3.13. Sanctions

The violation of the principles established in the Code of Ethics and in the company procedures compromises the relationship of trust between R.Pierre and whoever commits the violation (administrators, company staff, customers, suppliers). The violations, once ascertained, will be promptly prosecuted, through the adoption, compatibly with the provisions of the current regulatory framework, of adequate and proportionate disciplinary measures, regardless of the possible criminal relevance of such behavior and the establishment of criminal proceedings in cases where they constitute a crime.

Disciplinary measures for violations of this Code are adopted by the Company in line with current laws and the relevant national employment contracts. These measures may also include the removal from the Company of those responsible for such illicit conduct. R.Pierre, to protect its image and safeguard its resources, will not entertain relationships of any kind with subjects who do not intend to operate in strict compliance with current legislation, and/or who refuse to behave according to the values and principles set out in the Code of Ethics.

END OF THE CODE OF ETHICS

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