



# NOBIS Group Code of Ethics and conduct

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Approved on 30 March 2021 by the Boards of Directors of

**Nobis Compagnia di Assicurazioni S.p.A.**

**Nobis Vita S.p.A.**

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## DEFINITIONS

<b>Code</b>	Legislative Decree No. 209 of 7 September 2005, the so-called Private Insurance Code
<b>Group</b>	NOBIS Group
<b>Partners</b>	All those subjects who offer goods or services to the Group, or who sell products of the insurance companies belonging to the Group, according to the different modalities provided for and formalised by contract
<b>Lgs. D. 231/2001 or the Decree</b>	Legislative Decree No. 231 of 8 June 2001 and following amendments and integrations
<b>Employee</b>	The subjects having a subordinate job relationship with NOBIS, including Managers
<b>Corporate Rules and Regulations</b>	Document governing the use of IT tools in accordance with what provided for by the General Regulations of the Data Protection Authority. The Rules and Regulations are provided on the Corporate Intranet and they are posted on all corporate notice boards.
<b>Model or Models</b>	The organisational, managerial and control model or models provided for by Italian Legislative Decree 231/2001
<b>Offer</b>	The Company's business offer of insurance products and services
<b>Supervisory Body</b>	The internal control body in charge of supervising the functioning of and compliance with the Model, as well as related updating
<b>Employee</b>	The subjects having a subordinate job relationship with the Group, including Managers and Directors
<b>Solvency and Financial Condition Report</b>	Report drawn up in compliance with reporting obligations provided for by the Solvency II Directive
<b>Internal Control System</b>	The set of rules, procedures and organisational structures provided so that the business may be run in a way that is healthy, proper and consistent with pre-established objectives, based on a suitable process for identifying, measuring, managing and monitoring the main corporate risks.
<b>Stakeholders</b>	With reference to an organised entity, this expression indicates all those subjects being interest bearers with respect to the Group, such as shareholders, customers, employees, insurance intermediaries authorised to work out of office, investors, partners, suppliers, the Public Administration and the Authorities that supervise the work carried out and the civil society in general.

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## FOREWORD

NOBIS Group (hereinafter “NOBIS” or the “Group”) considers the laying down of the ethical principles related to its activity essential, in compliance with Article 4, paragraph 2, Article 11, paragraph 4 and Article 77 paragraph 4 of the IVASS Regulation No. 38 of 2018. To such end, it has provided an official document which constitutes an essential element of the Internal Control System.

With the aim to promote the personnel’s operational fairness and respect for integrity and ethical values, and to prevent deviant conducts of which they can be required to respond pursuant to Legislative Decree No. 231 of 8 June 2001 and pursuant to Article 325 of the Code, the Company adopts a Code of Ethics that lays down rules of behaviour, regulates situations of possible conflict of interest and provides suitable corrective actions, should the personnel deviate from the directives and procedures approved by the top management or violate the applicable Rules and Regulations and the Code of Ethics.

This Code of Ethics constitutes the charter of rights and moral duties that define the ethical-social responsibility of all those who participate in NOBIS’s entrepreneurial organisation.

NOBIS has decided to draw up this Code of Ethics, created as an actual “charter” of the Company’s relations with all its stakeholders. The Code expresses the values in which NOBIS believes and to which it wants to commit itself, it states the principles of conduct deriving therefrom within the context of the relation with each stakeholder and necessarily raises the level of consistency that each single individual must have within the Company, in order to deserve interlocutors’ trust.

This Code - a governance instrument – provides a wide view of our social and environmental responsibility, placing the relationship with our stakeholders in the centre. The constructive dialogue with the latter – based on listening to requests and balancing them with respect to corporate strategies - triggers a process that aims to activate a virtuous circle towards constant improvement.

## 1. SCOPE OF APPLICATION

The rules and regulations laid down in the Code were enacted by the Parent Company and shall be adopted by each company of the Group; therefore, the term NOBIS identifies all of the Group’s companies. The Code applies to:

- those who have executive or control responsibilities: administrators, auditors, directors, managers and officers;
- employed personnel, including those who work with a fixed-term or part-time contract and those assimilated to the same;
- intermediaries, partners, agency personnel;
- suppliers of goods and services that act in the name of and on behalf of NOBIS.

## 2. ETHICAL OBJECTIVES AND STANDARDS OF BEHAVIOUR

NOBIS’s mission is to become a significant player in the insurance services market offering innovative solutions aimed at satisfying individual needs in the areas of welfare, the protection of goods, the person and mobility.

NOBIS intends to establish a stable and durable bond with customers with the aim to maximise their satisfaction, at the same time pursuing the creation of value for the Group’s stakeholders and partners.

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NOBIS identifies with the values of innovation, service to the customer, quality and social responsibility. These principles summarise the Group's entrepreneurial mission and identify the most correct way to fulfil it.

Our growth strategy aims at creating solid and sustainable value from the economic and financial, social and environmental viewpoints, built on all of our interlocutors' trust and based on the following values:

## **2.1 Fairness and Compliance with laws, rules and regulations**

The Group operates complying with the applicable Laws, professional ethics and internal regulations. The pursuing of the Company's interest can never justify a conduct contrary to the principles of fairness and honesty.

NOBIS's entire entrepreneurial structure is founded on the inalienable and essential value of compliance with the Law, understood as any source of law applicable to NOBIS's activity (Constitution, Law, Regulation, Administrative or Jurisdictional Act, International Treaty, Community Directive and Recommendation) in any Country where NOBIS operates in a continuous or even only occasional manner.

## **2.2 Impartiality**

In its relations with Stakeholders, the Group avoids any form of discrimination based on nationality, sex, race or ethnic origin, religion, political opinions, age, sexual orientation, disability, health conditions of its interlocutors, and it ensures the respect of human rights universally recognised and sanctioned by the Universal Declaration of Human Rights.

Each operation, transaction or payment carried out must be guided by suitability criteria in relation to NOBIS's objectives and be impartial with regard to the conditions applied to subjects with equal social and cultural characteristics.

## **2.3 Confidentiality**

NOBIS is committed to protecting, safeguarding and promoting the right to confidentiality of the single individual and of commercial enterprises. All personal data, sensitive and non-sensitive, of which NOBIS comes to knowledge, due to or on the occasion of the conduction of its activity, are processed with the utmost care and in absolute compliance with the applicable laws and the instructions received from the Data Protection Authority.

With regard to the Employees' and Partners' use of IT tools, always in a view of safety and confidentiality, reference is made to the Corporate Rules and Regulations on the use of IT instruments.

Furthermore, the Group assures, in compliance with the rules and regulations of reference, the confidentiality of the information in its possession and its processing with modalities suitable to assure its utmost transparency to the direct parties involved and inaccessibility to third parties, if not for justified and exclusive corporate purposes or in the presence of specific warrant, in the cases provided for by the local rules and regulations. In particular, NOBIS forbids its partners to use and disseminate confidential information for purposes not related to the conduction of the professional activity.

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## **2.4 Conflict of interests**

In all the activities carried out, the Group operates to prevent the arising of real or even only potential situations of conflict of interests. In addition to the hypotheses set out by Law, a conflict of interest is also understood as the case when a partner operates to satisfy an interest different from the Group's interest with the aim to obtain a personal advantage.

The Personnel must be capable of recognising potential conflicts of interest that could occur during their work activity and must report said conflicts of interest to the Person in Charge of their Office or to the Compliance Office.

## **2.5 Respect for competition**

NOBIS operates in absolute respect for the commercial activity of competing enterprises; competition is always viewed as an incentive to improve and never as a negative term of comparison. NOBIS's ethics prohibits its employees, partners, agents, etc. to discredit competing firms for commercial purposes when negotiating with customers.

The Group promotes the commercialisation of its products and services in the full respect for competition, confiding in the quality of the offer supplied and drawing opportunities and inputs from the others' market strategies in a view of constant attention and improvement of the quality of its Offer.

## **2.6 Transparency and completeness of information**

Any operation, transaction or payment must be correctly and promptly recorded. Recording modalities are such to assure, at any time, the objective verifiability of the decision-making process. In particular, said recording allows evaluating with sufficient knowledge the legitimacy of decisions, the existence of necessary authorisations, licences or concessions, compliance with the Law, consistency with NOBIS's objectives, suitability of its value and appropriateness of the place and timing of its implementation.

To such end, any operation, transaction or payment must be accompanied by a suitable documental support, in paper or electronic format, which assures traceability for a sufficient period of time in accordance with the applicable Laws and with the nature and type of operation.

Cognizance of motivations and the identification of the persons in charge of operations must always be assured.

The information disseminated by the Group is complete, transparent, understandable and accurate, so as to enable its stakeholders to take aware decisions with regard to the relations to undertake with the Group.

NOBIS strictly rejects behaviours that diverge from the aforementioned principles.

## **2.7 Social responsibility**

Within the socio-economic system in which it operates, the Group intends to carry out its activity respecting social, environmental and ethical principles.

NOBIS's objective is to preserve the Company's success and the trust of the various stakeholders with whom it interacts, through an action of Social responsibility which translates into a positive impact for the physical, economic and institutional environment in which it operates.

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## **3. RULES OF BEHAVIOUR IN RELATIONS WITH AND BETWEEN EMPLOYEES**

### **3.1 Work environment**

The Group is committed to creating the indispensable conditions for partnership and solidarity in the work environment, consistent with the ethical principles laid down in the Code, and in creating and promoting a welcoming work environment, where integrity, respect, cooperation, diversity and inclusion are truly pursued values.

The Group considers its partners' physical and moral integrity a primary value. To such end, it promotes the creation of a stimulating work environment, free from any form of discrimination and respectful of the individual's personality and dignity.

NOBIS promotes the adoption and the enlargement of architectural structures suitable to facilitate disabled persons and/or persons with other physical and intellectual disabilities in the carrying out of their work activities.

NOBIS expressly declares to adhere to the Universal Declaration of Human Rights and to the International Labour Organisation.

People are NOBIS's fundamental patrimony, the driving force for fostering its development, growth and necessary flexibility in accordance with its business objectives.

The Group believes in the "added" value of its partners and builds its competitive advantage relying on each single employee's competence and commitment. To such end, NOBIS provides its partners with suitable training, professional updating and development instruments.

Both in the selection and in the career management and progression of its personnel, NOBIS avoids any form of discrimination and abuse with regard to race, religion, sex, political and trade union belonging, language, sexual orientation and personal conditions of other nature.

The personnel are hired with a regular job contract, no form whatsoever of illegal work or exploitation being tolerated. Any form of forced and compulsory work is banned, as well as the recourse to child labour.

NOBIS counters any form of harassment, intimidation or mobbing.

Communication with the Group's partners is based on the principles of fairness, transparency, clarity and information completeness.

### **3.2 Respect for others**

The personnel must use polite manners with the public, with people in charge and with colleagues, and their conduct must be in accordance with civil duties, cooperating towards the Company's prosperity.

Everybody has the obligation to observe a gestural and verbal conduct prompted by the full respect for colleagues, be they subordinates or superiors, and to operate for the maintenance of harmony resulting from good interpersonal relationships in the workplace.

### **3.3 Equal opportunities and non-discrimination**

In compliance with the applicable laws, but especially as moral principle, Nobis prohibits the discrimination between man and woman, and prohibits any type of discrimination with regard to:

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- recruitment and hiring
  - pay
  - working conditions and career
  - access to welfare services

Relationships between the women and men who work at different levels of responsibility within the corporate organisation must be based on mutual fairness. In such view, sexual conducts offending the dignity of persons must be particularly avoided. Indeed, such conducts cause uneasiness in the person to whom they are addressed and can affect, explicitly or implicitly, decisions concerning job relationships and professional growth. Furthermore, any discrimination with regard to orientations falling within the personal sphere is prohibited, such as, for example: sex, race, ideology, religion, sexual orientation, age, nationality, disability, culture, belonging to a trade union, or legal representation of workers, or due to other personal, physical and social characteristics.

Nobis undertakes to remove, also at corporate level, the prejudicial or discriminating effects of possible situations, acts or conducts contrary to the protection of the dignity of the person, adopting measures and provisions in line with the seriousness of the case.

Both in the selection and in the career management and progression of its personnel, NOBIS avoids any form of discrimination and abuse with regard to race, religion, sex, political and trade union belonging, language, sexual orientation and personal conditions of other nature, or favouritism.

### **3.4 Protection of the dignity of women and men at work**

Job relationships at different levels of responsibility within the corporate organisation must be based on mutual fairness. In such view, sexual conducts offending the dignity of persons must be particularly avoided. Indeed, such conducts cause uneasiness in the person to whom they are addressed and can affect, explicitly or implicitly, decisions concerning job relationships and professional growth. Furthermore, any discrimination with regard to orientations falling within the personal sphere is prohibited.

### **3.5 Workplace safety: Italian Legislative Decree n. 81/08**

NOBIS assures the absolute safety and healthiness in the workplace, assuring total compliance with the provisions provided for by Lgs. D. 81/2008, with the aim to prevent or anyway reduce to the minimum the partners' exposure to risks connected to their work activity; for these reasons, NOBIS's employees and partners must refrain from carrying out actions that can jeopardize other people's health or safety. NOBIS undertakes to ensure a suitable training on health and safety, with particular reference to the workplace and to the workers' duties.

The training activity has the aim to:

- lead all workers to be aware of the risks they encounter conducting the work activity of which they are in charge;
- lead all workers to learn how to prevent accidents, disorders and illnesses caused by work;
- lead all workers to learn how to work in such a way not to harm their health and that of their colleagues.



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Workers are required to be actively responsible for their safety and for that of others. All workers, in accordance with their training and with the instructions and means with which the employer has provided them, must be responsible for their safety and health and for the safety and health of those who can be affected by their actions or omissions, in accordance with their training and with the instructions and means provided.

In particular, workers:

- must use machinery, equipment, protection devices, etc. correctly
- must report any deficiencies and possibilities immediately, in order to eliminate or reduce deficiencies and dangers
- must not remove or modify safety devices without authorisation
- must not carry out manoeuvres not falling within their competence by personal initiative or that can compromise their safety and/or that of others
- must undergo health controls if provided for

#### **4. RULES OF BEHAVIOUR IN RELATIONS WITH THIRD PARTIES**

In carrying out its activity, NOBIS pursues the creation of value for all those being interest bearers with respect to it, that is: stakeholders, customers, agents, sub-agents, producers, free partners, promoters, investors, suppliers.

All subjects operating in the name or on behalf of the Group must be familiar with the present Code, so that, in carrying out their activities, they shall have a correct and linear conduct, such to prevent the risk of committing the crimes provided for by Italian Legislative Decree No. 231/01.

##### **Item I – Relations with customers**

Customers' appreciation is determining in the Group's strategic vision, as over time it allows the lasting consolidation of and increase in the positions achieved. Contractual relationships and communications to the Group's customers are based on the principles of fairness and honesty, professionalism, transparency and cooperation in searching for the most suitable solutions to their needs.

NOBIS pursues the objective to satisfy and retain its customers offering them products and services of high quality, reliable, with high technological standards and at the best market conditions, in compliance with the provisions of Law and of supervision applicable to the insurance sector.

NOBIS is aware of the importance of fairness and transparency in relations with the public, and it acts promoting the spirit of service in favour of its customers and a collaborative approach with the same; in such view, NOBIS promotes relations with the Consumers Associations of competence on mutual terms and commits, in its communications with the public, not to disseminate deceitful and biased information. It is hereby emphasised that any subject, physical or legal person or simple association, that has or wants to have relations of any nature with NOBIS must qualify as entity compliant with the Law in the above specified sense. NOBIS does not intend to start or continue any relation with entities unwilling to comply with the principle of legality in all its meanings, or that have a structure and characteristics such to question the propension and the capacity to comply with the law.

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## **Item II – Relations with stakeholders**

NOBIS's primary interest is to enhance its stakeholders' investment, implementing an industrial policy that assures, through an optimal management of resources, a suitable economic return and an increase in competitiveness and financial solidity.

The relationship between NOBIS and its stakeholders is based on transparency rules and on keeping Stakeholders informed; in this regard, NOBIS issues an annual Solvency and Financial Condition Report that provides an overview of its business, organisation, capitalization and management and has the aim to assure transparency concerning the financial and solvency position of each Insurance company and of the Group, so that the investors' decisions can be based on the correct assessment of corporate policies, of the progress of the management and of the expected profitability of the invested capital.

## **Item III – Relations with business partners**

The Group acknowledges the fundamental contribution of its business partners who, with their cooperation, make the daily conduction of the business activity possible. In this view, it is important to create and develop a network of lasting and mutually satisfactory relationships with them.

In its relations with partners, NOBIS essentially follows the principles of fairness, impartiality and transparency, and it undertakes to use only criteria connected to the objective competitiveness of the services and products offered and of their quality, also understood as correspondence of the partner's behaviours with the ethical principles expressed in this Code.

The selection and recruiting activity of the network of agents, sub-agents and brokers is carried out based on the candidates' professionalism and experience, in compliance with what provided for by the IVASS Regulation No. 40 of 2018 and following provisions on the requirements for the registration in the Single Register of Intermediaries ("Registro Unico degli Intermediari Assicurativi – RUI").

All members of the distributive network, within the scope of their duties, must observe the following principles:

- act in the pursuit of the Group's interest and in the awareness that, in carrying out their business activity, they are responsible for protecting NOBIS's image;
- commit themselves to the relations with the Group's customers based on criteria of transparency, loyalty, trust, responsibility, orientation to the result and quality of the service.
- protect the Group's values also in relations with suppliers and third parties different from customers.
- be familiar and comply with the applicable law in the time and place where they operate. In case of uncertainties, the subject must refer in advance to NOBIS's specific structures (Supervisory Board).

## **Item IV – Relations with suppliers**

NOBIS makes use of the cooperation of producers, suppliers and distributors selected in advance based on the level of competitiveness of the conditions offered by the same on the market.

The economic conditions offered being equal, NOBIS privileges business relationships with entities capable of assuring operational modalities compatible with the workers' rights (health, safety and respect

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for the person's dignity, equal opportunity), as well as with the respect for the environment both in terms of assessment of landscape impact and in terms of reduction in polluting emissions.

In the selection process of producers, suppliers and distributors, NOBIS carries out due verifications concerning their legal residence on the national territory.

NOBIS's policy provides for a periodic review of all the relations with its suppliers, with the aim to monitor whether they have implemented their qualitative standards.

All Persons in charge or all those appointed to carry out purchases are prohibited to accept gifts or other benefits of any nature from any supplier, with the exception of gifts of modest entity and only on the occasion of traditional holidays based on consolidated traditions and anyway such not to constitute a pursuit of privileged positions.

All of the Group's suppliers must be familiar with and operate in compliance with the applicable Law in the time and place where they carry out their activity. In case of uncertainties, the subjects shall directly refer in advance to the structures indicated by NOBIS (Supervisory Board).

All suppliers must be familiar with this Code, so that, in conducting their activity, they may behave in a correct and linear manner, such to prevent the risk of committing the crimes provided for by Italian Legislative Decree No. 231/01. The Code is provided on the internet websites [www.nobis.it](http://www.nobis.it) and [www.nobisvita.it](http://www.nobisvita.it) under the section "About us", item "Code of Ethics".

## **Item V – Relations with the Public Administration**

In its relations with the Public Administration, with the State, with territorial public bodies, with Companies governed by public law or state-controlled, with bodies having public service functions, with decentralized offices of central and local Administrations, with public supervisory bodies or similar offices, and in particular with IVASS and the Data Protection Authority, NOBIS acts based upon principles of legality, transparency and information completeness.

NOBIS forbids Persons in charge, Employees or other partners that in their work are anyway ascribable to the Group, to have relations or preferential connection channels with public officials, Italian or foreign State Officials, as well as with subjects appointed to carry out a public service.

NOBIS forbids Persons in charge, Employees or other partners that in their work are anyway ascribable to the Group, to receive or give amounts of money at any title. It also forbids the aforementioned to grant or receive financing, services of value or other benefits not resulting from written agreements, contracts, the granting of authorisations, licences or similar acts.

The sole gifts allowed are those which are suitable and of moderate value according to the customs and traditions allowed and on the occasion of holidays of greater relevance, as long as the gift cannot be considered a way for asking for favours or a reward for favours received, according to the judgment of a person of ordinary diligence.

NOBIS recommends scrupulous compliance with the law especially on the occasion of calls for tenders, competitions, awarding of a contract, job orders. It also recommends that, during negotiations with the Public Administration, no one takes in any way whatsoever direct or indirect initiatives resulting in the proposal or the acceptance of employment, job or business opportunities such to entail illicit advantages for Public Administration officials or employees.

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## **Item VI – Relations with the environment**

NOBIS considers the environment a primary asset and undertakes to promote its protection and respect by all stakeholders. For such purpose, it orients its choices so as to assure compatibility between economic initiatives and environmental needs, not limiting its compliance to the applicable laws.

Depending on production and economic needs, NOBIS promotes the use of technologies and construction and production methods that entail the lowest environmental impact possible, also through the use of eco-compatible materials (recycled paper, etc.).

## **Item VII – Relations with other external subjects**

### **a) Political parties, trade unions and associations**

NOBIS does not support events or initiatives organised exclusively or mainly for political objectives, abstains from any direct or indirect pressure on political exponents and does not give contributions to trade unions or associations with which there could be any conflict of interests.

NOBIS forbids financing or donations to Italian and foreign Political Parties. Instead, it expresses the need for the Group's companies and for those collaborating with them to actively support charitable organisations, non-profit institutions, non-governmental humanitarian organisations, charitable institutions, religious institutions, with the aim to defend human rights, promote democracy and peaceful coexistence, support medical and scientific research associations.

### **b) Media**

NOBIS acknowledges the fundamental role carried out by the media in providing information to the public, in general, and to investors, in particular. For such purpose, it undertakes to fully cooperate with all media, with no discrimination, respecting mutual roles and corporate confidentiality, in order to meet their information needs with timeliness, completeness and transparency.

### **c) Institutional and promotional communications**

The promotion of NOBIS's products and services respects the fundamental ethical values of the civil society in which they are disseminated, always maintaining a truthful content and rejecting the use of vulgar or offensive messages.

## **Item VIII – Corruption**

NOBIS does not tolerate any type of Corruption and rejects the same in any form or manner it is manifested.

The Personnel must behave honestly and in compliance with professional ethics. Therefore, no one shall offer or accept money or other benefits not owed, such as gifts, forms of entertainment or other illegal benefits.

NOBIS undertakes to cooperate actively in countering any corruptive episode by constantly monitoring the work carried out, complying with provisions related to customers and drawing inspiration from the principles laid down in related rules and regulations and in line with international best practices.

In compliance with the aforementioned practices and principles and in accordance with the ethical values set as reference of its activity, NOBIS enhances the Personnel's role in protecting corporate integrity and

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in promptly reporting any violation or risk of violation of internal rules and regulations and of principles and provisions countering corruption.

## **Item IX – Rules and Regulations on anti-money laundering and on countering the financing of terrorism**

NOBIS is committed to the international fight against money-laundering and financing of terrorism, countering any behaviour that may be interpreted as supportive of such criminal phenomena, and preventing the involvement of its customers, counterparties, suppliers and employees in illegal activities. NOBIS considers the prevention of risks related to money-laundering and financing of terrorism as objectives of paramount and fundamental importance not only with regard to the company's economic-patrimonial interest, but also to its operational and reputational aspects. For such reasons, the Personnel must pay the utmost attention towards situations that have a potential risk of money-laundering and financing of terrorism and must expressly abstain from entering into or maintaining "anomalous" relations of any nature whatsoever.

Should employees suspect a potential risk of money-laundering, they must promptly inform the appointed Person in charge and abstain from carrying out the operation even if they deem the same, erroneously, to be justifiable in the light of a corporate interest linked to the economic benefit deriving from the conclusion of the business.

NOBIS dissociates itself from the Personnel's non-compliant conduct with respect to what provided for. Besides, it reasserts that the pursuit of the Group's profitability and business efficiency has to always go along with an in-depth knowledge of the counterparty and be protected through a constant and effective assessment of the related operativeness.

## **5. IMPLEMENTATION**

### **5.1 Adoption and disclosure**

All employees must be familiar with this Code and with the Organisation and Control Model pursuant to Lgs. D. 231/01 so that, in carrying out their activities, they may behave correctly and linearly, so as to prevent the risk of committing the crimes provided for by Lgs. D. No. 231/01.

NOBIS undertakes to widely disseminate this Code among all the different categories of subjects involved and to draw up and carry out a suitable training programme in order to ensure the correct understanding and implementation of the Code.

NOBIS undertakes to develop a suitable training and awareness raising programme on all the values and principles laid down in the Code of Ethics, which will be made freely available on NOBIS's website ([www.nobis.it](http://www.nobis.it)) under the section "About us", item "Code of Ethics", and on the corporate Intranet for all Employees.

### **5.2 Violations**

NOBIS requires and invites the top management, the Board of Directors and the Board of Auditors to comply with this Code in all its parts, as well as all employed personnel, agents, sub-agents, internal and external partners, promoters, unpaid trainees, internal and external consultants, suppliers, stakeholders and all other possible investors.

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NOBIS encourages the Personnel to report to the Supervisory Body any conduct or act carried out violating, even only partially, the Law, the Code of Ethics, or other corporate provisions adopted by NOBIS in accordance with the principles expressed in this document.

The Supervisory Body provided for by the Model acts as “Ethical Body in Charge”, that is the body appointed with the duty to implement NOBIS’s Code of Ethics and to assure compliance with the same by all those belonging to NOBIS.

Any possible conducts contrary to the spirit and the rules and regulations of this Code constitute disciplinary illegal acts, whose repression is entrusted to the Supervisory Body in compliance with what provided for by the Model dedicated to the Disciplinary System.

Any sanction imposed on NOBIS’s employees must be in any case compliant with the principles and rules of guarantee sanctioned by the Labours’ Statute, and shall be in any case based on the principles of typicalness, proportionality and necessity.