

CODE OF ETHICS

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This document (hereafter, also just “Code of Ethics” or “Code”) identifies the principles, values and guidelines on which the actions of the Firm, its shareholders, its employees, and its professionals are based.

The Firm's Mission

Studio Rock STP s.r.l. is a society between professionals which provides tax and legal support and advice services, through the work of its chartered accountants and lawyers, based in Milan, Via Turati, no. 29 (hereafter also just “Studio Rock”).

Studio Rock is a longstanding, professional firm with a national and international reputation. By combining a multidisciplinary and pragmatic approach with an extremely technical method, the Firm is able to support all of its Clients with professional rigour and ethics.

Title I – The Code of Ethics and the Firm's Values

Art. 1 – Scope of Application

The Code of Ethics is also based upon non-legal rules and applies to all shareholders, consultants and collaborators (hereafter, “Professionals”), as well as employees of the Firm (hereafter, “Employees”), and all those who act in the Firm's name.

Art. 2 – General Principles and Values

The Firm and its Professionals and Employees are engaged on a daily basis in carrying out its activities, internally and externally to the Firm, with ethics, decorum, rigour, correctness, integrity, transparency and discretion.

The Firm's Professionals must conduct themselves in respect of the ethical rules of their relevant order of affiliation (i.e. Code of Ethics of Chartered Accountants and Accounting Experts, and Code of Ethics of Lawyers, as appropriate), in respect of professional legislation and the applicable rules of law.

The Firm's Employees must respect the provisions of the employment contract and the rules of law, insofar as they apply.

All Professionals and Employees, without exception, perform their work with rigour, commitment, professionalism and respect in an adequate and appropriate manner, with a view to protecting and enhancing the Firm's excellent reputation and prestige. They must respect the principles and rules of the Code of Ethics in the awareness that the same

forms an essential element of the work performance and the provision of professional collaboration.

All rules of law that are relevant and applicable at the time, along with the employment contracts, if any, and internal procedures that already apply to the Professionals and Employees must nevertheless continue to be respected.

Title II – Relationships with Clients

Art. 3 – Duties of the Firm's Professionals and Employees

In carrying out their activities and conducting the assignments received, the Firm's Professionals and Employees attribute primary importance to Clients and to their requirements, in order to incorporate their needs, demands and expectations. The Firm is thus able to offer excellent support and to maintain a constant and inviolable relationship of trust with its Clients.

The Firm's Professionals and Employees, in carrying out the assignments granted:

- a) guarantee thorough compliance with the rules of professional ethics, also in respect of the provisions on conflicts of interest, confidentiality and professional secrecy;
- b) carry out their activity with the utmost care, diligence and professional expertise;
- c) undertake to guarantee the utmost transparency and collaboration in relationships with Clients.

In carrying out its activities and services, the Firm acts in respect of professional laws and of the ethical principles indicated in this Code, considering that the same constitute a distinctive value of its activity to be offered to Clients.

Title III – Relationships between the Firm and its Professionals and Employees

Art. 4 – Duty of Mutual Respect

The Firm and its Professionals and Employees have the duty to act loyally, correctly and always transparently in their mutual relationships.

The Professionals and Employees undertake, mutually and towards the Firm, to act with responsibility and transparency, to carry out their professional and personal relationships in an adequate and appropriate manner, to respect the commitments accepted, and always to act in the Firm's interests.

Art. 5 – Duties of Collaborators and Employees

The Professionals and Employees of the Firm must act in conformity with this Code of Ethics and in respect of the obligations accepted, respectively, by way of the employment contract and the collaboration agreement, carrying out the requested performances loyally and diligently.

The Professionals and Employees must contribute to the growth of the Firm, both as a community and as a society between Professionals, and they must behave in a manner based upon the utmost collaboration and transparency towards the Firm, actively participating in building a calm environment and a high quality professional profile.

The Firm's Professionals and Employees must perform their activities promptly, diligently and clearly, respecting any indications received from their managers and consenting to any checks and controls by the same.

The right of criticism of Professionals and Employees is always preserved and guaranteed, in a constructive and proactive spirit, with a view to improving the work environment and the working conditions.

In addition to all obligations mentioned in this document, the Professionals and Employees are required to:

- a) avoid situations in which conflicts of interest may occur and refrain from taking personal advantage of business opportunities of which they have become aware during the conduct of their role;
- b) protect the Firm's image, name and reputation, even away from the work environment and outside of working hours, also through the informed and adequate use of social networks;
- c) in general and subject to specific agreements, if the collaboration relationship ends, guarantee respect of business continuity requirements and behave loyally towards the Firm;
- d) respect colleagues, behaving in a manner appropriate and adequate to the work requirements of others, not causing a disturbance or a nuisance of any nature;
- e) organise work times and personal commitments in respect of the organisational and time requirements of their managers, colleagues and Clients, informing the Firm/their managers in advance of any periods of absence and/or unavailability;
- f) dress appropriately for the work environment;
- g) indicate the commitment and time dedicated to the various professional activities, so as to allow the Firm to perform adequate management control;
- h) comply with the organisational procedures adopted by the Firm, in absolute respect of the functional reporting systems outlined in the Firm's organisational structure;
- i) respect the work environments and resources made available to them by the Firm.

Art. 6 – Commitment to Dialogue, Non-Discrimination and Fairness

The Firm recognises that its most important resource is its Professionals and Employees, who play a fundamental role in developing a healthy and stimulating work environment, enriched by each individual contribution made and by the diversity of every person.

For those reasons, the Firm guarantees to all its Professionals and Employees equal opportunities of access, development and professional growth in respect of the principles of non-discrimination, equality and fairness.

In respect of the requirements of its Clients, the Firm values the personal and professional characteristics and peculiarities of its Professionals and Employees and is attentive to the needs and aspirations of the latter.

Art. 7 – Commitment to the Work-Life Balance

The Firm undertakes to respect the rights of Professionals and Employees and is attentive to their expectations and needs, also in terms of their private lives. To that end, the Firm agrees methods of collaboration through remote working.

Art. 8 – Professional Training and Work Environment

Studio Rock rewards merit and aims to develop the skills of its Professionals and Employees.

It desires, incentivises and promotes, also through economic support, the continuous and constant professional update of its Employees and Professionals.

To achieve its aims, the Firm undertakes on a daily basis to:

- develop its human resources to the best possible extent, also by planning training courses and pursuing professional and personal growth;
- promote the adoption of integrity and of correct professional behaviours;
- reject illegal, illegitimate or incorrect behaviours towards anyone, including, for example, persons of significance in the conduct of the Firm's activity (i.e. Clients, Professionals, Public Administrations, Authorities, Investors, Competitors) and disassociate from any such behaviours implemented by its Professionals and Employees;
- adopt organisational decisions appropriate to the efficiency of the activity and to the well-being and human and professional growth of the Firm's Professionals and Employees;
- adopt and apply decisions, measures and procedures appropriate to prevent the implementation of incorrect behaviours by its Professionals and Employees and, in

any case, the violation of imperative rules and/or the provisions of this Code during the professional and work activity provided;

- monitor the implementation and respect of the Code of Ethics.

Title IV – The Firm’s Commitment to the Community

Art. 9 – The Firm’s Policies on and Commitment to Environmental Respect

The Firm considers principles of social responsibility to be a priority. These include, essentially, the Firm’s commitment to respect and protect the environment.

Studio Rock believes that it can generate, by adopting principled behaviours, a significant positive impact in the social and environmental context in which it operates.

The Firm carries out careful and informed consumption of the resources required for its professional activity; it is committed to spreading a culture of sustainability among its Professionals, Employees and Clients, and it adopts policies to reduce waste, consumption of resources and generation of emissions directly linked to the performance of its activity.

Art. 10 – Support to the Third Sector

The Firm consolidates its constant and continuous commitment to supporting associations that promote scientific research and/or perform activities in the public interest or to the benefit of the public.

Studio Rock also promotes the establishment of and/or participation in non-profit organisations or social enterprises.

Art. 11 – Institutional Relationships

The Firm does not pay out loans or contributions of any nature, directly or indirectly, to Italian or foreign political parties or organisations. Any participation in or funding of such organisations by the Professionals and Employees occurs exclusively on a personal basis and never involves the Firm.

In carrying out its professional activity, the Firm holds relationships of fair collaboration and cooperation with the Institutional Authorities and Trade Associations, in order to identify regulatory criticalities, to illustrate matters of general interest, and to suggest legal and operational solutions, making the Firm’s position known on significant issues.

Title V – Control and Respect of the Code of Ethics

Art. 12 – Duties in relation to the Code of Ethics

In relation to the Code of Ethics the duties, functions and activities are delegated to the Firm's Executive Committee.

In particular, the Executive Committee has the following responsibilities:

- a) to disseminate among the Firm's Professionals and Employees the principles, values and objectives of the Code of Ethics;
- b) to ensure that the organisation and the procedures adopted by the Firm are compliant with the contents of the Code of Ethics;
- c) to supervise the general compliance with and respect of the Code of Ethics by the Firm's Professionals and Employees;
- d) to adopt any useful measure in the event of a violation of and/or lack of compliance with Code of Ethics by the Firm's Professionals and Employees;
- e) to update and periodically review the Code of Ethics.

Art. 13 – Violation of the Code of Ethics and Sanctions

Except where the conduct constitutes a more serious act and subject to the sanctions envisaged by law and/or by the professional law of the order of affiliation, any violation of the Code of Ethics represents a breach of the fiduciary relationship with the Firm, leading to the adoption of measures proportionate to the severity of the conduct.

Art. 14 – Dissemination of the Code of Ethics

The Executive Committee promotes and guarantees knowledge of the Code of Ethics among all Professionals and Employees and provides access to the updated version on the Firm's website.

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