



ENDURANCE
O V E R S E A S

Code of Ethics
for
Stakeholders

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0. DEFINITIONS

CODE: the present edition of the Code of Ethics for Endurance' Stakeholders;

COMPLIANCE: conformity of activities with the company's legislative provisions, regulations, procedures and codes of conduct;

ENDURANCE or COMPANY: Endurance Overseas S.r.l. Company subject to the management and control of Endurance Technologies Limited; Holding Company for the management and coordination of the European Companies headed by Endurance Technologies Limited and its subsidiaries and/or associated Companies;

CONTRACTUAL DOCUMENTATION: means all contractual documentation signed between ENDURANCE and its Stakeholders in order to regulate relations

between the parties (e.g. Endurance General Terms and Conditions, Non-Disclosure Agreements and other Endurance contracts).

RECEIPIENTS or STAKEHOLDERS: wide circle of persons dealing with Endurance or having any interest in the company, including the Recipients of this Code, as defined above. In particular, the term Stakeholders means: customers, suppliers, business partners, shareholders, directors, board of statutory auditors, employees, collaborators, consultants, and, in a broad sense, all those individuals or organisations and institutions whose interests are affected by the direct and indirect effects of the activities of Endurance;

SUBSIDIARIES: companies that are owned or controlled by the holding company.

1. INTRODUCTION

ENDURANCE, defining its clear and transparent set of values, has developed its Code of Ethics, which expresses the ethical commitments and responsibilities in the performance of business activities and corporate operations. Observance of the Code by all its Stakeholders is essential for the proper functioning, reliability, reputation and image of the Company itself.

The adoption of the Code is based on Endurance's conviction that ethics in the conduct of business is a necessary condition for its success. For this reason it calls for respect of the legitimate interests of all its counterparts and of the community in which it operates.

The Code is part of the framework of the implementation of the provisions of Italian Legislative Decree 231/2001, as amended, dictating the general principles of conduct by which it is inspired. The Organisational Model of Endurance Overseas integrates, in fact, the present Code of Ethics of conduct and provides to deepen its contents by indicating the obligations and prohibitions of conduct introduced in the management of the Company aimed at contrasting the specific crimes at risk.

This Code expresses the ethical commitments and responsibilities required by Endurance to its Stakeholders in the performance of the company's activities and operations by Endurance in fact conducts its internal and external activities in compliance with the principles sanctioned by the Code, in the conviction that ethics in business is decisive for the company's success. Endurance therefore acts with honesty and integrity throughout its business, and expects the same from its Stakeholders - in particular customers, suppliers,

contractors, partner agents and all those with interests directly or indirectly affected by Endurance's activities.

2. SCOPE OF THE CODE

This Code applies to all Stakeholders who, for whatever reason, get in contact with Endurance, and constitutes an integral part of all the Contractual Documents in existence between Endurance and its Stakeholders.

This Code applies together with: the Code of Ethics for internal use, the Policy on the Protection of Personal Data, the Whistleblowing Policy, the Responsible Sourcing Policy and all the other codes, policies, procedures, guidelines and/or communications present or future issued by Endurance.

The Code has contractual value. Compliance with the Code is an integral and essential part of the duties of the Stakeholders. This Code is available for consultation by all Stakeholders and can be freely downloaded from <https://www.enduranceoverseas.com/>.

3. MAIN PRINCIPLES

All Endurance Stakeholders are required to refrain from conduct contrary to the provisions of the Code. The violation of the aforementioned provisions is to be understood as a breach of the duties arising from the relationship between the parties.

Endurance firmly opposes and refuses any form of discrimination or retaliation against the Stakeholders who denounce any violation of the Code.

If you become aware during your work activity, of the existence of a conflict of interest or of a violation of the Code within Endurance or with respect to its Stakeholders, please report it through access to the dedicated platform available at: www.enduranceoverseas.com/whistleblowing/.

3.1. Observance of Law

Endurance's activity is inspired by the most scrupulous respect of the laws of Italy, Europe and of the countries in which the Company operates, of the internal regulations, of the rules of fair competition, of the good technical and administrative practices and of the principles of the international standards of reference in the sectors in which it operates and of the rules expressed in this Code. Endurance believes that fair and honest conduct is fundamental to long-term success, and to achieve this it needs the support of its stakeholders, in particular its customers, suppliers and the community.

Endurance is committed to conducting its business in full compliance with the laws of each jurisdiction in which it operates and repudiates any unlawful conduct.

For this reason, ENDURANCE requires its Stakeholders to operate in compliance with all applicable laws, in order to prevent and or fight against any administrative and/or corporate crime and/or abuse.

GUIDELINES:

Act in accordance with the laws and regulations applicable in the country of operation;

Comply with legislative requirements at all times, even if economically disadvantageous or inconvenient;

Ensure that training and education is kept up-to-date with current legislation.

3.2. Fairness, loyalty and honesty

Endurance is committed to guaranteeing fair competition, as a guarantee for all market operators and for all Stakeholders, respecting the principles of market economy and competition, including antitrust laws, and operating in compliance with the rules applicable in every country in which it operates.

In the perspective of a fair collaborative relationship, the guiding principles of the relationship between Endurance and its Stakeholders are: professionalism, competence, availability, rapid response, fairness, transparency and courtesy.

In particular, Endurance undertakes to act in compliance with the Antitrust Laws in force, as well as in accordance with any regulation and law applicable for the prevention of insider trading. Therefore, Endurance condemns the use of any illegal or improper conduct aimed at securing its business interests, pursued solely through the excellence of its performance in terms of innovation, quality and economic, social and environmental sustainability.

GUIDELINES:

Enter into/conduct business arrangements on the basis of objective criteria, e.g. quality, price and the reliability of concerned business partner;

Ensure fairness and transparency during commercial negotiations and in the assumption of contractual obligations, as well as the faithful fulfilment of the same.

3.3. Transparent & Complete Information

Endurance ensures that business is conducted in full transparency with respect to stakeholders, without compromising the confidentiality required in the conduct of business. Each transaction is fair, accurate, official and registered.

Endurance ensures complete, transparent, understandable and accurate information, operating in accordance with ethical and moral standards. Endurance also promotes the utmost transparency, truthfulness, integrity as well as traceability of information inherent in every operation and transaction, particularly in the area of corporate accounting and the management of financial flows, corporate, tax and fiscal compliance. Maintains high standards of integrity and business honesty, complies with local laws and good international

practice and does not directly or indirectly offer, solicit or accept bribes in any form, and implements the provisions of this Code to demonstrate its commitment to maintaining a high standard of business integrity.

GUIDELINES:

Do not state either explicitly or implicitly that you represent ENDURANCE unless expressly authorized to do so.

In the event that you are authorized by ENDURANCE to speak on behalf of the Company or if this is required by your specific role at ENDURANCE, you must provide truthful information, clearly setting out the facts in order to avoid misunderstandings and speculation.

3.4. Equity & Anti-Discrimination

ENDURANCE asks to its Stakeholders to avoid all forms of discrimination of individuals on the basis of age, gender, sexuality, health or social status, race, nationality, political opinions and religious beliefs;

ENDURANCE subscribes to the principle of equal opportunity in the workplace, treats all employees fairly in terms of recruitment, progression, remuneration and conditions of work.

ENDURANCE allows consultative work-place structures and associations which provide employees with an opportunity to present their views to management.

GUIDELINES:

Evaluates any decision related to the hiring and management of the company's human resources without any kind of discrimination and in compliance with equal opportunities;

Respect the principles of equality and equal opportunities, ensuring gender equality, protecting the rights of minorities and local communities, and paying special attention to the most vulnerable groups;

Prohibits any type of harassment - wherever and however exercised - in the working relations between its employees, collaborators and consultants or in contractual relations between counterparties;

Comply with legal regulations, hiring people in accordance with ethical recruitment principles and the use of working hours in accordance with the provisions of the law and the National Collective Labour Agreements, with particular regard to employment law regulations;

Do not tolerate forms of discrimination based on race, colour, sex, age, religion, physical condition, marital status, sexual orientation, citizenship, ethnic origin, political or trade union membership or any other discrimination contrary to the law.

Protect the rights of minorities and local communities, respecting local laws, culture and customs, committing to maintaining an open dialogue with its stakeholders and paying special attention to the most vulnerable groups;

Ensure gender equality, promoting opportunities for growth, equal pay and duties, gender management policies and maternity protection.

3.5. Safeguard of Human Rights

Endurance recognize the basic importance of human resources, believing that the key to success of business is working in fairness and mutual trust.

Endurance asks to its STAKEHOLDERS to recognize the fundamental principles stated in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights, which also assigns similar responsibilities to each individual and to companies.

Endurance applies the principle of continuous training to the field of human rights, so as to be able to create a solid, aware and constantly updated corporate culture, valuing respect for rights on a daily basis.

GUIDELINES:

Avoid and do not tolerate the use neither of child labour nor of forced labour.

Prohibit the use of conflict minerals ¹ in your production activities and in those of your Stakeholders: design and develop products that do not contain conflict minerals; do not supply materials and components containing the specified metals from mines and foundries in the Conflict Region that are not certified as "Conflict Free".

3.6. Respect of Environment & Health Safety

Endurance safeguards health, safety and industrial hygiene in the workplace, and consider respect for workers' rights as a fundamental of business. For this reason, endurance adopted a multisite EHS control system, in order to ensure continuous monitoring of risks.

Endurance is working to ensure Stakeholders value creation, social progress, safe working conditions and environmental protection; provides safe and healthy working conditions for its employees and contractors, ensuring working conditions that respect the dignity of the individual and with regulations for conduct based on good manners.

Suppliers and sub-contractors are also expected to contribute to reduce the environmental impact of their own operations. The Company encourages the efficient use of natural resources and promotes the protection of the environment, the implementation of

¹ CONFLICT MINERALS: natural resources extracted in a conflict zone and sold to perpetuate the fighting; rif. to Regulation EU 2017/821 <http://data.europa.eu/eli/reg/2017/821/oj>

measures for the reduction of direct and indirect greenhouse gas emissions, reduction of consumption of natural resources, monitoring of spills of hazardous chemicals and implementation of an environmental management system.

Endurance in order to create a healthier and more comfortable environment for its Employees and visitors, has introduced a general ban on smoking in and around workplaces.

GUIDELINES:

Ensure compliance with all applicable health, safety and environmental protection laws and more recent international standards and follow ENDURANCE policies that demand stringent requirements (i.e. ISO 45001, ISO 14001 and ESG PRINCIPLES). Remember that prevention in this area is, first and foremost, an act of social responsibility.

Participate in the process of preventing occupational health and safety risks to oneself and third parties;

Take reasonable precautions to maintain a safe and healthy working environment, ensuring that not to put yourself or others at risk by your actions;

Provide Personal protective equipment and supervise the use of the same in accordance with the risks identified for the safe performance of your activities on Endurance premises; undergo health checks and training programs required by applicable regulations; and not perform dangerous maneuvers on your own initiative that are not part of your duties;

Encourage any action to protect and safeguard the environment's natural resources:

- ✓ contribute to the protection of nature and biodiversity;
- ✓ contribute to the protection of forest, soil and water resources;
- ✓ implementing recovery and recycling policies;
- ✓ encourage the process of decarbonization, helping to reduce direct and indirect greenhouse gas emissions, promoting where possible the replacement of fossil fuels with technologies that exploit the use of renewable sources.

3.7. Community and Territory

Endurance is aware of the effects of its activities on economic and social development and on the general welfare of the community and takes care in its actions to preserve its interests. For this reason, it intends to conduct all its activities with respect for the local and national communities.

GUIDELINES:

Play an active role in the application of the principles of environmental sustainability, also outside your work activities;

Comply with current environmental protection regulations, as well as additional requirements relating to the maintenance of international environmental standards (such as ISO 14001; ISO 14064);

Encourage any action to protect and safeguard the environment's natural resources:

- o contribute to the protection of nature and biodiversity
- o contribute to the protection of forest, soil and water resources
- o contributing to the reduction of greenhouse gases
- o implement recovery and recycling and energy saving policies
- o encourage the process of decarbonisation, helping to reduce direct and indirect greenhouse gas emissions, promoting where possible the replacement of fossil fuels with renewable energy technologies.

Contribute to spreading awareness of the fundamental role played by each Stakeholder for the economic-social development and wellbeing of the community;

Take into account, in their decision-making activities, the possible consequences on the interests of the community and the territory;

Refuse to enter into financial relations with parties whose activities hinder human development and contribute to the violation of fundamental human rights (e.g. through the exploitation of child labour or soil or through the use of materials from conflict zones).

Preserve the cultural and landscape heritage, recognize and defend the special artistic and environmental wealth of Italy and Europe, contributing to preserving the memory of the national community, its territory and to

3.8. Confidentiality & Data Protection

Endurance ensures that information given shall remain confidential and refrains to seek confidential information except for those cases expressly authorized and in compliance with the law in force.

Endurance prohibits the unauthorized reproduction of software, documentation or other copyrighted material. In particular, endurance complies with the restrictions specified in the license agreements for the production/distribution of third-party products or those entered into with its software suppliers and prohibits the use or reproduction of software or documentation other than as permitted by each of these license agreements.

To this end, endurance undertakes to activate all the preventive and subsequent control procedures necessary for the purpose, guaranteeing compliance with the regulations on industrial property and copyright, in particular in the management of technological or scientific intellectual works and databases, as well as the protection of identification marks, trademarks and patents.

During its activities, endurance also ensures compliance with legislation on data protection (with particular regard to EU GDPR 679/2016 regulation and applicable national legislations). Thereby, endurance guarantees the correct processing of data of its

stakeholders and adopts appropriate security measures and regulations in order to prevent any privacy violation.

Endurance undertakes to protect the confidentiality of information relating to its Stakeholders, generated or acquired within and in business relations, and to avoid any improper use of this information.

At the same, all Stakeholders need to treat available information with respect for the confidentiality and privacy of the parties concerned.

GUIDELINES:

Ensure compliance with national and European legislation on data protection in order to protect the personal data of Endurance's employees and/or third parties. This activity must be carried out through the predisposition of appropriate security measures -with particular regard to ICT ones- and throughout appropriate appointments of qualified suppliers/contractors and appropriate agreements in place.

Each recipient is responsible for protecting and conserving the data and assets, both physical and intangible, entrusted to him/her by Endurance for the performance of its tasks. Any use of these assets and resources that is in conflict with the interests of Endurance or is dictated by professional reasons unrelated to the business relationship with the Company, is prohibited.

The information, knowledge and data acquired or processed by Endurance in the course of its activities belong to Endurance and may not be used, communicated or disclosed without the specific authorization of Endurance.

If you notice unlawful transmission of personal data to third parties, or unauthorized access to personal data by third parties, or loss of personal data within Endurance, please do not hesitate to inform us: privacy@enduranceoverseas.com.

3.9. Combating Transnational crime

ENDURANCE recognizes as a fundamental principle the respect of the laws and regulations in force in all the countries in which the Company operates.

GUIDELINES:

Comply with the rules of the legal system (national, supranational or foreign) in which you operate and refrain from committing any type of violation against ENDURANCE.

Do not engage in conduct that may in any way be related to transnational crimes (including, by way of example, criminal association and association for the purpose of illicit drug traffic).

3.10. Prevention of Conflicts of Interest

Endurance works to avoid situations where the persons involved in the transactions are, or may appear to be, in conflict with the interests of the Company itself.

GUIDELINES:

Avoid any situation or activity that conflicts with the proper performance of your duties or that may lead to conflicts of interest with Endurance or that may interfere with the ability to make impartial decisions.

They constitute, by way of example only, typical cases of potential conflict of interest:

- Having financial or commercial shareholdings in suppliers, customers or competitors;
- Taking advantage of opportunities discovered through the use of Company property, information or positions, for one's own personal gain;
- Accept from third parties gifts, money, benefits and advantages of economic value and not, in any form, as a result of employment;
- Establish and/or favors professional and commercial relations with subjects linked by affiliation or in any case by kinship.

3.11. Anti-bribery, prohibition of illegal gifts and payments

Endurance strives to maintain the utmost integrity, honesty and fairness in all relations within and outside the Group, in accordance with national and international laws on the fight against corruption. Endurance does not accept personal interests interfering with any activity involving it, and also does not tolerate any form of corruption.

Endurance rejects any form of bribery, whether in the form of acceptance of money for the purpose of obtaining an advantage, in relation to or by public officials or persons in charge of a public service or third parties, including legal persons.

GUIDELINES:

Avoid offering any amount of money or offer by any means, or any offer of gifts, favors or other forms of benefit, aimed at obtaining undue commercial, contractual and economic advantages.

Refrain from unlawful favors or solicitation of personal benefits for oneself, one's company or others.

Act in accordance with the applicable anti-corruption law of the country in which you operate.

Not to receive or accept any promise of money or other cash payments or to take part in any initiative for the purpose of laundering money or other proceeds of unlawful or criminal activities;

Avoid the improper use, falsification, alteration, undue possession, transfer or acquisition of credit or payment cards, or any other payment system or instrument suitable for withdrawing, purchasing goods or services, and the improper transfer of monetary values or virtual currencies.

3.12. Anti-Money Laundering and Counterterrorism

ENDURANCE works to prevent the use of its economic and financial system for the purposes of money laundering and terrorist financing (or any other criminal activity), and requires its Stakeholders to do the same; therefore proceeds to verify with the utmost diligence the information available on commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their activity.

GUIDELINES:

Verify in advance the information available on commercial counterparties, suppliers, partners, collaborators, sponsors and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relations with them.

Avoid any involvement in operations suitable, even potentially, to promote terrorism or money laundering from illegal or criminal activities, and act in full compliance with the regulations and internal control procedures.

3.13. Tackling Organized Crime

Endurance acts to prevent any possible infiltration of organised crime in the exercise of its activity, verifies compliance with the contents of the Code and undertakes to sanction any behaviour by all Stakeholders that does not comply with its provisions.

3.14. Cash flow management, tax and fiscal compliance

Endurance and all its Stakeholders undertake to comply with all applicable corporate, administrative, financial, fiscal and tax regulations and accounting and financial procedures to avoid irregularities, illegitimacy and violations of specific regulations, in order to combat the phenomena of money laundering, self laundering, receiving and use of money or goods of dubious origin, as well as the commission of tax offences relating to income tax and value added tax.

3.15. Compliance of Import and export

Relations with the Customs Agency are marked by the principles of maximum cooperation and transparency. Recipients are forbidden to engage in conduct aimed, in any way, at evading customs duties. Endurance firmly condemns all forms of smuggling and prohibits conducting business with persons implicated in any way in smuggling activities or who, in any case, do not comply with the relevant regulations and use expedients aimed at evading customs duties.

Endurance therefore requires all internal and external Stakeholders to strictly apply the customs regulations in the countries in which the Company operates in its import and export activities, ensuring that all taxes, duties and royalties collected in connection with the extraction, trade and export of minerals in conflict and high-risk areas are remitted in accordance with applicable laws.

3.16. Protection of ENDURANCE's reputation and business image

Endurance considers its image as an intangible asset with legal and economic value deserving protection. Any damage to ENDURANCE's reputation means the violation of a constitutionally guaranteed right.

For these reasons, ENDURANCE asks its Stakeholders to respect the reputation that Endurance has built in the social and professional context in which it operates. In particular to assume a behavior in accordance with applicable laws and the principles of confidentiality, integrity and loyalty.

GUIDELINES:

Respect the image of ENDURANCE, remembering that, even in the use of social networks, each person is responsible for the contents and opinions he/she disseminates or publishes on the network;

Not spreading untruthful news that negatively affect the reputation or that could create prejudicial effects on Endurance, on its economic-financial results and/or on the company assets

To act in accordance with the principles of confidentiality, integrity and loyalty, in particular avoiding, in the use of social networks:

- ⊗ any form of on-line publication and discussion that could damage the company reputation of Endurance or its Stakeholders;
- ⊗ content (in any form, such as videos, photographs, music, distinctive signs, trademarks...) that violates the rights of third parties, including without limitation: copyrights, industrial property rights and image rights;
- ⊗ content that encourages any form of discrimination and/or incitement to violence and/or that infringes the personal sphere of third parties;
- ⊗ content advertising, spamming or promoting private interests or illegal activities.

Avoid any behaviors that leads to the loss, theft, unauthorized disclosure or misuse of one's own or others' intellectual property or confidential information;

Comply with the restrictions specified in license agreements relating to the production/distribution of third-party products, or those entered into with its suppliers (in particular software suppliers);

Act in accordance with the principles of confidentiality, integrity and fairness, avoiding, in the use of social media, content (in any form, such as videos, photographs, music, distinctive signs, trademarks, etc.) that infringes the rights of third parties, including without limitation: copyrights, industrial property rights and image rights;

Strengthen its commitment in the fight against counterfeiting: promote awareness, information and training actions aimed at businesses, consumers, institutions and law enforcement agencies to strengthen everyone's commitment in the fight against counterfeiting.

4. CORPORATE GOVERNANCE AND INTERNAL CONTROL SYSTEM

4.1. Corporate Governance

ENDURANCE adopts a Corporate Governance model inspired by the highest standards of transparency and propriety in the operation of the Company, to safeguard the interests of all investors and other Stakeholders, guaranteeing the representativeness of the Company's shareholders, protection of minority shareholders and transparency of management processes, also pursuing the following objectives:

- ✓ Ensure regularity in management activities
- ✓ Prevent and control business risks;
- ✓ Ensure transparency toward all Company Shareholders;
- ✓ Reconcile the interests of all the different Stakeholders, with those of shareholders;
- ✓ Comply with the Codes of Conduct and best practices of Endurance Technologies Ltd, with particular reference to those addressed to Endurance persons who also hold certain positions within Endurance Technologies Ltd (by way of example only:: Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, Code of Conduct for Prevention of Insider Trading, Whistle-blower Policy);
- ✓ Report any conduct that is illegal or contrary to the principles of ethics set out herein.

The above system of Corporate Governance ensures the best cooperation and synergies between management and internal control roles.

4.2. Internal Control System

ENDURANCE adopts a special system the purpose of which is to ensure that the various corporate procedures are effective, efficient and economical.

Internal control system refers to a mix of aids, activities and procedures that, through an integrated process of identification, measurement, and monitoring of major risks, secures the following aims:

- ✓ Efficacy and efficiency of business operations, so also guaranteeing that documents and decisions are traceable;
- ✓ Reliability of accounting and management information;
- ✓ Compliance with laws and regulations;
- ✓ Safekeeping of Company assets.

4.3. ESG Principles

Endurance internationally undertakes the Environmental Social and Governance Principles: principles reflecting the growing relevance of environmental, social and corporate governance issues in accordance with the United Nations Sustainable Development Goals (SDGs) or EFRAG's European sustainability reporting standard (ESRS) and the Paris Accords, as well as for investment practices shared with the Group's shareholders. According to this commitment ENDURANCE confirms, inter alia, to uphold

high standards of business ethics; comply with local laws; adopt and adhere to good governance practices; provide safe working environment to its employees and contractors.

4.4. CSR - Corporate Social Responsibility

Endurance is aware of its role in the local community and is therefore committed to ensuring that any potentially harmful effects on occupational health and safety, the environment and society are properly assessed, addressed, reduced and monitored.

Endurance invests in the community through cultural sponsorships, social initiatives, study and innovation projects. Meanwhile promotes CSR initiatives in areas including environmental preservation and human rights throughout the entire supply chain by working closely with its Stakeholders, with reference to communities, suppliers and customers.

Endurance promotes the importance of preserving the cultural and landscape heritage, of recognizing and defending the special artistic and environmental wealth of Italy and Europe, contributing to preserving the memory of the national community and its territory and promoting the development of culture.

4.5. CITI Endurance Values

ENDURANCE integrates and outlines the Endurance Group Values, defining for each of these the acceptable and the non-acceptable behaviors: Customer Centricity, Integrity, Transparency, Teamwork and Innovation.

All values are equally important to the organization's legacy. For more information visit www.endurancegroup.com.

5. ENDURANCE' STAKEHOLDERS

Endurance undertakes to ensure fair competition for all market operators, for customers, and for all Stakeholders.

Endurance also demands honesty and integrity in all parts of its activities and expects the same from all Stakeholders with whom the Company has business relation.

For this reason, endurance requires that all its Stakeholders comply with the principles and rules of this Code. Below some of the Stakeholders to whom our Code is most addressed:

Customers

ENDURANCE demands business ethics from all Customers with whom it has business relation. ENDURANCE condemns the recourse to any conduct that is illegal or in any way improper as a means of securing its economic aims, the latter being pursued solely through the excellence of its performance in terms of innovation, quality and economic, social, and environmental sustainability.

Suppliers, Partners and Consultants

Suppliers Partners and Consultants play a key role in improving the competitiveness of the business.

While seeking the keenest competitive edge, ENDURANCE bases its relations with them on fairness, impartiality, and ensuring equal opportunities for all parties concerned.

Cost-effectiveness and profitability are pursued in accordance with ethical principles that prohibit the achievement of maximum competitive advantage using other parties that are not in line with the same principles stated by ENDURANCE.

Bribes are forbidden and all forms of compensation from third parties shall refer only to justified products or services.

Suppliers and Sub-contractors are expected to contribute to an ecologically sustainable development, to continually strive to reduce the environmental impact of their own operations, and to ensure the health and safety of their employees.

Suppliers and sub-contractors, partners and consultants are also expected to respect employees and their rights, to offer safe and good working conditions, to offer non-discriminatory conditions.

Endurance prohibits any conduct aimed at causing the loss, theft, unauthorized disclosure or misuse of the industrial property or confidential information of Endurance itself or of third parties. Your conduct must be inspired by the current Code, which must be provided at the time of accreditation and, if necessary, attached to the stipulation of the contract. Supplier, Partners and Consultants must accept Endurance's Code.

Public Administration, Local Institutions and other Authorities

The relations between Endurance and the public authorities at a local or national level are characterised by an active, transparent collaboration and by the recognition of the reciprocal independence, economic objectives and values contained in the present Code.

Endurance is constantly committed to dialogue with local institutions and with the communities affected by Endurance's business activities, favouring communicative relations and ensuring a continuous flow of technical and management information. It is forbidden to conduct any activity, directly or through intermediaries, aimed at influencing the independence or judgement of a public official in order to obtain an advantage for Endurance. The assumption of commitments towards the Public Administration and Public Institutions cannot in any way compromise the integrity and reputation of Endurance, and is reserved exclusively to the appointed and authorised company functions, in respect and observance of the applicable laws and regulations.

Sports Associations and Charitable Organizations

ENDURANCE believes in investing in social, cultural and/or sports programs, supporting them financially and encouraging volunteering. The development of social initiatives and support for associations testify to the participation of ENDURANCE in initiatives aimed at promoting sport, its values and ethical principles, as well as its social and educational character.

ENDURANCE may, however, adhere to requests for contributions limited to proposals from bodies and associations declaredly non-profit and with regular articles of association and

deeds of incorporation, which are of sporting, cultural, charitable value and / or involving a large number of citizens, or otherwise have a wide impact on the territory or in the sector in which the Company operates. In providing such donations ENDURANCE pays attention to any possible conflict of interest of a personal or corporate nature.

Furthermore, ENDURANCE does not allow the abusive exercise of gambling or betting.

Competitors

ENDURANCE recognizes that fair and equitable competition is essential for the development of businesses and markets. In conducting its business, ENDURANCE embraces competition based on innovation and the quality and performance of its products. ENDURANCE rejects unfair commercial practices.

6. FINAL PROVISIONS

This Code of Ethics is approved by ENDURANCE Management. Any changes and/or integration of the same will be promptly disclosed.

Anyone who becomes aware in the course of his or her work of a violation of the Code by any person is required to report the violation in the manner described in the Endurance Whistleblowing Policy, by accessing the dedicated platform available at: www.enduranceoverseas.com/whistleblowing

If any violation of the Code is ascertained, the appointed Whistleblowing Manager will take charge of the report, analyze it and give feedback to the whistleblower regarding the outcome of the investigation. Endurance will ensure the necessary confidentiality within the terms of the law.

Object: For acknowledge, sharing and acceptance of the above principles

The Endurance Overseas' Code of Ethics is available on the website <https://www.enduranceoverseas.com>,

_____ here by declares to know it and undertakes to respect it, adopting and effectively implementing corporate procedures and rules.

It also undertakes to make available to the Company the documents adopted pursuant to Legislative Decree 231/2001, if any.

The failure, even partial to comply with these obligations constitutes a serious breach of duties which justifies the suspension of the execution of the same, in the most serious cases, the termination of the same with immediate effect, without prejudice to the compensation for any damages caused to the Company.

DATE:

COMPANY NAME/STAMP:

SIGNED BY (Legal Representative):
