

**PERCASSI**

# **Λ'ΙΝΝΟΜΙΝΑΤΟ CYPRUS LIMITED ΚΩΔΙΚΑΣ ΔΕΟΝΤΟΛΟΓΙΑΣ**



# PERCASSI

## L'Innominato Cyprus Limited

### Code of Ethics

APPROVED BY THE BOARD OF DIRECTORS OF L'INNOMINATO CYPRUS LIMITED  
BY RESOLUTION DATED 18 DECEMBER 2025

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## **1 Introduction**

This code of ethics (Code of Ethics or Code for short), approved by the Board of Directors of L’Innominato Cyprus Limited (“L’Innominato Cyprus” or the Company for short), contains the general ethical values that, together with legal, regulatory and contractual provisions, represent the indications on which the principles of conduct must be based.

The Company recognises that the observance of principles of conduct based on ethical values is of fundamental importance for its economic growth and the development of its reputation.

The Company aims to set an example of fairness and correctness, thus making the utmost effort in the protection and development of its image and reputation, while also requiring its own workforce to do the same.

Aware of the importance that the conduct of all those acting in the name and on behalf of the Company holds in developing its image, the Company requires that said figures always maintain an ethically and professionally irreproachable demeanour. At the same time, the Company undertakes to guarantee full respect for the personality and professionalism of its collaborators and to ensure that it makes the most of said figures in the organisation and carrying out of its activities, fostering a climate of mutual respect and opposing any behaviour that is potentially detrimental to personal dignity.

All those operating in the name of and on behalf of the Company must collaborate in promoting the values from which the latter draws inspiration by committing themselves to respecting and promoting the values upheld by the Company.

The Code of Ethics has been drawn up in order to express ethical values through principles of conduct, which the Recipients of the Code are required to adhere to in the conducting of business and activities.

The ethical principles of conduct, contained within this document, therefore characterise the Company’s activities and serve as guidelines for the company organisation, in that they provide mandatory indications for programming.

The Code of Ethics includes an initial section containing general and fundamental ethical values, followed by the ethical principles of conduct relating to the individual interests that the Company is committed to protecting.

## **2 Recipients of the Code of Ethics**

The Code of Ethics is addressed to all persons acting on behalf of L’Innominato Cyprus, whatever the relationship they have with the former (hereinafter referred to as the “Recipients”), whether they:

- fulfil roles of representation, administration or management of the Company or of an organisational unit of the Company with financial and functional autonomy.
- exercise, including in a *de facto* manner, management and control of the Company.

- are subject to the management or supervision of one of the subjects indicated above.
- are, in any event, authorised by the aforementioned subjects to act in the name of, on behalf of or in the interests of the Company.

In the light of the above, the recipients of the Code are therefore:

- the Administrative Body.
- employees and collaborators of various nature.
- third parties, suppliers and partners (also in the form of temporary associations of companies, including temporary staff agencies and joint ventures), to the extent to which they operate on behalf of or in the interests of the Company.

Respect for the principles contained in the Code of Ethics is the moral duty of the Recipients, with a view to pursuing the Company's goals in accordance with the fundamental values of integrity, transparency, legality, impartiality and prudence, in full compliance with the applicable legislation.

In particular, the Recipients are required to:

- ensure that their conduct complies with the provisions of the Code of Ethics.
- promptly report any breaches of the ethical principles of conduct, as soon as they become aware of said breaches.
- request, when necessary, interpretation or clarification of the ethical principles of conduct defined below.

### **3 Responsibility for the Code**

The Board of Directors of the Company has overall responsibility for ensuring the Code complies with our legal and ethical obligations, and that all those under our control comply with it.

### **4 General and fundamental ethical values**

In the pursuit of its objectives, the Company recognises the following general and fundamental ethical values, which are mandatory for the Recipients:

- **Integrity:** activities are managed in a professional and responsible manner in order to resolve situations in which potential conflicts may arise, ensuring that conduct is characterised by honesty, morality and fairness and perceived as such.
- **Transparency:** a commitment is guaranteed to provide clear, complete, timely and truthful information in the Company's internal and external relations with its various stakeholders.
- **Legality:** behaviour, both in the stages of decision-making and of implementation, in full compliance with internal procedures, is strictly governed by the applicable legislation.
- **Impartiality:** decisions and conduct are implemented with full respect for the personal characteristics of each individual, encouraging and rewarding integrity and a sense of responsibility,

respecting diversity and rejecting any possible discrimination on the basis of age, state of health, gender, religion, ethnicity, political and cultural opinions, and personal or social status.

- **Prudence:** activities are managed with full awareness of risks and with the aim of managing the same in an appropriate manner. This takes the form of prudent behaviour, especially when one's actions and decisions may result in harm to persons or damage to property.

Under no circumstances may the pursuit of the Company's interests or advantages for the same justify unethical, dishonest or illegal conduct.

## **5 Ethical principles of conduct**

In the pursuit of its objectives, the Company recognises the following ethical principles of conduct, subdivided according to the type of interest they intend to protect, as mandatory for the Recipients.

### **5.1 Principles to protect individuals**

Recipients, each according to their own role and responsibilities, must:

- respect the physical and moral integrity of individuals by ensuring the enhancement and growth of each internal resource member of personnel.
- ensure and promote the protection of people's health and physical integrity, aspects understood to be of fundamental importance for individuals.
- undertake to provide a healthy and safe workplace for their employees, clients, suppliers, collaborators and anyone present on the Company's premises, ensuring, in particular, the prevention of accidents and occupational illnesses and the minimisation of risk.
- strive for continuous improvement in performance in terms of health and safety, aimed in particular at the prevention of occupational injuries and illnesses.
- undertake to comply with current occupational health and safety legislation and regulations, provisions and signed voluntary agreements, cooperating with institutions, local authorities and industrial organisations.
- ensure and promote the protection of individual freedom and human dignity as fundamental aspects through which human personality is expressed.
- countering and hindering the occurrence of acts of discrimination in the workplace that may give rise to severe anxiety and other stress-related conditions.
- ensure respect for human rights and the protection of individual dignity, actively opposing any form of worker exploitation and, especially, child labour.

### **5.2 Principles to protect the community**

Recipients, each according to their own role and responsibilities, must:

- ensure and promote the protection of the environment, considered a fundamental asset for the community, through continuous improvement and ongoing research into environmentally sustainable operational procedures.

- counter phenomena of undeclared labour and clandestine immigration by promoting the integration and training of foreign workers with valid permission to stay.
- counter phenomena of clandestine immigration by ensuring compliance with standard administrative procedures for the issuing of permission to stay.
- ensure adequate prevention of the risk of criminal infiltration and promote the adoption of methods for selecting the various figures (individuals or entities) that have relations with the Company.
- ensure adequate prevention of the risk of criminal infiltration, including through the careful selection of business partners.
- reject and undertake to oppose the promotion of ideas and the carrying out of actions aimed at spreading terror or subverting democratic constitutional order.

### **5.3 Principles to protect economic relations**

Recipients, each according to their own role and responsibilities, must:

- ensure the adequacy and effectiveness of the administrative-accounting system, which is used to prepare and disclose accurate and full economic, property and financial data, aimed at providing a clear, true and fair representation of the facts concerning the management of the Company.
- promote the establishment and use of appropriate tools to identify, prevent and manage risks relating to the preparation of statements on the Company's financial situation as well as to fraud or misconduct.
- promote and ensure compliance with the principles of free competition and proper market performance, in the selection of contractual counterparties, and in the negotiation and conclusion of commercial transactions and contractual agreements.
- promote the exercising of business practices in accordance with the principles of good faith, honesty and fairness, protecting the trust placed in the Company by contractual counterparties.
- ensure and promote the necessary confidentiality of regulated information relating to listed issuers to which they may have legitimate access, as well as the use of said information exclusively for the purposes permitted.
- ensure suitable traceability of financial flows, in full and diligent compliance with legislation for the prevention of money laundering.
- ensure appropriate cooperation with the competent authorities in preventing, countering and repression of the phenomena of counterfeiting and forgery of banknotes, coins and any other form of payment.
- ensure compliance with current tax legislation in order to guarantee the correct determination, certification and payment of taxes.

### **5.4 Principles to protect company assets**

Recipients, each according to their own role and responsibilities, must:

- ensure and promote the integrity and safeguarding of data and information, guaranteeing that individual access to data and information is in line with each individual's role and responsibilities.
- ensure compliance with national, European Community and international legislation for the protection of copyright.
- promote the protection and the prudent and diligent use of the company's assets, equipment and resources in accordance with the principles of honesty, economy, efficiency and effectiveness in the pursuit of the corporate purpose.

## 5.5 Principles to protect the State and public authorities

Recipients, each according to their own role and responsibilities, must:

- ensure and promote the protection of democratic values and respect for the State and Public Institutions as fundamental organisational values.
- respect the regularity of administrative procedures and the proper functioning of the activities of the Public Administration, with formal and substantial respect for the latter's financial interests, in every relationship entered into.
- ensure and allow, through their own conduct, that the activities in which the Public Administration is expected to be involved are carried out in full compliance with the provisions of the law, avoiding any external pressure that may result in favouritism, discrimination or arbitrary acts in the pursuit of the public interest, in such a manner as to ensure the loyalty of the Public Administration to the function and purpose assigned to it by the law, without misdirecting or altering its impartiality.
- ensure and promote correct, transparent and cooperative behaviour in relations with criminal investigation bodies and legal authorities responsible for investigation and judgement.

## 6 Disciplinary and penalty system

The Company undertakes to penalise any conduct in breach of the values and principles set out in this Code of Ethics. Breaches of the Code of Ethics are subject to the provisions of the Company's disciplinary and penalty system, regardless of the initiation or outcome of any legal proceedings.

## 7 Whistleblowing

The Company is committed to full compliance with legislation concerning "whistleblowing", thus guaranteeing the protection of all persons authorised to report conduct liable to constitute an offence.

The management of reports of non-compliance with the Code of Ethics is governed by company regulations and guarantees protection for reporting parties in good faith against any form of retaliation, discrimination or penalisation, ensuring the utmost confidentiality, without prejudice to legal obligations.

## 8 Adoption and communication of the Code of Ethics

The Code of Ethics is adopted by resolution of the Company's Board of Directors.

This Code will be reviewed annually or as required following any updates that prove to be necessary as a result of:

- significant changes in the organisational structure of the Company, or in the manner in which corporate activities are carried out, or
- changes of the applicable law, or changes to industry guidance that might impact on it or
- any breach or other incident relating to the issues addressed in this Code.

Any updates on the Code of Ethics will be adopted by subsequent resolution of the Board of Directors.

It is the responsibility of the Board of Directors to ensure that the principles contained in the Code of Ethics are communicated to all Recipients and are understood and respected by the latter.

Recipients are required to read and ensure full understanding of the contents of the Code of Ethics. In particular, the Company's directors and managers are responsible for creating a culture that is rooted in the principles contained in the Code of Ethics, promoting awareness and encouraging commitment to uphold the same.

Aware of the moral importance of this Code of Ethics, L'Innominato Cyprus intends to render its values and guiding principles public and accessible to all. To this end, the Code of Ethics can be consulted on the official website of the Company.