



Fuoritinerario Code of Ethics

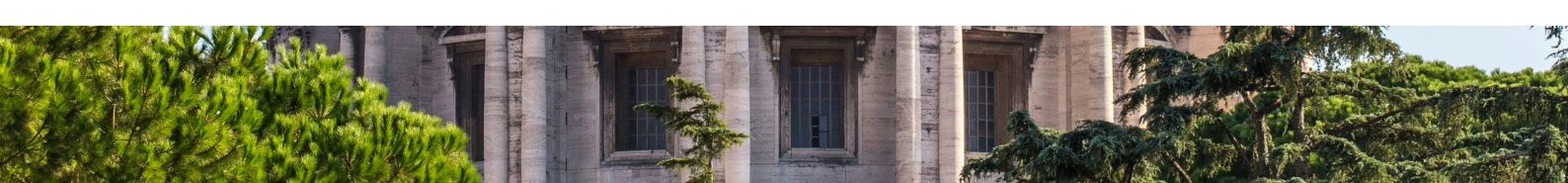
The present Code of Ethics (hereinafter, “Code of Ethics”) defines the ethical principles and behavioral guidelines that govern the business activities of FuorITinerario – Discover Your Italy, and which should guide the actions of all individuals collaborating with the Company, whether internal or external. The Code applies to anyone participating, directly or indirectly, in achieving the social objectives of FuorITinerario – Discover Your Italy, which is committed to promoting an authentic and aware enjoyment of Italy's cultural, artistic, and landscape heritage. This Code of Ethics aims to ensure correct, transparent, and respectful behavior towards all stakeholders, including customers, business partners, institutions, and the community at large, in compliance with the Italian Civil Code, Legislative Decree 231/2001, the EU General Data Protection Regulation (GDPR) 679/2016, and other applicable regulations.

Although it cannot foresee every specific situation, the Code establishes general principles and behavioral guidelines to which recipients must adhere. The company recognizes, however, that it is crucial to allow for individual responsibility and interpretation by recipients, while maintaining the possibility of disciplinary action when necessary.

In particular, FuorITinerario - Discover Your Italy commits to operating with integrity, professionalism, and respect for culture and the environment, striving to offer experiences that respect diversity and sustainability, valuing Italy's unique beauty through conscious and inclusive tourism.

Recipients of the Code of Ethics

The Code of Ethics is mandatory for all individuals who have relationships with the company, including employees, collaborators, suppliers, and anyone acting on behalf of the company (hereinafter, “Recipients”).





Each Recipient, in relation to their functions and responsibilities, is obliged to perform their duties with maximum commitment, competence, and professionalism. The company's interest does not justify behavior contrary to ethics under any circumstances. Therefore, no Recipient is authorized to undertake actions that violate the principles established by this Code of Ethics.

The company commits to ensuring that all Recipients are adequately informed about the Code of Ethics and are enabled to fully comply with it.

Ethical Principles

The company considers the following ethical principles indispensable, to which all Recipients must adhere in their activities:

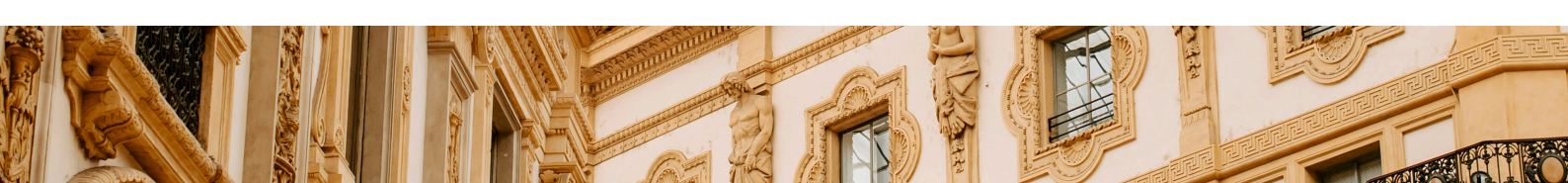
1.1 Principle of Legality: The company respects all applicable local, national, and international laws in Italy, in accordance with the principles of the Italian Republic's Constitution. The company commits to actively collaborating with Public Administration, Judicial Authorities, and Regulatory Authorities when required. Recipients must act in compliance with current regulations and orient their actions according to the principles set by the Code of Ethics.

1.2 Value of the Person: Respect for the inviolable rights of humans is a fundamental principle. The company promotes the defense of these rights and rejects any form of discrimination based on gender, ethnicity, language, religious, political belief, or social and personal conditions. Recipients must ensure the dignity of individuals, protect minors, and respect human rights in all public communications.

1.3 Honesty and Integrity: In performing their duties, Recipients must behave with honesty and transparency, taking responsibility for their actions. They must respect the company's mission and values, avoiding conflicts of interest and acting to prevent unintended negative consequences.

1.4 Fight Against Corruption: The company rejects all forms of corruption, both public and private. It is prohibited to offer, promise, or give undue advantages to public officials or private individuals to obtain illicit services for the company or oneself.

1.5 Protection of Intellectual and Industrial Property: The company protects intellectual and industrial property, respecting and safeguarding copyrights, patents, trademarks, and other intangible assets.





1.6 Confidentiality and Personal Data Protection: The company guarantees the protection of confidential information and personal data processed in the course of its activities. Recipients are required to comply with current privacy legislation and not use confidential information for non-business purposes.

1.7 Management of Information Systems: The use of IT tools must comply with applicable laws and licenses. Unauthorized software use is prohibited.

1.8 Fair Competition: The company promotes fair competition and respects antitrust regulations, avoiding behaviors that might undermine free and fair competition.

1.9 Financial Management and Accounting Transparency: The company adopts transparency practices in financial transactions, preventing money laundering and self-laundering. Every transaction must be correctly recorded, documented, and compliant with accounting regulations.

1.10 Conflict of Interest: Recipients are obliged to avoid situations of conflict of interest and to promptly report any conflicts to the competent bodies.

1.11 Environmental Protection: The company promotes ecological sustainability and complies with environmental regulations, pursuing development that considers environmental protection for future generations.

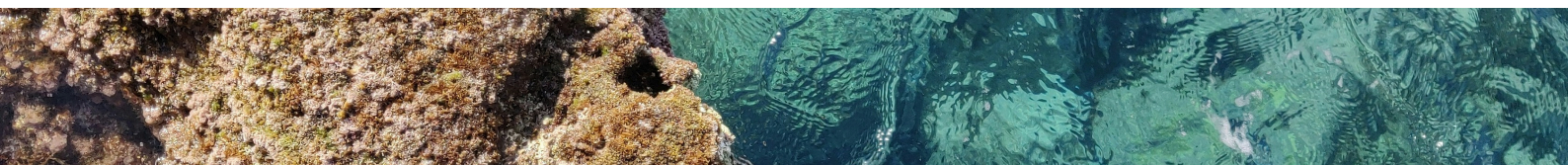
1.12 Health and Safety at Work: The company commits to ensuring health and safety at the workplace, applying relevant safety regulations and promoting a culture of prevention among its employees and collaborators.

Conduct Criteria in Internal and External Relations

The following conduct rules guide behaviors in interactions with various company stakeholders:

2.1 Relations with Customers: The company respects principles of transparency, impartiality, availability, and courtesy towards customers, fostering a professional and collaborative relationship.

2.2 Relations with Suppliers: Supplier selection occurs impartially, with equal opportunities for all, and in compliance with the law, ensuring traceability of decisions made.





2.3 Relations with Employees and Collaborators: The company values human resources, promoting relationships based on loyalty, trust, and respect for rights. It commits to safeguarding the health and safety of workers and avoiding behaviors that compromise integrity at the workplace.

2.4 Relations with the Community: The company is aware of the impact of its activities on the community and commits to respecting public interests, avoiding funding political or union activities in violation of the law.

2.5 Relations with Public Administration, Judicial Authority, and Regulatory Authorities: In the context of this Code of Ethics, "Public Administration" (hereinafter "P.A.") refers to any public entity, public service concessionaire, physical or legal person acting as a public official, public service appointee, member of a European Union body, official of the European Communities, or official of a foreign state, as well as the judiciary and regulatory and oversight authorities.

In relations with the P.A., it is essential to operate in full compliance with applicable laws and the provisions of this Code of Ethics. Specifically, it is strictly forbidden:

- (i) to present falsified or altered documents, omit required documents, data, or information, or perform acts aimed at deceiving the P.A.;
- (ii) to unduly influence the decisions and judgment of P.A. representatives through illicit or inappropriate offers, including but not limited to payments or favors for oneself or the Company;
- (iii) to accommodate or induce a public official or public service appointee to request or receive undue benefits, such as money or other utilities;
- (iv) to pressure, threaten, or offer advantages to a person called to testify before the Judicial Authority to obtain false statements or prevent statements from being made.

Commitments made with the P.A. must be exclusively the responsibility of authorized company functions and must strictly adhere to current regulations without compromising the company's integrity or reputation.

To ensure transparency in these relationships, documentation related to contacts with the P.A. must be collected and preserved. The Company also commits to ensuring fairness and correct conduct in dealings with the Judicial Authority, following principles of correctness, honesty, and transparency. In particular, the company commits to:

- (i) providing guidelines on correct behavior for its employees, managers, and legal representatives when called to cooperate with the Judicial Authority;
- (ii) adequately instructing those in charge of corporate functions involved in such monitoring and control activities.





The company also commits to fully respecting market regulatory authority regulations and to timely providing all information requested by these entities and other regulatory bodies during the exercise of their functions.

Implementation and Monitoring of the Code of Ethics

The company commits to ensuring that all Recipients of the Code of Ethics are adequately informed about its content, promoting their involvement in updating the Code and adopting effective measures to ensure its correct application.

3.1 Communication and Dissemination of the Code of Ethics:

To ensure effective dissemination of the principles and values contained in the Code of Ethics, it is made available on the company's official website and internal company network. Moreover, the Code of Ethics is formally accepted by employees upon hiring, while all external collaborators are required to sign a commitment to respect it.

3.2 Violations of the Code of Ethics: Compliance with the Code of Ethics is an obligation arising from the sharing of its fundamental principles, with particular reference to the observance of laws in all professional activities of the Recipients. The company views violations of the Code of Ethics with utmost seriousness, emphasizing that company leaders must be the first to respect it, setting an example for other levels of the organization. Violations of the Code of Ethics constitute disciplinary and contractual breaches, and penalties will be proportional to the role of the offender:

- (i) Employees will be subject to disciplinary sanctions as provided by law and applicable contractual regulations;
- (ii) For external collaborators, the company reserves the right to terminate the contract without notice or compensation.

3.3 Monitoring of the Code of Ethics: All Recipients are obliged to actively cooperate with management, reporting any violation, even attempted, of the Code of Ethics. The identity of those reporting violations is protected and confidential, ensuring no retaliation, discrimination, or penalties against them, in compliance with applicable laws and the rights of the company or those who might be unjustly or maliciously accused.

