GROUP CODE OF ETHICS

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1. Presentation of the Group Code of Ethics

This Code of Ethics (hereinafter, the "Code") defines the set of principles and rules of conduct that guide the activities of LibraCyber S.p.A and its directly or indirectly controlled subsidiaries (hereinafter, the "Group"). The Code serves as the common reference for all Group companies and applies to anyone who operates, in any capacity, in the interest of or on behalf of the Group, both in internal relations and in dealings with external parties. It is designed with a uniform and consistent approach suited to a business reality operating across multiple legal contexts, ensuring the adoption of homogeneous ethical standards across all controlled companies. Through this Code, the Group aims to consolidate a system of shared values and an ethical-behavioral standard based on:

- Legality and respect for rules.
- Fairness, equality and non-discrimination.
- Collaboration and transparency towards employees, collaborators, suppliers, institutions and clients.
- Loyalty, impartiality and protection of the Group's image.
- Responsibility linked to assigned roles and duties.
- Efficiency and proper use of company resources.
- Protection of information in terms of confidentiality, integrity and availability.
- Protection of personal data processed in the course of work activities.
- Environmental protection.
- Promotion of health, safety and organizational wellbeing.

The Code is an integral part of the Group's governance system and serves as a tool for preventing conduct that is inconsistent with corporate values and applicable regulations in the contexts in which the Group operates. Compliance with the rules of conduct it contains is an essential condition for achieving business objectives, protecting the Group's reputation and maintaining the trust of all stakeholders.

2. Recipients of the Code of Ethics and Purposes

The provisions and rules set out in this Code are binding on directors, members of corporate bodies, executives, employees and all collaborators who, in any capacity and under any type of contractual arrangement, operate in the interest of or on behalf of the Group. Recipients are required to observe the principles and rules of conduct contained in this Code and to comply with the procedures and operational instructions adopted by the respective Group companies for the performance of their activities, in accordance with the regulatory framework applicable in the various operating contexts. Through specific contractual clauses, suppliers, consultants, commercial partners and, more generally, all third parties that have relations with Group companies are also required to share and respect the principles and rules of conduct set out in this Code when carrying out activities on behalf of the Group. The Code is made available through corporate communication channels in order to ensure the widest possible dissemination and awareness within the various Group companies. LibraCyber S.p.A. shall:

- Make the Code of Ethics available to each new hire, explaining its objectives and the principles underlying it;

- Ensure the dissemination of this Code to all employees and external collaborators, including a notice of its adoption in all employment contracts and publishing the document on the corporate website;
- Prepare and complete a specific training plan differentiated by corporate role, aimed at disseminating the principles and ethical rules on which the Group's entire activity is based;
- Promptly update the content of the Code in order to adapt it to any relevant regulatory developments, ensuring its dissemination as specified above;
- Provide any clarification necessary regarding the implementation of the rules contained in this Code.

All recipients must formally confirm in writing that they have received the Code of Ethics, are aware of it and accept the provisions contained therein.

The purposes of this Code are:

- To ensure the adoption of uniform and consistent ethical standards across all Group companies.
- To integrate ethical principles into decision-making processes and daily operational activities.
- To prevent conduct is inconsistent with corporate values and applicable regulations.
- To strengthen a culture of responsibility, transparency and legality in both internal and external relations.

The Code is not merely a programmatic document, but a concrete reference for the actions and conduct of each recipient. Its violation may result in the activation of measures provided for by internal procedures and by the applicable legislation and contractual rules in the company concerned.

3. General Principles

In conducting its activities, the Group is guided by the principles set out in this Code. The conduct of recipients must be based on the principles of legality, integrity, non-discrimination, confidentiality, diligence, loyalty, respect for the environment and protection of human rights. These principles form the foundation of the Group's actions and apply uniformly to all member companies, including those operating abroad.

3.1 Legality

The Group ensures that its activities are carried out in full compliance with the legislative and regulatory provisions in force in the countries in which it operates. Compliance with laws, regulations and internal procedures is a non-negotiable principle and an essential prerequisite for every corporate decision and conduct.

3.2 Integrity and Management of Gifts or Other Benefits

The Group requires that the conduct of the Code's recipients be guided by fairness and moral integrity as non-derogable duties. Recipients are prohibited from establishing privileged relationships with third parties for the purpose of obtaining undue advantages. The acceptance or offering of gifts, gratuities, or other benefits is permitted only within the bounds of normal courtesy, within the limit of €100, and in compliance with applicable laws and regulations across the jurisdictions where the Group operates. Any gift or benefit exceeding this threshold, or of any amount, that may even appear to be intended to influence a decision, must be refused and reported to the relevant manager.

3.3 Non-Discrimination and Equal Opportunities

The Group avoids and condemns any discriminatory conduct based, by way of example, on race, religion, age, sex, sexual orientation, political opinions, disability, family status, social status or membership of any other category, in compliance with applicable statutory provisions or anti-discrimination regulations, whether national or international. The principles of fairness, inclusion and respect for personal dignity must guide all internal and external relations.
LibraCyber S.p.A. is committed to ensuring equal employment opportunities, including by reducing the gender gap in the workplace.
The following are considered contrary to company rules of conduct and unlawful:
- failure to comply with personnel recruitment procedures on grounds of race, sex, religion, age, disability or other protected status;
- discriminatory treatment of an individual with regard to the terms and conditions of their employment relationship or in the application of disciplinary measures;
- harassment of any individual on grounds of race, colour, sex, religion, age, disability or other protected status;
- retaliation of any kind against a person who reports or intends to report a violation of equal opportunity rights in the workplace, or who has participated in any way in an investigation, proceeding or testimony concerning such a report;
- any change to the organization of working conditions or working time motivated by pregnancy, maternity or paternity status and the exercise of the related rights, or simply by sex, age or personal or family care needs, which places or may place the employee in at least one of the following situations:
1. a position of disadvantage compared with employees generally;
2. limitation of opportunities to participate in corporate life or decision-making, taking into account the role actually held;
3. limitation of access to individual recognition and development systems, including advancement and career progression mechanisms, where applicable.

3.4 Confidentiality

The Group safeguards the confidentiality of the information and data in its possession, operating in compliance with applicable regulations on personal data protection and information security. Data and information are managed in accordance with the principles of lawfulness, fairness, and security. LibraCyber S.p.A, aware of the nature of the personal data processed in the course of its activities, has adopted a specific system for the management and protection of personal data, integrated with its information security systems. This system constitutes the organizational and methodological reference framework for the entire Group and, where applicable, must also be observed by other directly or indirectly controlled companies, in compliance with the applicable regulatory requirements in their respective jurisdictions. The reform introduced by Regulation (EU) 2016/679 established the adoption, according to a risk-based approach, of appropriate technical and organizational measures to ensure the protection of the rights and freedoms of natural persons with regard to the processing of personal data. These principles are reflected in the Group's organization and procedures.

3.5 Diligence

As required by applicable law, the relationship between the employer and its employees and collaborators must be characterized by mutual trust and integrity. The Group promotes this principle as a foundation for creating a healthy, collaborative work environment oriented towards organizational wellbeing. Employees and collaborators are required to carry out their duties with responsibility, professionalism and care, pursuing the interests of the Group in compliance with applicable regulations and the rules of conduct set out in this Code. Each recipient must

act with the diligence required by the nature of the task assigned, contributing to the protection of company assets and the proper use of resources, including to ensure their preservation, efficiency and long-term sustainability. Employees and collaborators are also required to comply with the company regulations, the internal IT disciplinary policy and the social media policy adopted by the Group, as essential tools for ensuring conduct consistent with organizational, security and proper use standards for technologies and communication channels.

3.6 Loyalty

The Group conducts its activities in accordance with the principle of loyalty, as an element of protecting competition in the markets in which it operates. Recipients undertake not to engage in conduct that could undermine the integrity, impartiality or reputation of the Group.

3.7 Respect for the Environment

The Group recognizes the environment as a primary value and orients its activities towards sustainable development, promoting responsible use of resources and behaviors aimed at reducing environmental impact. The Group adopts an ESG (Environmental, Social, Governance) approach integrated into its strategic and operational decisions, committing to measure and, where possible, progressively reduce its environmental footprint. Recipients are called upon to actively contribute to the Group's sustainability objectives, adopting conduct consistent with these goals in the performance of their professional activities.

3.8 Protection of Human Rights

The Group is committed to the protection of human rights and condemns all forms of exploitation, marginalization, forced or child labour, promoting respect for human dignity in all contexts in which it operates. Compliance with the principles set out above is an essential element for the proper conduct of the Group's activities and for the safeguarding of its reputation across all territories where it operates.

3.9 Conflicts of Interest

Recipients are required to avoid situations in which their personal, family, or financial interests may conflict, or even appear in conflict, with the interests of the Group. Conflicts of interest include, by way of example: direct or indirect participation in activities competing with those of the Group; the performance of work or consultancy activities for clients, suppliers, or competitors without prior authorization; the use of confidential information acquired in the course of one's duties for personal gain or to benefit third parties; and the exercise of influence over company decisions where there is a personal interest in the matter concerned. Any actual or potential conflict of interest must be promptly disclosed to the relevant manager and, for members of corporate bodies and senior management, to the competent governing body, in accordance with the internal procedures adopted by the relevant company. The Group adopts appropriate organizational measures to prevent and manage conflicts of interest, ensuring that corporate decisions are taken exclusively in the interest of the Group and in compliance with the principles of transparency and impartiality.

3.10 Responsible Use of Artificial Intelligence

The Group recognizes the opportunities offered by artificial intelligence (AI) tools and promotes their responsible, ethical use in compliance with applicable regulations both European (i.e. the AI Act) and national (for example, as regards Italy, Law No. 132/2025). Recipients are required to use only AI tools approved by the Group, refraining from sharing confidential information, personal data or trade secrets of the Group or third parties with unauthorized AI systems. Content generated using AI tools must be verified and validated by the recipient before being used, shared or communicated externally: responsibility for the generated content remains with the user who employs it. It is prohibited to use AI tools to engage in conduct contrary to this Code, applicable regulations or

the Group's ethical principles. The Group reserves the right to adopt and update a specific policy on the use of AI tools, with which recipients are required to comply.

3.11 Responsible Supply Chain Management

The Group is committed to selecting its suppliers, consultants and commercial partners on the basis of integrity, reliability and compliance with applicable ethical and regulatory standards. To this end, the Group conducts supplier due diligence proportionate to the risk and significance of the relationship. This process covers adherence to the principles of this Code and to applicable regulations on labor, health and safety, the environment and personal data protection, as well as the absence of any involvement in unlawful or unethical conduct. All contracts with suppliers and commercial partners include clauses requiring compliance with this Code and the Group's ethical principles. The Group reserves the right to adopt specific guidelines or operational procedures on supplier qualification and monitoring, with which all personnel involved in procurement processes are required to comply.

3.12 Fair Competition

The Group operates in compliance with national and European competition law and commits to competing fairly, basing its success on the quality of the products and services it offers. Recipients refrain from entering into agreements, arrangements or concerted practices with competitors aimed at restricting or distorting competition, including conduct related to price-fixing, market or customer allocation, or the manipulation of tender procedures. The Group does not impose on its channel partners, resellers or distributors the prices to be applied to end customers. Information on competitors is gathered exclusively through lawful and transparent sources, without resorting to unfair practices or misrepresentation of identity. Recipients who become aware of conduct potentially harmful to competition must promptly report it in accordance with applicable internal procedures.

3.13 Prohibition of Sexual Harassment

LibraCyber S.p.A. is committed to maintaining a professional environment free from inappropriate or disrespectful conduct and communications of a sexual nature.

The term "sexual harassment" refers to any unwanted conduct of a sexual nature or any other form of discrimination based on sex that violates the dignity of women and men in study and work environments, including physical, verbal or non-verbal conduct.

In other words, such harassment includes deliberate or repeated unwelcome verbal comments, gestures or physical contact of a sexual nature, including inappropriate sexual advances, requests for sexual favours or other physical conduct of a sexual nature.

In the workplace specifically, sexual harassment is relevant where:

- acceptance or rejection of such conduct by an individual is used as a basis for employment decisions affecting that person's job, pay, career or economic wellbeing;
- submission to such conduct becomes, explicitly or implicitly, a term or condition of the employment relationship;
- such conduct has the purpose or effect of unreasonably interfering with work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment may be verbal (sexual innuendo, comments, inappropriate jokes or jokes that may be perceived as offensive to personal dignity, threats), non-verbal (inappropriate or obscene sexual sounds or gestures, obscene graphic comments, sexually suggestive representations or objects, clearly lewd looks) or physical (any deliberate and manifestly inappropriate physical contact).

Every member of the Group is required to eliminate the possibility of sexual harassment by adapting their conduct to company rules of conduct, preventing inappropriate conduct by third parties, and reporting and communicating any misconduct to the relevant Managers.

3.14 Consumption or Possession of Narcotic Substances During Work Activities

LibraCyber S.p.A. is committed to creating and maintaining a work environment free from the use or mere possession of narcotic substances.
For the purposes of this Code, narcotic substances include:
- any illegal or controlled substance;
- any substance whose use or abuse may alter or impair mental functioning.
It is therefore expressly prohibited to:
- personally use, possess, hold, sell, transport or distribute illegal substances within the workplace;
- perform work activities or report to the workplace while clearly under the influence of any illegal substance;
- perform work activities or report to work following the abuse of substances, including legal substances, that impair cognitive abilities, or while such effects are still present mentally or physically during the working day, whether in the workplace or elsewhere while on duty.
Failure to comply with company rules of conduct concerning the use, possession or abuse of the substances referred to above in the performance of work or in the workplace may result in disciplinary action, up to and including dismissal.

4. Work Environment and Organizational Wellbeing

The Group is committed to providing its employees and collaborators with a healthy and safe working environment, in compliance with the applicable legal requirements in the countries in which it operate, promoting working conditions that respect human dignity and are oriented toward the protection of health and safety. Management fosters a professional environment based on collaboration, mutual respect, and fairness in interpersonal relationships, thereby supporting the development of skills and the responsible contribution of everyone to the Company's activities. The Group recognizes remote working (smart working) as an organizational model that promotes work-life balance and is committed to regulating its use in compliance with applicable legal requirements in the different jurisdictions in which it operates. In this context, the Group safeguards the right to disconnect its employees and collaborators, ensuring that the use of digital work tools outside working hours does not constitute an implicit obligation, except in exceptional circumstances expressly authorized.

5. Management of Activities and Work Performance

5.1 Compliance with Internal Procedures

Recipients are required to scrupulously comply with the procedures, operational instructions and protocols adopted by the respective Group companies in the performance of their activities, ensuring conduct consistent with the provisions of this Code and applicable regulations across all contexts in which the Group operates. They are further required to contribute to the proper functioning of the organization by reporting any conduct that does not comply with internal rules or applicable regulations, in accordance with company procedures.

5.2 Promotion and Communication

Promotional and/or advertising activities must be carried out in compliance with the ethical principles set out in this Code, ensuring integrity, transparency, protection of personal dignity and protection of personal data, including images, audio and video content. Recipients of this Code undertake not to make statements to the press or to any external party that could compromise the image or reputation of the Group without the prior written authorization of the relevant company. Promotional activities carried out using digital tools, such as newsletters,

social media marketing or telemarketing, must comply with applicable personal data protection regulations and the internal procedures adopted by the Group.

5.3 Protection of Information

Technical, commercial, project-related and organizational information, as well as personal data processed in the course of activities, constitute an asset of the Group and must be adequately protected in the interest of all member companies, including those operating internationally. LibraCyber S.p.A has adopted an information security management system certified to the ISO/IEC 27001, ISO/IEC 27017 and ISO/IEC 27018 standards. These standards serve as the methodological and organizational reference for information security for the entire Group and also constitute a reference model for controlled companies, while respecting the specific organizational characteristics and any certifications they may hold. Recipients are required to adopt conduct that ensures the confidentiality, integrity and availability of information, in compliance with internal procedures and applicable regulations, contributing to the protection of the informational assets of Group companies. Any actual or suspected violation must be promptly reported in accordance with applicable internal procedures, in order to allow for the adoption of appropriate countermeasures and assessment of any data breach management and notification obligations.

6. Making Ethical Decisions in Difficult Situations

This Code sets out the principles and rules that guide the Group's activities but cannot provide a specific answer for every situation that recipients may encounter. When faced with difficult decisions or ethically ambiguous situations, recipients are encouraged to follow a structured approach that helps them align their choices with the Group's values.

Pause. If a situation causes an employee discomfort or raises concerns, the employee should take the necessary time to assess it before taking action.

Reflect. An employee should consider whether their decision is consistent with the values and principles of the Code, whether it builds or preserves the trust of colleagues, clients, and stakeholders, and whether they would be willing to stand by it openly. An employee must never compromise the Group's reputation or their personal integrity in exchange for immediate benefit.

Ask. If uncertainty remains, the employee should consult their direct manager, the Legal & Compliance function, or other relevant internal resources. Asking questions and raising concerns is always preferable to inaction or inappropriate conduct. The Group is committed to ensuring that employees who seek guidance can do so without fear of negative consequences.

Follow the guidance received. Once the appropriate clarifications have been obtained from the competent corporate functions, and without prejudice to instructions that are manifestly contrary to law or to the principles set out in this Code, commit to following the guidance provided in the interest of the Group's integrity, reputation and wellbeing.

7. The Role of Managers in Ethical Culture

Those who hold a position of responsibility within the Group have the special task of defining the culture of their team through their choices and daily conduct. The way in which a manager handles problems, addresses differing opinions and responds to reports from collaborators forms the foundation of mutual trust within the Group. Managers are committed to: regularly communicating to their collaborators the importance of ethics and integrity, making clear that results must be achieved in the right way; leading by example by adopting conduct consistent with this Code; creating an environment in which collaborators feel free to ask questions and raise concerns

without fear of retaliation; actively listening when a collaborator raises a concern, treating every report with seriousness and confidentiality; refraining from exerting pressure to achieve objectives through means contrary to this Code or applicable law. Should a manager become aware of a possible violation of this Code or internal procedures, they are obliged to act promptly in accordance with the internal control system and the reporting procedure adopted by the Group.

8. Relations with Public Administrations and Authorities

Relations with Public Administrations and Authorities are conducted exclusively by the legal representative of the company or by another person formally authorized in accordance with the organizational structure and internal procedures adopted by the relevant Group company. Any interaction with Public Authorities must be traceable, consistent with assigned responsibilities and carried out in compliance with applicable regulatory provisions in the relevant territorial context. Any activity not expressly authorized will fall under the exclusive responsibility of the person who carries it out, with all consequences provided for by law. The Group absolutely prohibits any form of corruption, favoritism, promise or granting of undue advantages, direct or indirect, towards public officials or public servants, whether national or foreign, as well as any conduct aimed at obtaining preferential treatment or illegitimate benefits. It is also prohibited to solicit or accept undue advantages in dealings with public entities.

9. Control System and Disciplinary Measures

The Group requires that compliance with the rules and principles set out in this Code be ensured through the responsible and informed conduct of each recipient, in accordance with the functions and role assigned within the organization. The Group companies ensure that adequate monitoring and oversight activities are carried out to verify the correct application of this Code and the related internal procedures, in compliance with the organizational framework and the regulatory provisions in force across the respective jurisdictions. In this context, the Whistleblowing procedure adopted by LibraCyber S.p.A also applies, extended to all directly or indirectly controlled companies, as a tool for reporting and managing violations while ensuring the protections afforded by whistleblowers. In the event of an established violation of this Code, the company concerned shall promptly initiate a formal contestation of the facts, in accordance with the principles of proportionality, impartiality and the right to be heard, with a view to determining responsibilities and adopting the measures provided for under internal procedures. Where the violation is committed by an employee, the disciplinary instruments provided for under applicable legislation and collective bargaining agreements in the country where the company concerned operates shall apply. By way of example only and subject to applicable local regulations, disciplinary measures may include: a verbal or written warning; a fine or suspension from work and pay; dismissal for just cause or justified reason, in cases of particularly serious violations. The severity of the sanction shall be proportionate to the nature and gravity of the established violation, taking into account the circumstances of the specific case, the role of the recipient and any recurrence of the conduct. Where the violation is attributable to collaborators, consultants or other third parties, liability shall be assessed on a contractual basis, with the possible application of the measures provided for under existing agreements, including termination of the contractual relationship, without prejudice to the right of the company concerned to protect its interests before the competent courts. In cases provided for by law, the company concerned retains the right to file a report or complaint with the competent Authorities and to pursue any further action in defense of its rights and interests.

9.1 Prohibition of Retaliation

The Group recognizes that reporting a violation requires courage and that fear of negative consequences may hinder the disclosure of misconduct. For this reason, the Group expressly prohibits any form of retaliation, whether direct or indirect, against anyone who: has made, in good faith, a report of a potential violation of the Code, internal procedures, or applicable laws; has refused to carry out instructions that are contrary to this Code, the Group's policies, or the law, even where this has resulted in a missed business opportunity; has cooperated in an internal investigation or in an inquiry conducted by a competent authority. Retaliation includes any act or behavior that, following a report or a legitimate refusal, adversely affects the working conditions, career progression, or compensation of the recipient concerned. Any confirmed act of retaliation shall be subject to the same disciplinary measures provided for other violations of the Code, up to and including termination of the relationship. The protections set out in this provision apply in accordance with the Group's Whistleblowing procedure and applicable laws on the protection of reporting persons.