The Story Group
Nati per raccontarti

Code of Ethics

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Lifonti & Company
STAKEHOLDER ENGAGEMENT

CABIRIA
BRANDUNIVERSE®

social content factory
VIDEOSTRATEGY® AGENCY

Phrase
SHAPING OPINIONS

Code of Ethics

Summary

Code of Ethics

1 The Code of Ethics

THE STORY GROUP – NATI PER RACCONTARTI (hereinafter referred to as THE STORY GROUP or the Company) Code of Ethics sets out the corporate values, rights, duties and responsibilities of the company with regard to all parties it enters into relationships with to achieve its corporate purpose. It also sets standards and rules of conduct that must guide the behaviour and activities of those who work in the company, whether they are directors, employees, collaborators or external consultants.

The Code of Ethics sets out the general principles of management, supervision and control that organisational models must be based on and also regulates specific cases and behaviour for the Company.

The Code of Ethics applies not only to THE STORY GROUP, but also to its subsidiaries, namely: Lifonti & Company, Cabiria BrandUniverse, Social Content Factory and Phrase.

2 General principles

The Code of Ethics defines the fundamental principles and rules of conduct, as well as the responsibilities THE STORY GROUP recognises, respects and assumes as a value and which all recipients of the Code are required to comply with.

The code ensures that the company's activities are inspired by the principles of fairness, transparency, diligence, honesty, mutual respect, loyalty and good faith, with regard to the activities carried out, both in Italy and abroad, and the resulting relationships with operators, companies and institutions in order to:

- safeguard the interests of all those involved with the Company;
- ensure an efficient, reliable and correct working method, set up in compliance with relevant regulations and ethical principles deemed appropriate, necessary and essential to operate on the market.

The code requires compliance with company regulations and procedures approved by the company in accordance not only with the law but also with the voluntary standards THE STORY GROUP adheres to.

2.1 Laws and regulations

THE STORY GROUP's essential principle is compliance with the laws and regulations in force in all countries it operates it. This commitment applies to all recipients of the code of ethics.

2.2 Ethical principles and conduct

Relationships and conduct at all levels must be based on the principles of honesty, fairness, good faith, integrity, transparency and mutual respect.

Fairness in relationships with parties with an interest in the company's activities, both nationally and internationally, is an essential objective of the company.

Employees are required to maintain a relationship of trust and loyalty with THE STORY GROUP; the obligation of loyalty means that no employee may be employed by third parties competing in the same sector without prior written authorisation from the company.

3 Recipients

The recipients of the Code of Ethics, whether internal or external, are all those who have an interest in the company, including, but not limited to, shareholders, members of the board of directors, employees, collaborators and Company consultants, as well as its subsidiaries, affiliates, suppliers, consultants and, in general, all exclusive or occasional collaborators of THE STORY GROUP.

The company asks all recipients to observe and enforce the principles contained in the code to the extent of their competence: under no circumstances does the claim to act in the interests of the company justify behaviour that conflicts with that set out in the code of ethics and prescribed by company procedures or, in general, by laws, regulations and rules. Therefore, all actions, operations, negotiations and, in general, conduct carried out by recipients in performing their duties must comply with company policies.

The Code of Ethics is shared with interested parties via the company's virtual notice board, THE STORY GROUP website and the websites of all subsidiaries.

4 Code of conduct

4.1 Conflicts of interest

Any situation of conflict of interest between personal or family economic activities and company duties must be avoided. By way of example, and without limitation, the following situations may give rise to conflicts of interest:

- having economic and financial interests with suppliers or competitors, including through family members;
- accepting money, gifts (unless within the limits of normal courtesy and of modest value), favours or other benefits of any kind from persons, companies or entities that are or intend to enter into business relationships with the company;
- exploiting one's position for personal gain, whether this conflicts with the company's interests or not;
- concluding, finalising or initiating negotiations or contracts with family members or partners, or legal entities owned by the recipient or which the recipient has an interest in;
- taking personal advantage of 'market information' and business opportunities that come to light in the course of performing one's duties in the company.

In any case, it is necessary to avoid all situations and activities that may conflict with the interests of THE STORY GROUP or that may interfere with the ability to make impartial decisions in the best interests of the company and in full compliance with the principles and contents of the code and, in general, to perform duties and responsibilities accurately.

4.2 People management

4.2.1 Staff recruitment and management

THE STORY GROUP adopts selection, training and work procedures and methods based on respect for human values, the autonomy and responsibility of workers, and the importance of individual and organised participation and adherence to company objectives and values.

THE STORY GROUP encourages the development of the potential of every employee or collaborator, promoting an environment, procedures and work organisation that are based on respect, including in the recruitment of personnel, for the personality

and dignity of each individual, and which avoid situations of discomfort, hostility or intimidation, or discrimination and abuse at all times.

4.2.2 Integrity and protection of the individual

THE STORY GROUP requires that there be no harassment in internal and external working relationships of any kind, such as the creation of a hostile working environment towards individual workers or groups of workers, unjustified interference with the work of others or the creation of artificial obstacles and impediments to the valid professional prospects of others.

4.2.3 Health and safety

In accordance with the company's health and safety policy, THE STORY GROUP ensures the creation and management of work environments and places that are adequate from the point of view of occupational health and safety and provides training and information.

All workers, including those in positions of responsibility, such as managers and supervisors, are required to contribute to the protection of their own and others' safety by complying with the procedures adopted by the company, which considers failure to comply with the prescribed rules to be a serious offence.

4.3 Data processing, respect for privacy and intellectual property of data subjects

THE STORY GROUP understands the importance of personal data and proprietary information belonging to the various categories of data subjects it comes into contact with.

In the case of personal data, all processing is based on the principle of contractual lawfulness or consent and is strictly necessary within the scope of work processes, in accordance with the principles of relevance and non-excess. The various types of data subjects are provided with complete and transparent information at a preliminary stage prior to any mutual commitment, in accordance with GDPR 679/2016.

THE STORY GROUP guarantees adequate management and protection of privileged information, safeguarding its accuracy, completeness and implementing security provisions with regard to storage methods, in compliance with the relevant regulations.

4.4 Protection of company assets

Each recipient is required to safeguard company assets by protecting movable and immovable property, technological resources and IT media, equipment, company products, information or know-how, in accordance with the procedures adopted. In particular, in strict compliance with company security policies and procedures, each recipient must:

- use company assets in accordance with the procedures adopted, scrupulously observing all security programmes to prevent unauthorised use or theft;
- avoid improper use of company assets that could cause damage or reduce efficiency or, in any case, be contrary to the interests of the company;
- keep confidential information about the company secret, avoiding disclosure to third parties, in compliance with the provisions of the company's data security policy and current legislation;
- not copy or reproduce company software for personal use or use the tools provided for private purposes.

Each recipient is responsible for protecting the resources entrusted to them and has a duty to promptly inform their department managers of any potentially harmful events.

4.5 Environmental protection

In accordance with the environmental protection policy adopted by the company, as part of its activities, the company is committed to contributing to the development and well-being of the communities it operates in by pursuing the goal of reducing its environmental impact.

4.6 Image protection

Good reputation and image are essential intangible assets. Recipients undertake to act in accordance with the principles set out in this code in their relationships with colleagues, clients and third parties in general, by maintaining a dignified and respectful demeanour, based on professionalism and focused on competence.

4.7 Accuracy of accounting information

THE STORY GROUP ensures its managers, employees and collaborators are trained so that the accuracy, completeness and timeliness of information is constantly guaranteed, both inside and outside the company.

To this end, every operation or transaction must be correctly and promptly recorded in the company's accounting/reporting system in accordance with the criteria indicated by law and on the basis of applicable accounting principles; every operation or transaction must be authorised, verifiable, legitimate, consistent and appropriate.

4.8 Conduct towards reference communities

THE STORY GROUP ensures compliance with the rules applicable to relationships with reference communities and bodies representing them. All external communications and information relating to the company intended for external use must be accurate, truthful, complete, transparent and consistent.

4.9 Conduct towards suppliers and external collaborators

Suppliers and external collaborators are selected according to procedures that comply with the laws applicable at the time.

To this end, managers and employees responsible for the company functions/organisational units involved in these processes must:

- acknowledge equal opportunities for participants who meet the necessary requirements to participate in the selection process;
- verify that they have the means, including financial resources, organisational structures, technical capabilities and experience, quality systems and resources appropriate to the needs and image of the company through appropriate documentation; In the case of individual professionals, verification focuses on skills, qualifications and professionalism;
- verify compliance with labour regulations, including those relating to occupational health and safety.

Suppliers and external collaborators must comply with all contractual documentation.

The selection of suppliers and external collaborators and fulfilling the relevant contracts are governed by transparency, certainty and are bound by written form,

and no other rules, regardless of their source, can override or be binding for the company if they contradict the information already present in the official documents.

Activities carried out by suppliers and external collaborators must comply with procedures designed to ensure occupational health and safety, whether they are required to collaborate with company employees or carry out their activities independently.

Corruption, unlawful favours, collusive behaviour, solicitation of advantages, payment of material and immaterial benefits, and other advantages aimed at influencing or compensating company employees or collaborators from suppliers are not tolerated and will be prosecuted in accordance with the law.

4.10 Conduct towards business partners

Business partners must adhere to all contractual documentation submitted by the company, which will include the obligation to comply with the code, as well as other voluntary rules of conduct the company has prepared and communicated for this purpose, which will also provide for specific penalties for any violation thereof.

THE STORY GROUP has a network of partners it establishes mutual non-competition agreements with, whereby the relationship with the client remains with its original reference company and the other organisations undertake not to damage the relationship with the lead company either directly or indirectly with marketing communications and offers. The interchangeability of the lead role ensures the satisfaction of the entire network.

4.11 Conduct towards clients

The company considers client loyalty and trust to be defining values and an essential asset, when applying its quality policy. THE STORY GROUP defined contractual rules for clients that are transparent and consistent with the characteristics of the services provided and which comply with current legislation.

4.12 Conduct towards competitors

To avoid possible distortions on the markets the company operates on, managers, employees and collaborators must not take part in agreements or discussions with current or potential competitors on behalf of the company (unless expressly authorised to do so) regarding:

- prices or discounts;

- terms or conditions relating to the services provided by the company and its competitors;
- profits, profit margins or costs;
- promotional schemes for services provided by the company and competitors;
- offers to acquire shareholdings or proposals for such acquisitions;
- sales territories or markets.

4.13 Conduct for participating in tenders

When participating in tenders, the company undertakes:

- to act in accordance with the principles of fairness, transparency and good faith;
- to assess the appropriateness and feasibility of the services requested, during the tender examination phase;
- to provide all data, information and news requested during the selection of participants and necessary to award the tender.

If the tender/call for tenders is awarded, the company, in its relationships with the client, undertakes:

- to ensure that negotiations and commercial relationships are conducted in a clear and correct manner;
- to ensure the diligent fulfilment of contractual obligations.

4.14 Conduct in relationships with the public administration

Relationships with public officials are limited to the company functions responsible for and authorised to comply with legal and regulatory provisions and may not in any way compromise the integrity and reputation of the company.

Relationships with the public administration are based on transparency and fairness, as well as a spirit of collaboration.

The company expressly prohibits the direct or indirect offering of sums of money, benefits or other means of payment to public officials, managers or public service employees to influence their activities in the performance of their duties.

These requirements cannot be circumvented by resorting to different forms of contributions which, under the guise of sponsorships, assignments and consultancies, advertising, etc., have the same prohibited purposes.

4.15 Conduct towards public authorities and institutions

All relationships with state or international institutions shall be limited exclusively to forms of communication aimed at assessing the implications of legislative and administrative activities for the company, responding to informal requests and acts of parliamentary scrutiny (questions, inquiries, etc.) or, in any case, making known the company's position on issues relevant to it.

To ensure maximum clarity in relationships, contacts with institutional bodies shall take place exclusively through representatives with explicit mandates.

Diego Vinicio Lifonti

(Legal Representative)