



# **Ethical Code Kube Partners Italy S.r.l.**

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## SUMMARY

1. PREMISE .....	3
2. MISSION .....	3
3. SCOPE AND IMPLEMENTATION METHODS .....	3
3.1. RECIPIENTS .....	3
3.2. CODE ENFORCEMENT .....	4
4. VIOLATION OF THE CODE OF ETHICS .....	4
5. REFERENCE PRINCIPLES.....	4
5.1. PROFESSIONALISM AND TRUST .....	4
5.2. LEGALITY AND HONESTY.....	5
5.3. PREVENTION OF POTENTIAL CONFLICTS OF INTEREST .....	5
5.4. RESPECT FOR THE PERSON .....	5
5.5. FAIRNESS AND TRANSPARENCY .....	6
5.6. RESPECT FOR FREE COMPETITION.....	6
6. IMPORTANT BUSINESS RULES.....	6
6.1. RELATIONS WITH EMPLOYEES .....	6
6.2. RELATIONS WITH COLLABORATORS AND CONSULTANTS.....	6
6.3. HEALTH AND SAFETY .....	6
6.4. RELATIONS WITH PUBLIC AUTHORITIES AND INSTITUTIONS AND OTHER SUBJECTS REPRESENTING COLLECTIVE INTERESTS .....	7
6.5. RELATIONS WITH THE JUDICIAL AUTHORITIES .....	7
6.6. RELATIONS WITH THE MASS MEDIA.....	7
6.7. RELATIONS WITH CUSTOMERS AND SUPPLIERS .....	7
6.8. HANDLING OF CONFIDENTIAL AND INSIDE INFORMATION.....	8
6.9. PROCESSING OF SENSITIVE DATA AND PROTECTION OF PRIVACY.....	8
6.10.PROTECTION OF INDUSTRIAL, INTELLECTUAL PROPERTY AND COPYRIGHT.....	9
6.11.TRANS Parency OF ACCOUNTING ACTIVITIES .....	9
6.12.GIFTS, GIFTS AND OTHER FORMS OF BENEFITS .....	9
6.13.USE OF COMPANY EQUIPMENT, DEVICES AND FACILITIES.....	9
Annex to Code of Conduct for Employees and Collaborators.....	10

## **1. PREMISE**

Kube Partners Italy S.r.l. (hereinafter, for brevity, "Kube Partners." or the "Company") is a company specialized in *data analytics* and provides technological and strategic consulting services in the ICT field, as well as *data mining and scoring services*, mainly aimed at the Banking and Insurance sector.

This Code of Ethics (hereinafter, also the "Code") contains principles and rules of conduct, which enrich the company's decision-making processes and guide the conduct of all entities involved, as identified below.

The Code of Ethics forms a reference point for its recipients and broadly embraces the role and relations of the Company with its *stakeholders* (i.e. those subjects such as individuals, groups, organizations, who have significant relationships with the Company from which specific or generic legitimate interests derive).

The Code is brought to the attention of all interested parties, both internal and external, by means of the appropriate means of communication and published on the Company website:  
[www.kubepartners.com](http://www.kubepartners.com)

## **2. MISSION**

Kube Partners provides professional services aimed at creating value for its clients in full compliance with the ethical principles of the profession, using its tools to combat the illicit and socially reprehensible practice of insurance fraud. Kube Partners aspires to maintain and develop a relationship based on trust with its various stakeholders by pursuing as effectively as possible its mission that is closely linked to established relationships and to its reputation that has been developed and consolidated over time.

## **3. SCOPE AND IMPLEMENTATION METHODS**

### **3.1. RECIPIENTS**

The Code of Ethics is based on an ideal of cooperation in mutual respect and for the benefit of the parties involved and is therefore binding for all those who collaborate with the Company, either directly or indirectly, permanently or temporarily.

This Code applies to the Company and its stakeholders, shareholders, members of statutory bodies, solicitors, consultants, employees and collaborators of Kube Partners, suppliers, who contribute to the Company's value chain, business partners, as well as all those who, directly or indirectly, permanently or temporarily, act in the name and on behalf of the Company (hereinafter, for brevity, the "Recipients" and, individually, the "Recipient").

This document can be found on the Company's website [www.kubepartners.com](http://www.kubepartners.com) and will be subject to periodic review by the Board of Directors, in order to adapt it to eventual regulatory developments relevant to the Code itself.

The Company undertakes to identify the most effective and suitable tools and implement the most effective and suitable means to ensure the dissemination, knowledge and application of the Code of Ethics, providing, if necessary, appropriate training and information sessions.

Kube Partners will also provide any clarification necessary for the interpretation and implementation of the principles contained in this document.

### **3.2. CODE ENFORCEMENT**

The Recipients are required to be aware of the rules contained in the Code of Ethics and the reference rules that govern the activity carried out within the scope of their function, based on law or on internal procedures and regulations.

The Recipients must also explicitly accept their commitment deriving from this Code of Ethics, at the time of establishment of the employment or business relationship, of the initial dissemination of the Code of Ethics or of any significant amendments or additions thereto.

In particular, the Recipients are obliged to:

- refrain from conduct contrary to the rules contained in the Code of Ethics;
- promptly report to the shareholders any news, whether directly detected or reported by others, regarding possible violations and any request for violation they may come across.

Shareholders shall ensure absolute confidentiality to the originator.

### **4. VIOLATION OF THE CODE OF ETHICS**

In the event of a confirmed violation of the Code of Ethics – compliance with which is an essential part of the contractual obligations assumed by the Recipients – sanctioning measures will be adopted for the protection of the Company's interests and in line with the applicable legislation, which may also lead to the termination of the relationship and compensation for damages suffered.

Interested parties may report to the Shareholders, in writing and anonymous, any violation, suspicion or request for violation of the Code of Ethics.

The Shareholders will produce an analysis of the report, possibly meeting with the subjects affected by the alleged violation, guaranteeing the confidentiality of the identity of both, without prejudice to legal obligations.

Reports submitted in good faith may not have negative repercussions to the detriment of the whistleblower, even if they are unfounded. However, it is requested to refrain from making reports whose sole purpose is to inform on the person concerned.

### **5. REFERENCE PRINCIPLES**

The ethical principles that guide Kube Partners are:

- Professionalism and Trust
- Legality and Honesty
- Prevention of potential conflicts of interest
- Respect for the person
- Fairness and Transparency
- Respect for free competition

#### **5.1. PROFESSIONALISM AND TRUST**

The company values the professionalism of its collaborators who are carefully selected and trained, as well as the transfer of knowledge and the sharing of objectives and results while respecting personal characteristics.

Each person must therefore act with honesty, with commitment and ethical rigour in order to protect, in all situations, the image and good reputation of Kube Partners.

## **5.2. LEGALITY AND HONESTY**

Kube Partners holds as an essential principle the observance of laws, rules and corporate procedures to carry out and report business operations, obtain appropriate authorizations and comply with all aspects of internal and external accounting control. To this end, it undertakes to adopt useful and appropriate measures to ensure that the obligation of compliance with the laws and all the regulations in force is adopted and practiced by the Recipients of the Code of Ethics.

Therefore, any behaviour or conduct that constitutes, or may constitute, any type of offence is to be considered prohibited. It should be noted that the conviction of acting in any way to the advantage of the Company does not justify, for Kube Partners, the adoption of conduct contrary to the rules expressed in this document. Therefore, any violation of the Code will result in the adoption of related sanctions.

This commitment must also apply to consultants, suppliers, customers and to anyone who has dealings with Kube Partners.

## **5.3. PREVENTION OF POTENTIAL CONFLICTS OF INTEREST**

In conducting any business, Kube Partners tends to avoid situations where the parties involved in the transactions are, or may even appear, to have a conflict of interest.

Employees and collaborators are therefore required to avoid any situation and to refrain from any activity that may oppose a personal and/or family interest to those in the Company or that may interfere and hinder the ability to take, in an impartial and objective manner, decisions in the interest of the Company itself.

Any situation of conflict of interest, even indirect or potential, must be promptly reported to the Shareholders.

## **5.4. RESPECT FOR THE PERSON**

Kube Partners acts in full respect of personal characteristics, encouraging the spirit of being part of a team and valuing professionalism, integrity and sense of responsibility, in compliance with the principles of freedom, dignity of the human person and respect for diversity and repudiating any discrimination based on age, sex, race, language, personal and social conditions, religious and political beliefs.

Kube Partners ensures respect for the physical and cultural integrity of the person and respect for relationships with others. In particular, it protects and promotes the value of human resources, in order to improve and increase the assets and complementarity of the skills possessed by its employees.

The Company, in decisions that affect relations with its stakeholders, undertakes to avoid any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions, membership of trade unions and religious beliefs.

The Company does not tolerate requests or threats aimed at inducing people to act against the law or directly/indirectly discriminatory, or aimed at adopting behaviour that is detrimental to one's moral or personal beliefs and preferences.

## **5.5. FAIRNESS AND TRANSPARENCY**

All actions of the Recipients must be based on the legitimacy, both formal and substantive, of the regulations in force in order to protect the Company based on fairness. Kube Partners is committed to providing complete, timely and truthful information, ensuring the transparency of decisions taken in an exhaustive and verifiable manner avoiding possible ambiguity. Complete information must also be provided to all those who sign, in any form, agreements or contracts with Kube Partners, in order to clearly communicate the behaviour expected.

## **5.6. RESPECT FOR FREE COMPETITION**

The Company considers free competition as an asset to be protected and recognizes that fair and equitable competition affects reputation and is functional to the sustainable development of the Company and the market in which it operates. On this basis, it refrains from conduct aimed at facilitating the conclusion of business for its own benefit in an unfair manner or in violation of laws or regulations in force, condemning any act carried out in violation of the regulations in force to protect the same, even more so through the use of threats and/or violence.

## **6. IMPORTANT BUSINESS RULES**

### **6.1. RELATIONS WITH EMPLOYEES**

Values such as specialization of skills, timeliness, innovation, attention to quality in the services and products offered to the customer, are the essential fulcrum of the Company's policy.

Kube Partners values the knowledge, skills and quality of its employees, and the skills assessment systems adopted reflect this approach. In addition, Kube Partners evaluates the contribution of individual resources to the company's results through the comparison between the objectives set and the results actually achieved, the behavior adopted, the tasks performed over a predetermined period of time.

### **6.2. RELATIONS WITH COLLABORATORS AND CONSULTANTS**

Kube Partners identifies and selects collaborators and consultants with absolute impartiality, autonomy and independence of judgment.

All those who collaborate in various capacities with the Company are required to act loyally in order to comply with the obligations signed in the employment contract and the provisions of this Code of Ethics, whilst ensuring the required services.

Each collaborator is required to work diligently in order to protect the Company's assets, through responsible behaviour and in line with the operating procedures set up to regulate their use. Each employee is responsible for the protection of the resources entrusted to him/her, which he/she must take care of with diligence and attention.

### **6.3. HEALTH AND SAFETY**

Kube Partners considers its human resources as a fundamental element for the existence of the company. With this in mind, it undertakes to pursue the maximum results in terms of protection and compliance with current regulations, adopting the necessary measures for the protection of the safety of the working environment and the health of workers, including the prevention of occupational risks, information and training, as well as the preparation of an organization and the necessary means.

Kube Partners is therefore committed to compliance with internal regulations on safety at work, to ensuring adequate insurance coverage for its employees and to training and disseminating existing procedures.

#### **6.4. RELATIONS WITH PUBLIC AUTHORITIES AND INSTITUTIONS AND OTHER SUBJECTS REPRESENTING COLLECTIVE INTERESTS**

All the actions of the Recipients must be based on lawfulness, transparency, clarity and fairness. Relations with institutions (Public Administration, organizations, official public bodies or those in charge of public services, etc.), at national, international or local level, as well as with other subjects representing collective interests, are delegated exclusively to those who are formally appointed.

The Company will act, in carrying out its relations with the institutions, in full compliance with the regulations in force.

In particular, in accordance with the principles set out in this Code of Ethics, it is prohibited, in relations with representatives of the Italian or foreign Public Administration, directly or indirectly, to:

- promise or make disbursements of money, gifts or gifts outside the purposes or for purposes other than institutional and service purposes;
- propose employment and/or business opportunities that may benefit employees of the Public Administration in a personal or family capacity;
- promise or grant benefits of any kind, in order to influence independent judgement or to obtain any advantage for the Company;
- engage in misleading conduct that may lead the Public Administration into an error of technical-economic evaluation of the products and services offered/supplied;
- allocate contributions, subsidies, incentives, concessions or public funding for purposes other than those for which they were obtained.

#### **6.5. RELATIONS WITH THE JUDICIAL AUTHORITIES**

In the event of involvement in a proceeding, it is expressly forbidden to induce an employee (or other person), by violence or threat, to omit statements or to provide a false representation of the facts before any judicial authority.

#### **6.6. RELATIONS WITH THE MASS MEDIA**

By virtue of the importance of information for the image of Kube Partners, relations with the mass media are based on compliance with current legislation, internal regulations, as well as the principles of professional fairness.

Any communication to the media or published on social platforms must be timely, complete, transparent and be truthful and homogeneous.

Dissemination of information to the Recipients is provided for by the publication of relevant communications on the company website [www.kubepartners.com](http://www.kubepartners.com) or on the company's Linked In page or by e-mail.

#### **6.7. RELATIONS WITH CUSTOMERS AND SUPPLIERS**

Relationships with customers must be based on courtesy and shared objectives, in the spirit of professionalism, responsibility and integrity. Collaborators must therefore pursue the maintenance and development of existing relationships according to the highest quality standards for the satisfaction of the customer's reasonable expectations, which will be regularly monitored.

All contracts, drawn up in accordance with the legal regulations in force from time to time, are characterized by transparency, impartiality, completeness and clarity.

Kube Partners undertakes not to discriminate against its clients in the performance of its activities and not to resort to evasive or unfair practices.

The selection of suppliers and the formulation of the conditions of purchase of goods and services is

dictated by values and parameters of lawfulness, competition, objectivity, fairness, impartiality, fairness in price, quality of the goods and/or services, carefully evaluating the guarantees of assistance and the panorama of offers.

Purchasing processes must be based on the search for maximum competitive advantage but also on loyalty and impartiality towards each supplier in possession of the required requirements. The conclusion of a contract with a supplier must always be based on extremely clear relationships, avoiding, wherever possible, the assumption of contractual obligations that entail forms of dependence on the contracting supplier.

## **6.8. HANDLING OF CONFIDENTIAL AND INSIDE INFORMATION**

Kube Partners, working with listed client companies, is aware of its responsibility towards customers and the market and operates in compliance with Privacy legislation, with particular reference to the provisions contained in the GDPR Regulation 296/2016 which came into force on 25 May 2018.

In this sense, internal rules have been set up to regulate information flows: the recipients, even during any smart working situation or at the Customer's premises, in accordance with the law and the contract, are required to maintain the strictest confidentiality on Company data and information in their possession and/or available on the Company information system and consequently must adopt – in relation to the particular mode of its service – any suitable measures to guarantee confidentiality.

Recipients have also been specifically informed of the duties of confidentiality regarding "price sensitive" information, in order to avoid abuses (in compliance with both national and international legislation on insider trading) aimed at deriving financial and non-financial advantages, direct or indirect, from the unlawful disclosure of information.

Finally, it is forbidden for persons in possession of such information to improperly use or communicate inside information to third parties without justified reason.

## **6.9. PROCESSING OF SENSITIVE DATA AND PROTECTION OF PRIVACY**

Kube Partners protects the privacy of personal and sensitive data in accordance with the provisions of the aforementioned European GDPR Regulation. To this end, it uses the necessary technical and organizational solutions to ensure the security and confidentiality of the data processed.

In terms of data analysis, the security of Kube Partners' information system is a determined and fundamental requirement to ensure the reliability of the information processed, as well as the effectiveness and efficiency of the services and consultancy provided by the Company.

The security of the information system has as its primary objective the protection of data and the elements of the information system that deal with the management of the data itself.

The protection of data and associated elements is guaranteed if the following values are preserved:

- confidentiality: ensures that data is only accessible to those who are authorized to access it;
- integrity: safeguards the completeness of data and transfer methods;
- availability: ensures that authorized users have access to data and the elements to process it when needed.

The lack of an adequate level of data security, in terms of confidentiality, availability and integrity, in addition to representing an offense that can be prosecuted and sanctioned, can result in the loss of competitive advantage, image, customers, turnover and therefore a significant financial loss.

Therefore, at Kube Partners, the security of the information system is achieved by implementing a series of appropriate security measures, i.e. procedures, systems and technical or practical solutions that reduce the risks to which the Company's information assets as a whole are exposed.



## **6.10. PROTECTION OF INDUSTRIAL, INTELLECTUAL PROPERTY AND COPYRIGHT**

Kube Partners bases its conduct on legality and transparency in every sector of its activity and condemns any form of disturbance to the freedom of industry and commerce, as well as any possible form of fraud, abusive duplication or reproduction, counterfeiting, usurpation or alteration of tangible and intangible assets susceptible to rights deriving from its own or third parties' industrial or intellectual property rights, reminding all those who work on behalf of the Company to comply with such regulations. The industrial and/or intellectual property rights on the assets that may be protected, which may be created, developed or manufactured in the course of work (such as, but not limited to, trademarks, patents, logos, identification marks, know-how, trade secrets, software, studies and publications, etc.) belong to the Company, which retains the right to use them in the manner and form it deems most appropriate, without prejudice to the moral right of the author of the same to be recognized as such.

Each Recipient undertakes to protect the industrial and intellectual property rights owned or used by Kube Partners and not to unlawfully use in any context goods protected by industrial and/or intellectual property rights.

## **6.11. TRANSPARENCY OF ACCOUNTING ACTIVITIES**

Kube Partners, in compliance with the law and with accounting standards in force, regulations and internal procedures, bases its accounting records and the documents deriving from them on precise, exhaustive and verifiable information in compliance with the principle of transparency, accuracy and completeness of accounting information. Kube Partners strives to ensure that the administrative-accounting system is reliable and correctly represents the management facts with the aim of preventing and dealing with, in a reasonable manner, financial and operational risks.

## **6.12. GIFTS, GIFTS AND OTHER FORMS OF BENEFITS**

No form of gift or free benefit, promised, offered or received, which may be interpreted as exceeding normal commercial practices or courtesy, or in any case aimed at acquiring preferential treatment in the conduct of any transaction attributable to the Company's activity, is permitted. This rule does not allow exceptions even in those countries where offering valuable gifts to business partners is considered customary.

In any case, the Recipients must refrain from engaging in practices that are not permitted by law and commercial usage. They must also comply with any policies, procedures and practices of the companies or entities with which they have relationships.

## **6.13. USE OF COMPANY EQUIPMENT, DEVICES AND FACILITIES**

Each Recipient is required to work diligently to protect the Company's assets, through responsible conduct and in line with the operating procedures set up to regulate their use.

To this end, each Recipient is responsible for safeguarding, preserving and defending the Company's assets and resources entrusted to him/her as part of his/her business and is required to use them in a manner consistent with the social interest as well as with the law, preventing and avoiding their use by unauthorized third parties as well as their use for improper purposes. It is expressly forbidden to use Company assets, for personal or non-business needs, for purposes contrary to the law, public order or morality.

With particular reference to the IT tools made available by the Company to the Recipients, it is forbidden to engage in conduct that may damage, alter, deteriorate or destroy the computer or telematic systems, programs and computer data of the Company or of third parties. It is also expressly forbidden to illegally enter computer or telematic systems protected by security measures or to remain there against the express or tacit will of those who have the right to exclude it, as well

as to procure, reproduce, disseminate, communicate and/or deliver codes, keywords or other means suitable for access to computer or telematic systems protected by security measures, or, in any case, provide indications or instructions suitable for the aforementioned purpose.

It is also forbidden to destroy, deteriorate, erase, alter or suppress information, data or computer programs of others, including those used by the State or by other public bodies or pertaining to it, or in any case of public utility, as well as to introduce or transmit data, information or programs capable of destroying, damaging, rendering, in whole or in part, unusable computer or telematic systems of others or of public utility or seriously hindering their operation.

Finally, the falsification of any document, including computer documents, is prohibited.

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### **Annex to Code of Conduct for Employees and Collaborators**

Every employee and collaborator is committed to acting professionally, conducting business with integrity, upholding the reputation of Kube Partners, treating people and the environment with respect, taking responsibility, working together and acting together in the best way to carry out the Company's activities.

In addition, every employee and collaborator must not be limited to the correct conduct of the business and the relationship with customers. In fact, an integral part of their job must also concern the area of collaboration with other colleagues, i.e. acting responsibly and respectfully, being open to grow and help their collaborators to grow through coaching and any type of constructive training.