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CODE OF ETHICS

PURSUANT TO LEGISLATIVE DECREE 231/2001

STAR7 GROUP

Registered office: Via Alessandria 37 b,
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1. General provisions

Since the STAR7 Group's formation, its companies have striven to base all their actions on the ethical values and principles described in this document when pursuing their economic and corporate aims.

This Code of Ethics sets out all the ethical principles that must be respected to ensure that work is done properly and relationships with different stakeholders are managed well.

Freedom, respect for differences, human dignity, integrity and honesty are some of the principles that should inform all company actions. STAR7 Group companies also repudiate discrimination in all its forms, be it on the grounds of gender, race, language, religion or political beliefs.

Under no circumstances will the STAR7 Group tolerate actions taken in companies' interests or to reach company aims if they are not in line with the rules in its Code of Ethics.

For those STAR7 Group Companies that have an Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter also "Model 231"), this Code of Ethics is an integral part of said Model 231.

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2. Nature and purpose of the Code

This document is to be understood by all stakeholders in STAR7 Group companies as the definitive set of values and principles that inform those companies' conduct when pursuing their own economic and corporate interests.

2.1. Recipients of the Code

The rules in this document must be respected, without exception, by every one of its recipients.

The recipients of this Code are corporate bodies, employees, customers, suppliers (both in the same country and abroad) and in general anyone with a relationship with a Group company.

Every recipient of this Code is obliged to read every rule it contains and to respect every principle when carrying out company activities.

Those who have been employed by STAR7 Group companies for longer are obliged to pass on these ethical values to the people who report to them, as well as their duties and responsibilities to the STAR7 Group. Any employee who is uncertain about any rule in the Code should ask their supervisor for clarification.

In defining economic goals, company strategies to follow and in general all activities in the realm of management of the STAR7 Group, managers should take their cue from the values and principles in the Code of Ethics.

Supervisors and members of company bodies must always ensure that company conduct, and their own conduct as holders of certain positions within their companies, is in line with the stated ethical principles. These particular recipients must set an example, a model to be followed by employees.

All recipients of the Code must in particular:

- ✓ use the STAR7 Group's assets and tools with the utmost diligence and only for company purposes;
- ✓ read and understand their company's internal procedures, so as to conduct themselves in line with the ethical principles at all times;
- ✓ inform third parties of every value and principle in this document so they can adapt their conduct to the Group's culture too.

The STAR7 Group strives to use all the most suitable means of communication to inform both internal and external recipients of the principles in the Code.

This document is an integral part of the employment contract that binds each employee to the STAR7 Group. Therefore, to ensure fair, transparent working relationships, all employees must promise to accept and follow the principles from the moment they sign their contract.

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3. Standards of conduct

STAR7 Group companies operate internationally in the fields of translation, specialist technical writing, printing, process engineering, virtual reality and immersive reality.

The Group's added value is its all-encompassing range of services – ranging from translation to product advertising, with special marketing campaigns and after-sales assistance – that ensure customer loyalty.

In carrying out its economic activities, the STAR7 Group aims to:

- invest continuously in research into innovative technologies;
- offer services that always meet its customers' demands;
- ensure a working environment that respects all its employees;
- always strive for excellence;
- carry out its work with respect for the environment.

The STAR7 Group guarantees that all its company assets and resources are used solely to reach its own and its companies' aims and not for personal interests.

This document is founded on the principles of honesty, the physical and moral integrity of people, respect for the law, quality of services and probity wherever conflicts of interest may arise.

Honesty

The STAR7 Group is committed to placing integrity and honesty at the heart of its corporate conduct at all times, in its work and in its relationships with its various stakeholders.

Any conduct whatsoever that is not in line with this principle must be punished, as set out in the Code itself and in current legislation.

Group companies also ban:

- ✓ collusive behaviour and corrupt practices;
- ✓ illegally obtaining confidential information on company business;
- ✓ conduct detrimental to trade and industry.

All those acting in the name or on behalf of the STAR7 Group are therefore obliged to conduct themselves fairly and honestly, whatever the nature or importance of the company business they are doing.

Physical and moral integrity of people

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STAR7 Group companies believe that to pursue their economic and corporate aims they must invest in improving their human resources, as they embody the Group's true added value. STAR7 Group companies therefore strive to preserve an atmosphere of dialogue, openness and listening to employees, strengthening the trust between them.

The STAR7 Group also protects its employees from discrimination on the grounds of race, language, nationality, religion, political beliefs, age and sexual orientation. STAR7 Group companies are also assiduous in valuing and taking up their staff's own ideas, encouraging people to take part in the Group's growth and development.

STAR7 Group companies offer their staff training courses that guarantee ongoing internal growth and continuous learning, so they can offer services that are always in line with market demands.

Respect for the law

All company conduct is founded on respect for the law and current legislation. STAR7 Group companies will not hesitate in punishing severely any recipient whose conduct is outside the law.

Group companies also undertake to make all recipients aware of this principle using the most suitable means of communication, and to take further monitoring measures so that any conduct that is not in line with the principle does not occur.

Principle of confidentiality

In line with EU Regulation 2016/679 (GDPR) and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018, the STAR7 Group ensures data and personal information are protected when carrying out its company activities, and prevents it being used improperly or illegally. STAR7 Group companies endeavour to inform data subjects in a suitable manner and to obtain their consent before processing their data.

All recipients should keep sensitive data on STAR7 Group companies completely confidential, including outside of work and after their working relationship has ended, so as to protect information on the companies' technical skills, assets, finances, legal and administrative workings.

Every recipient of this document must in particular:

- ✓ disseminate data and information in accordance with the applicable company procedures;
- ✓ keep all data in such a way that it is inaccessible to unauthorised people;
- ✓ process information and data exclusively for the stated purposes.

Quality of services

Top quality services are at the heart of all company activities. STAR7 Group companies aim constantly to improve the features of their services and the way they provide them, so as to respond as best they can to the market's shifting demands.

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After-sales assistance is one of the main things STAR7 Group companies offer their customers, especially when it comes to management of IT services. Group companies therefore run a series of training courses for their staff, to get them more informed on certain topics and improve customer care services.

Transparency

The STAR7 Group aims for the utmost transparency and accuracy when giving out information to recipients.

Recipients of this Code must make sure any information they give out is:

- ✓ consistent
- ✓ truthful
- ✓ lawful
- ✓ verifiable
- ✓ documentable
- ✓ accurate.

STAR7 Group companies also keep their suppliers, creditors and employees constantly informed of news on the Group's activities that will be of interest to them.

Protecting competition

The STAR7 Group forbids any conduct whose aim is to do business for personal interests, in violation of applicable laws and regulations. Group companies endeavour to protect the value of fair competition, because they feel it is essential to their own growth and development.

The STAR7 Group absolutely forbids any collusive conduct, abuse of powerful positions or unprofessional behaviour in general.

Fairness

Group companies strive to honour the principle of integrity and non-discrimination on the basis of race, gender, religion, political beliefs, language or age when carrying out their activities and in their relationships with their various stakeholders.

In particular, the companies of the STAR7 Group are committed to respecting the ethical principles described in this Code when authoring, translating and printing documents, as requested by customers. They therefore do not accept requests to author, translate or print texts from customers who do not meet the principles of lawfulness, fairness, non-discrimination and the principles in this document in general.



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The Group also refuses to translate, author or print documents that contain or deal with pornography, child prostitution, terrorism or slavery.

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4. Business conduct

STAR7 Group companies are particularly eager to develop trusting relationships with all their stakeholders, and invest resources to that effect.

The STAR7 Group forbids all its employees and collaborators to offer or accept benefits, gifts or anything else of that nature, apart from gifts of modest value that could be considered reasonable tokens of courtesy.

When doing their work STAR7 Group companies must at all times base their conduct on the principles of honesty, fairness and professionalism. Their conduct must remain within the law and current legislation.

4.1. Customer relations

The corporate reputation of STAR7 Group companies is one of the main strategic factors in its success and in the expansion of its business. To stay profitable in the long term, STAR7 Group companies commit to investing resources in customer relations.

Group companies make sure they always honour the methods and deadlines set out in contracts with customers.

In their relationships with customers, employees must:

- always work with the utmost courtesy and efficiency and with respect for all the terms agreed in contracts;
- provide information and clarification on the terms of contracts if asked for;
- not resort to deceitful or unfair practices;
- act in a spirit of fairness, honesty and transparency;
- guarantee high-quality services, in line with customers' demands.

4.2. Relations with suppliers

The selection process for new suppliers is based on evaluation criteria of reliability, timely delivery, integrity and any guarantees offered.

When it comes to selecting a new supplier, Group companies strive to use criteria that are impartial and objective, so it can give everyone the same opportunities and make sure procedures are transparent and fair.

The STAR7 Group also undertakes only to enter supply contracts with parties whose conduct is considered to be in line with the Code's rules and values.

When managing relations with suppliers, both in the same country and abroad, STAR7 Group companies must:

- not exclude any company that meets the requirements from the chance of a supply contract;
- always maintain open and fair dialogue with them;

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- always ensure a flow of correct and transparent information.

4.3. Relations with public authorities

All interaction with public authorities must be based on fairness, transparency, independence and impartiality.

Specifically, employees may not improperly influence the decisions of people from public authorities, by offering money or other rewards (for example, commercial or work opportunities that are in the personal interests of people tasked with public service).

The STAR7 Group also forbids direct or indirect payments to people from public authorities, unless expressly provided for in law or current legislation.

4.4. Relations with legal authorities

Relations with legal authorities must be managed by specific predefined company functions.

All recipients are obliged to collaborate as far as possible with, and make themselves as available as possible to, legal authorities in the event of checks or inspections by the latter.

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5. Internal policies

In implementing all internal policies concerning staff management, health and safety at work and internal communication, STAR7 Group companies feel that respecting all the principles therein is essential to ensure a clean, safe workplace.

5.1. Staff management policies

The STAR7 Group aims to offer its employees equal work opportunities, without resorting to any kind of discrimination. Group companies give all candidates the chance to take part in their selection processes, as long as they have the skills and characteristics they are looking for.

The Group feels that the training and continuing education of its own staff is fundamental to professional growth within its companies. The STAR7 Group is also committed to offering training courses on specific topics, for example on changes to rules on health and safety at work.

The STAR7 Group wants to create a working atmosphere based on common respect for the dignity of every person in every company.

Recruitment

When recruiting staff, STAR7 Group companies look for people who satisfy the professional, psychological and behavioural requirements of the profile required.

Under no circumstances does the STAR7 Group allow favouritism, nepotism or clientelism. It takes suitable measures and deploys specific company procedures in its processes of selection, hiring and staff management in general.

New hires are provided with information on:

- ✓ the nature of their job, their role and position in the company;
- ✓ their salary;
- ✓ the procedures and regulations followed by STAR7 Group companies to prevent occupational risks;
- ✓ the tasks and responsibilities that will be entrusted to them.

Providing this information is intended to ensure that candidates can take decisions with knowledge of all the facts.

Employment contracts

The STAR7 Group will not tolerate any improper employment contracts whatsoever. It will ensure that such contracts comply with the Italian national collective bargaining agreement and with law.

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From the moment their contracts are signed, STAR7 Group companies commit to informing all employees of the conditions and terms needed for their work to be carried out properly. STAR7 Group companies also guarantee fair payment in line with current regulations.

5.2. Health and safety in the workplace

STAR7 Group companies are intent on cultivating a culture of safety, promoting responsible behaviour by all recipients working for them. STAR7 Group companies, in going about their business, carry out all activities while protecting their employees' health and safety, creating internal procedures and measures for the purpose.

STAR7 Group companies aim to constantly check and update their working methods for keeping their employees healthy and safe, along with anyone else working in the name of or on behalf of the companies.

The Group also strives to prevent employees suffering accidents or illnesses resulting from their work or workplace.

6. External communications

All external communication by staff must fully respect the values in the Code, as well as current laws and regulations.

The following are forbidden, without exception:

- ✓ Giving out confidential and sensitive information on STAR7 Group companies, unless for defined and declared purposes.
- ✓ Giving incorrect or debatable information or news on the STAR7 Group or any parties with which its companies have relationships.

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7. Transparent accounting

The criteria of transparency, truthfulness, accuracy and completeness are the foundations of the Group's accounting processes. STAR7 Group companies strive to be as rigorous and respectful as possible when it comes to current legislation on drafting financial statements and other compulsory accounting documents.

All recipients are obliged to collaborate within the remit of their role and responsibilities. They must promptly report to those in charge, in the interests of correct production of financial statements for Group companies. Should any illegal or illegitimate orders be given to any recipient, the latter has the right not to carry them out and is obliged to report what has happened to the Supervisory Body.

STAR7 Group companies make sure to report all accounting data with full respect for the principles of truthfulness, accuracy and diligence.

In order that all transactions can be reported properly within companies' accounting systems, they must be:

- ✓ legitimate
- ✓ consistent
- ✓ authorised
- ✓ correct
- ✓ verifiable.

Any omission or falsification of accounting data must be punished heavily, in line with current regulations and with this document.

Every recipient of this Code is obliged to keep documents with accounting data and information from STAR7 Group companies, so it can be easily found and consulted by people responsible for carrying out audits.

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8. Conflicts of interest

A conflict of interest is a situation in which the opinions and interests of individuals prevent Group companies carrying out their activities wholly in their own interests, thereby harming impartiality.

All STAR7 Group activities must seek to avoid leaving anyone involved in a conflict of interest.

When carrying out their tasks on the STAR7 Group's behalf, all Group company employees must take special care not to take part in any social activity that might lead to conflicts of interest or any other situation that could bring to bear their personal interests or those of other people connected to them.

Group companies demand timely reports from the Group's heads and from the Supervisory Body on any situations that could lead to a conflict of interest. Supervisors must be informed of all potential conflicts, so they can use all the tools at their disposal to prevent these situations occurring.

All employees are obliged to avoid any conflict that might arise between their own economic or family interests on the one hand, and the responsibilities and role they have within the Group on the other.

Employees and collaborators may use confidential information and data from STAR7 Group companies when carrying out business activities on behalf of those companies.

The following constitute conflicts of interest:

- ✓ accepting gifts, rewards, money or other benefits from parties who want to establish a working relationship with Group companies;
- ✓ abusing one's position within the company or confidential data in one's possession;
- ✓ pursuing one's own financial and economic ends rather than the interests of the STAR7 Group.

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9. Violation of the Code and penalties

Respecting the rules in this Code of Ethics is a prerequisite for continuation of any relationship with the STAR7 Group, regardless of its nature or the conditions in any contract.

Any recipient who becomes aware of a violation, even if only a suspected one, of the rules in this document should inform his or her supervisor and the relevant supervisory body without any hesitation.

At companies with a 'Model 231' compliance programme, any company conduct that is not in line with this document, even if only suspected, must be reported promptly to the Supervisory Body. The Supervisory Body is responsible for verifying whether such reports are founded and truthful.

Recipients who behave in any way contrary to the ethical principles described will be subject to specific sanctions.

The Code of Ethics is an integral part of the employment contracts that employees sign with STAR7 Group companies. Therefore, in accordance with applicable labour legislation, any violation of the Code of Ethics by employees could entail a claim for damages or even termination of the working relationship.

The rules outlined in this document are part and parcel of the contractual obligations taken on by anyone who has a business relationship with Group companies. Therefore, any failure to observe them could lead to claims for damages and, in more serious cases, termination of contract or responsibilities.