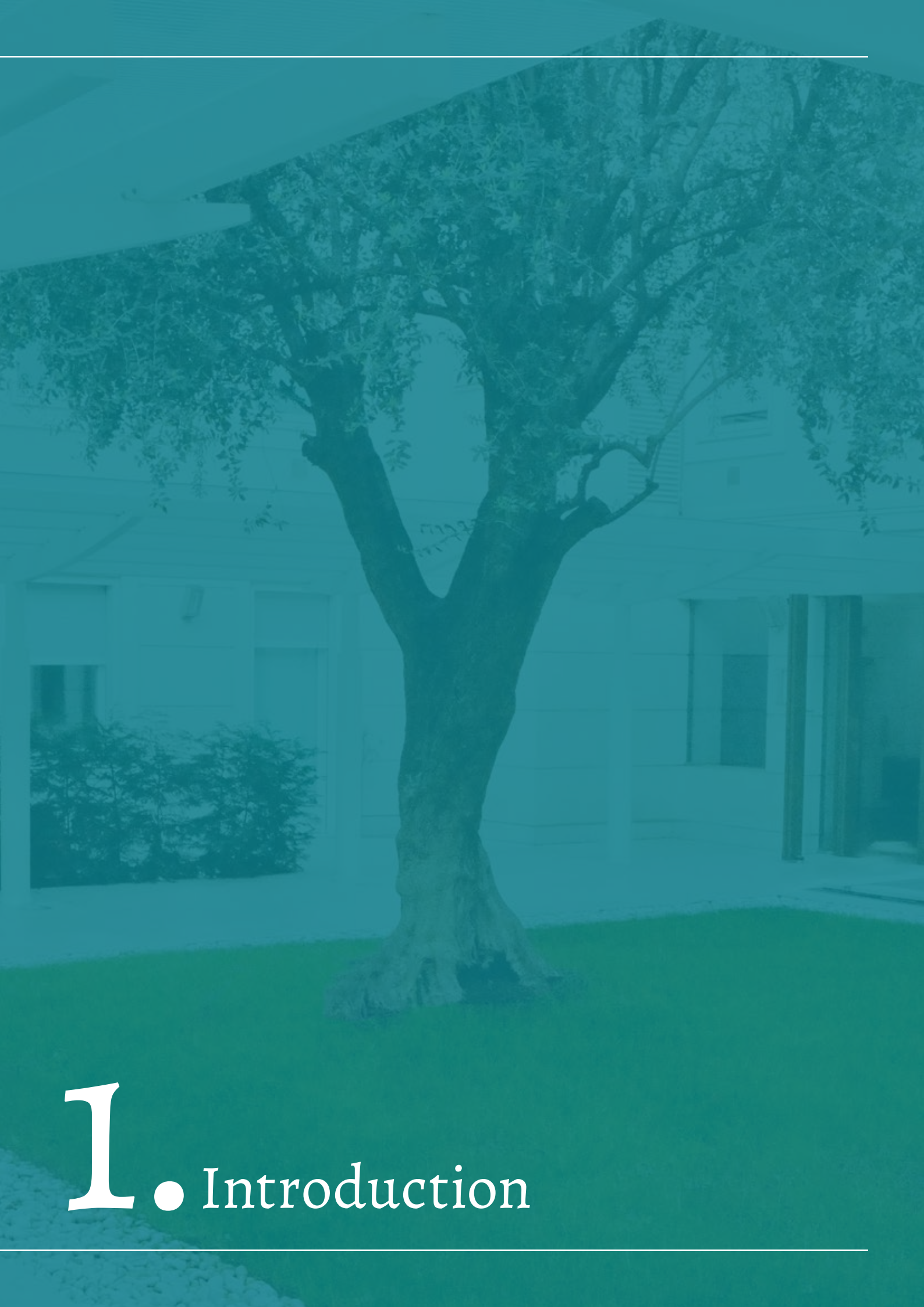


Code of Ethics

Index

1. Introduction	5
2. Recipients	11
3. Principles	17
4. People	23
5. Honesty and integrity in business management	33
6. Relationships with stakeholders	43
7. Security	51
8. Implementation, distribution, monitoring, reporting	57



I ● Introduction

1. Introduction

The management of Image Building S.r.l S.B. (from now on referred to as “Image Building” or the “Company”) has approved an internal code of conduct (**Code of Ethics and Equal Opportunities**), which regulates the responsibilities, obligations and rights undertaken by the Society towards the **stakeholders** or interlocutors with whom it interacts daily in the course of carrying out its activities. Image Building recognizes that a company's reputation is built not only on the expertise of its **team** and the high-quality service it delivers to **clients** but also on its commitment to addressing the needs of the broader community.

The principles that have always led Image Building's work are formally consolidated in a **Code of Ethics**, guided by the belief that trust is earned every day through respect for the laws and regulations of the countries where we operate and by valuing people.

This **Code of Ethics** thus represents a specific and distinctive element for the community, whose knowledge and spread builds the foundation of our activity.

Image Building firmly believes that all activities must be carried out ethically, in compliance with the principle embedded in **Article 41** of the **Constitution of the Italian Republic**, which states that private economic initiative "[may not be conducted in conflict with the social good or in a way that could harm security, freedom, or human dignity](#)".

The **Code of Ethics** is intended to guide the Company's activities toward cooperation and trust with individuals, groups, and institutions whose contribution is necessary to achieve the corporate mission and/or whose interxests are directly or indirectly influenced by the Company's activities.

Indeed, the concept of ethics is at the core of Image Building's activities and guides its approach and relationships with all internal and external **stakeholders**.

The purpose of this **Code of Ethics** is to clearly define Image Building's ethical values, establishing them as fundamental principles of the corporate culture and a standard of conduct for the Company, its **employees**, and anyone who, directly or indirectly, on a permanent or temporary basis, contributes to its operations and the achievement of its mission.

Image Building's goal is to implement the policies and principles of the **Code of Ethics** - a decision that contributes concretely to the success of its entrepreneurial project while also fulfilling its duties as a social entity.

A personal commitment to law compliance, honesty, loyalty to the Company, and transparency is therefore required.

Image Building is committed to disseminating the **Code** to all its **Recipients** and to periodically monitoring compliance with its regulations.



2 • Recipients

2. Recipients

2.1. Who is required to apply it

This **Code of Ethics** outlines the ethical and moral principles central for Image Building's operations and the behavioural guidelines followed by the Company both internally with employees and externally in its relationships with **institutions, suppliers, clients**, and business **partners**.

The set of principles and values expressed in this **Code** must guide the activities of everyone involved, particularly the following **Recipients**:

- members of the **Presidency**, who draw on the **Code's** principles when setting the Company's objectives;
- **executives, employees, collaborators** and **suppliers**, who align their actions and behaviour with the principles, objectives, and commitments established in the **Code**;
- all those who, directly or indirectly, act on behalf of Image Building.

To this end, Image Building is committed to spreading the **Code** to all identified **Recipients**, ensuring its proper interpretation, and promoting awareness of both the **Code** and the relevant regulations.

2.2. Spreading and education

The **Code** is shared with all the involved **stakeholders** - internal and external - and can be found in the **Code of Ethics** folder on the Company's server, accessible to all **employees**.

To ensure that all **employees** fully understand and apply the principles set out in the **Code**, the Company - through Image Building's **HR Manager** - holds periodic training sessions tailored to each participant's roles and responsibilities.

Through knowledge sharing and training, Image Building promotes a culture of fairness, transparency, and quality.

These **values** guide every team member, reflecting the core principles of this **Code of Ethics** in daily activities, regardless of role or level of responsibility.



3 • Principles

3. Principles

At all levels of the organization, **Recipients** are expected to act in accordance with the principles of legality, fairness, non-discrimination, confidentiality, diligence, and loyalty.

3.1. Legality

Image Building operates in full compliance with the law and with this **Code**. Consequently, all **Recipients** must comply with all applicable laws, stay updated on legislative developments, and fully benefit from the training opportunities offered by Image Building.

3.2. Fairness, loyalty and cooperation

Fairness and moral integrity are fundamental duties for all **Recipients**. All **Recipients** of this **Code** must perform their activities in accordance with the principles set forth herein. Fairness involves respecting the rights of all individuals involved in work and professional activities. The Company is therefore committed to acting fairly and impartially toward all stakeholders, recognizing that different forms of interaction and communication may be required depending on the nature and institutional role of each **stakeholder**.

In performing their duties, **Recipients** must not accept donations, favours, or benefits of any kind (except for items of modest value) and must not accept any form of compensation aimed at granting undue advantages to third parties.

Similarly, **Recipients** must not make monetary or in-kind donation to third parties, nor offer illegal benefits or favours of any kind (except for items of modest value or business courtesy gifts authorized by the Company) in connection with activities carried out for Image Building.

Even if they believe they are acting in the Company's best interests, they are still required to strictly abide by the rules and principles of this **Code**.

3.3. Loyalty

Image Building maintains a relationship of mutual trust and loyalty with each individual working for the Company.

Accordingly, **Recipients** must view compliance with this **Code of Ethics** as an essential part of their social responsibilities.

As part of their duty of loyalty, **employees** must not:

- a) accept external employment or consultancy engagements during their contract term if those activities conflict with their duties on the Company's behalf, unless expressly authorized in writing by the Company;
- b) engage in activities incompatible with their professional duties or contrary to the Company's interests.

3.4. Respect for the individual

Image Building rejects any form of **discrimination** based on age, gender, sexuality, health status, race, nationality, or religious and political beliefs of its **directors, managers, employees, or collaborators**.

It also prohibits all forms of **harassment** (psychological, physical, or sexual) against **directors, managers, employees, external collaborators** or **suppliers**.

Harassment is defined as any form of intimidation or threat that disrupts the peaceful performance of duties, or any abuse of power by a supervisor.

Image Building is committed to upholding physical, moral, and cultural integrity, adopting a human resources management system that ensures equal opportunities for professional development and growth for all personnel, while maintaining work environments that respect dignity and ensure safe working conditions.

Image Building promotes **gender diversity** in key roles and **gender equality** throughout the Company.



4 ● People

4. People

Image Building considers full compliance with all applicable laws and regulations an indispensable principle in conducting its activities.

All **Recipients** are expected to uphold this principle.

This obligation applies to **employees, consultants, collaborators, suppliers, customers**, and anyone else who interacts with Image Building - meaning all those required to follow the **Code** and uphold its general principles. Consequently, Image Building commits to adopting all necessary measures to ensure that the **Recipients** of the **Code of Ethics** adhere to current laws and regulations.

Image Building makes every effort to provide equal employment and career-development opportunities to all employees, enabling them to reach their fullest potential through training and professional growth. Each **Division Manager** is responsible for ensuring that, in all aspects of employment - such as hiring, training, salary, promotions, and termination - **employees** are treated based on their ability to fulfil role requirements, without **discrimination** based on gender, race, sexual orientation, social or personal status, physical condition or health, disability, age, nationality, religion, union affiliation, or political/personal beliefs.

Below are Image Building's **values**, which serve as key pillars in implementing the proposed framework:

- **professional expertise, independence, and experience:**
 - passion, outstanding quality and reliability;
 - methodology and fairness;
 - sharing and collaboration;
 - talent development;
 - value creation for all **stakeholders**;

-
- **transparency, confidentiality, and fairness:**
 - equality and honesty;
 - transparent flow of information;
 - avoidance of conflicts of interest;
 - **integrity:**
 - loyalty and respect;
 - inclusion;
 - knowledge and compliance with national and international laws and regulations in our field;
 - **health, safety, and environment safeguarding:**
 - respectful culture;
 - safeguarding the health and safety of individuals;
 - protecting the environment.

4.1. The value of human resources

Image Building values its **human resources** and prioritizes relationships built on loyalty and mutual trust, while supporting each individual's aspirations and abilities.

Discriminatory behaviour based on race, ethnic or regional origin, gender, age, religion, political views, health status, or any personal characteristic is prohibited in the workplace. Any form of **favouritism** or **clientelism** is strictly forbidden in both hiring and employee management.

For Image Building, **employees** and **collaborators** are the fundamental resource for achieving the Company's success. Professionalism, expertise, commitment, motivation, and engagement are essential values for Image Building.

Therefore, in addition to adhere to the requirements of this **Code of Ethics**, Image Building offers career-development opportunities and invests in its workforce, ensuring equal opportunities, fair compensation aligned with each role, and contracts and benefits fully consistent with labour regulations, labour codes and the National Collective Labour Agreement (NCLA) to which the Company adheres.

Moreover, Image Building provides training programs for its **employees**, promoting individual growth, recognizing specific skills, and fostering internal collaboration with a team-based approach. Image Building has always safeguarded personal dignity and prohibits all forms of **harassment** or **intimidation** in the workplace, ensuring a safe work environment through strict adherence to applicable regulations.

Recipients must maintain positive, cooperative relationships with **colleagues** and **stakeholders**, contributing their full commitment and professional expertise to the Company and its **clients**, in line with Image Building's methodology.

4.2. Equal opportunities for men and women

In accordance with **Legislative Decree 198/2006**, Image Building is committed to prohibiting any act, agreement, practice, or behaviour that discriminates based on gender, resulting in a detrimental effect or less favourable treatment compared to others in similar circumstances. This also applies to indirect discrimination, where an apparently neutral rule, practice, act, agreement, or behaviour places - or could place - **employees** of one gender at a particular disadvantage compared to those of the other gender.

4.3. Prohibition of discrimination

Discrimination must be prohibited at all stages of employment:

- access to employment, regardless of hiring method, sector, or branch of activity, at all levels of the professional hierarchy;
- compensation;
- job performance and career development;
- social security benefits;
- marital status;
- pregnancy, maternity leave, and breastfeeding.

4.4. Harassment

Any form of **sexual harassment** or misconduct that offends or disturbs an individual - such as displaying sexually explicit images or making persistent, inappropriate remarks - is strictly forbidden.

All employees are entitled to respect and human dignity.

No behaviour that could directly or indirectly violate these rights is tolerated, particularly any form of **harassment** or **bullying**.

It is also unacceptable for the employer to retaliate against a complaint or any action taken to ensure equal treatment.

4.5. Recruitment

Personnel evaluation and recruitment must be conducted fairly and transparently, respecting equal opportunities while aligning Image Building's needs with candidates' professional profiles, ambitions, and expectations.

Image Building commits to adopting all necessary measures to prevent **favouritism** in the recruitment process by using objective, merit-based criteria and respecting candidates' **dignity**, as well as the Company's interests in effective business operations.

New hires, including those appointed under this **Code**, receive clear and accurate information about their roles, responsibilities, rights, and obligations of all parties.

4.6. HR management

Image Building protects and values its **human resources** by ensuring continuous professional development, knowledge, and skills.

This includes providing suitable training and initiatives to support professional growth. Each **employee** is given a tailored training plan and career path with measurable performance goals.

Image Building encourages **employee's** participation in Company life by offering tools to gather opinions and suggestions, ensuring fullest involvement.

Without compromising the Company's overall willingness and flexibility toward its employees, no employee shall be forced to perform tasks, services, or favours that are not required under their employment contract or role within the organization.

The Company is firmly committed to preventing instances of **bullying, stalking, psychological abuse**, and any **discriminatory** or demeaning **behaviour** inside or outside the workplace.

Employees should interact with loyalty, fairness, and mutual respect, in accordance with the values of civil coexistence and personal freedom.

4.7. Value of the individual

Image Building promotes the use of **human resources** that acknowledges and values individual characteristics, embraces diversity, and is fundamentally based on dialogue and listening to foster professional growth and development.

All **Recipients** of this **Code** must respect each person's **dignity** and privacy while pursuing corporate objectives.

Harassment and **abuse** of any kind will not be tolerated.

They must also maintain a climate of mutual **respect** within the Company.

4.8. Impartiality and the principle of non-discrimination

In its dealings with internal and external **stakeholders**, the Company is committed to avoiding any form of **discrimination** based on:

- age, gender, sexual orientation, health status, disability, language, ethnicity, or nationality;
- personal, political, philosophical, or religious beliefs;
- labor union membership, non-membership, or withdrawal from membership.



5 • Honesty and integrity in business management

5. Honesty and integrity in business management

5.1. Transparency and Confidentiality of Information

Image Building upholds the confidentiality of its information and complies with **data** protection regulations, ensuring that no confidential information is obtained through illegal means.

Any **employee** who, for any reason, comes into possession of significant information about the Company or its stakeholder (**governing bodies, clients, employees, consultants, suppliers**, etc.) must not disclose or use it for purposes beyond those for which it was obtained.

Image Building is committed to ensuring the security and protection of confidential or personal **data** and information relating to its **clients, employees, consultants, collaborators**, or third parties.

Recipients are prohibited from sharing or improperly using insider information that could influence the market, as well as from manipulating such information or spreading false **data**.

Recipients also must not use privileged or confidential information to conduct personal transactions, directly or indirectly, including through third parties, whether for themselves or on behalf of others.

Finally, advising or encouraging any third party to make transactions through financial instruments that, if used by **Recipients**, would fall under the above prohibitions, is also forbidden.

5.2. Accounting and managerial information

Every operation or transaction within Image Building must be authorized, verifiable, legitimate, consistent, and appropriate. Additionally, each transaction must be accurately recorded in the Company's accounting system according to legal guidelines.

To ensure the accuracy, completeness, and transparency of recorded data, comprehensive supporting documentation for each transaction must be maintained.

All **Recipients** are required to cooperate, within their capacity, to ensure that all relevant facts pertaining to Image Building's management are accurately and promptly recorded in the accounts. Image Building, in alignment with the principles of clarity and accounting transparency, ensures the accuracy and truthfulness of its financial statements and associated reports, in compliance with current regulatory standards.

5.3. Anti-money laundering

Recipients collaborate to uphold transparency, fairness, and integrity in commercial transactions, actively combating the phenomena of illicit receipt and money laundering.

Specifically, measures are in place to ensure that:

- cash transactions are minimized;
- thorough assessments of the commercial and professional reliability of **partners** and **suppliers** are conducted;
- any engagements with service providers or individuals managing the Company's economic and financial interests are formalized in written agreements delineating the terms and conditions agreed upon.

5.4. Business integrity and impartiality.

Corruption prevention

Every individual associated with Image Building, including **administrators, managers, employees,** and **partners,** must maintain a stance of integrity and honesty in all professional interactions, both within the organization and with external parties.

Specifically, **Recipients** must refrain from pursuing unlawful or unethical objectives to gain undue advantages for themselves or others. This commitment extends to **consultants, suppliers, clients,** and anyone engaging with Image Building. Under no circumstances can the Company's interest justify or induce dishonest conduct.

Image Building also upholds impartiality in its dealings, ensuring fairness and avoiding favoritisms under all circumstances.

Consequently, all **employees** act in a manner that preserves the independence of judgement and freedom of action for themselves and others involved. To uphold principles of honesty and impartiality fully, no form of compensation, monetary promise, or other benefits are permitted in any relationships, including those with **public entities** or competing firms. Similarly, the provision or promise of gifts or favors that could be perceived as exceeding standard commercial or courtesy practices, or aimed at gaining favorable treatment in any company-related activities, is strictly prohibited.

5.5. Correct entity management and resource utilization

Image Building pursues its corporate purpose not only by adhering to the law, but also by meticulously adhering to its Statute and Articles of Incorporation, ensuring the correct functioning of its entities and preserving the integrity of its assets.

5.6. Protection of intellectual property and copyright

Image Building condemns any interference with the freedom of industry or commerce involving both tangible and intangible assets that may be protected by an industrial or intellectual property right, whether its own or belonging to a third party. This includes any form of fraud, unauthorized duplication or reproduction, counterfeiting, or alteration. Therefore, everyone acting on its behalf must comply with the applicable regulations in this area.

All industrial and intellectual property rights for any protectable assets created, developed, or produced in the course of employment (such as trademarks, logos, distinctive signs, know-how, software, studies, and publications) are owned by the Company.

The Company retains the right to utilize these assets as it sees fit while respecting the author's moral right to be recognized as the creator.

Each **Recipient** commits to safeguarding the industrial and intellectual property rights owned by or licensed to Image Building and to refraining from any unlawful use of assets protected by such rights.

5.7. Gifts, courtesy gifts, and benefits

It is prohibited to accept gifts, courtesy gifts, or benefits beyond normal courtesy practices, especially if aimed at obtaining preferential treatment in dealings related to Image Building's activities.

In any case, **Recipients** must avoid practices that are illegal or do not align with accepted commercial standards.

5.8. Conflict of interest prevention and management

Image Building is committed to identifying and managing any conflicts of interest involving its **administrators, employees, consultants, collaborators, suppliers, and partners**.

Situations that could potentially create conflicts between personal economic interests and one's role within the Company must be actively avoided and promptly disclosed.

The personal utilization of Company assets, direct or indirect investments in competing entities, **clients**, or **suppliers** is strictly prohibited. Additionally, individuals associated with Image Building, including **employees, collaborators, suppliers, consultants**, or partners, must refrain from activities that could create conflicts of interest with the Company or any public or private entity.

5.9. Use of company devices and IT systems

Employees and **collaborators** of Image Building must use the Company's assets and tools appropriately. **Recipients** are expected to act responsibly to protect corporate assets.

In particular:

- All **data** and information stored on Image Building's IT systems, including email accounts, are the property of the Company and must be used for work-related activities in accordance with Image Building's established policies and limitations;
- IT tools must be used in strict adherence to information protection measures;
- it is forbidden to use IT tools to create, store, or distribute content or personal data unrelated to the Company's activities;
- personal use of the internet is generally prohibited, including accessing websites that violate ethical standards, contain illegal content, or promote violence, hatred, or discrimination;
- personal online purchases on e-commerce sites or downloading/uploading files for personal use are not permitted.

Moreover, **employees** and **collaborators** of Image Building must follow these guidelines when using social networks:

- i) post responsibly;
- ii) maintain professional confidentiality;
- iii) respect the Company's values.



6 Relationships ● with stakeholders

6. Relationships with stakeholders

6.1. Relationships with clients

Relationships with **clients** must be characterized by a high level of professionalism, loyalty, and a willingness to accommodate their requests and needs wherever possible.

From the negotiation phase through the entire duration of the contract, each **Recipient** should provide complete, accurate, and clear information regarding all relevant aspects of the services, including their characteristics, features, nature, and origin.

Image Building is committed to fulfilling contractual obligations precisely and promptly. In compliance with data privacy regulations (**GDPR**), Image Building does not disclose **client** information outside professional contexts or without the **client's** explicit consent. Both during and after the conclusion of any contract, Image Building maintains strict confidentiality concerning the **client's** activities and any associated private information.

6.2. Media relations and information sharing

Image Building conducts its activities with professionalism, efficiency, and, above all, with the greatest diligence, loyalty, and clarity.

With due respect to the confidentiality of information,

Recipients authorized to engage with the **media** must avoid making false or misleading statements about the Company's operations or its relationships with **stakeholders**. All external communications, including branding and promotional activities for Image Building, must adhere to the **ethical principles** of this **Code**.

Any contacts with the press, media outlets, or, more broadly, external parties, must be handled exclusively by individuals expressly authorized in line with Image Building's policies.

All Image Building **employees** and **collaborators** who interact with the media must:

- i) establish relationships with journalists and media professionals based on transparency, fairness, trust, and professional collaboration, respecting each party's role;
- ii) refrain from sharing information that is partially or wholly untrue, unverified, or unreliable;
- iii) comply with the communication regulations set by market oversight and regulatory authorities.

6.3. Relationships with partners

When forming temporary associations or partnerships, the choice of **partners** involves the verification of their integrity, honesty, and reliability. The allocation of assignments and establishment of partnerships must adhere to criteria reflecting the highest standards of efficiency, ethics, and fairness - ensuring both the protection of the Company's interests and ethical dealings with counterparties. Image Building collaborate exclusively with **partners** who fully comply with current regulations.

6.4. Suppliers

At Image Building, **supplier** selection is based on objective criteria such as quality, price, capacity, efficiency, ethics, and legal compliance.

The procurement of products or services must be justified by the genuine and substantiated needs of the Company, aligning with established requirements.

Image Building commits to ensuring that its **suppliers, consultants,** and commercial **partners** adhere to behavioral principles consistent with its own, recognizing this alignment as crucial for initiating or maintaining contractual relationships.

The sharing of this **Code of Ethics** is a prerequisite for establishing and sustaining **supplier** relationships.

6.5. Relationships with competitors

Image Building firmly believes in the **value** of fair competition and free market, which Company **employees** are required to protect by ensuring compliance with national and European regulations.

Image Building condemns any form of ethically inappropriate behaviour or activities.

6.6. Conduct guidelines for interactions with Public Administration or equivalent entities

In all interactions with the **Public Administration** or similar entities, each **Recipient** must:

- i) engage with institutional contacts solely through the designated communication channels and in full compliance with established procedures;
- ii) not seek nor attempt to obtain confidential or undisclosed information.

6.7. Management of public procurement and contracts

When participating in **public tenders** or negotiations for work or services with the **Public Administration**, Image Building **employees** must act in good faith, upholding professional integrity, and comply with legal requirements, treating public authorities and competitors with fairness and loyalty. In executing **public contracts** - or any agreements or conventions with the **Public Administration** - they must fully adhere to current regulations and meet their contractual obligations promptly.

6.8. Contributions and sponsorships

Any **sponsorship** activities undertaken by Image Building must align with the Company's values and support events of high-quality standards. Image Building may support requests for contributions from public or private entities and non-profit organizations if they involve cultural, charitable, social, or humanitarian initiatives. In any event, when deciding which proposals to support, Image Building seeks to avoid any personal conflicts of interest involving public or private entities with which it has ongoing relationships.

6.9. Receipt and use of public funds

When seeking **public funds** for various purposes (such as developing new projects or activities, staff training, etc.), all parties involved must adhere to principles of fairness, clarity, and transparency in both securing and managing such **funds**, as well as act loyally toward the providers. It is strictly forbidden to use **funds** for purposes other than those for which they were allocated.



7 • Security

7. Security

7.1. Workplace: health and safety

Image Building is fully committed to protecting the health and safety of all **Recipients** and third parties interacting with the Company.

Knowledge of and compliance with current workplace health and safety regulations is a top priority for Image Building, its **employees**, **collaborators**, contractual counterparts and **suppliers**.

Image Building ensures that its activities take place in safe and healthy work environments, fully complying with all applicable laws on workplace accident prevention and **worker** protection.

The Company fosters a strong safety culture among its **workers**, raising risk awareness and promoting responsible behaviour.

Every **employee** and **collaborator** is expected to contribute to workplace health and safety initiatives.

7.2. Free competition

Image Building values **free competition** as a value worth protecting and recognizes that fair and honest competition enhances the Company's reputation while supporting the sustainable development of both the business and the market in which it operates.

Accordingly, it avoids any behaviour aimed at securing business deals unfairly or in violation of applicable laws or regulations.

7.3. Environmental protection

Environmental responsibility is a priority for Image Building, which promotes practices aimed at reducing the environmental impact of its operations.

In carrying out its activities, the Company is committed to safeguarding the **environment** and **public health** by motivating and educating its **employees**, fostering a positive attitude, and strengthening their sense of responsibility toward the **environment**.



8

Implementation,
distribution,
● monitoring, reporting

8. Implementation, distribution, monitoring, reporting

Image Building is committed to upholding the standards set forth in the **Code of Ethics** and will undertake **surveillance** and **monitoring** activities to ensure its effective implementation.

Specifically:

- ongoing monitoring the application of the **Code of Ethics** by all **Recipients** will be continuously monitored, including the reception of reports and suggestions;
- behaviour analysis and behaviours that conflict with the **Code of Ethics** will be analysed and corrected;
- distribution plans for disseminating the **Code** will be developed.

8.1. Gender Equality Committee

Image Building ensures the enforcement of the **Code** by establishing a **Gender Equality Committee**, responsible for overseeing and monitoring the implementation of the **Code of Ethics**.

The **Committee's** duties include:

- ensuring the dissemination and understanding of the **Code**;
- constantly monitoring the application of the **Code of Ethics** by relevant parties, including receiving reports and suggestions;
- reporting any violations to Management for necessary corrective actions;
- providing consultative support during disciplinary proceedings related to the **Code**;

-
- offering opinions on revisions to Company policies and procedures to ensure their alignment with the **Code**;
 - periodically assessing the effectiveness of the **Code** and proposing revisions when necessary.

8.2. Monitoring, reporting, and violations

Image Building encourages employees to seek clarification directly from the **Gender Equality Committee** in any situation related to the **Code of Ethics** where they are uncertain about the most appropriate behaviour to adopt. Adherence to the principles contained in this **Code** is mandatory.

All **administrators**, members of the **Gender Equality Committee**, **managers**, **employees** and **collaborators** may report, either in writing and anonymously (using one of the two designated boxes

[urn 1 - ex-showroom area](#) and [urn 2 - server area](#))

or non-anonymously (directly to a member of the **Gender Equality Committee** or, if possible, directly to the **HR manager**), any violation or suspected violation of the **Code of Ethics** to Image Building's **Gender Equality Committee**. The **Committee** will:

- conduct an **analysis** of the report, potentially hearing from both the reporter and the individual accused of the alleged violation;
- request and verify the implementation of any necessary **corrective or preventive actions**;
- safeguard reporters against any form of **retaliation**, defined as any act that could even suggest **discrimination** or penalization;
- ensure **confidentiality**, maintaining the reporter's identity private, except where such disclosure is required by law.

Compliance with the standards outlined in this **Code** must be considered part of the contractual obligations for **administrators**, members of the **Gender Equality Committee**, **managers**, **employees**, and **collaborators** of Image Building, as per **Article 2104** of the **Italian Civil Code**.

Any violations of these standards will constitute a breach of the obligations under the employment relationship and/or disciplinary misconduct, subjecting the violator to all legal consequences, including those affecting the employment relationship.



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