

CODE OF ETHICS

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My partners and I are proud to present Andersen's Code of Ethics, which we regard as a moral agreement of cooperation for the benefit of all, as well as the foundation for a relationship of mutual trust within the firm.

In general, this document forms an integral part of the 231 Model (Organisation, Management and Control Model, OMCM), drawn up in accordance with Legislative Decree 231/01 to prevent and manage the commission of 231 offences within an organisation.

The Code of Ethics sets out the principles and values on which our work is based and the ethical boundaries within which we have decided to operate. It is a document that identifies our mission and the values in which we believe, and which should guide us in the prevention of offences. It has been developed with the aim of creating a transparent, ethical and responsible working environment that promotes trust among employees, professionals, partners, clients, suppliers and the community in which we operate.

Every member of our firm is required to adhere to these principles and guidelines in all the professional activities we undertake.

The aims of the Code of Ethics can be summarised as follows:

- *to establish a clear regulatory framework defining acceptable and unacceptable behaviour within the firm, enabling us to operate within a sound ethical and legal framework, ensuring the integrity of our actions and the protection of the interests of all parties involved*
- *to promote awareness and understanding of the fundamental ethical principles that guide our work, so that everyone is aware of the importance of acting virtuously and responsibly in accordance with values such as honesty, fairness, confidentiality, integrity and mutual respect*
- *to provide practical guidance on addressing the ethical challenges that may arise in our professional practice, so that we can make considered and informed decisions in the interests of clients, colleagues (employees and associates) and other stakeholders*
- *to highlight the importance of an inclusive, respectful working environment free from discrimination of any kind. At Andersen, we aim to promote a culture of diversity and equality, in which diversity is seen as an asset and all employees, all staff and all partners are treated with dignity and respect, regardless of differences in gender, ethnicity, religion, sexual orientation or ability.*

My partners and I firmly believe that adherence to this Code of Ethics enables us to operate with professionalism and integrity, building relationships of trust consistent with the moral and social responsibilities we hold.

In order to ensure an ethical, honest and respectful working environment for everyone, I invite you to read carefully and adhere to the provisions contained in this document.

Andrea De Vecchi



Why have we adopted a Code of Ethics?

Within our Code of Ethics, you will find guidelines for conduct to guide you in the course of your work and professional activities. You will not find answers to every question, but you will be able to navigate easily, ensuring there is always a guiding light to follow.

Further details and information can be found in our Organisation, Management and Control Model (hereinafter referred to as Model 231), which sets out the rights, duties and responsibilities towards all stakeholders and forms an essential part of the control system designed to reduce the risk of offences being committed that could reasonably involve the Firm.

Our values

The pride we take in being part of Andersen will naturally lead us to observe and respect the principles and values set out in our Code of Ethics. Our firm aims to be an outstanding business partner for clients and colleagues, through conduct that is always guided by professionalism and integrity. Together, we will tackle the challenges naturally associated with carrying out our work, proposing swift and efficient solutions.

Please do not hesitate to ask questions should you have any doubts regarding the application of our internal procedures. Your manager or the relevant departments will be happy to discuss this with you.

We believe that, through dialogue and with full respect for each other's roles, we can easily overcome difficulties, improve processes and resolve critical situations.

Who is this for?

Our Code of Ethics must be considered an official document of Andersen Italia and is therefore binding on all parties working with our firm, whether they are internal to the organisation or external to it.

We therefore address all partners, associates, professionals, employees, and collaborators of the firm and, in general, all those who, directly or indirectly, permanently or temporarily, interact with us.

These individuals are therefore required to take note of the contents of our Code of Ethics and must observe and comply with it.

OUR RULES OF CONDUCT

❖ The integrity of our conduct in dealings with the Public Administration

It often happens that, in the course of our work, we deal with the Public Administration (P.A.). On such occasions, we must under no circumstances unlawfully influence the decision or conduct of the Public Administration by offering money or other benefits.

Our Firm does not tolerate and condemns any form of corruption.

Our firm's reputation depends on the fairness and integrity of each of our actions.

We believe it may be useful to identify behaviours that could unlawfully influence the conduct of the Public Administration, resulting in inappropriate benefits or advantages for the Firm or our clients.

Below are some examples of situations that may be used to unlawfully influence the Public Administration:

- money or other assets used for purposes other than those intended in relation to the service to be provided;
- entertainment expenses without supporting documentation or for purposes other than strictly business-related objectives;
- promising or granting, directly or indirectly, direct or indirect gifts or favours of significant value;
- procuring or promising to procure confidential information and/or documents;
- adopting, during formal and informal meetings, including through external lawyers and party-appointed consultants, conduct such as to induce judges or members of the Arbitration Panel, as well as representatives of the public administration where they are a party to the dispute, to unduly favour the interests of the Firm;



- adopting, during inspections or audits by public bodies or court-appointed experts, conduct likely to influence their judgement in the Firm's interest;
- adopting, during the resolution of litigation or arbitration, conduct likely to unduly influence the decisions of the adjudicating body or the positions of the public administration, where the latter is a party to the dispute.

We also consider prohibited any conduct that is detrimental to our integrity, for example:

- presenting false or fabricated documents or data;
- engaging in deceitful conduct with the aim of misleading the public administration in its technical and economic assessment of the products and services offered or provided;
- deliberately omitting required information in order to influence the decisions of the public administration in one's favour;
- to use public grants, subsidies or funding for purposes other than those for which they were obtained;
- accessing the public administration's information systems without authorisation, in order to obtain and/or alter information for the benefit of the Firm;
- using external consultants where the required work could be carried out within our firm;
- hiring or promising to hire individuals, contrary to our policy, in order to influence the independence of judgement of public authorities or induce them to secure advantages for our Firm;
- promoting, condoning or remaining silent regarding the existence of an unlawful agreement or a concerted practice for unlawful purposes.

Ask yourself:

- *is my conduct in line with our policy?*
- *Am I certain that my conduct has not resulted in any breach of the firm's code of ethics?*
- *Am I certain that I have not unduly influenced the activities of the public administration?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *our Supervisory Body.*

Don't forget that our 231 model and related internal procedures are always available to you on our intranet and you can consult them at any time.

❖ **The integrity of our conduct in the firm's internal controls and in the management of our financial resources.**

The smooth running of our firm depends on the work of each and every one of us.

Our internal organisation provides for decisions to be taken on the basis of the work of Committees, Service Lines, Business Units and Industries. There are also specific functions responsible for carrying out daily necessary activities (including HR, Communications, Marketing and the DPO). Each of us operates according to our own skills and assigned roles.

Therefore, if, for any reason, you have been entrusted with tasks relating to the running of the Firm, we ask you to observe a few simple rules, for example:

- you must ensure the smooth running of the Firm and its internal bodies by providing, in advance and in a timely manner, all documentation regarding the management of the Firm that may be requested of you;
- you must not engage in conduct that hinders the oversight of the Firm's management, such as concealing documents, disseminating false news or information, or delaying the submission of requested documentation.

If you are responsible for managing the firm's financial resources or come into contact with our clients and suppliers, you must also act in accordance with the following:

- always check that what you are paying is appropriate and corresponds to the orders accepted and approved by the relevant bodies or by those delegated to perform this function;
- ensure that your conduct always complies with the Firm's internal procedures regarding relations with our clients and suppliers;
- liaise regularly with the relevant bodies of the Firm should you be asked to do so.
- If contacted by our Supervisory Body, be prepared to provide any information that may be requested of you.



We believe that the management of our financial resources deserves the utmost attention. We have therefore devised some simple rules to help us ensure everything runs as smoothly as possible:

- the person making decisions must not be the same person who implements them;
- the person responsible for carrying out the checks required by law must not be involved in the transactions being audited;
- We have set quantitative thresholds for the management of financial resources: these thresholds are consistent with the management powers and organisational responsibilities entrusted to individual persons; the thresholds thus set may only be exceeded by following the authorisation procedures and, in any case, only with adequate justification;
- the use of our economic and/or financial resources must always have a specific purpose and must always be documented and recorded.

Ask yourself the following questions:

- *do you think there are any critical issues in the management of financial resources?*
- *Do you believe that your behaviour, or that of other colleagues, is not in line with our procedures?*
- *Do you have any suggestions for improving our procedures?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *our Supervisory Body.*

Please also remember that our 231 model and related internal procedures are always available to you on our intranet and you can consult them at any time.

❖ **How should we deal with the judicial authorities?**

Should you need to deal with the Judicial Authorities in the course of your work whilst carrying out duties for our Firm, we have set out some rules that you are asked to observe:

- avoid any conduct intended to, or having the effect of, inducing any person to make false statements in the context of judicial or arbitration proceedings or similar proceedings;
- always be cooperative and transparent with the public authorities, in particular with the investigating and adjudicating magistrates; provide all data, information and details that may be requested, whilst ensuring compliance with data protection legislation.

Ask yourself the following questions:

- *Am I required to provide all the information requested of me?*
- *Have I omitted to provide any relevant details or information?*
- *Have I been reticent?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *our Supervisory Body.*

Don't forget that our 231 model and related internal procedures are always available to you on our intranet and you can consult them at any time.

❖ **Safety first: health and safety in the workplace.**

We are committed to health and safety within our firm, across all our offices, and we share a daily commitment to working in a safe and healthy environment. We are committed to complying with the requirements relating to the health and safety of workers in accordance with current legislation. All parties who have dealings with Andersen Italia in any capacity are likewise bound to comply with current legislation and the relevant procedures in this regard.

Thanks to the commitment of each and every one of us, we will succeed in fostering and consolidating a culture of safety, raising awareness of risks and promoting responsible behaviour among all staff.



We have established internal procedures regarding risk prevention and the protection of health and safety, so that a useful guide is always available to everyone. The Firm has appointed an external Health and Safety Manager, with the primary aim of managing worker safety in the best possible way, efficiently and in accordance with best practice.

We have identified some simple rules that can help us, and we summarise them below:

- in the course of our daily work, we always follow the procedures that our firm has made available to everyone;
- we are always cooperative during any inspection activities, for example when we come into contact with the relevant local health authorities (ASL), Labour Inspectorates, Provincial Labour Directorates, the Fire Service, and social security institutions;
- we carefully retain documents relating to worker health and safety and workplace hygiene; these documents must be drawn up in such a way that they cannot be altered without proper documentation, and may only be accessed by the competent person or their delegate, in accordance with our internal procedures;
- we provide full support to the Health and Safety Manager, the occupational health doctor and all those who, in various capacities and each within their respective areas of responsibility, are involved in managing the safety of our staff.

Ask yourself the following questions:

- *Am I making the right choice, or am I putting myself or my colleagues at risk by failing to comply with the Workplace Safety Policy?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *the external Health and Safety Manager appointed by the Firm,*
- *our Supervisory Body.*

Please also note that our 231 model and related internal procedures are always available to you on our intranet and you can consult them at any time.

❖ **Anti-money laundering and related obligations.**

Andersen complies with legislation designed to combat the crime of money laundering. We have put in place very precise and detailed procedures that will guide you smoothly so that our conduct always complies with the law. The guidelines developed by the Firm will help us carry out our work with peace of mind and the utmost transparency, as well as in full compliance with the law.

Remember to follow a few clear rules:

- take an active part in the training organised by the firm;
- if you have any doubts about the application of the internal anti-money laundering procedure, do not keep them to yourself but discuss them;
- if requested, promptly update the anti-money laundering file for your assigned clients.

Ask yourself the following questions:

- *do I know the contents of the anti-money laundering regulations?*
- *Does the customer I am registering leave me feeling perplexed or doubtful?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *the firm's anti-money laundering officer,*
- *our Supervisory Body.*

Please also remember that our 231 model and related internal procedures are always available to you on our intranet and you can consult them at any time.

❖ **Data protection & Cyber Security: care in data management.**

A primary objective of our daily work must also be the proper management and protection of the data – personal and otherwise – with which we come into contact: personal data of staff, clients and suppliers; the firm's know-how and that of our clients; and any confidential information belonging to the firm and/or our clients.



We take great care to protect people's information, ensuring that the confidentiality and secrecy of the relevant data are always guaranteed. We strictly comply with current legislation by sharing user-friendly internal procedures that support us in safeguarding the data we process.

The Firm also uses hardware and software providers capable of ensuring the security of the networks and IT and telecommunications systems in use and, in this regard too, has adopted specific internal regulations, which we are all required to be familiar with and comply with.

To this end, below are some references that may help you:

- ensure the privacy notice on the processing of personal data prepared by our firm is properly disseminated;
- obtain consent for data processing where necessary;
- contact our DPO (Data Protection Officer) if you have any doubts regarding data processing;
- always act in a manner designed to minimise the risk of data loss or breach;
- comply with the internal policies issued by the ICT Department (formerly the DIGIT Committee);
- contact the ICT Department (formerly the DIGIT Committee) if you have any doubts regarding the management of the IT system.

Ask yourself the following questions:

- *Am I using the firm's computer for personal purposes?*
- *Have I installed suitable antivirus software on my smartphone, and can I therefore check the firm's emails from my personal smartphone?*
- *Am I familiar with the firm's DP/IT Policy?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *the firm's RPS/DPO,*
- *the firm's ICT department,*
- *our Supervisory Body.*

Don't forget that our Model 231 and the related internal procedures are always available to you on our intranet and you can consult them at any time.

❖ **Social and environmental responsibility, the sustainability of our work.**

Andersen makes decisions regarding partners, associates and employees based on specific criteria: skills, professionalism and the ability to collaborate within the firm. We do not treat people differently based on their characteristics, such as origin, gender, age, social background, disability, religion, sexual orientation or gender identity.

To this end, we have established an internal committee (Equal Opportunities Committee – EOC) which deals with these issues and is available to our firm for any discussions.

All our relationships are centred on and based upon respect and the transparent and fair management of relationships, both within our firm and externally.

We do not tolerate any form of harassment or discrimination in interpersonal relationships, such as behaviour that, through the improper use of language, undermines a person's dignity—including humiliation, a sense of not belonging, exclusion from working life, or a sense of failure. We are always open to dialogue and sharing, convinced that open and calm discussion can help us create and maintain a healthy and pleasant working environment. Politeness, respect, consideration for others, sensitivity: these are the values in which we deeply believe and which inspire our daily actions.

We care deeply about the environment in which we operate: we adopt behaviours and have implemented procedures that guide us in acting in a manner that is always respectful of the environment and nature. To this end, we have established a dedicated function within the firm that operates in the field of sustainability, both internally and as a service offered to our clients (Sustainable Innovation Desk): its members are available to everyone to provide useful support.



Ask yourself:

- *Is waste disposed of correctly (paper, plastic, organic waste, unsorted waste, toner cartridges, etc.)?*
- *Do I feel uncomfortable in my dealings with one or more colleagues or staff members at the firm? Do I feel humiliated, harassed or discriminated against?*
- *Could my behaviour have a negative impact on the working environment and my relationships with colleagues?*

Here's where you can find the answers:

- *your line manager,*
- *the firm's internal 231 officer,*
- *our Supervisory Body.*

Please also remember that our 231 model and related internal procedures are always available to you on our intranet and you can consult them at any time.

Conclusions and useful references

We hope this document will be of help to you, resolving any doubts and supporting you in overcoming any critical issues.

Our organisation is here to help you; to this end, we have listed below some departments that can provide valuable support – please do not hesitate to contact them:

- your line manager
- the firm's internal 231 officer (231@it.andersen.com ; gestione231@it.andersen.com)
- our Supervisory Body (odv@it.andersen.com)
- our DPO (dpo@it.andersen.com)
- our HR department (hr@it.andersen.com).

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