



CODE OF ETHICS AND CONDUCT

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The Company's values, identity and commitments

Nimis Consulting s.r.l., founded in 2014, is a company specialising in the design, production, implementation and maintenance of IT systems, operating with professionalism and expertise in a constantly evolving technological environment.

The Company recognises that **the adoption of sound and universally accepted ethical principles in the conduct of its business is an essential prerequisite** for the pursuit of its strategic objectives, as well as a key factor in safeguarding its **reputation, credibility and image** in the market.

Adherence to the values of **integrity, transparency, fairness** and **accountability** is therefore an essential part of the company's identity and corporate culture. These values form an integral part of the corporate culture and guide both internal and external relationships, helping to create a professional environment based on trust and collaboration.

In line with these principles, the Company has adopted this **Code of Ethics and Conduct**, which sets out the **values, general principles** and **rules of conduct** to be observed by all those acting on behalf of or in the interests of the Company, in whatever capacity and regardless of the role they hold.

The **Code** is a **cornerstone** of the **corporate governance system**: it is not only a tool for preventing predicate offences, but also a practical guide for promoting a corporate culture based on integrity, effective action and fair dealings, in full compliance with the law and applicable regulations.

The present Code shall come into force on the date of its adoption and shall remain in force indefinitely, subject to any need for revision or updating, which in any event requires formal re-approval.

Any party with whom the Company enters into collaboration agreements is required to sign and comply with the present Code, which forms an **integral** and **essential part of the contractual relationship**.

Scope and Target Audience

The provisions of this Code apply, without exception, to all those who have dealings with Nimis Consulting s.r.l. or act in its name, on its behalf or in its interests, and in particular to: employees, managers, directors, members of corporate bodies, collaborators, consultants, suppliers, customers and partners. All those to whom this Code applies – meaning the persons listed above – are required to familiarise themselves with the contents of the Code, to comply with its provisions and to contribute actively to its implementation, reporting any non-compliant behaviour in accordance with the procedures set out in the company's system.

New recruits are introduced to and briefed on the Code upon recruitment.

The Company undertakes to monitor compliance with the provisions of the Code by all employees and contractors acting on its behalf, ensuring adherence to the principles contained therein and the proper conduct of the Company's business activities.

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Binding Effect and Disciplinary Implications

Compliance with the Code forms an essential part of employees' contractual obligations pursuant to and for the purposes of Articles 2104, 2105 and 2106 of the Civil Code, as it is closely linked to the duties of diligence, loyalty and good faith in the performance of their work.

Failure to comply with the provisions of the Code constitutes a breach of the relationship of trust with the Company and may give rise to liability, be taken into account for disciplinary purposes and result in a claim for compensation for any damages suffered. Such consequences will be implemented in full compliance with the procedures set out in Article 7 of Law No. 300 of 20 May 1970 (Workers' Statute), the applicable collective labour agreements and the company's disciplinary codes.

All those to whom the Code applies, with particular reference to those holding senior or managerial positions, are required to make every effort to ensure that the rules of conduct contained therein are strictly observed and applied.

Interpretation and application

As this Code cannot comprehensively cover every situation or circumstance that may arise in the course of the company's business, any conduct or events not expressly covered by it will be assessed and interpreted in the light of the principles, values and spirit of the Code itself, and in full compliance with the provisions of the law and applicable regulations.

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Ethical principles

Legality

All activities carried out in the name and on behalf of the Company must be conducted in full compliance with the laws and regulations in force at national, supranational and international level.

In the course of their duties, the addressees are required to comply with the applicable legal framework in the contexts in which they operate and, in any event, to refrain from any conduct that might constitute a breach of the law, regardless of the nature or type of penalties provided for.

To this end, each recipient undertakes to acquire and maintain an adequate and up-to-date knowledge of the regulatory provisions relevant to the performance of their duties, acting with due diligence and responsibility.

This is without prejudice to the obligation to comply not only with the general principles of diligence and loyalty referred to in Article 2104 of the Civil Code, but also with the rules of conduct laid down in the applicable collective labour agreements.

Honesty and transparency

Honesty is the fundamental principle underpinning all activities, initiatives, products, reports and communications, and is an essential element of corporate governance. Relations with stakeholders, at all levels, must be guided by standards and conduct characterised by fairness, consistency, loyalty and mutual respect. Nimis Consulting communicates with its stakeholders in a clear, transparent, accurate and timely manner.

The Centrality of the Individual

In line with its underlying ethical vision, Nimis Consulting promotes the value of the individual through respect for physical, cultural and moral integrity, and respect for relationships with others. Nimis Consulting upholds and respects human rights in every aspect of its activities and within its sphere of influence.

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The Respect and Enhancement of Human Resources

Nimis Consulting is committed to not utilising, even indirectly, either forced or compulsory labour or child labour. It rejects all forms of discrimination on the grounds of age, gender and gender identity, sexual orientation, health status, ethnic origin, nationality, political opinions and religious beliefs; it condemns all forms of discrimination in its recruitment policies and human resources management. Nimis Consulting is committed to preventing all forms of workplace bullying and labour exploitation, whether direct or indirect, and to recognising merit, work performance and professional potential as the key criteria for pay and career progression.

In particular, the Company is committed to upholding the Universal Declaration of Human Rights and adhering to international principles, as defined by the OECD and the UN.

Professional Competence and Cooperation

Each recipient shall carry out their duties with the professionalism required by the nature of the tasks and functions performed, making every effort to achieve the objectives assigned to them and assuming the responsibilities incumbent upon them by virtue of their role. Each recipient shall diligently undertake the necessary research and professional development.

Mutual cooperation between all those involved in any capacity in the same project or production process is a fundamental principle for the Company. Each individual is therefore required, through their conduct, to contribute to upholding these values, both in the workplace and outside it.

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Safeguarding Health and Safety

Nimis Consulting guarantees working conditions that respect individual dignity and ensures safe and healthy working environments, in compliance with current legislation on accident prevention and health and safety at work.

The Company strongly promotes a culture of safety and awareness of the risks associated with the work carried out, requiring everyone, at every level, to behave responsibly and in accordance with the safety system put in place and all company procedures that form an integral part of it.

The consumption of alcoholic drinks, drugs or similar substances whilst at work is prohibited, in order to ensure the safety, wellbeing and integrity of all staff members. Similarly, the possession, distribution or sale of such substances on company premises is not permitted and may result in disciplinary action in accordance with current regulations.

With this in mind, every employee, contractor and anyone else carrying out work in any capacity at Nimis Consulting's offices or on clients' premises is required to contribute personally to maintaining the safety and quality of the working environment in which they operate.

Adherence to Rules and Standards

In the course of their professional activities, employees and all other associates of Nimis Consulting are required to diligently comply with applicable laws, this Code of Ethics and Conduct, internal regulations and, where applicable, professional codes of conduct. Under no circumstances may the pursuit of Nimis Consulting's interests justify conduct that breaches these rules.

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Confidentiality

All parties to whom this Code applies are required to comply with the applicable legal provisions, with particular reference to Regulation (EU) 2016/679 (GDPR), Legislative Decree No. 196 of 30 June 2003, as amended and supplemented (Personal Data Protection Code), as well as any other applicable national and European legislation.

The Company implements minimum and appropriate security measures to minimise, in line with technical progress, the risks of loss, unauthorised access or unauthorised processing of the data for which it is the Data Controller.

Investigations into private lives are not permitted, and everyone is prohibited from disclosing false or biased information or comments concerning the Company, and/or its employees and/or its collaborators.

Those subject to this Code must not disclose information that is not in the public domain, or information acquired whilst carrying out their duties for the Company, as provided for in the Company's regulations.

The knowledge developed by the Company constitutes a fundamental asset that every recipient must protect; therefore, such information must not be disclosed. This does not, of course, apply to cases where such disclosure is required by law or is expressly stipulated in contractual clauses.

The use of corporate information of external relevance may only be carried out by expressly authorised persons.

Management Responsibilities

Company management is required to comply with the provisions of the Code when proposing and implementing any project or activity designed to enhance the economic value of the Company and the well-being of its Employees, Contractors and Stakeholders. The belief that one is acting in the Company's best interests does not justify adopting unethical behaviour that contravenes the principles of the Code.

Reporting and Preventing Misconduct

The Company promotes a corporate culture based on legality, accountability and the prevention of conduct that is unlawful or inconsistent with the principles of this Code. Failure to act or turning a blind eye to breaches of ethical or regulatory standards is considered contrary to the principles of accountability and integrity that guide the Company's actions.

Rules and standards of conduct

Laws and regulations relating to trade compliance

Commercial laws and regulations at national, European Union and international levels govern the import, export, re-export and transfer of goods, services, technologies, technical data and information, regardless of where such activities take place. The Company requires full and strict compliance with all applicable provisions relating to international trade, export controls, economic sanctions and trade restrictions. Failure to comply with these obligations may result in significant consequences, including operational restrictions, administrative and financial penalties, as well as civil and criminal liability for the individual addressees and, where provided for by law, for the Company.

Each recipient of this Code is therefore required to be familiar with and apply the rules relevant to their activities and to take all appropriate measures to ensure that goods, technologies, data, information, software and materials – including those derived from the Company's services or products – are not transferred, used or made available, directly or indirectly, in breach of the provisions in force or for unauthorised purposes.

Antitrust and Fair Competition

Nimis Consulting recognises the importance of a corporate culture based on strict compliance with competition law and the protection of fair competition, and is committed to operating in the market in a fair, transparent and responsible manner.

Although these laws may vary from country to country, they generally prohibit agreements or actions that restrict competition without bringing benefits to consumers. They aim to safeguard the competitive process so that consumers can benefit from competition.

All those to whom this Code applies are required to comply with national and European competition laws and regulations, and to refrain from any conduct that may restrict or distort the free play of competition.

Breaches of antitrust or competition laws may result in severe penalties, including heavy fines and prison sentences.

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It is expressly prohibited to enter into agreements, arrangements or concerted practices with competitors which have as their object or effect:

- directly or indirectly fixing prices or other trading conditions;
- restricting or controlling the production, sale, development or supply of products or product ranges;
- dividing up, allocating or partitioning markets, territories, customers or supplies;
- to boycott suppliers or customers, including through concerted refusals to buy or sell;
- to arrange or coordinate tenders with a view to steering the award of contracts towards specific competitors or resellers (tender rigging), including by refraining from participating in tenders, submitting non-competitive or purely 'courtesy' bids, or manipulating the tender conditions.

These prohibited agreements contravene both current legislation and company policy and must be strictly avoided in all dealings with Nimis Consulting and with representatives of other companies or partners. You must refrain from any discussions with competitors regarding prices, costs, profits or profit margins, production volumes, offers, quotations or activities relating to specific clients.

Those to whom this Code applies must also avoid exchanging sensitive or confidential information with competitors and any other conduct that could constitute an abuse of a dominant position or unfair competition.

Please note that direct sales by Nimis Consulting, other partners or any other entity that may compete for business opportunities are considered to be in competition. Should a Company employee request or encourage prohibited conduct, this must be reported promptly via the following whistleblowing channel: [My Governance](#)

Conflicts of interest

When carrying out any activity of interest, situations where those involved are in a conflict of interest must always be kept to a minimum. A conflict of interest is deemed to exist both where an employee, a contractor or a director pursues an objective other than that pursued by Nimis Consulting or deliberately secures a personal advantage whilst carrying out activities in the interests of Nimis Consulting, or where representatives of clients, contractors, subcontractors, suppliers or public or private institutions act in breach of the fiduciary duties associated with their position.

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Gifts and Benefits

In dealings with public officials and public service employees, it is prohibited to offer, promise or grant money or any other benefit, in any form whatsoever, whether for personal gain or for the benefit or advantage of Nimis Consulting.

It is also prohibited to give gifts, presents or confer benefits on parties with whom Nimis Consulting has commercial and/or business dealings, unless such gestures are of modest value and fall within normal commercial practices and customs, taking into account the countries in which the Company operates.

In any event, before offering gifts, tokens of appreciation or benefits of a value exceeding that considered modest according to current standards in Italy (approximately €50.00), employees and contractors must seek prior authorisation from their team leader in order to agree on the appropriate course of action.

If the team leader intends to take such initiatives directly, they must seek authorisation from their line manager.

Anyone acting in the name and on behalf of Nimis Consulting must, in all circumstances, refrain from conduct that is not permitted by law, commercial practice or the codes of ethics – where known – of public and/or private counterparties, both in Italy and abroad.

Employees and contractors who, whilst carrying out activities for Nimis Consulting, receive gifts, tokens of appreciation or benefits of any kind are required to report this to the team leader or, in the case of employees, to their immediate line manager. Should the value of such benefits exceed a modest amount, as assessed according to local customs and practices and those of the relevant sector, the team leader shall inform the board of directors.

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Financial Integrity and Compliance

Nimis Consulting is committed to upholding high standards of financial integrity and to preventing any form of unlawful payment, money laundering or unlawful economic activity. All employees, contractors and partners must refrain from any practices that could compromise the transparency of the company's transactions or breach applicable legislation on anti-money laundering, financial fraud and economic boycotts.

In particular, it is prohibited to offer, promise, authorise, order, pay, make or receive bribes, cash payments or any other item of value (directly or indirectly) with the aim of improperly securing business or any other advantage for Nimis Consulting or for oneself. Any form of money laundering, which consists of concealing, channelling or converting such money into legitimate funds, is also prohibited.

The above prohibition applies:

- the Government and the public sector, which includes public services, higher education, public health bodies and public international organisations, as well as their employees or officials;
- political parties or candidates for political office;
- commercial entities wholly or partly owned or controlled by the government (known as state-owned enterprises) and their employees or officials;
- private commercial companies and their employees;
- employees of Nimis Consulting;
- any other third party.

Every financial transaction must be documented in a clear and traceable manner, and any suspicion of unlawful conduct must be reported promptly via the following whistleblowing channel, in accordance with the established procedures: [My Governance](#)

Nimis Consulting prohibits the offering of money or items of value, either directly or indirectly, to government officials or employees of state-owned enterprises, as well as to their immediate family members or closely associated persons, for the purpose of influencing or rewarding an action or decision by the government or by a public-sector employee or official, or of obtaining undue advantages.

It is prohibited to accept gifts or favours from third parties that go beyond the normal rules of hospitality and courtesy. This applies both where a representative of Nimis Consulting pursues an interest other than the company's mission and where they derive personal benefit from business opportunities.

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The term ‘valuable item’ has a broad meaning and includes not only money, but also gifts, lavish or excessive hospitality, the funding of personal travel such as tourist trips, donations to charities and employment opportunities.

Nimis Consulting is committed to implementing all necessary measures to prevent and avoid the situations described above.

Nimis Consulting also prohibits facilitation payments, i.e. payments made to a public official to expedite or speed up routine government actions, including the processing and approval of Time Off and Leave.

Nimis Consulting prohibits participation in economic boycotts or commercial exclusion practices against individuals, customers, suppliers or countries, unless such actions are expressly authorised by law.

It is also prohibited to provide information, advice or assistance that could be interpreted as support for unauthorised boycotts. All employees, contractors and partners must ensure that their actions comply with applicable laws and report any concerns to the Legal Department or the company’s compliance bodies.

Diligence and Fairness in Contract Management

Contracts and work assignments must be carried out in accordance with the terms agreed upon by the parties. To ensure the proper management of contractual relationships, Nimis Consulting undertakes to provide comprehensive and detailed information to all employees and contractors involved in the activities set out in the contracts entered into.

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Human Resources

Nimis Consulting ensures an appropriate level of professionalism in the performance of the tasks assigned to its staff. To this end, the Company is committed to recognising and enhancing the skills of its staff by providing suitable training, professional development and career development opportunities. Employees, whose physical and moral integrity is considered a core value of the Company, are guaranteed working conditions that respect individual dignity, in safe and healthy working environments.

Recruitment and Selection

The selection of staff to be recruited is carried out, whilst ensuring equal opportunities for all interested parties, on the basis of how well candidates' profiles and specific skills match the company's requirements. The information requested is limited to that necessary to verify compliance with the required profile, whilst respecting the candidate's privacy and opinions.

The Human Resources Department, within the limits of the information available, takes appropriate measures to prevent favouritism, nepotism or any form of cronyism during the selection and recruitment stages.

Establishment of the Employment Relationship

Staff are employed under a standard employment contract; no form of irregular or undeclared work is tolerated. Upon commencement of employment, each employee receives detailed information regarding:

- the nature of the role and the duties to be performed;
- regulatory and remuneration provisions, as set out in the national collective labour agreement;
- the rules and procedures to be followed in order to avoid any potential health risks associated with the work.

This information is provided to the employee in such a way that their acceptance of the role is based on a genuine understanding.

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People Management

Nimis Consulting avoids any form of discrimination against its employees.

Nimis Consulting guarantees the right to equal pay for men and women performing the same work, and it is the company's policy to comply with the minimum working age requirement.

In the context of staff management and development processes, as well as during the recruitment phase, decisions are based on the match between the expected profiles and those possessed by employees (for example, in the case of promotion) and/or on merit-based considerations (for example, the allocation of incentives based on results achieved). Access to roles and positions is also determined on the basis of skills and abilities.

In the context of work organisation, flexibility measures that facilitate maternity and childcare are encouraged, subject to technical and production requirements.

Fairness in Authority

When establishing hierarchical relationships, Nimis Consulting is committed to ensuring that authority is exercised fairly and correctly, whilst preventing any abuse thereof. In particular, it guarantees that authority does not become an exercise of power that undermines an employee's dignity and autonomy, and that decisions regarding the organisation of work safeguard these values. It constitutes an abuse of a position of authority to demand, as an obligation towards a superior, favours, personal services or any behaviour that constitutes a breach of the Code of Ethics.

Work Organization Adjustments

In the event of a reorganisation of work, the value of human resources is safeguarded by providing, where necessary, training and/or retraining programmes.

Health and Safety

Nimis Consulting is committed to fostering and consolidating a culture of safety by raising awareness of risks and promoting responsible behaviour amongst all employees and/or contractors; furthermore, Nimis Consulting works to safeguard, primarily through preventive measures, the health and safety of workers, as well as the interests of other stakeholders.

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Protection of Company Assets

Every employee and contractor is required to act with due care to safeguard the company's assets, by behaving responsibly and in accordance with the operating procedures established to regulate their use, and by accurately documenting their use.

In particular, every employee and contractor must:

- to use the assets entrusted to him with care and prudence;
- avoid any misuse of company assets that may cause damage or reduce efficiency, or that is otherwise contrary to the company's interests;
- to implement the provisions of the company's information security policies in order to ensure the integrity of information. The company reserves the right to prevent the misuse of its assets and infrastructure through the use of accounting, financial control, and risk analysis and prevention systems, subject to compliance with the provisions of applicable legislation (Data Protection Act, Workers' Statute, etc.).

With regard to IT applications, every employee and contractor is required to:

- strictly comply with the provisions of the company's security policies, so as not to compromise the functionality and security of the IT systems;
- refrain from sending threatening or abusive emails, using inappropriate or foul language, or making inappropriate comments that may cause offence to individuals and/or damage the company's reputation;
- refrain from visiting websites containing indecent or offensive content.

Customer Relations

Acquisition of Contracts and Orders

Nimis Consulting's activities aimed at securing contracts and orders must be carried out in accordance with sound economic principles, within a normal market context and in fair competition with rivals, whilst complying with the applicable laws and regulations.

Contracts and Communications with Customers

Nimis Consulting's contracts and communications with clients are:

- comply with current regulations, without resorting to evasive or otherwise improper practices;
- comprehensive, so as not to overlook any factor relevant to the customer's decision;
- promptly communicated and properly supported by appropriate documentation.

Standards of Conduct for Employees and Collaborators Towards Customers

Nimis Consulting's approach to its clients is characterised by helpfulness, respect and courtesy, with a view to fostering a collaborative and highly professional relationship.

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Supplier Relations

Relationships with suppliers, including financial and consultancy contracts, are governed by the provisions of this Code of Ethics and are subject to constant and careful monitoring by the company.

Specifically, it is mandatory to:

- Comply with company procedures relating to the selection, appointment and monitoring of Suppliers;
- Do not prevent any Supplier who meets the required criteria from competing for the sale or supply of the necessary products or services (whilst seeking the greatest competitive advantage);
- To secure the cooperation of Suppliers in meeting the company's requirements in terms of quality, cost and adherence to delivery times;
- Observe and ensure compliance with the contractual terms clearly set out in writing;
- Maintain an open and frank dialogue with suppliers (in line with good commercial practice);
- Avoid using any contractual loopholes (or unforeseeable events) as a pretext to renegotiate the contract by exploiting the position of dependency in which the other party finds itself.

Nimis Consulting works with suppliers, contractors or subcontractors who operate in accordance with current legislation and the rules set out in this Code of Ethics.

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Public Administration Relations

Nimis Consulting recognises the importance of maintaining transparent, fair and lawful relationships with all public institutions and government bodies, both nationally and internationally.

All employees, contractors and partners must comply with the laws, rules and regulations governing the procurement of goods and services by government bodies and the performance of public contracts, both in Italy and abroad. They must act with integrity and responsibility, avoiding any conduct that could compromise the company's impartiality, legality or reputation.

Nimis Consulting is familiar with and complies with all legislation applicable to public procurement and dealings with public officials and civil servants, including, by way of example but not limited to, the following cases:

- It is not permitted to obtain, directly or indirectly, from any source, confidential or sensitive information relating to procurement, unless it is in the public domain or has been expressly authorised by government bodies. This includes confidential information within the government concerning the selection of suppliers prior to the award of a contract, as well as any proprietary information belonging to competitors, such as tenders or proposals, obtained during a procurement process or in other circumstances where disclosure is not authorised.

Nimis Consulting ensures that every interaction with the public administration is documented and tracked in accordance with internal procedures. Any concerns, suspicious requests or unlawful conduct must be reported promptly via the company's whistleblowing channel.

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Lobbying and Relations with Government Officials

For the purposes of this Code of Conduct, ‘lobbying’ means any activity carried out by the Company, its employees, directors or persons acting on its behalf, consisting of communications, meetings or other forms of interaction, whether direct or indirect, with government officials, public decision-makers or their staff, with the aim of influencing legislative or regulatory processes or administrative decisions in which the Company has an interest.

However, in some jurisdictions, the legal definition of lobbying may also include procurement and business development activities. It is the recipient’s responsibility to understand when their activities constitute lobbying and therefore to comply with the relevant applicable laws.

Under no circumstances is it permitted to carry out lobbying activities with government bodies or authorities on behalf of Nimis Consulting. Similarly, consultants or lobbyists specialising in government relations who may be engaged by the recipient may not be used by Nimis Consulting, just as the user is not authorised to use Nimis Consulting’s consultants or lobbyists to carry out lobbying activities with government bodies.

Corporate Communications and Information

Stakeholder information is processed by Nimis Consulting in full compliance with confidentiality and privacy regulations. To this end, specific policies and procedures for the protection of information are implemented and constantly updated.

Nimis Consulting’s communication with its stakeholders is guided by respect for the right to information; under no circumstances is the disclosure of false or biased news or comments permitted. All communication activities comply with the law, regulations and professional conduct standards, and are carried out with clarity, transparency and timeliness, whilst safeguarding, amongst other things, ‘sensitive’ information and trade secrets.

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Violations of the Code of Ethics and Sanctions

Compliance with the provisions of the Code of Ethics must be regarded as an essential part of employees' contractual obligations pursuant to and for the purposes of Article 2104 of the Civil Code. It must also be regarded as an essential part of the contractual obligations undertaken by non-salaried collaborators and/or parties having business dealings with the Company. In accordance with civil, criminal and administrative law, any proven breach of this Code may constitute grounds for the imposition of disciplinary sanctions by the competent bodies.

Whistleblowing

Nimis Consulting, with a view to promoting a culture of transparency and legality within the corporate environment, actively supports and encourages the practice of 'whistleblowing' in accordance with Legislative Decree of 10 March 2023, No. 24, which implements EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and laying down provisions on the protection of persons who report breaches of national law.

To this end, anyone who becomes aware of suspected breaches of this Code of Ethics and Conduct or of applicable regulations, or of situations that may give rise to the risk of unlawful acts or irregularities, must report them without delay via the dedicated internal reporting channel using the 'My Whistleblowing' add-on to the software [My Governance](#).

The Company guarantees that reports will be handled confidentially, in accordance with the applicable legislation, and ensures that the whistleblower is protected against any form of retaliation, discrimination or penalisation resulting from a report made in good faith.

The employee must be reinstated in their post in the event of dismissal, and any discriminatory or retaliatory measures must be deemed null and void. The burden of proving that the discriminatory or retaliatory measures taken against the whistleblower are based on reasons unrelated to the report shall lie with the Company.

Under no circumstances may the identity of an employee who reports acts of discrimination be disclosed; furthermore, in the context of criminal proceedings, the report shall be protected in accordance with the procedures and conditions set out in Article 329 of the Code of Criminal Procedure. The report is exempt from the access provisions laid down in Articles 22 et seq. of Law No. 241 of 7 August 1990, as amended.

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Duties of Employees

For the purposes of the Code, every Employee is required to:

- To set a good example through one's behaviour to one's staff and colleagues, avoiding any form of abuse and any form of discrimination on the grounds of:
 - Age;
 - Sex;
 - Gender and gender identity;
 - Health status;
 - Ethnic origin;
 - Nationality;
 - Political views;
 - Trade union membership;
 - Religious beliefs;
 - Any form of harassment and/or discrimination will be prosecuted.
- To act with integrity, ensuring that the required performance is delivered in accordance with the obligations set out in the Employment Contract and the provisions of the Code;
- To comply with the provisions of the company's policies on quality, safety and the environment;
- Avoid situations in which conflicts of interest may arise, and promptly inform your line manager should any such conflicts arise, even if they are only apparent;
- To ensure, within the scope of one's responsibilities, that no tasks are assigned to individuals (whether internal or external) who do not demonstrate full commitment to complying with the Code;
- Report the breach via the Company's whistleblowing platform, providing a full account;
- Treat the Company's infrastructure, equipment, tools and materials with the utmost respect, and report any misuse by other employees;
- Use company equipment solely for the purpose of carrying out your duties and tasks (whether these are carried out on or off the company's premises).

Implementing Principles

In order to ensure the effective implementation of the Code of Ethics and compliance with its provisions by all stakeholders, the Company undertakes to:

- disseminate the Code of Ethics both internally and externally through communication activities tailored to all target audiences, for example by attaching the Code of Ethics to other documentation provided to employees upon recruitment, and to suppliers and customers when contracts are signed;
- ensure that all staff and collaborators understand the Code of Ethics and receive the necessary clarification, so that the Code is regarded as an integral part of the employment relationship, through a training programme designed to promote awareness of the principles and rules contained therein and/or referred to therein;
- periodically monitor the level of compliance with the Code.

Revision History

Review	Date	Draft	Approved by
00	04/05/2026	First Draft version Italian	CdA
01	19/08/2026	English translation of the Italian official version	CdA (Informal acknowledgement)

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