

Doxee Group Code of Ethics	Version: 4	
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# Group Code of Ethics

Organizational Model pursuant to Italian Legislative Decree 231/2001

# CONTENTS

## Table of Contents

<b>CONTENTS .....</b>	<b>2</b>
<b>1 Foreword .....</b>	<b>3</b>
<b>2 Scope and addressees .....</b>	<b>4</b>
<b>3 Underlying ethical principles.....</b>	<b>4</b>
<b>3.1 Responsibility.....</b>	<b>4</b>
<b>3.2 Fairness .....</b>	<b>5</b>
<b>3.3 Transparency .....</b>	<b>6</b>
<b>3.4 Confidentiality .....</b>	<b>6</b>
<b>3.5 Combating corruption and conflicts of interest .....</b>	<b>6</b>
<b>3.6 Competition .....</b>	<b>7</b>
<b>3.7 Equality, Diversity &amp; Inclusion.....</b>	<b>7</b>
<b>3.8 Occupational health and safety .....</b>	<b>7</b>
<b>3.9 Environment and protection of the environment .....</b>	<b>7</b>
<b>3.10 Human Rights .....</b>	<b>8</b>
<b>3.11 Protection of minors .....</b>	<b>8</b>
<b>4 Rules of Conduct .....</b>	<b>9</b>
<b>4.1 Principles of conduct governing relations with the Addressees.....</b>	<b>9</b>
<b>4.2 Relations with investors and the market .....</b>	<b>9</b>
<b>4.3 Relations with clients .....</b>	<b>9</b>
<b>4.4 Relations with vendors .....</b>	<b>10</b>
<b>4.5 Relations with the Institutions .....</b>	<b>10</b>
<b>4.6 Environment, health and safety .....</b>	<b>11</b>
<b>4.7 Transparent accounting and auditing .....</b>	<b>11</b>
<b>4.8 Acceptable use policy for the corporate information systems.....</b>	<b>11</b>
<b>5. Procedures for implementation and monitoring.....</b>	<b>13</b>
<b>5.1 General considerations.....</b>	<b>13</b>
<b>5.2 Reports and requests for clarification to the SB .....</b>	<b>13</b>
<b>5.3 Dissemination of the Code of Ethics .....</b>	<b>14</b>
<b>5.4 Effectiveness of the Code and sanctions .....</b>	<b>14</b>

Title: MOG231_Codice Etico v4_IT_UNRESTRICTED	
Subject: Codice Etico Gruppo Doxee	
Confidentiality level: Unrestricted	
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# 1 Foreword

This Code of Ethics (hereinafter also the “Code”) sets out the principles of conduct to which Doxee S.p.A. and its subsidiaries (hereinafter also simply the “Companies”, “Doxee Group” or “Group”) undertake to observe in the pursuit of its corporate goals, both within the Company’s organization and in its relations with external parties.


The principles set out in this document are conforming with the common values established in the [Articles of Association of Doxee S.p.A.](#) as a benefit corporation and in its management system, as set out in its “[High Level System Management Policy](#)”

The ethical principles and values established in the Code establish a framework to guide the actions of everyone working for the Group, taking into account of the importance and diversity of their roles, the complexity of their functions and the responsibilities assigned to them in the pursuit of the Group’s objectives. In particular, by way of example and without limitation:

- the members of the corporate bodies take the principles established in the Code into account 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 pursuant to the law and applicable regulations, the Group’s employees and outside contractors align their actions and behavior with the principles, objectives and commitments set out in the Code.

Taking an ethical approach is an essential means of ensuring the reliability of the Group’s conduct towards all stakeholders and, more generally, towards the entire civil and economic context in which the Group operates. The Group’s observance of certain specific behavioral principles in its relations with public authorities, clients and other third parties is a manifestation of its commitment to preventing the offenses listed in Italian 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 Group 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 Group staff, plays a key role in safeguarding the smooth operation, reliability and reputation of the Group. In line with the Code’s purpose of preventing certain offenses, the Doxee Group and, specifically, the Supervisory Body (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.

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## 2 Scope and addressees


- The principles and provisions of the Code are binding on:
  - the Directors di Doxee S.p.A. and its subsidiaries (“Directors”);
  - all persons employed by Doxee S.p.A. and its subsidiaries (“Employees”);
  - all persons working on behalf of Doxee S.p.A. and its subsidiaries, regardless of the nature of their relationship with the same and even if it is temporary (“Outside Contractors”).
  - Third parties, also called “business partners”, with whom the Group has or intends to have commercial relations – as well as relations of other kinds – which are binding on the Group in terms of policy, economics, strategy or lasting over the medium/long term (including: clients, vendors, partners, consortia, advisors);

Said Directors, Employees and Outside Contractors and Business Partners are hereinafter collectively called the “Addressees”.
- The Code will be brought to the attention of all third parties awarded contracts by Doxee S.p.A. and its subsidiaries or who have permanent or temporary relations with the same, with specific reference to Outside Contractors, in compliance with the respective contractual conditions.
- The pursuit of the Doxee Group’s interests shall never, under any circumstances, justify any conduct in contravention of established law or the rules set out in this Code. The Code of Ethics is designed to provide a guarantee and ensure reliability, in order to protect the assets and reputation of the Group.

## 3 Underlying ethical principles


### 3.1 Responsibility

- 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. and its subsidiaries.
- 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, pursuant to the law and the applicable employment contracts, with all legal consequences, including in relation to the continuation of the employment contract (without prejudice to the possible criminal significance of said conduct, and the institution of criminal proceedings, should a criminal offense have been committed).
- 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.
- 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.

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## 3.2 *Fairness*

1. All of the Addressees' behavior and everything they do in pursuance of their role or duties, must observe 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. The Addressees may not use the information, assets or equipment placed at their disposal by virtue of their role or duties for any personal purposes.
3. The Addressees must comply diligently with the law, the Code and internal regulations. The pursuit of the Group's interests shall never, under any circumstances, be used to justify any dishonest or illegal conduct.
4. The Employees of Doxee S.p.A. and its subsidiaries may not engage in any business activities in competition with the Group. They must also comply with Company rules and observe 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. and its subsidiaries, nor result in unfair advantage for themselves, the Companies or any third party; nor may the Addressees accept or make undue promises or offers or money or other advantages.
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.

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### 3.3 Transparency


1. The Doxee Group conducts 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 clients, vendors and external contractors, in such a way that the interests of the Group are made unequivocal, and that Group's outside contractors and other interlocutors are therefore in a position to take informed decisions.

### 3.4 Confidentiality

1. The Group guarantees the confidentiality of the personal data and information it processes, and safeguards the information it acquires in the course of its operations by observing the rules regarding the protection of personal data set out in EU Regulation 2016/679 (GDPR) and its subsequent amendments, additions and implementing regulations.
2. The Addressees shall maintain the utmost confidentiality with regard to news and information forming part of the Group's assets or relating to the Group's business, including personal data acquired for processing, pursuant to the law and applicable regulations, this Code, the Information Security Policy, Data Protection Policy and other relevant corporate procedures.

### 3.5 Combating corruption and conflicts of interest

1. In keeping with the values of honesty and transparency, Doxee S.p.A. and its subsidiaries undertake to take all measures required to prevent and avoid 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 Group's interests, regardless of whether they seek to derive any personal benefit from the Group's business opportunities. A conflict of interest also arises when the representatives of clients, vendors or public institutions act against the fiduciary duties associated with their position.
2. In performing their role and/or duties, the Addressees pursue the objectives and general interests of the Doxee Group in observance of applicable regulations, this Code and the Anti-bribery Policy.
3. The Addressees shall inform their line managers or other appropriate persons without delay of any situations or activities in which their own interests or those of their immediate relatives may be in conflict with those of Doxee S.p.A. and its subsidiaries, as well as of any other relevant situations. The Addressees shall comply with all decisions taken by Doxee S.p.A. and its subsidiaries in this regard, and refrain from acting against the Company's interests.

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### 3.6 Competition

1. The Doxee Group acknowledges that competition plays an essential role in economic and social development and progress. In the course of its business, therefore, the Group enforces 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 clients, by encouraging the containment of prices and the improvements in service quality that derive from free competition.
2. The Doxee Group deplores the organization of and participation in any activity that is against current legislation on free competition, antitrust and monopolies.
3. The Group 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 Equality, Diversity & Inclusion


1. The Doxee Group 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 Group also avoids all discrimination based on the condition of differently abled people.
2. All Employees and Outside Contractors must demonstrate respect for their interlocutors, and ensure that their conduct is guided by respect for the individual and personal dignity, in observance of corporate regulations and, furthermore, the law.

### 3.8 Occupational health and safety

1. The Doxee Group 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. All Employees and Outside Contractors must scrupulously comply with the current Company regulations and, in any case, with the legal requirements concerning personal safety and health protection.

### 3.9 Environment and protection of the environment

1. The Doxee Group is committed to continuously improving its environmental performance, to limiting its production of waste, and to reducing its wastage and consumption of energy by, among other things, promoting the use of renewable energy.
2. In the interests of the continuous and permanent improvement of its efficiency, the Group pays special attention to the limitation of its direct and indirect impacts, in particular such as are related to the operations of its clients and vendors, by means of initiatives to promote awareness of and incentivize the adoption of digitalization and dematerialization processes to reduce the consumption of paper and CO<sub>2</sub> emissions.
3. The Group also observes the requirements of environmental regulations and the Environmental Policy. Any Outside Contractors involved in operations with an environmental impact must work

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conscientiously and in accordance with established law and regulations.


### 3.10 Human Rights

1. The Doxee Group is committed to ensuring respect for internationally recognized Human Rights in its operations, pursuant to the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OCSE Guidelines for Multinational Corporations.
2. The Group's companies observe established regulations regarding the protection of human rights. Any Employees and Outside Contractors must work conscientiously and in accordance with established law and regulations, and the Doxee Group shall ensure that persons be treated with dignity and respect.
3. Respect for human rights and the promotion of the wellbeing of its Employees are foundational values and principles of the Doxee Group. Doxee and its subsidiaries believe in the sustainable development of their business, and consider respect for human rights and observance of labor rights to be an integral part of responsible corporate conduct. They also recognize that persons make an essential contribution to the growth of the Group, and consequently promote their capabilities, competencies, commitment and creativity, protect their work and occupational health and safety, and guarantee safe and protected working conditions and workplace, as well as a system of values and principles that promote legality, transparency and sustainable development.

### 3.11 Protection of minors

1. The Doxee Group pays the utmost attention to the protection of minors and the prevention of conduct 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 the Group's IT systems (see 4.8 of this Code), it is also prohibited to bring any type of pornographic material onto the Group's premises.



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## 4 Rules of Conduct

### 4.1 Principles of conduct governing relations with the Addressees


1. Doxee S.p.A. and its subsidiaries base their business relations on the principles of legality, fairness, integrity, transparency and efficiency.
2. The Employees of the Group and its Outside Contractors whose actions can be linked in any way to the Group, must act with integrity in the course of business conducted in the interest of the Group and, in particular, in relations with the Public Authorities, regardless of the competitiveness of the market or the importance of any negotiated business. 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.
3. All Addressees are required to observe the [corporate policies](#), with special reference to the prevention of corruption, protection of the environment, confidentiality and data protection.

### 4.2 Relations with investors and the market

1. It is a key principle of the Group to promote the widest possible engagement of shareholders in the life of the Group 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. The Group'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. In particular, for listed companies, specific procedures have been adopted to regulate:
  - the management of the internal and external communication of privileged information;
  - the obligations of disclosure and limitations covering the purchase, sale, subscription and exchange of shares or financial instruments by "important" 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 of this Code.
5. All Employees and Outside Contractors working for the Group in any capacity must comply with all national and international insider trading regulations.
6. No Group Employee or Outside Contractor may gain any advantage of any kind, whether direct or indirect, personal or economic, from the use of Privileged Information 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 operations and completing their corporate duties.

### 4.3 Relations with clients

1. The Doxee Group pursues business success in the markets it serves by offering quality products and services at competitive conditions and in compliance with the rules to protect fair competition.
2. The Doxee Group recognizes that the satisfaction of parties who require its products or services plays a key role in its success as a business. The Group is therefore committed to:

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- observe internal procedures for managing client relations;
- provide, with efficiency and courtesy and within the limits of the contractual provisions, high quality products that satisfy or exceed the client's reasonable expectations;
- provide accurate and comprehensive information about products and services so that clients can make informed decisions;
- observe the truth in its advertising and other communications.

#### 4.4 *Relations with vendors*

1. The selection of vendors and the determination of purchasing conditions are based on an objective assessment of the quality and price of the good or service, as well as guarantees of service and timeliness.
2. In its supply relationships, Doxee S.p.A. is committed to:
  - o observing internal procedures and policies in selecting and managing its relationships with its vendors;
  - o not precluding any qualified vendor from competing for a supply contract with Doxee S.p.A. and its subsidiaries, and adopting objective evaluation criteria in the selection process, based on stated and transparent procedures;
  - o obtaining the collaboration of vendors in constantly ensuring that the needs of the Group's clients are met in terms of quality, cost and delivery times to an extent at least equal to their expectations;
  - o maintaining frank and open dialogue with vendors, in line with good business practices.

#### 4.5 *Relations with the Institutions*

1. Doxee S.p.A.'s, its subsidiaries' 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 participating in a tender with the Public Authorities, Doxee S.p.A., its subsidiaries and the Addressees must act in accordance with the law and fair business practice.
3. In its relations with Institutions and Public Officials, the Group will never allow itself to be represented by Employees or Outside Contractors with whom conflicts of interest may arise.
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., its subsidiaries and the Addressees will refrain from the following actions, whether direct or indirect:
  - examining or offering employment and/or commercial opportunities that may personally benefit employees of Institutions or Public Officials;
  - offering or in any way providing, accepting or encouraging free gifts, favors or

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- commercial or behavioral practices that are not based on the highest degree of transparency, integrity and fairness, or are otherwise against the applicable law;
- soliciting or obtaining 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 initiated by Institutions or Public Officials.

5. Should it see fit, the Doxee Group 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.

## 4.6 *Environment, health and safety*


1. Within the framework of its business operations, the Doxee Group observes to the principles of protecting the environment, health and safety.
2. The activities of the Group and the Addressees must be in full compliance with applicable environmental and health and safety prevention and protection regulations.

## 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 the accounts of Doxee S.p.A. and its subsidiaries.
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, the 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 for the corporate information systems*

1. The use of information technology, with particular reference to internet access, exposes the Doxee Group to both economic and penal risks, involving possible security breaches and damage to the Group's image. Bearing in mind, therefore, that the Group'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 threats to the security of data processing, and is committed to promoting the adoption of said document by all members of the Group.
2. This Policy sets out the rules of conduct governing the use of corporate work tools. Said rules have been adopted in observance of the internal regulations of the Doxee Group and established personal data protection regulations, in particular EU Regulation 679/2016 concerning the protection of natural persons with regard to the processing of their personal data, and the free movement of such data, referred to hereinafter as the GDPR.
3. This regulation is made available to all Addressees who enjoy institutional or commercial relations with Doxee S.p.A. in order to ensure the security required for the best performance of the above activities,

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and will also be promoted in relations with all partners of the subsidiaries.

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Subject: Codice Etico Gruppo Doxee	
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## 5. Procedures for implementation and monitoring


### 5.1 General considerations

1. Everyone who works with the Doxee Group, without distinction or exception, in Italy or elsewhere, is committed to ensuring observance of the principles of this Code. Acting in the interests or for the advantage of the Group 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.
2. The corporate bodies, executives and all Group companies have a duty to set an example of coherence between everyday behavior and the principles established in the Code. For Doxee S.p.A., the body designated to oversee the application of the Code is the SB, established in accordance with the Organization, Management and Control Model for the prevention of criminal offenses pursuant to Italian 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 SB

1. All Addressees in the Group, whether internal or external, are required to report any violation or suspected violation of the Code of Ethics to the Reports Officer, who shall review the report and, as appropriate, interview the author of the report and the person responsible for the alleged violation.
2. For circumstantiated reports of violations consisting in conduct, acts or omissions which injure the integrity of the Group in any circumstance of which the whistleblower is aware as a result of his or her official duties, the Doxee Group has set up internal channels to protect the confidentiality of the whistleblower.
3. In order to encourage the prompt observance of the provisions of this paragraph, the Doxee Group has set up the following internal channels to protect the identity of the whistleblower:
  - Written reporting by registered post to:

Stefano Domenichini  
c/o Studio Legal & Engineering  
Via F.lli Cervi n. 59  
42124 – Reggio Emilia
  - Verbal reporting following a direct meeting with the Reports Officer, which may be requested by the whistleblower by contacting the Officer at (+39) 328 197 6617 on weekdays, 10:00 to 18:00
4. Reports regarding possible violations can be addressed to the Board of Directors of the respective subsidiary company, which will appoint one of its members to make any necessary and appropriate inquiries.
5. By virtue of the introduction of regulations governing whistleblowing within the scope of the Decree, the Doxee Group ensures that:
  - a) all reports are kept strictly confidential;
  - b) no party will disclose the identity of anyone who provides the Reports Officer with useful information for identifying conduct 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 Group's companies or any persons accused erroneously or in bad faith;
  - c) whistleblowers are protected against retaliation and discrimination relating to their decision to make a report;

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- d) appropriate sanctions are applicable to anyone who violates the above measures for safeguarding whistleblowers and/or upon anyone who makes clearly unfounded reports.
6. All information and reports envisaged by the Model are kept by the Reports Officer in a dedicated archive (digital and/or hard copy) for a period of 5 years.
7. The complete procedure is available at the following [link](#).

### 5.3 Dissemination of the Code of Ethics

1. The Doxee Group 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 of the [Code of Ethics](#) in the [governance](#) section of the Parent Company's website; availability on the Group's intranet and posting on the noticeboards at each Group site;
  - notice to temporary or occasional staff, contractors and vendors 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 activity of the Group's companies is based.

### 5.4 Effectiveness of the Code and sanctions

1. Compliance with the requirements of this Code forms an integral and essential part of the obligations of the Group's staff by virtue of their employment by the Group. 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.
2. Any staff who make improper use of the reporting system may also be liable to disciplinary proceedings. In particular, staff who make complaints containing false and/or unfounded information, for 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.
3. Doxee S.p.A. and its subsidiaries undertake to consistently, impartially and uniformly establish and impose sanctions which 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

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Drafted By	Giorgio Galli	Compliance
Verified By	Fabio Cavazzuti	Chief Information Security Officer
	Ester Barbanera	Data Protection
	Luca Merzi	Compliance
	Simona Sassatelli	Human Resources
Approved by	Paolo Cavicchioli	CEO
Classification	Public	
Distributed	Everyone	

Revision Index	Date	Description of edits
1	11/13/2009	First draft
1.1	09/14/2012	Company rebranding
1.2	02/23/2017	Layout Review
2	08/16/2019	Updated references to standards and regulations
2.1	10/18/2019	Review for MOG 231 implementation
3	12/05/2019	Addition of paragraph 4.2 concerning relations with investors and the market
4	09/26/2024	Updated with application to the subsidiaries and updated whistleblowing section