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Code of Ethics

Organizational Model pursuant to Legislative Decree 231/2001




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1 Foreword

This Code of Ethics (hereinafter also simply the “Code”) sets out the behavioral principles to which Doxee S.p.A. (hereinafter also simply the “Company” or “Doxee”) undertakes to adhere when carrying out the activities necessary to the pursuit of its corporate goals, both within the company’s organization and in its relations with external parties.

The principles set down in this document are in line with the common values established in the document entitled “High Level System Management Policy”.

The set of ethical principles and values established in the Code provides a framework designed to guide the actions of everyone who works for the Company, taking account of the importance and differentiation of their roles, the complexity of their functions and the responsibilities assigned to them for the purposes of pursuing the Company’s objectives. In particular, by way of example but without limitation:


- the members of the corporate bodies take account of the principles established in the Code, when setting business objectives;
- the individual executives put the Code’s values and principles into practice, by fulfilling their responsibilities towards internal and external parties, and building trust, cohesion and team spirit;
- on a continuous basis and in accordance with the law and the applicable regulatory requirements, employees and outside contractors align their actions and behavior with the principles, objectives and commitments set down in the Code.

Taking an ethical approach is an essential means of ensuring the reliability of the Company’s conduct towards all stakeholders and, more generally, towards the entire civil and economic context in which the Company operates. Adherence to certain specific behavioral principles in the course of relations with public authorities, customers and other third parties is a manifestation of the Company’s commitment to preventing the offenses listed in Legislative Decree No. 231 of 8 June 2001, as amended.

In view of the above, it is essential to clearly define the set of values that the Company recognizes, accepts and shares. The act of establishing this Code of Ethics meets these requirements and provides a code of conduct which, when complied with by all Company staff, plays a key role in safeguarding the smooth operation, reliability and reputation of the Company. In line with the Code’s purpose of preventing certain offenses, Doxee and, more specifically, the Supervisory Board (hereinafter also simply “SB”), ensure compliance with the rules set down herein, by providing adequate training and information, constantly and effectively monitoring the manner in which it conducts its business, and taking appropriate corrective action.

2 Scope and addressees

1. The principles and requirements of the Code are binding for the Directors of Doxee S.p.A. (“Directors”), all employees of Doxee S.p.A. (“Employees”) and all persons who operate on behalf of Doxee S.p.A., regardless of the nature of their relationship with the Company and even if it is temporary (“Outside Contractors”). Directors, Employees and Outside Contractors are hereinafter collectively designated as the “Addressees”.
2. The Code will be brought to the attention of all third parties that are awarded contracts by Doxee S.p.A. or that have permanent or temporary relations with it, with specific reference to outside contractors, in accordance with the related contractual conditions.
3. The pursuit of Doxee’s interests shall never, in any circumstances, justify any conduct that it is against the applicable laws or against the rules set down in this Code. The Code of Ethics is designed to

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provide a guarantee and ensure reliability, in order to protect the assets and reputation of the Company.


3 Underlying ethical principles

3.1 Responsibility

1. Each Addressee carries out their work and provides their services with diligence, efficiency and integrity, making the best possible use of the tools and time at their disposal, and fulfilling all responsibilities connected with their obligations, in accordance with the applicable regulatory requirements and the procedures and duties established by Doxee S.p.A..
2. Any violations of the Code of Ethics by Employees will constitute non-fulfillment of the obligations associated with their employment contract and will therefore be viewed as a disciplinary offense and sanctioned as such, in accordance with the law and the applicable National Collective Labor Contract, with all legal consequences, including in relation to the continuation of the employment contract (irrespective of the possible criminal significance of the conduct concerned, and/or the launch of criminal proceedings, where an offense has been committed).
3. In the event of violation of the Code of Ethics by an Outside Contractor, the conduct in question will be sanctioned in accordance with the terms and conditions of the relevant contract, for example by terminating the contract.
4. In the event of violation of the Code by one or more members of the Board of Directors, the violation in question will be assessed according to its seriousness and may – in the most serious cases – result in fair dismissal of the perpetrators, in accordance with the law.

3.2 Integrity

1. All of the Addressees' behavior and everything they do in pursuance of their role or duties, must adhere to the principles of legality, in both form and substance, in accordance with the applicable rules and internal procedures, and with the principles of integrity, cooperation, fairness and mutual respect.
2. Addressees do not make use, for personal purposes, of the information, assets or equipment placed at their disposal by virtue of their role or duties.
3. Addressees are required to comply diligently with the laws in force, the Code and internal regulations. The pursuit of Doxee's interests shall never, in any circumstances, justify any conduct that it is dishonest or against the applicable laws.
4. Employees of Doxee S.p.A. must not carry on any business activities in competition with the latter's. They must also comply with Company rules and adhere to the precepts of this Code, insofar as compliance therewith is also a requirement of art. 2104 of the Italian civil code.
5. No Addressee, either on their own behalf or on behalf of others, shall submit to or bring to bear undue pressure, or accept or make recommendations or reports that may cause harm to Doxee S.p.A. or give rise to unfair advantages for themselves, for Doxee S.p.A. or for third parties. No Addressee, furthermore, shall accept or make undue promises and/or offers of money or other benefits, unless they are of modest value and unrelated to requests of any kind.

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6. Should an Addressee receive an offer of or request for benefits from a third party, with the exception of free gifts within the scope of standard commercial practice or of modest value, they shall not accept the offer or fulfill the request, and shall immediately inform their line manager or other person to whom they are required to report, in order that the appropriate action may be taken.

3.3 Transparency


1. Doxee undertakes its business in a spirit of transparency, both in terms of the internal management of the business and the allocation of roles and responsibilities, and in its relations with customers, suppliers and external contractors, in such a way that the interests of the Company are made unequivocal, and that Doxee's outside contractors and other interlocutors are therefore in a position to take informed decisions.

3.4 Confidentiality

1. The Company guarantees the confidentiality of the personal data and information it processes, and safeguards the information it acquires in the course of its work, by adhering to the requirements concerning the confidentiality of personal data laid down in Legislative Decree No. 196 of 30 June 2003 (Personal data protection code) as updated by Legislative Decree No.101 of 10 August 2018 and pursuant to EU Regulation 2016/679 (also known as GDPR) and subsequent amendments, additions and implementing regulations.
2. The Addressees shall maintain the utmost confidentiality with regard to news and information forming part of the Company's assets or relating to the business of Doxee S.p.A., including personal data acquired for processing, in accordance with the law, the regulations in force, this Code, the Data Privacy Policy and the other relevant Company procedures.

3.5 Combating corruption and conflicts of interest

1. In keeping with the values of honesty and transparency, Doxee S.p.A. undertakes to put in place all the necessary measures to prevent and avoid acts of corruption and conflicts of interest. A conflict of interest arises when an employee or outside contractor has a direct or indirect interest that is in conflict, even only potentially, with the Company's interest, regardless of whether they seek to take "personal" advantage from the Company's business opportunities. A conflict of interest also arises when the representatives of customers, suppliers or public institutions act against the fiduciary duties associated with their position.
2. In performing their role and/or duties, Addressees pursue the objectives and general interests of Doxee in accordance with this Code and the regulatory requirements in force.
3. Addressees inform their line managers or other reference persons, without delay, of any situations or activities in which their own interests may be in conflict with those of Doxee S.p.A. (or if any of their immediate relatives have any such interests) and in any other relevant cases. Addressees comply with the decisions taken by Doxee S.p.A. in this respect, and refrain, in any event, from undertaking any operations in conflict with the Company's interests.

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3.6 Competition

1. Doxee recognizes that competition plays an essential role in economic and social development and progress. In the course of its business, the Company therefore ensures compliance with the general conditions upon which free enterprise depends, allows economic operators to access the market and compete on a level playing field, and protects its customers, by encouraging the containment of prices and the improvements in service quality that derive from free competition.
2. Doxee deplores the organization of and participation in any activity that is against current legislation on free competition, antitrust and monopolies.
3. The Company does not withhold, conceal or delay any information requested by the antitrust authorities or regulatory bodies in pursuance of their inspection duties, and actively cooperates with investigation procedures.

3.7 Impartiality


1. Doxee S.p.A. avoids all discrimination based on the age, gender, health status, ethnicity, language, sexual orientation, personal beliefs, nationality, political opinions or religious beliefs of its interlocutors, or on their membership or non-membership of a trade union association or their withdrawal from such membership. The Company also avoids all discrimination based on the condition of differently abled people.

3.8 Environment and occupational health and safety

1. Doxee S.p.A. is committed to complying with all regulatory requirements intended to safeguard the health of workers in the workplace, by means of the ongoing activity of the Company functions specifically assigned to this role. Personnel must rigorously adhere to the applicable Company provisions and, in any event, to all legal requirements concerning personal safety and the protection of health.
2. The Company also adheres to the requirements of environmental legislation. Personnel involved in operational processes that could have an environmental impact must carry out their work conscientiously and in accordance with the laws and regulations in force.

3.9 Protection of minors

1. Doxee S.p.A. pays the utmost attention to the protection of minors and the prevention of behaviors that may constitute offenses of a sexual nature against minors (e.g. child prostitution, child pornography).
2. To this end, as well as it being prohibited to make improper use of Doxee IT systems (see 4.8 of this Code), it is also prohibited to introduce any form of pornographic material into the Company.
3. Any employee or outside contractor who, in the course of their work, becomes aware of the existence of acts or conduct within the Company or within the scope of its organization that are not consistent with the principles or are in breach of the above prohibitions, must, without prejudice to

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their legal obligations, immediately inform their line managers and the Supervisory Board thereof, as specified in paragraph 5.2 of this Code: “Reports and requests for clarification addressed to the Supervisory Board”.

4 Rules of Conduct


4.1 Business relations

1. Doxee S.p.A. bases its business relations on the principles of legality, fairness, integrity, transparency and efficiency.
2. Employees of Doxee S.p.A. and Outside Contractors whose actions can be linked in any way to Doxee S.p.A., must act with integrity in the course of business conducted in the interest of Doxee S.p.A. and, in particular, in relations with the Public Authorities, regardless of the competitiveness of the market or the importance of the deal concerned. They must therefore refrain from adopting, legitimizing, accepting or encouraging any behaviors that are not in strict compliance with the legislation in force or with the principles of integrity, diligence and fairness established in this Code.

4.2 Relations with investors and the market

1. It is a key principle of Doxee S.p.A. to promote the widest possible participation of shareholders in the life of the Company and to encourage them to exercise their rights as shareholders, by providing them with comprehensive information in accordance with the regulations governing privileged information.
2. Doxee S.p.A.’s primary objective is to make the most effective use of its shareholders’ investments, partly as a means of enabling shareholders to make informed choices regarding the allocation of their resources.
3. Doxee S.p.A. has put in place specific procedures to govern:
 - the management of internal and external communication of privileged information;
 - obligations of disclosure and limitations covering the purchase, sale, subscription and exchange of Doxee S.p.A. shares or financial instruments connected with Doxee shares by “significant” persons and persons closely associated with them;
 - the management of transactions with related parties.
4. The above-mentioned procedures and all other regulatory requirements applicable to the correct management of the release of information to the market form an integral part hereof.
5. All employees and outside contractors who work for Doxee in various capacities must comply with both national and international regulations governing insider trading.
6. No Doxee employee or outside contractor must gain any advantage of any kind, whether direct or indirect, personal or economic, from the use of Privileged Information that is not in the public domain.
7. Addressees who have access to confidential information are not authorized to use or share such information for the purposes of stock trading or any purpose other than conducting Company business and performing their work duties.

4.3 Relations with customers

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1. Doxee S.p.A. pursues business success on the market by offering quality products and services at competitive conditions and in accordance with the rules laid down to protect fair competition.
2. Doxee S.p.A. recognizes that the appreciation of the parties who require its products or services plays a key role in its success as a business. Doxee S.p.A. therefore undertakes to: observe internal procedures governing the management of relationships with customers; efficiently and courteously supply, within the limits of the relevant contractual conditions, high-quality products that meet or exceed the reasonable expectations of customers; provide accurate and comprehensive information about its products and services so as to enable customers to take informed decisions; adhere to the truth in all advertising and other communications.

4.4 *Relations with suppliers*


1. Suppliers are selected and purchasing conditions are determined on the basis of an objective assessment of the quality and price of the goods or service, and the guarantees of support and punctuality.
2. In its procurement relationships, Doxee S.p.A. undertakes to: observe internal procedures governing the selection and management of relations with suppliers; not preclude any supplier that meets the necessary requirements from competing for the award of supply contracts from Doxee S.p.A., and adhere to objective assessment criteria in the course of selection, in accordance with clear, explicit procedures; obtain the cooperation of suppliers in ensuring constant fulfillment of the requirements of Doxee S.p.A. customers, in terms of quality, cost and delivery times, at least in line with their expectations; maintain frank, open dialog with suppliers, in line with good commercial practices.

4.5 *Relations with institutions*

1. Doxee S.p.A.'s relations and the Addressees' relations with local, national, EU and international public institutions ("Institutions"), and with public officials or public servants, i.e. bodies, representatives, agents, delegates, members, employees and consultants or appointees of public functions, public institutions, public authorities, public bodies, including of an economic nature, public entities or enterprises of a local, national or international nature ("Public Officials") are conducted by all Directors and Employees, regardless of office or function, or, where appropriate, by all Outside Contractors, in accordance with the legislation in force and on the basis of the general principles of integrity and fairness.
2. In the specific case of taking part in a tender procedure with the Public Authorities, Doxee S.p.A. and the Addressees must act in accordance with the law and proper commercial practice.
3. Within the scope of its relations with Institutions or Public Officials, Doxee S.p.A. will never allow itself to be represented by Employees or Outside Contractors with whom conflicts of interest may arise.

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4. Without prejudice to all obligations imposed by the relevant regulations in force, in the course of business negotiations, applications or commercial relations with Institutions or Public Officials, Doxee S.p.A. and the Addressees will refrain from performing the following acts, either directly or indirectly:
 - a. examining or offering employment and/or commercial opportunities that may personally benefit employees of Institutions or Public Officials;
 - b. Offering or in any way providing, accepting or encouraging free gifts, favors or commercial or behavioral practices that are not based on the highest degree of transparency, integrity and fairness, or are otherwise against the applicable law;
 - c. solicit or obtain confidential information that might compromise the integrity or reputation of either party or that might otherwise violate the principles of equal treatment and public tendering procedures launched by Institutions or Public Officials.
5. Where it sees fit, Doxee S.p.A. may support the programs of public bodies intended to be useful and beneficial for the community, and the activities of foundations and associations, in accordance, at all times, with the regulations in force and the principles of the Code.

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4.6 *Protecting health and safety*

1. Within the framework of its business activity, Doxee S.p.A. adheres to the principle of safeguarding the environment and pursues the objective of protecting the health and safety of the Addressees..
2. Doxee S.p.A.'s activities must be managed in full compliance with the applicable regulations concerning prevention and protection.

4.7 *Transparent accounting and auditing*

1. In accordance with their respective functions and job description, the Addressees undertake to ensure that facts relating to the Company's management are represented correctly and faithfully in Doxee S.p.A.'s accounts.
2. Accounting records must be kept in such a way as to make it possible to reconstruct accounting operations quickly, identify possible errors and establish the degree of responsibility within each individual operating process.
3. Within the scope of their respective functions and job descriptions, Addressees are required to check that all accounting records are correct and truthful, and to inform the relevant persons of any errors, omissions and/or falsifications.


4.8 *Acceptable use policy relating to Company information systems*

The use of information technology, with particular reference to internet access, exposes Doxee to both economic and criminal risks, involving possible security breaches and damage to the Company's image. Bearing in mind, therefore, that the Company's IT and communication tools must be used in accordance with the principle of diligence and integrity at all times, in line with what is normally expected of any employee, Doxee has adopted an Acceptable Use Policy relating to the Company's information systems, which constitutes an internal regulation designed to ensure that unintentional acts do not give rise to problems or security threats relating to data processing.

This Policy sets out the rules of conduct governing the use of Company work tools.

These rules are adopted to ensure compliance with Doxee internal regulations and regulations governing personal data protection:

- Personal data protection code, approved by Legislative Decree No. 196/03, as updated by Legislative Decree No. 101/2018, referred to hereinafter as the Privacy Code;
- European regulation 679/2016 concerning the protection of natural persons with regard to personal data processing, and the free movement of such data, referred to hereinafter as the GDPR.

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In general, it is mandatory to adhere to the provisions concerning personal data protection set down in the letter appointing a person as an Authorized Data Processor.

This regulation is made available to all partners who enjoy institutional or commercial relations with Doxee S.p.A. in order to ensure the necessary conditions of security for optimum performance of the above activities.

5 Procedures for implementation and monitoring

5.1 General considerations

Everyone who works with Doxee, without distinction or exception, in Italy or elsewhere, is committed to ensuring compliance with the principles established in this Code. Acting in the interests or for the advantage of the Company shall never, in any circumstances, justify committing or omitting acts, either individually or in conjunction with others, in breach of regulatory requirements and these principles.

The corporate bodies and executives have a duty to set an example of coherence between everyday behavior and the principles established in the Code. The body designated to oversee the application of the Code is the Supervisory Board, established in accordance with the Organization, Management and Control Model for the prevention of criminal offenses pursuant to Legislative Decree 231/2001 and related regulations, which liaises, as appropriate, with the relevant bodies and functions to ensure the correct implementation and adequate monitoring of the Principles established in the Code of Ethics.

5.2 Reports and requests for clarification to the Supervisory Board

All Company personnel, whether internal or external, are required to report any violation or suspected violation of the Code of Ethics to the Supervisory Board, which then examines the report and, if applicable, interviews the perpetrator and person responsible for the alleged violation. The same personnel, furthermore, if in doubt about whether a given act is lawful, ethically acceptable or in breach of the Code, may contact the Supervisory Board to ask for the necessary clarification.


The Supervisory Board's duties include:

- periodically checking that the Code is being correctly applied and complied with;
- checking the contents of the Code, in order to establish whether it needs to be amended to bring it into line with changes in the law;
- promoting the dissemination of the Code;
- proposing additions and amendments to the Code to the Board of Directors;
- receiving reports of violations of the Code and conducting investigations into them;
- reporting to the designated parties on the outcome of inquiries conducted in response to reports.

All of the Company's employees and outside contractors are required to cooperate with the Supervisory Board and, where appropriate, provide the necessary Company documentation to enable the Supervisory Board to conduct its inquiries.

Personnel shall not be liable to disciplinary sanctions as a result of duly fulfilling their obligation to provide information.

In order to enable timely compliance with the provisions of this paragraph, an email address - odv231@doxee.com - has been set up for the specific purpose of enabling all addressees of the Model to communicate with the Supervisory Board in relation to any substantiated reports of unlawful conduct and/or violations that may arise or to verify the lawfulness of any dubious conduct in relation to the principles established by this Model.

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Doxee S.p.A. also provides other channels through which reports can be sent to the Supervisory Board. For all practical purposes, the Supervisory Board is also required to give due consideration to reports that have been sent anonymously.

Reports regarding possible violations by the Supervisory Board can be addressed to the Board of Directors, which will appoint one of its members to make the necessary and/or appropriate inquiries.

By virtue of the introduction of regulations governing whistleblowing within the scope of the Decree, the Company ensures that:

- a) all reports received are kept strictly confidential;
- b) no party will disclose the identity of anyone who provides the Supervisory Board with useful information for identifying conduct that is contrary to the provisions of the Model, the procedures established for its implementation or the procedures established by the internal control system, without prejudice to any legal obligations and the protection of the rights of the Company or of persons who are accused erroneously and/or in bad faith;
- c) whistleblowers are protected against any act of retaliation or discrimination deriving from their decision to provide information;
- d) appropriate sanctions are imposed upon anyone who violates the above measures for safeguarding whistleblowers and/or upon anyone who makes clearly unfounded reports.

All information and reports envisaged by the Model are kept by the Supervisory Board in a dedicated archive (electronic and/or hard copy) for a period of 5 years.

5.3 Dissemination of the Code of Ethics


Doxee S.p.A. undertakes to inform all Addressees of the provisions and application of the Code and subsequent updates thereof by whatever means are considered most appropriate at the time, such as, for example:

- transmission by email or other media and/or by post and/or delivery by hand to members of the corporate bodies, employees and outside contractors on a continuous basis (indicating that the Code is to be considered binding for all employees) and, where appropriate, requiring the addressee of the Code to sign a declaration acknowledging that they have received, read and accepted it (e.g. at the time of hiring);
- publication on Code of Ethics (<https://www.doxee.com/about-us/governance/>) and on the Company intranet, and posting on the Company noticeboard at each of its sites;
- notice to casual staff, occasional contractors and suppliers regarding the existence and contents of the Code;
- inclusion in contracts of a clause informing third parties of the existence of the Code, which such parties must accept and undertake to comply with;
- preparation of a specific training/information plan, differentiated by work role, aimed at communicating the principles and ethical standards on which all the Company's activity is based.

5.4 Effectiveness of the Code and sanctions


Compliance with the requirements of this Code forms an integral and essential part of the obligations accruing to personnel by virtue of their work contract. Violation of the Code therefore constitutes non-fulfillment of the above obligations and, as such, has disciplinary consequences and may give rise to disciplinary proceedings against the persons concerned.

Any personnel who make improper use of the complaint system may also become liable to disciplinary proceedings. In particular, personnel who make complaints containing false and/or unfounded information, for

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retaliatory, malicious and/or abusive purposes or with a view to defaming the alleged perpetrator of the reported act, may become subject to disciplinary proceedings.

Doxee S.p.A. undertakes to consistently, impartially and uniformly establish and impose sanctions that are proportionate to the respective violations of the Code and compliant with the applicable provisions governing employment contracts.

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Addendum A: Document Configuration

Drafted by:	Fabio Cavazzuti	Chief Information Security Officer & Data Protection Manager
Verified by:	Guido Spagnoli	Finance & Human Resources Manager
Approved by:	Sergio Muratori Casali	CEO
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1	13/11/2009	First draft
1.1	14/09/2012	Company rebranding
1.2	23/02/2017	Layout Review
2	16/08/2019	Normative references updated
2.1	18/10/2019	Review for MOG 231 implementation
3	05/12/2019	Addition of paragraph 4.2 concerning relations with investors and the market