Giunti Psychometrics

CODE OF CONDUCT

Scientific knowledge for the development and well-being of people and organizations

Giunti Psychometrics

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The current period is a moment of great transformation, both in our external world as well as within our organization. We are seeing innovations in our technologies, in our ways of working and in our processes. In a period such as this, it is important that our science and technology are guided by mindful choices and awareness so as to not lose the underlining purpose of our activities: maximize development and well-being in people and organizations.

As we continue to grow globally, it is important to establish core principles to guide our actions and behaviors in a uniform way across our group. This is what you will find in Giunti Psychometrics' Global Code of Conduct: principles that should always lead our decisions and choices to ensure our growth and continuing innovation. These principles will assist us for future challenges and will help us to continue, confidently but humbly, the Giunti Psychometrics' tradition of delivering scientific knowledge for the development and wellbeing of people and organizations.

José Sales Grade
CEO

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What is a Code of Conduct?

A Code of Conduct is a set of guidelines adopted by an organization to address what behaviors are expected and appropriate. The main function of an organization's Code of Conduct is to make the fundamental values and principles which guide the activities of the organization, within the organization itself and to all external interlocutors.

Why a Code of Conduct?

We, as Directors, employees and collaborators of Giunti Psychometrics, have the opportunity to influence the communities in which we operate and to benefit when we act correctly. Since it is not always easy to understand what is the best choice to make and how to act in the most correct manner, Giunti Psychometrics has therefore decided to provide company guidelines and a code of conduct (hereinafter the "Code") approved by the Board of Directors of Giunti Psychometrics S.r.l., with the aim of ensuring that all members of Giunti Psychometrics act with the highest integrity, respecting the laws in force, to build a better future for our Company and the communities in which we operate.

What the Code of Conduct is based on?

Giunti Psychometrics endorses, and its code of conduct incorporates, the principles of the Universal Declaration of Human Rights of the United Nations Organization ("UNO"), the International Labour Organisation ("ILO") and the Conventions and the Organisation for Economic Cooperation and Development ("OECD") Guidelines for multinational enterprises.

Is the Code of Conduct exhaustive?

The Code aims to ensure that all members of Giunti Psychometrics act with the utmost integrity, respecting the laws in force, to build a better future for our Company and the communities in which we operate. No document can reasonably cover all the cases that may arise in the performance of one's work. The Code, therefore, guides correct behavior by pointing out cases where additional assistance is needed.

What does the Code of Conduct include?

Neither the Code nor any of the principles, rules or procedures contained in it are intended to constitute nor do they constitute a contractual right that may be used against Giunti Psychometrics by any employee or collaborator, shareholder, customer, or supplier. The guidance contained in the Code helps us to understand what is expected of us, as members of Giunti Psychometrics, and ensures that we are acting with awareness and integrity.

Who are the Recipients of the Code of Conduct?

The Code applies to all members of the Board of Directors and to all employees, both full-time and part-time, of Giunti Psychometrics. The Code also applies to all collaborators, consultants and companies acting on behalf of Giunti Psychometrics, anywhere in the world. Since Giunti Psychometrics operates in different countries and, therefore, in different legal contexts, recipients of the Code may be subject to additional rules set by their direct employer. While we believe that the Code does not conflict with the spirit of those rules applied in the individual countries in which Giunti Psychometrics operates, requests

for clarification of any potential conflict situations may be made to the Human Resources Department and the Legal Department.

For those entities which hold a minority shareholding, Giunti Psychometrics undertakes to ensure that these entities adopt codes of conduct whose principles are inspired by those contained in this Code or in any case do not conflict with them.

Lastly, Giunti Psychometrics endeavors to ensure that the Code is considered good practice and is also respected by those with whom it has business relations, such as: suppliers, dealers, consultants and agents.

What are my responsibilities?

Giunti Psychometrics aims to create an environment that promotes its values and encourages ethical conduct, in order to create a collaborative working environment that respects human dignity. All members of Giunti Psychometrics must treat others as they expect to be treated, including clients and other external parties who have a working relationship with the Company. Therefore, Giunti Psychometrics expects the Code to be respected by all recipients, together with all applicable laws and regulations. The Code must be complied with whenever recipients work on behalf of Giunti Psychometrics or interact with other subjects of the Company. All members of Giunti Psychometrics must be aware that, by their conduct, they represent the Company, even outside working hours, if they act or may be understood to act on behalf of Giunti Psychometrics.

What are the basic principles of the integrity system?

There are three elements of the integrity system of Giunti Psychometrics:

a) The Principles: these are general statements expressing Giunti Psychometrics' commitment to ensure respect for appropriate company and personal conduct.

b) The Rules: these set the guidelines for conduct in accordance with our Principles. They serve as a standard; they are a tool for juggling complex situations and achieving desired results; they are the ground rules that must guide our daily actions. These rules are an integral part of the Code.

c) The Procedures: when more information is needed, the Procedures explain in detail how to act in compliance with the Rules. The scope of some Procedures may be limited to certain geographical areas/business sectors, as appropriate.

The nature of some of Giunti Psychometrics' objectives may make it necessary to apply more specific rules of conduct than those set out in this Code. In these

cases, additional standards may be established for specific geographic areas, business sectors, or individual activities in the form of Specific Procedures or other rules. The Code also requires you to follow those rules that are applicable to your geographic area, business sector or individual activity. In any case, all members of Giunti Psychometrics must comply with the provisions contained in the Code.

In order to ensure compliance with the Code, the legal function of Giunti Psychometrics will carry out audits of compliance with the Code in the course of its inspections and will include the Code itself and any additional regulations applicable to the scope of the activity being audited in its audit processes. When appropriate, the results of the audits will be presented to the President, the Chief Executive Officer, and the legal department of Giunti Psychometrics. To facilitate compliance with the Code, Giunti Psychometrics implements various periodic training initiatives to ensure that employees are adequately informed of the provisions contained in the Code.

What is the relationship between the Code and current legislation?

One of the fundamental elements of the Code is compliance with current regulations when conducting business for Giunti Psychometrics. The current regulatory framework reflects the conduct expectations of the communities in which we operate. Moreover, if laws are broken there is a negative financial and/or image impact on our Company. Non-compliance with laws can also lead to serious consequences, including criminal penalties, for the individuals involved. For these reasons, our Principles, Rules (where applicable) and Procedures place a strong emphasis on compliance with the laws that govern our business activities. The Code is an essential component of Giunti Psychometrics' ethics and compliance program, aimed at ensuring effective prevention and detection of violations of laws and regulations applicable to its activities.

Of course, our activities are subject to the laws of many different countries, and each of us has a strict duty to

comply with the laws of the geographic area in which we operate.

If the Code and local law do not conflict, you are required to comply with both. In the event that the laws and regulations in force in a particular jurisdiction are more permissive than those contained in this Code, the latter will prevail.

If you have any doubts about your duties, or if you think you cannot comply with local legislation without violating the Code, or conversely, you should immediately clarify your doubts by contacting the Legal Department and the Human Resources Department.

What conduct may be subject to disciplinary sanctions?

We expect the best from our employees and collaborators, especially in terms of assuming responsibility. Those who violate the Code and applicable legislation, or who behave in a manner contrary to the spirit of the Code, are subject to consequences that may include the possible termination of employment, as well as legal proceedings. Any breach of the Code will be evaluated objectively and fairly by the competent bodies, which will apply the appropriate disciplinary sanctions.

By way of example, but not limited to, types of conduct liable to disciplinary sanctions are:

- Breaching the law or the Code either directly or indirectly
- Being complicit in a violation of the law or the Code
- Providing false and/or misleading information to the Company, or intentionally denying relevant information at any time, including during an investigation
- Failure to adequately supervise the conduct of our People

- Failing to react to known or suspected violations of the law or the Code
- Deliberately ignoring information that falls within one's area of responsibility and that would allow one to become aware of known or suspected violations of the law or the Code
- Not cooperating with or obstructing audits by Human Resources, Legal or other entities engaged in investigations concerning illegal or unethical conduct
- Retaliating against anyone who has reported illegal or unethical conduct

Any waivers, even if only partial and limited in time and object, to the provisions of the Code may only be granted for serious and justified reasons. Any waiver of this Code for members of the Board of Directors of Giunti Psychometrics may only be approved by the Board of Directors of Giunti Psychometrics and must be disclosed in accordance with the provisions of law and other regulations in force.

Where can I find additional information and support?

In the event that you witness or become aware of conduct contrary to the spirit of the Code, it is essential that you take charge of the matter and act.

If you have doubts about the ethical or legal conduct of any member of the company, you have several options to choose from to make them known to the appropriate person. Generally speaking, your line manager is the closest person you can confront about this. If the issue you wish to raise also concerns your line manager, you may contact the Legal Department and the Human Resources Department who will treat your report with strict confidence, even with the help of an impartial observer or expert.

Can the Code be amended?

The Code is subject to revision by the Board of Directors of Giunti Psychometrics. Revisions take into account, among other things, suggestions and comments received from the Board of Directors, Giunti Psychometrics employees and collaborators and third parties, changes in legislation and "best practices", as well as experience acquired in applying the Code itself. Any amendments to the Code introduced as a result of this review shall be promptly published and made available in compliance with applicable regulations.

PART ONE

PROTECTION OF PERSONS

PRINCIPLES

a) **Providing a fair and safe working environment**: Giunti Psychometrics is committed to ensuring a fair, productive, and non-discriminatory working environment in which everyone is valued according to their personal contribution. This is essential to our success as a company. We can only achieve this if everyone takes responsibility and treats colleagues, customers, suppliers and visitors with respect and professionalism. More specifically, each of us must work to promote fairness and to ensure an environment free of discrimination and harassment, in accordance with all applicable laws. Performance appraisals and our remuneration system are based on the recognition of merit and operate in accordance with applicable laws. Your role in creating this favorable working environment is crucial. We expect you and all members of the workforce to work together in pursuit of these goals.

b) **Providing health and safety**: Giunti Psychometrics guarantees a safe and productive working environment; we recognise health and safety in the workplace as a key element of Giunti Psychometrics' sustainable approach. Giunti Psychometrics believes in a culture of injury prevention and risk awareness on the part of workers. Whether you spend your day in a factory, working in an office or on the ground, as an employee of our Company you must actively commit to protecting your health and the health of others, whether they are Giunti Psychometrics employees or visitors, customers, suppliers, or members of the communities in which we operate.

PART TWO

BUSINESS CONDUCT

PRINCIPLES

a) **Purchasing goods and services in a sustainable manner**: Giunti Psychometrics must ensure that its supplies of goods and services are in line with the company's objectives and processes, including increasing shareholder value, maintaining the highest quality standards, and caring for our People and the Communities in which we operate. When purchasing goods or services, you must keep this principle in mind and act in accordance with applicable laws. You must also ensure that your purchases comply with authorizations from relevant corporate bodies, and restrictions on the types of goods or services permitted. Giunti Psychometrics is committed to observing sustainable practices in its purchasing processes.

b) **Respect for legality in the conduct of business**: compliance with the law is essential for Giunti Psychometrics to operate globally, maintaining its reputation. Each employee and collaborator of Giunti Psychometrics must carry out their duties with the highest degree of honesty and in compliance with the laws in force. The achievement of the Company's positive results is based on our ability to comply with the law in order to conduct business with integrity. Every Giunti Psychometrics employee and collaborator must be familiar with the procedural rules in force in his or her geographic area and/or production area/unit and in the individual activities he or she carries out to ensure that his or her conduct complies with the law. The penalties for violating applicable regulations can be severe. These include reputational damage, large fines and imprisonment. Those who do not comply with the Principles, Rules and Procedures in force may be subject to disciplinary sanctions, including dismissal, if the conditions are present. If Giunti Psychometrics employees and collaborators have questions regarding the way in which certain laws regulate their activities, they must contact the Legal Department; if there is no local Legal Department, they must contact the local Human Resources Department.

(i) Government Investigations; Litigation

Giunti Psychometrics responds appropriately to legitimate requests from government authorities or external agencies, requests and orders from authorized judicial authorities issued in the course of legal proceedings. The Company's conduct in the course of government investigations or litigation in which it is involved must be guided by the appropriate Legal Department together with designated Entities and individuals appointed through appropriate powers of attorney, in certain cases. This activity may require the involvement of other members of Giunti Psychometrics. All information provided to government authorities shall be honest and truthful. It is not acceptable to conceal or destroy information related to litigation, whether it is ongoing or proceedings that may be contemplated.

(ii) Relations with Public Institutions

Giunti Psychometrics undertakes to maintain relations with Public Institutions in compliance with the laws and ethical standards in force, as well as with the Code and any Procedures in force at local level. Giunti Psychometrics aims to contribute positively to the future development of regulations and standards in the field of psychology and psychometrics.

To the extent permitted by local legislation and in compliance with Giunti Psychometrics Procedures and anti-corruption measures, any gifts or favours towards representatives of Government or Public Institutions must be modest and proportionate to the legitimate business purposes and, in any case, such that they cannot be interpreted as an attempt by Giunti Psychometrics to acquire or attempt to acquire an undue advantage.

Payments, loans or transfers of money or equivalent assets using company or personal funds to public officials or employees are prohibited, unless such actions are permitted by applicable laws, ethical standards and are approved by Giunti Psychometrics' Procedures and Anti-Corruption Measure.

(iii) Compliance with regulation

Giunti Psychometrics is committed to acting in full compliance with applicable laws, including anti-corruption, anti-money laundering, export, and competition laws; please remember that these are complex laws.

Giunti Psychometrics, including its subsidiaries, wherever located, must comply with these laws.

All third parties, including agents, consultants, representatives, Joint Venture partners, dealers, distributors and other third parties with whom Giunti Psychometrics entertains professional relationships, must also comply with the above laws, relating to the activities or business performed by these parties on behalf of Giunti Psychometrics.

(iv) Corruption and illegal payments

Giunti Psychometrics is committed to the highest standards of integrity, honesty and fairness in all relations inside and outside the Company and does not tolerate corruption of any kind. The legislation of the countries in which Giunti Psychometrics operates prohibits corruption.

Giunti Psychometrics establishes that no director, employee, collaborator, consultant or representative may, directly or indirectly, give, offer, request, promise, authorize, solicit or accept sums of money or other benefits (including gifts or favors, with the exception of commercial items of modest economic value, expressly permitted by the laws in force and in compliance with the Code and all the Standards and Procedures in force), relating to their activity for Giunti Psychometrics at any time and for any reason whatsoever.

Anti-bribery laws implemented by the OECD Convention on "Combating Bribery of Foreign Public Officials in International Business Transactions", and the OECD Guidelines prohibit paying, or promising to pay, directly or indirectly (e.g. through an intermediary), sums of money or other benefits of value to officials/employees of one's own or other governments, to officials/employees of political parties or the armed forces, to officials of foreign political parties or to political candidates, or to employees of entities controlled or owned by foreign governments; or to representatives of international organisations such as the United Nations or the World Bank; or to private entities/individuals for the purpose of obtaining, retaining or securing any improper business advantage.

Giunti Psychometrics' internal accounting Rule and Procedures are designed to ensure accurate and complete internal records of company activities.

(v) Anti-money laundering

Giunti Psychometrics prohibits money laundering or any activity that facilitates money laundering or the financing of terrorist or other criminal activities. Giunti Psychometrics and its employees and collaborators, before establishing business relations with a third party, must verify available information (including financial information), on potential business counterparties and suppliers, in order to ascertain their respectability and the legitimacy of their activities. Giunti Psychometrics must always comply with the application of all applicable anti-money laundering laws and regulations.

(vi) Exports and sanctions; customs activities

Export control and customs laws regulate how and where Giunti Psychometrics may sell products and exchange information. Giunti Psychometrics is committed to acting in full compliance with the laws and regulations regarding export control and customs activities. In some cases, these laws may prohibit doing business in certain countries, or impose requirements and approvals that must be obtained before products can be exported or traded. Laws concerning customs activities require accurate documentation and careful reporting and evaluation of goods.

(vii) Competition laws

Giunti Psychometrics recognizes the fundamental importance of a competitive market and is committed to fully complying with competition and other applicable protective laws where it operates. Giunti Psychometrics and its directors, employees and collaborators will ensure not to engage in practices that constitute a violation of competition laws. In the context of fair competition, Giunti Psychometrics will not knowingly infringe the intellectual property rights of third parties. The legal consequences of non-compliance with such laws may be severe and violations of this principle may lead to disciplinary sanctions, including dismissal. Moreover, compliance with competition laws is of paramount importance for the Company's reputation. Employees who need clarification about applicable laws or the correct action to take should contact the Legal Department.

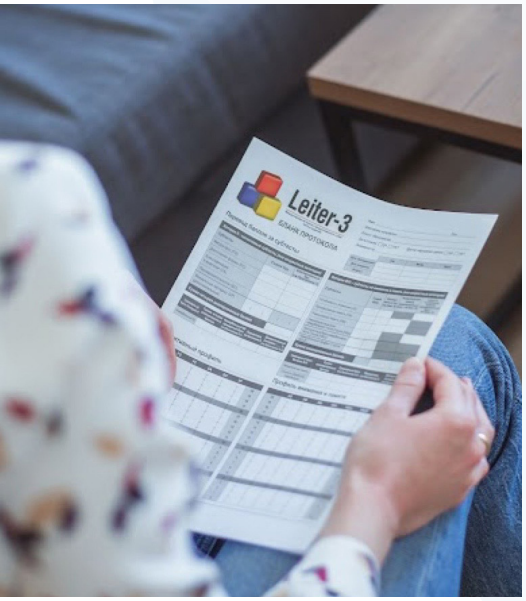
c) **Conduct business in a sustainable manner**: Giunti Psychometrics is firmly committed to conducting all its activities in a socially responsible manner and in line with sustainable practices and local or regional regulations and

expectations. The use of sustainable business practices is an integral part of the ongoing transformation at Giunti Psychometrics, which aims to match present business objectives with minimising negative impacts on present and future generations and resources. We are committed to the sustainable use of environmental resources and to positively influencing the people and communities in which we operate. The success of Giunti Psychometrics and its positioning as a leader in its industry depends on our commitment to these sustainable practices.

d) **Safeguarding the environment**: creating a culture of sustainability requires effective risk management and a responsible, proactive and innovative decision-making. Our efforts minimize negative impacts on natural resources and the global environment. In particular, Giunti Psychometrics considers environmental protection a decisive aspect to be promoted in the global

approach to business. Giunti Psychometrics is committed to continuously improving the environmental performance of its activities and to complying with the provisions contained in applicable laws and regulations. Furthermore, Giunti Psychometrics is committed to producing and marketing, in full compliance with the provisions of applicable laws and regulations, products that conform to the highest standards in terms of environmental performance and safety, and to developing and implementing innovative technical solutions aimed at minimizing environmental impact and maximizing safety. Finally, we encourage safe and environmentally friendly use of our products by informing customers on how to use, maintain and dispose of vehicles and other products.

e) **Customers, Suppliers and Partners**: we must all strive to exceed the expectations of customers, both internal and external, and to continuously improve the quality of Giunti Psychometrics products and services. We also encourage the adoption of sustainable practices and sharing them with our suppliers and partners. Therefore, we are dedicated to implementing sustainable practices to ensure that we minimize our impact on the environment and set examples of efficiency. In particular, Giunti Psychometrics considers collaboration with its chain of suppliers an integral part of its success and is therefore committed to work as a team with its suppliers. The selection of suppliers is not only based on the quality and competitiveness of their products and services, but also on their adherence to the environmental, ethical, and social principles outlined in this Code.



PART THREE

MANAGING EXTERNAL RELATIONS

PRINCIPLES

a) **Avoiding situations of conflict of interest**: all our employees and collaborators must always follow a conduct that protects and promotes the best interests of Giunti Psychometrics. Conflict of interest situations may arise when some members of Giunti Psychometrics engage in activities or have personal interests that compromise those of our Company, because these activities or interests directly interfere with their performance of their work duties, or because they make decision-making less objective, or because they cause an undue personal advantage to the employee, collaborator, or director. Such activities may harm the Company financially, but even more significantly, they may damage our reputation. Conflict of interest situations also arise when an employee, collaborator or director, or a member of their family, receives undue personal benefits as a result of their position in the Company. Therefore, it is essential that you manage your relationships and activities, both outside and inside the work environment, in ways that do not interfere, even potentially, with your ability to perform your duties and make fair and objective business decisions. All our employees and contractors are expected to always maintain the highest degree of honesty during their interactions with our partners and to act solely in the best interests of the Company. Any situation that constitutes a conflict of interest, even if only potential, must be reported immediately to your manager or the Board of Directors.

To ensure that Giunti Psychometrics takes full advantage of the time and talents of each employee, should you be asked to serve on a Board of Directors of a profit or non-profit company, please contact the Human Resources and Legal Departments to determine whether such a position must be approved in advance by the competent entities.

b) **Supporting the communities in which we operate**: in addition to the daily work we do to maintain the excellent results we have achieved and our reputation in the reference sector, Giunti Psychometrics believes it is

our duty to invest energy in social programs by supporting them financially, in order to help and enrich the dynamism of the communities in which we live and operate. The development of social initiatives and support for various associations testify to our commitment to our Communities. Giunti Psychometrics actively supports volunteer work and other forms of social commitment. One of the values that unites us is the desire to give something back to the Communities in which we operate. Giunti Psychometrics' social initiatives must be guided by the local management in charge. The Company will carefully assess which initiatives to support, to ensure that our support for one organization and/or initiative does not cause resentment of other organizations, within our workforce or Community.

PART FOUR

MANAGE OUR RESOURCES AND INFORMATION

PRINCIPLES

a) **Communicate effectively**: Giunti Psychometrics recognizes the primary role of clear and effective communication in establishing internal and external relationships and ensuring high company standards. Creating a business climate in which communication is swift, open and bidirectional is a key factor in maintaining our success. We aim to promote mutual understanding between managers and their staff, as well as between Giunti Psychometrics and partners, customers, the business world, and the public. While transparency and honesty are values for which we are all individually accountable, we recognize that maintaining our success relies on our ability to safeguard our information and communicate consistently in order to maintain the integrity of our business.

b) **Protecting our assets and intellectual property**: Giunti Psychometrics owns a large number of company assets and intellectual property that are essential to the continuation of our business. As members of Giunti Psychometrics, each of us must be committed to protecting company assets and ensuring that they are used only for their intended purposes. It follows that each of us is responsible for protecting and properly using the Company's assets, taking appropriate precautions to safeguard the Company's assets, and those of third parties under the Company's control, from theft, loss, damage, abuse or unauthorized use, access, or destruction, including illegal use or other uses considered inappropriate in any respect. The protection of Giunti Psychometrics' assets is our collective duty and an obligation that we must respect as members of the Company. Since information is a fundamental asset for the company's business, we are individually responsible for maintaining the confidentiality, integrity, and availability of company information, in compliance with legal, regulatory and contractual provisions. Confidential information (any information considered or declared confidential by Giunti Psychometrics, which, if disclosed, could cause legal or financial harm to Giunti Psychometrics or damage the company image) must be kept totally confidential for the duration, and beyond, of an employee's, or other member of the workforce's,

or collaborator's employment contract (regardless of the type of collaboration). In addition, our employees and contractors must understand the Company's obligations with respect to third-party confidential information of which they become aware and must act in compliance with them.
In carrying out its business, Giunti Psychometrics collects a significant amount of personal data and confidential information, which it undertakes to process in strict compliance with all applicable privacy laws and our Confidentiality and Security Policies. To this end, Giunti Psychometrics guarantees a high level of security in the selection and use of its Information Technology systems for processing personal data. The intellectual property developed by Giunti Psychometrics is a resource of fundamental and extreme value to the Company; everyone must do their best to protect it and is responsible, in addition to protecting Giunti Psychometrics' intellectual property, for respecting the intellectual property rights of third parties.

c) **Ensure the regularity of accounting transactions**: our customers, partners, shareholders, government agencies and other stakeholders rely on accurate information from the Company's accounting records. In addition, we are required to prepare specific records to comply with tax and legislative requirements. Giunti Psychometrics is committed to maintaining high standards of integrity regarding the Company's accounting records. We want to ensure that all accounting records are authentic, reliable, and verifiable. Finally, the Company is committed to training all employees responsible for creating and maintaining accounting records.

(i) Accounting and internal Controls

Giunti Psychometrics has effective internal control systems in place to ensure compliance with the law and our Principles, Rules and Procedures, as well as to prevent and impede the misuse of company assets, ensure proper authorization of company operations and other business activities. Giunti Psychometrics' internal controls allow for complete, clear, accurate, timely and comprehensible disclosure not only of the reports and documents that the Company sends to the relevant authorities, but also other public communications, including the financial statements, which accurately represent Giunti Psychometrics' financial position. To this end, it is necessary to maintain accurate and complete internal records of all activities carried out and to require that all transactions and commitments entered into with partners are properly authorized and documented. Accounting records are the exclusive property of Giunti Psychometrics and must be created and maintained in a manner consistent with the Rules and Principles in force.