



WamBlee

DEA

Company Procedure for Adopting and Complying with the Code of Ethics

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1 Introduction

This Code of Ethics establishes the principles and guidelines that all individuals working within the company must adhere to. It is based on values of **integrity, transparency, mutual respect**, and **responsibility**. Its purpose is to promote a corporate culture based on ethical and legally compliant behavior, fostering a positive and trusting work environment.

2 Goals

- Promote and disseminate a culture of corporate ethics.
- Define the behaviors expected of employees, managers, collaborators, and external partners.
- Ensure transparency in corporate operations.
- Prevent illegal or unethical behavior, such as conflicts of interest, corruption, discrimination, etc.
- Create a respectful and safe work environment.

3 Scope of Application

The Code of Ethics applies to all individuals working within the company, including:

- **Employees** (at all levels)
- **Directors and Area Managers**
- **External collaborators, consultants, and suppliers**
- **Business partners and customers**

All involved must comply with the guidelines established in the Code of Ethics.

4 Fundamental Principles of the Code of Ethics

4.1 Integrity and Honesty

- a) All company operations and activities must be conducted transparently, honestly, and in compliance with applicable laws and regulations.
- b) Conduct that could compromise the integrity of the company or the trust of customers, suppliers, and the community is not tolerated.

4.2 Compliance with Laws and Regulations

- a) The company is committed to complying with all applicable laws, rules, and regulations, at the local, national, and international levels. All employees and collaborators must fulfill legal obligations in their professional activities.

4.3 Respect for Human Rights

- a) The company respects fundamental human rights, avoiding any form of discrimination based on

gender, race, ethnicity, religion, sexual orientation, or otherwise.

- b) The work environment must be inclusive, safe, and free from harassment or discrimination.

4.4 Conflicts of Interest

- a) Every employee and collaborator must avoid situations in which their personal interests may conflict with those of the company. If a conflict of interest arises, it must be promptly disclosed to their superior or the Ethics Officer.

4.5 Transparency and Communication

- a) The company promotes transparency in all its activities, including internal and external communications. Behaviors, business decisions, and operations must be clear and easily understandable.

4.6 Social and Environmental Responsibility

- a) The company is committed to operating responsibly towards the community and the environment, adopting sustainable and environmentally friendly practices.

5 Adoption and Implementation of the Code of Ethics

5.1 Approval and Communication

- a) The Code of Ethics is approved by the Board of Directors or an equivalent figure and communicated to all employees and collaborators upon hiring or contract renewal.
- b) It must be made available to all interested parties (both internal and external to the company) through publication on the intranet, company website, or other accessible means.

5.2 Training

- a) The company organizes annual **training sessions on the Code of Ethics**, which must be mandatory for all employees and collaborators.
- b) The training includes practical examples and case studies to ensure the Code is understood and properly implemented.

5.3 Adoption Responsibilities

- a) The **Ethics Officer or Compliance Officer** (responding to Management) will be responsible for ensuring the adoption, dissemination, and compliance with the Code of Ethics within the organization.

6 Monitoring and Control

6.1 Compliance Verification

The company conducts **periodic reviews** to monitor compliance with the Code of Ethics, through internal controls or external audits, if necessary.

Each employee or collaborator is required to report any violations of the Code, using secure and anonymous channels, if desired.

6.2 Investigations

In the event of an alleged violation of the Code of Ethics, a **full internal investigation** is initiated to determine the facts.

If the violation is confirmed, appropriate disciplinary measures are taken, ranging from a warning to dismissal, depending on the severity of the violation.

6.3 Corrective actions

If areas for improvement in compliance with the Code are identified, the company will take corrective actions, which may include modifying company procedures, introducing new controls, or increasing staff training.

7 Misure Disciplinari

In the event of a violation of the Code of Ethics, the company adopts disciplinary measures that may include:

- Verbal or written warnings
- Temporary suspension or dismissal
- Termination of contractual relationships with suppliers, partners, or external collaborators.

The extent of the sanctions depends on the severity of the violation and the damage caused to the company.

8 Changes and Updates

The Code of Ethics is **reviewed periodically**, at least every two years, to take into account any regulatory, technological, or organizational changes. Any changes will be approved by the Board of Directors and promptly communicated to all stakeholders.

9 Conclusions

The Code of Ethics is a fundamental tool for ensuring compliance with corporate values and protecting the reputation and trust of all those involved in corporate activities. Every member of the organization is

responsible for adhering to these principles and promoting an ethical and transparent corporate culture.

10 Contact for Reports

To report violations or unethical behavior, you can submit any report anonymously using the form on the website:

Anonymous reporting channel: From the company website; Menu → Company Policy → Reports