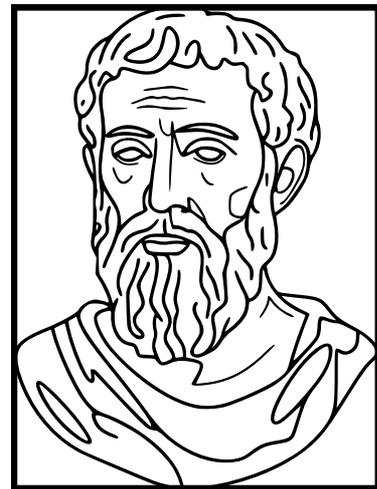


VIDEOWORKS

J U S T I C E
B A L A N C E
I N T E G R I T Y

C O D E O F
E T H I C S

Virtue consists in doing the right thing, towards the right person, at the right time, in the right measure, in the right way and for the right reason



Aristotle

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PREMISE AND OBJECTIVES

VISION, MISSION AND CORPORATE VALUES

RECIPIENTS AND RESPONSIBILITIES

FUNDAMENTAL ETHICAL PRINCIPLES

RULES OF CONDUCT

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PREMISE AND OBJECTIVES

This Code of Ethics reflects the principles that VIDEOWORKS adopts in conducting its business and in managing its relationships with Employees, Partners, Clients and Suppliers.

It constitutes the instrument through which VIDEOWORKS establishes the principles of legality, fairness, transparency and integrity governing all corporate activities. Far from being a mere internal regulation, the Code functions as a governance and preventive tool, safeguarding the Company's reputation and ensuring ethical and responsible behaviour in every professional context.

The Code complements applicable laws and all internal corporate policies, with the aim of fostering a corporate culture grounded in ethics and responsibility. It protects not only the Company, but also its stakeholders and the community in which it operates.

It represents VIDEOWORKS' formal declaration to operate in strict compliance with applicable legislation, refraining from any subjective interpretation that might alter its meaning, application or scope.



VISION, MISSION AND CORPORATE VALUES

VIDEOWORKS' strategy is founded upon a clear definition of its purpose and corporate identity, expressed through its **Vision**, **Mission** and **Corporate Values**. These principles constitute genuine operational guidelines governing every action and decision.

- **Vision:** The Company aspires to become the global reference partner for innovative technological solutions, capable of transforming clients' aspirations and needs into concrete results through excellence, expertise and continuous innovation.
- **Mission:** VIDEOWORKS is committed to being a leading global provider of solutions for the design, implementation and installation of AV/IT, Lighting, Comfort and Security systems. The Company acts as a reliable, innovative and client-oriented partner, striving to exceed market expectations and strengthen its leadership in the luxury yachting and cruising segments, as well as in the high-end corporate and residential sectors. Customer centricity and active listening are essential tools for understanding client needs and delivering tailored solutions.



Corporate Values: A company's values are not just words, but the very essence of its culture, guiding every action and decision.

- **Ambition:** A constant drive toward excellence and continuous improvement, embracing challenges with determination and a mindset focused on high performance.
- **Humbleness:** We recognize that there is always room to learn, and humbleness enables us to build solid relationships based on mutual respect. It is the balance between awareness of one's abilities and acknowledgement of one's limits. Humbleness is reflected in our concreteness, practicality, and ability to face daily challenges.
- **Passion:** Our work is fuelled by a deep passion for technology and innovation, reflected in the quality of our projects. Passion drives us to give our best — it is motivation, dedication, and commitment.
- **Resilience:** Resilience is our ability to adapt, overcome obstacles, and persevere in the face of adversity. It is the capacity to address and overcome any challenge by relying on our resources and accepting the help of others when needed. Resilience allows us to transform difficult situations into opportunities for growth.

RECIPIENTS AND RESPONSIBILITIES

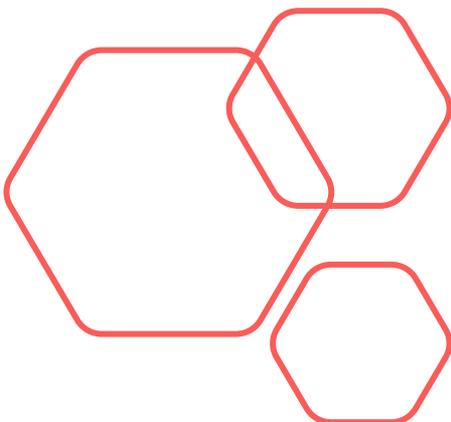
This Code applies to all individuals who, in any capacity, contribute to the activities of Videoworks. Strict compliance is required from:

- **Board of Directors:** Responsible for approving the Code and recognising its fundamental role within the Company.
- **Executive Committee:** Responsible for promoting the Code's principles and supervising their proper implementation.
- **Directors:** Serve as role models of ethical conduct and ensure that strategic decisions align with the Code.
- **Area Managers:** Translate the Code's principles into daily operational practice and guide their teams by example.
- **Employees and Partners:** Are individually required to know, understand and comply with the Code and to report any violation or improper behaviour encountered.
- **Consultants, Suppliers and External Stakeholders:** VIDEOWORKS expects all external partners to adhere to the Company's ethical standards when acting on its behalf.

FUNDAMENTAL ETHICAL PRINCIPLES

VIDEOWORKS undertakes to respect and promote ethical principles governing corporate conduct in every context. These principles are essential to maintaining the Company's integrity and reputation.

- **Compliance with laws and regulations:** Strict compliance with national and international laws, regulations and standards.
- **Fairness, impartiality and honesty:** All decisions must be guided by fairness, impartiality and honesty.
- **Integrity and transparency:** Conflicts of interest and improper use of information or corporate assets are prohibited. All transactions must be legitimate, documented, verifiable and consistent with transparency requirements.
- **Efficiency:** Commitment to continuous improvement and responsible use of resources.
- **Excellence:** Pursuit of quality and safety, with a strong focus on client needs and satisfaction.



- **Protection of individuals and human rights:** VIDEOWORKS promotes and safeguards fundamental human rights, ensuring respect for every individual and prohibiting discrimination based on gender, race, ethnicity, colour, language, religion, personal opinions, sexual orientation, age, disability, social or economic condition, marital status or any other individual characteristic. Equal opportunities, merit, professional development and a respectful, harassment-free workplace are actively promoted. VIDEOWORKS condemns exploitation, forced labour and child labour, and protects individual freedom, with particular attention to minors, in accordance with:
ILO Convention No. 138/1973 (minimum working age)
ILO Convention No. 182/1999 (worst forms of child labour)
The UN Universal Declaration of Human Rights (1948)
The UN Convention on the Rights of the Child (1989).
- **Health and safety at work:** VIDEOWORKS ensures workplace safety and compliance with health and safety regulations, promoting both physical and mental well-being.
- **Protection of personal data:** VIDEOWORKS complies with privacy legislation through appropriate technical and organisational measures to ensure data integrity, confidentiality and protection from unauthorised access.
- **Environmental protection:** VIDEOWORKS is committed to respecting the environment, reducing negative impacts and promoting sustainable development.

- **Relations with Public Institutions:** VIDEOWORKS manages its interactions with Public Authorities with clarity, integrity and fairness, strictly prohibiting any form of corruption.
- **Transparency in Transactions:** VIDEOWORKS promotes transparency in commercial and financial transactions, actively preventing money laundering and the handling of illicitly obtained goods.
- **Protection of Industrial and Intellectual Property:** VIDEOWORKS respects intellectual property rights and prohibits the use of counterfeit, unauthorised or patented products.
- **Rejection of Terrorism:** VIDEOWORKS maintains no relations with individuals or entities involved in terrorist activities and does not finance such activities in any form.
- **Rejection of Criminal Organisations:** VIDEOWORKS opposes all forms of criminal activity and does not engage in relationships with criminal organisations.
- **Cooperation with Authorities:** VIDEOWORKS cooperates fully with the competent Authorities and does not obstruct investigations or the pursuit of the truth.



- **Relations with Associations, Trade Unions and Political Parties:** In line with the principles of impartiality and transparency, VIDEOWORKS does not finance political parties, nor does it, as a Company, maintain electoral, structured or promotional relationships with political organisations or candidates. The Company may, however, support social, cultural or scientific initiatives.
- **Prohibition of Counterfeiting:** VIDEOWORKS prohibits the falsification and circulation of counterfeit banknotes, coins or any other forged securities or valuables.
- **Protection of Competition and the Free Market:** VIDEOWORKS promotes fair competition and avoids any improper conduct that could harm the market or consumers, with the aim of building long-term, trustworthy relationships with clients and partners.

RULES OF CONDUCT

VIDEOWORKS has defined clear behavioural rules aimed at ensuring ethical, professional and respectful conduct:

- Awareness of corporate ethical values and acting as role models
- Compliance with laws, the national collective labour agreement and internal policies
- Prevention of all unlawful conduct, including corruption, money laundering and accounting violations
- Prohibition of corruption, undue advantages or favoritism
- Cooperation with Public Officials, where required
- Protection and diligent use of corporate assets and IT systems
- Confidentiality and prohibition of disclosing corporate or price-sensitive information
- Compliance with health and safety regulations and proper use of PPE
- Diligent performance of assigned duties

- Promotion of collective well-being and corporate growth
- Avoidance and reporting of conflicts of interest
- Contribution to a respectful, safe and professional workplace



RELATIONS WITH STAKEHOLDERS

VIDEOWORKS values its stakeholders — clients, suppliers, employees, local communities and institutions — and aims to maintain transparent, trustworthy and respectful relationships.

- **Clients**

Relations are based on transparency, integrity and certified quality. Complaints are managed promptly, and client feedback is considered essential for continuous improvement. Courtesy gifts are permitted only if they do not compromise integrity.

- **Suppliers and Partners**

Selection is based on objective criteria such as quality, reliability and competitiveness. In public tenders, VIDEOWORKS ensures accuracy and fairness.

- **Employees and Partners**

VIDEOWORKS fosters a positive, safe, inclusive work environment, promotes gender equality, encourages professional development and supports continuous training.

- **Local Communities**

The Company contributes to local development through participation in social and educational initiatives and collaborations with schools and universities.

- **Environment**

VIDEOWORKS complies with environmental regulations, reduces energy consumption and emissions, and ensures responsible waste management.

- **Employees and Partners:**

VIDEOWORKS is committed to creating a positive, safe and inclusive working environment. It promotes gender equality and goes beyond mere compliance with labour regulations by actively fostering employee well-being. The Company supports professional development and continuous training, recognising that employees are its most valuable asset and a key factor in corporate success.

- **Local Communities:**

The Company is committed to contributing positively to the development of the communities in which it operates. This includes participation in social and educational projects that promote collective well-being, such as supporting local initiatives and collaborating with schools and universities of all levels.

- **Environment:**

The Company is committed to complying with environmental regulations, reducing energy consumption and emissions, managing waste responsibly and using resources in a sustainable and responsible manner.



DISSEMINATION AND IMPLEMENTATION OF THE CODE OF ETHICS

- VIDEOWORKS is committed to ensuring that the Code of Ethics is known, understood and fully integrated into the corporate culture by all its recipients, both within and outside the organisation.
- To achieve this objective, the Code of Ethics is distributed to all relevant parties and made clearly and easily accessible on the Company's website, with the aim of ensuring that its principles become an integral part of the daily activities of every employee and collaborator.



WHISTLEBLOWING SYSTEM

- Should any individual subject to the Code of Ethics become aware of circumstances that may reasonably be considered a violation, they may promptly report the matter through the dedicated Whistleblowing platform, accessible at the following link: [WHISTLEBLOWING](#).
- This reporting system is a fundamental tool for preventing and identifying unethical or unlawful conduct, strengthening a culture of integrity and transparency within the organisation. VIDEOWORKS guarantees the highest level of confidentiality and protection against any form of retaliation for those who submit reports in good faith. Such safeguards are fully compliant with Legislative Decree 24/2023 on whistleblowing. The Company undertakes to handle all reports with the utmost seriousness, conducting thorough investigations and taking appropriate corrective actions where necessary.



VIOLATIONS AND SANCTIONS

- A violation of this Code of Ethics constitutes a serious contractual breach and a significant disciplinary offence. Applicable sanctions are proportionate to the severity of the misconduct, its impact on corporate values and its potential effect on the reputation of VIDEOWORKS.
- Sanctions are always applied in compliance with applicable laws and labour agreements, ensuring proportionality between the violation and the measure adopted.
- It is important to emphasise that sanctions may also be imposed on suppliers and external partners. Should a supplier or partner fail to comply with the ethical principles set out in this Code, VIDEOWORKS reserves the right to terminate the contract or discontinue the business relationship.



VIDEOWORKS

Audio/Video | Lighting/Comfort | IT/Connectivity | Security

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the right person, at the right time, in the right
measure, in the right way and for the right reason*

- Aristotle -