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01	28/08/2019	Rodolfo Politi	Domenico Martino	Francesco Taccone	Revisione formale
02	20/09/2021	Mario Bruzzese Alessandra Focà	Valentina Nicosia	Francesco Taccone	Revisione formale ed integrazione con la SA8000

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## 1. PURPOSES AND CONTEXT

negg® strongly believes that every activity should be ethically conducted, identifying everyone's selves in the principle set off in the art. 41 of Constitution, on the basis of which the private economic activity "cannot take place in contrast with social utility or that brings damage to human security, liberty and dignity" and is conscious that the authority of a company is identified, in addition to their partners' competence and the high quality of the service provided to the clients, also by the attention on the needs of the whole community.

negg® has chosen then to provide itself with a Code of Ethics and company direction, approved later as a Code, inside of which is possible to spread the morals that have always inspired and continue to inspire the work of the company, with the belief that the reliability is built daily in the respect of the rules and attributing value to people, in line with the disposition of the regulations SA8000:2014, UNI EN ISO 9001:2015 e ISO IEC 27001:2014.

With the objective of pursuing the excellence in the market in which it works, negg® promotes an aware, conscious and sustainable development, which is capable to switch from the safeguard of the Security of people and the environment involved through the adoption of a behavior which is coherent and respectful of the Social Ethics, which allows us to create value added and to obtain the general satisfaction of the Community. This represents a distinctive and identifiable element regarding the market and third parties, whose knowledge and sharing, requested to to all of them who operate in it ora who collaborate with it, constitute the fundament of the activity and the first step to contribute to the pursuit of the company's vision.

The Code shows the whole set of ethical and moral principles which are the basis of negg® activity, as well as the behavior guidelines adopted by the company both inside, in the relations with the staff, and outside, in the relations with stakeholders, may them be suppliers, clients, commercial partners, institutions, political and labor union organizations and formative authorities.

The respect of these principles is for negg® of vital importance for the achievement of its own mission, as well as granting its reputation in the social and financial context in which it works.

The Code is binding for both administrators and employees of negg®, as well as for all of them who operate and cooperate, occasionally and permanently, with the company.

negg® also commits itself to adopt every opportunity to furnish large diffusion and application of the principles and prescription of the Code, also through the internet website

[www.negg.group](http://www.negg.group).

The Code has been drafted coherently with the integrated Policy and the internal Regulations.

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## 2. GENERAL PRINCIPLES

The Receiver's conduct, at all company levels, is inspired to the principles of **legality, honesty, privacy, perseverance, loyalty and non-discrimination/inclusivity**. The intrinsic conviction to act in the interest of negg® does not relieve all the stakeholders from being obliged to observe punctually the rules and principles of the following Code.

### 2.1. Legality, honesty, privacy.

negg® operates in the absolute respect of the law and of the present Code. All the internal and external stakeholders, are expected to observe every regulation applicable and to constantly keep up to date with the legislative evolutions, taking also advantage of the formative opportunities that negg® offers.

negg® considers transparency of of accounting and financial statements a fundamental principle for the business of its activity and for the protection of its reputation.

Honesty and moral integrity are an indefectible duty for all the internal and external stakeholders, who are required to not creating any privileged relationship with third parties, which may result in external insinuations finalized to obtain improper advantages. There are so required, while developing their activity, to not accept any donation, favor or utility of any type (with the exception of objects of modest value) and, in general, to not accept any exchange with the objective of conceding improper advantages to third parties, neither to make donations in turn to third parties or to offer utilities and illegal favors of any kind (except mere objects or courtesy gifts authorized by the company) in connection with the beneficial activity carried out by them for negg®.

negg®, in particular concerning maximum confidentiality files containing *know-how* information, company and industrial secrets or financial operations of the company.

### 2.2. Perseverance and loyalty.

The relationship between negg® and its employees is founded on mutual trust: employees are, therefore, required to operate in order to favor the company's interests, in observance of the values in the current Code.

Considered the fundamental value which negg® admits in the work relationship marked on deep trust and esteem, whenever an employee receives job offers from rival companies, negg® expects

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the interested employee to contact the CEO, as soon as possible, in order that, in the respect of the rules established for the free competition and of the liberty of choice of the individual, the Directorate may evaluate the hypothesis of an unfaithful competition action, meaning that the offer of the competitor company, might be moved by an *animus nocendi*, aiming to damage the research, the experience and the production structure of negg®, getting to alter significantly the honesty of the competition. negg® desires also that the employee informs about defamatory actions from competitors directed to the company, meaning attempts to make the employees violate the loyalty commitment about the work relationship, resigning without respecting the notification period and subtraction of company information and files.

All the stakeholders must keep off from whatever activity that may create conflict with the interests of negg®, giving away the pursuit of personal intentions that may be in contrast with the company ones. In case an employee identifies the subsistence of a conflict of interests is expected to address, without delay, to his/her hierarchical superior, in order that the company evaluates, and eventually authorizes, the activity potentially in conflict.

In cases of violation, negg® will adopt every measure intended to stop the conflict of interests, setting aside the chance to take an action to protect itself.

negg® and its main stakeholders commit their selves in the realization of a loyal competition, in the respect of the national and community normative, being aware that a virtuous competition constitutes an healthy incentive for the innovation, development and protection processes, also the interests of the consumers and the community.

### **2.3. Social responsibility requirements SA8000**

In order to protect human rights and promote the respect of ethical principles, negg® commits to:

- Not benefit or support the use of infant work;
- Not benefit or support the use of obligated work;
- Respecting the worker's right to take part and create labor unions of individual choice and the right of collective negotiation;
- Granting that the potential labor union representatives freely elected by workers not find their selves discriminated in their work place and that are freely able to communicate and educate their members;
- Not make discriminations in recruitment, retribution, access to education, promotion, layoff or retirement depending on race, class, nationality, religion, disability, sex, sexual orientation, labor union belonging, political affiliation, age; it grants moreover the maternity protection not undergoing the employees to pregnancy or virginity tests during the hiring as well as in any other circumstance;

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- Not interfere with the personal right of following principles, beliefs, uses and costumes or the satisfaction of needs connected to race, social class, nationality, religion, disability, sex, sexual orientation, labor union belonging, political affiliation;
- Not permit behaviors, including gestures, language or physical contact, which may be sexually coercive, threatening, offensive or intended to exploitation;
- Not s nor favor corporal punishments, mental or physical coercions, verbal violence;
- Adapt to the work time-table expected from the actual laws and to the public transport sector's standards, conceding a day off at the end of the six days of work as expected from the contract; furthermore, it is granted the right, in case of serious danger, to move away without asking for permission.
- Adjust in order that the work week is the one established by the law, not exceeding the standard 40 hours
- Work hard so that the overtime work doesn't overlap the 12 hours per week expected for every employee and that this is paid with an extra percentage;
- Ensure that the respect of the minimum wage, legal, in order that the salary satisfies anyway the essential and primary needs.
- Grant that the eventual deductions on salary, due to disciplinary reasons (allowed by the category contract) are utilized for beneficial finalities and that the pay slip is clear and comprehensible to all;
- Grant that the retribution is given according to the legal prescriptions and, in any case, in the most convenient reason for the workers;
- Grant that are not stipulated work contracts which underline an abuse of the typology of the collaboration relationship, in order to not regularize the contributive position of the worker;
- Grant that are false apprenticeship schemes are not applied, in order to avoid the fulfillment of obligation in topic of work;
- Grant a safe and healthy work place, taking the effective measures in order to prevent potential incidents and injuries to the workers' health reducing, in the most reasonable way, the causes of risk present in the work place.

## **3. RELATIONSHIP WITH EMPLOYEES AND COLLABORATORS**

### **3.1. Employee administration**

negg® protects and adds value to its human resources, committing to maintain constant the necessary conditions for the professional growth, the knowledge and skills of each person,

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carrying out the necessary educational and update meetings and every initiative aimed at pursuing this objective.

negg® carries on the evaluation and selection of the employees based on honesty and transparency, in the respect of equal opportunities, in order to unite its own necessities with the ambitions and expectations of the candidates.

negg® commits to adopt every measure useful to avoid every type of favoritism, using objective and meritocratic criteria, in the respect of candidates' dignity as well as the company's interest.

negg® promotes workers' participation to the company life, providing them participative instruments capable of collecting the opinions and advices of workers.

The staff employed, also through the actualization of the current Code, receives an information clear and correct about roles, responsibilities, rights and duties of the parts.

Considering the maximum availability for the company, no worker can be obliged to execute tasks, performances or favors not due based on their work contract and their role inside the company.

negg® firmly commits in contrasting episodes of mobbing, stalking and psycho violence and every type of behavior aiming to discriminate or injury the person's dignity inside and outside of the company locals.

Relationships between employees have to be distinguished by loyalty, honesty and mutual respect, observing the values of civil coexistence and liberty of people.

## **4. JOB ENVIRONMENT**

negg® commits to offer its employees an healthy and safe job environment, respectful of the worker's dignity, it looks after to manage the social and psychophysical dimension and protects their health severely implementing the regulations expected by the currently into effect law, for example, by actively promoting the safety culture through specific formative programs.

The employees perform their functions trying to rationalize and contain the use of company resources.

## 5. COMPANY MANAGEMENT

### 5.1. Conformity to internal procedures

negg® believes that management efficiency and control culture are essential elements to reach the objectives. For this reason, all the employees is expected to respect the procedures and operative instructions of the Company management system, to act in reference to the respective authorization profiles and to conserve every adequate documents regarding the actions taken. The system of monitoring and internal control is oriented to the adoption of instruments and methodologies intended to contrast potential company risks.

### 5.2. Accounting management and assets safeguard

In the activity of management accounting, the employees are called to act in reference to the principles of authenticity, accuracy, and transparency. The respect of those principles allows the company also to plan its strategies coherently to its real financial-economic situation. Therefore, all the items reported in accountability, must be supported by complete, clear and valid documents, avoiding every type of omission, falsification and/or irregularity. In case of property or economic elements founded on appraisals or estimates, the relative registration must inspire to the criteria of rationality and caution. All the addressees are compelled to correctly applicate the instructions relative to safety to protect the hardware and software devices from non-authorized accesses, which may seriously endanger the rights to the protection of the personal data of both employees and clients of negg®.

### 5.3. Communication

negg® promotes and efficient digital company communication capable of putting in contact the company with the society, aiming to adopt requests, needs and necessities of the congregation and spread its values and mission. negg® provides its stakeholders with the right instruments of communication through which it is possible to interact with the company itself for requests, explanations and complaints. The information spread are complete and accurate, so to give them the opportunity to take correct and conscious decisions.

The public relations' promotion follows the ethic values, safeguards children and rejects gross and offensive messages.

## **6. EXTERNAL RELATIONS**

### **6.1. Relations with Authorities and Public Administration**

The relations with Authorities and Public Administration must be marked by maximum clearness, transparency and collaboration, in the full respect of law and according to the highest moral and professional standards. In the relations with Public Officials, with the people in charge of Public Service, and the Public Administration in general, the employees, earlier authorized, will conform to the maximum levels of accuracy and integrity, keeping off from every form of pressure, explicit or veiled, finalized to obtain every illicit advantage for itself or for negg®.

Regarding this, the authorized addressees will be required to strictly follow what is disposed in the current Code, as well as, more generally, what expected from the guidelines given by the Directorate.

### **6.2. Relations with political and union Organizations**

negg® does not support nor discriminates whatever type of political or union organizations and keeps off from providing any type of contribute to parties, unions or any other social formations, with exception to specific dispensations and, in any case, always in the limits of what allowed by the regulations in effect.

The employees are required to refrain every pressure direct, indirect or boasted against political exponents or union representatives.

### **6.3. Relations with customers and suppliers**

negg® believes that the safeguard of the corporate image and reputation depend, also, from the courtesy, competence and professionalism that the employees demonstrate in the relations with third parties. In particular, keeping off every disloyal or deceptive behavior that may induct customers or suppliers to believe in unfounded facts or circumstances.

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In order to maximize the client's satisfaction, every employee commits with perseverance to offer high-quality services to customers, trying to limit any type of disservice or delay.

The choice of suppliers is taken on the basis of the objective criteria of affordability, opportunity and efficiency. It is impeded the choice of suppliers on mere subjective and personal basis or by virtue of interests conflicting with the company ones. The relations with suppliers are marked by loyalty, correctness and transparency.

All the employees or collaborators have to bring about every possible control in order that suppliers and customers are able to respect the fundamental ethical principles in the current Code.

## 7. GUIDELINES OF THE SANCTIONATORY SYSTEM

The respect of the regulations of the current Code is entrusted to the employees' safe, reasonable and careful surveillance, within the scope of the respective roles and functions inside the company, who are expected so, to report to their director the circumstances potentially in contrast with the fundamental principles and the prescriptions of the Code.

An illicit or non-ethical behavior, violating the principles established in the Code and in the procedures specified in the internal controls may compromise the trustworthy relationship between negg® and its administrators, employees, consultants, partners with any qualification, customers, suppliers, commercial and financial partners.

negg® will not allow that the employees who have faithfully reported violations, even if only suspicious, become targets of discriminations and reprisals; it is in any case assured the privacy of the identity of the reporters, except for the legal obligations. Anyone who commits acts of reprisal will be subject to disciplinary measures.

Depending on the seriousness of the behavior brought about by the subject involved in an illicit activity who, with any qualification, has relations with negg®, the company Directors will instantly provide to take adequate and proportionate disciplinary measures, following the regulation in effect in matters of the right of work, independently from the legal action.

The identification and implementation of the sanctions will always take place considering the general principles of proportionality, generality and suitability in relation to challenged violation.

The company penalty system is clarified in the document **All.004 | Internal Guidelines**.

## 8. REPORT CONTROL

The Responsible of the Integrated Management System is the function of internal control entrusted to verify the reports of violation of the ethical Code and company behavior who executes then the investigation of verification of the violation and reports the results to the Directors, who will express their opinion about the necessary measures to apply.

The RIMS is also responsible of the periodic control of the respect of the ethical Code and company behavior.

**Francesco Taccone**

**Chief Executive Officer**



**Paolo Frascati**

**Chief Executive Officer**

