Code of Ethics

Revision 1.0 · 14 April 2026

1. Purpose and scope

The Code of Ethics defines the values and principles of conduct that guide Diplome S.r.l. in its relationships with customers, users, suppliers, authorities, colleagues and communities. It expresses Management’s commitment to promoting a culture of quality, security and ethical conduct as required by UNI EN ISO 9001:2026, and serves as a reference for the possible adoption of an Organisation, Management and Control Model under Italian Legislative Decree 231/2001.

The Code applies to the Sole Director, personnel and collaborators and, where relevant, to consultants, suppliers and partners, who are required to understand and comply with it.

2. Values

• Integrity: we act honestly and fairly, respecting laws, contracts and commitments.

• Trust and security: we protect the information and data entrusted to us by customers and users as if they were our own.

• Quality: we provide reliable software and services, measuring and improving our performance.

• Transparency: we communicate clearly and promptly, including when the news is not positive.

• Respect for people: we value people, ensure equal opportunities and provide a safe and inclusive working environment.

• Responsibility: everyone is accountable for their actions and contributes to continual improvement.

3. Principles of conduct

3.1 Compliance with the law

Diplome complies with applicable laws, including those concerning data protection, cybersecurity, financial services, competition, employment, taxation and anti-corruption. Any doubt regarding the interpretation of a rule should be referred to the Sole Director or legal adviser.

3.2 Relationships with customers and users

• We provide truthful information about products, their features and security measures, without promising what we cannot guarantee.

• We answer security questionnaires and due diligence enquiries truthfully.

• We promptly inform customers of incidents, vulnerabilities and service disruptions that affect them.

• We process customer data only in accordance with their instructions and never for our own purposes.

• We design products taking account of their impact on end users, including accessibility and the responsible use of artificial intelligence.

3.3 Relationships with suppliers

Suppliers are selected using objective criteria of quality, security, reliability and cost-effectiveness, without favouritism. Suppliers are required to comply with principles equivalent to those set out in this Code.

3.4 Anti-corruption and conflicts of interest

• Offering, promising, giving, requesting or accepting money, gifts or other benefits to obtain undue advantages is prohibited, in dealings with both public and private parties.

• Gifts and hospitality are permitted only if they are of modest value (indicatively no more than EUR 150), occasional and consistent with business practice, and must be reported to the Sole Director.

• Dealings with public authorities, including tender procedures, must observe fairness, transparency and traceability.

• Anyone facing an actual or potential conflict of interest must inform the Sole Director and refrain from taking the related decisions.

3.5 Protection of information and company assets

Confidential information, code and company assets are protected in accordance with the Integrated Management System. Their use for personal purposes or disclosure without authorisation is prohibited.

3.6 People and the working environment

• Discrimination, harassment, workplace bullying and offensive behaviour are not tolerated.

• Occupational health and safety are a priority.

• Flexible working arrangements and the right to disconnect are respected.

• Professional development is encouraged through training and knowledge sharing.

3.7 Communication and social media

Only the Sole Director, or persons authorised by the Sole Director, may communicate externally on behalf of Diplome. In their personal use of social media, personnel must not disclose confidential information, speak on behalf of the Company or publish content that could harm its reputation or that of its customers.

3.8 Environment and sustainability

Diplome considers the environmental impact of its digital activities, favours cloud providers with energy-efficiency commitments and reduces resource waste.

3.9 Accounting integrity

Accounting records must be accurate, complete and supported by documentation. Unrecorded funds and false documents are prohibited.

4. Reporting

Anyone who becomes aware of breaches of the Code, the law or company rules may report them to the Sole Director or, alternatively, to the Integrated Management System Consultant. Reports are handled confidentially, and retaliation against anyone reporting in good faith is not permitted. If Diplome adopts a Model under Legislative Decree 231/2001 or exceeds the applicable thresholds, the reporting channels required by Italian Legislative Decree 24/2023 will be established.

5. Breaches and updates

Breaches of the Code may result in disciplinary measures under the applicable National Collective Labour Agreement (CCNL) or, for third parties, termination of the relationship. The Code is reviewed during management review and updated when necessary.