

## Ethical Code

adopted pursuant to Legislative Decree 8 June 2001, n. 231

### REVISION HISTORY

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## INTRODUCTION

Italy Car Rent S.r.l. (hereinafter referred to as "Italy Car Rent" or the "Company") firmly believes that its work activities should be based on compliance with national and supranational norms, as well as on principles of business ethics: honesty, integrity, and respect for the interests of customers, employees, suppliers, intermediaries, commercial and financial partners.

This document (hereinafter "Ethical Code"), representing a voluntary and unilateral self-regulation tool, encapsulates and details the principles to which the Company conforms and demands compliance from all recipients (as defined below) and, in any case, from all those who, in Italy or abroad, cooperate and collaborate with it in the pursuit of its corporate purpose.

Similarly, this Ethical Code aims to prevent the crimes provided for by Legislative Decree 8 June 2001, n. 231 (hereinafter "Legislative Decree 231/2001"), through the declaration and respect of the corporate values that inspire the Company and all those who perform activities in its favor.

From this perspective, the Ethical Code constitutes an integral part of the Organization, Management, and Control Model adopted by the Company pursuant to art. 6 Legislative Decree 231/2001 (hereinafter "Model"), approved by the Board of Directors of Italy Car Rent on 24/04/2024.

For the drafting of this Ethical Code, the Company also took into account the Code of Conduct "Short-Term Vehicle Rental Activities," elaborated by the National Association of Car Rental and Automotive Services Industries (ANIASA), which adheres to Confindustria and of which Italy Car Rent is a member.

In particular, the aforementioned Code of Conduct was elaborated by ANIASA to promote the adoption, by its members, of ethical behaviors and adherence to the highest standards in the provision of vehicle rental services, both in the interest of market development as a whole and in the specific interest of customers.

The Company adheres to and is inspired by the principles outlined in the said Code of Conduct, paying particular attention to ensuring the highest level of car rental services, so that customers can turn to Italy Car Rent with the assurance of receiving high-level services in terms of quality, safety, fairness, and transparency.

## CHAPTER I - GENERAL PROVISIONS

### RECIPIENTS

The principles expressed in the Ethical Code represent a common value base and an essential, non-derogable prerequisite that must guide the behaviors of all those involved, in various capacities, in the conduct of business and the management of corporate activities.

The contents of the Ethical Code are binding for all those who, within the Company, hold representation, administration, or management functions, or who exercise, even de facto, the management and control of Italy Car Rent, for all employees without exception, for those who cooperate and collaborate with it – in any capacity – in pursuing its objectives

and for anyone who has business relationships with it, such as customers, suppliers, intermediaries, consultants, commercial partners, etc. (hereinafter collectively referred to as the "Recipients" or, individually, the "Recipient").

The Company undertakes to faithfully observe the provisions of this Ethical Code and to conduct its activities with the utmost diligence, professionalism, and reliability, constantly promoting correct and decent behavior in relations with customers, suppliers, and partners, and protecting the reputation and image of the Company.

Similarly, the Company requires all suppliers, customers, and partners to conduct themselves in line with the prescriptions contained in the Ethical Code, compliance with which is, therefore, an indispensable requirement for establishing and maintaining collaborative relationships.

## **CHAPTER II - PRINCIPLES**

### **ETHICAL PRINCIPLES**

The behavior of the Recipients must be inspired by the following principles (hereinafter also referred to simply as "Principles"):

Respect for the applicable legal provisions in Italy and any other country where the Recipients operate;

Transparency towards all stakeholders, i.e., all individuals, groups of individuals, or institutions whose interests are directly or indirectly influenced by the conduct of corporate activities (e.g., shareholders, customers, employees, collaborators, commercial partners, intermediaries, suppliers, investors, Public Administration, etc.);

Responsibility towards the community, which, even indirectly, may be influenced in its economic and social development by the activities of the Company;

Protection of safety and health, physical and moral integrity, and the rights of workers;

Protection and safeguarding of the environment in all its components: atmosphere, water, soil, and subsoil, flora, fauna, and ecosystems;

Respect for employees and commitment to enhancing their professional skills;

Rejection of any behavior that, although aimed at achieving a result consistent with the Company's interest, presents aspects incompatible with the principles of this Ethical Code and the commitment to respect the applicable legal provisions, as well as the behavioral and procedural rules of Italy Car Rent.

The Recipients conform their conduct to the above Principles, as defined in the following paragraphs of the Ethical Code.

In no case can the conviction of acting in the interest or to the advantage of Italy Car Rent justify behavior contrary to the same.

### **LEGALITY**

Italy Car Rent recognizes compliance with laws and regulations in all the countries where it operates as an indispensable principle.

All behaviors within the work activities carried out on behalf or in the interest of Italy Car Rent must, therefore, be based on the strictest respect for national, community, and international laws in force and applicable to the Company or in the management of the relationship with it.

### **CORRUPTION PREVENTION**

The Company promotes – and requires – compliance with the anti-corruption principles and norms applicable to it.

Corruption in all its forms is prohibited, and Italy Car Rent is committed to implementing all necessary measures to prevent and avoid related phenomena; to this end, every action, operation, transaction, as well as every accounting record, must be managed in accordance with the principles of integrity, correctness, impartiality, transparency, and truthfulness.

### **CONFLICT OF INTEREST PREVENTION**

Recipients act impartially in the exclusive interest of Italy Car Rent, making decisions responsibly, transparently, and according to objective evaluation criteria, avoiding situations where they are, or may even appear to be, in conflict of interest\*.

In the case of a conflict of interest, even potential, Recipients must immediately inform their superior or company reference, complying with the directions given by them.

Conflict of interest refers to cases where the Recipient pursues an interest of their own or of third parties, different from that of the Company, or performs activities that may, in any case, interfere with their ability to make decisions in the exclusive interest of the Company, or personally benefits from business opportunities of the same.

### **PROFESSIONALISM AND RELIABILITY**

Italy Car Rent conducts its activities in accordance with the highest ethical-professional standards.

Recipients are called upon to perform their activities with a commitment appropriate to the responsibilities entrusted to them, safeguarding the Company's reputation.

### **FAIR COMPETITION**

The Company believes in healthy and fair competition and a competitive market and acts in compliance with antitrust regulations.

Italy Car Rent rejects collusive practices, obstructionist behaviors, and the dissemination of false, misleading, distorted, or defamatory information about a competitor and its services. Deceptive behavior is therefore prohibited.

To this end, the Company prohibits the use of information, of any type and nature, and in any way obtained, for purposes of defamation or diversion of clientele and refrains from any unfair competition activity.

## **TRANSPARENCY AND FAIRNESS IN THE MANAGEMENT OF CORPORATE INFORMATION**

Italy Car Rent firmly believes that the transparency of information represents an irreplaceable value; therefore, the keeping of accounting records is based on principles of truth, completeness, clarity, precision, and accuracy.

Corporate assets are managed in a correct and honest manner. All Recipients contribute to protecting its integrity to achieve the highest safeguard.

In managing corporate activities, Recipients are required to provide, even externally, transparent, truthful, complete, and accurate information, refraining from disseminating false news or carrying out simulated operations.

No Recipient can provide information to the press or other communication and information media without prior authorization from those responsible for external communication.

With particular reference to financial statements, the truthfulness, correctness, and transparency of financial statements, reports, and other social communications required by law constitute an essential principle in conducting business and a guarantee of fair competition.

## **CONFIDENTIALITY AND PERSONAL DATA PROTECTION**

The Company protects the confidentiality of information that constitutes corporate assets or, in any case, information or personal data of third parties in its possession, in strict compliance with current legislation, including personal data protection.

The obligation of confidentiality extends, therefore, beyond non-public corporate data and the management methods of business processes, to information relating to customers, suppliers, and commercial partners, whose personal data the Company acquires and processes.

No Recipient can derive any kind of advantage, direct or indirect, from the use of confidential information or personal data, acquired in the course of activities carried out for the Company, nor communicate such information to others or recommend or induce others to use the same.

When communicating information to third parties, which is allowed for professional reasons, the confidential nature of the information must be explicitly declared, and the third party must be required to observe the same confidentiality obligation.

In the case of access to electronic information protected by passwords, the latter can only be known by the assigned subjects, who have the obligation to carefully guard them and not disclose them.

### **PROTECTION OF CORPORATE ASSETS**

Corporate assets must be used diligently, responsibly, and to ensure their protection and integrity.

Each employee is required to use corporate assets at their disposal based on the principles of utmost diligence, good faith, and fairness, respecting the purposes for which they have been provided.

With reference to the use of IT tools and, in particular, email services and internet access, Italy Car Rent demands behavior inspired by principles of correctness and compliance with legal provisions. Employees operate on corporate computers exclusively for carrying out work activities authorized by the Company, except for specific authorizations issued by the relevant company manager.

### **VALUE OF THE PERSON AND HUMAN RESOURCES**

The value of Italy Car Rent lies in the people who enable the Company to grow daily in the sector in which it operates through their work.

The Company protects the value of the human person and, from this perspective, does not tolerate discriminatory behavior, harassment, and/or personal offenses.

The Company is committed to ensuring that in the workplace and in the conduct of all business activities, there is no harassment or discriminatory behavior based on age, gender, sexual orientation, race, color, language, nationality, political and union opinions, religious beliefs, marital and family status, disability, genetic information, or other personal characteristics not relevant to the job.

In the selection and management of personnel, the Company adopts criteria of equal opportunity, merit, and enhancement of the capacities, skills, and potential of individuals.

The Company complies with regulations on working hours, rest periods, weekly rest, mandatory leave, and holidays and does not subject workers to degrading working conditions, surveillance methods, or accommodation situations.

In personnel selection procedures and within the limits of available information, the Company performs the necessary checks to avoid favoritism, nepotism, or forms of clientelism.

The Company supports gender equality and the full participation, on an equal basis, of all persons, regardless of gender and sex, in corporate life and decisions, essential elements for building an inclusive society.

## **HEALTH AND SAFETY AT WORK**

Italy Car Rent promotes the health and safety at work of its employees and all those who access its offices and work environments.

The Company is committed to ensuring working conditions respectful of individual dignity and safe and healthy work environments, also through the dissemination of a culture of safety and risk awareness, promoting responsible behavior from everyone, including through training activities, in compliance with company procedures and current safety regulations.

More specifically, the Company undertakes to:

Spread and consolidate a culture of safety, developing risk awareness and promoting responsible behavior;

Seek the best available safety standards applicable to business activities based on established scientific and technological knowledge;

Implement preventive actions to ensure workers' health and safety;

Promote training programs to make all corporate personnel responsible for health and safety at work, ensuring the understanding of risks related to work activities carried out within the Company;

Involve and raise awareness among all corporate subjects, at all levels, in managing workplace safety issues;

Apply and maintain the correct procedures at all organizational levels.

In this regard, every Recipient is called upon to personally contribute, within their activities, to maintaining the safety of the work environment in which they operate and to adopt responsible behavior to protect their own and others' health and safety.

## **ENVIRONMENTAL PROTECTION AND HERITAGE**

In managing business activities, Italy Car Rent considers environmental protection and heritage conservation as top priorities, aiming to improve environmental conditions and protect the community's cultural and landscape heritage in full compliance with current regulations.

In particular, the Company pays attention to the following aspects:

Implementing all necessary actions to ensure compliance and adaptation to current regulatory requirements;

Constantly updating on legislative and regulatory developments in environmental matters;

Monitoring technological advancements and possible implementation if they ensure greater environmental protection;

Collaborating with internal parties (e.g., Environmental Management Officer, employees, etc.) and external parties (e.g., regulatory institutions) to optimize environmental management issues;

Pursuing adequate levels of environmental protection through the implementation of management and monitoring systems;

Promoting actions aimed at waste separation, recycling, and proper disposal.

### **ANTI-MONEY LAUNDERING**

The Company requires maximum transparency in commercial transactions and relationships with third parties, in full compliance with national and international anti-money laundering regulations.

All financial transactions must have appropriate justification in the related contractual relationships and be carried out using payment methods that ensure traceability.

Recipients, therefore, cannot start business relationships on behalf of the Company with partners, customers, intermediaries, suppliers, or third parties who do not provide guarantees of integrity, do not have a good reputation, or whose names are associated with money laundering activities or, in general, criminal activities of any kind.

### **SERVICE QUALITY AND COMMERCIAL COMMUNICATION**

Italy Car Rent always bases its activities on compliance with the highest standards in the provision of vehicle rental services, as well as on transparency and fairness in relations with customers.

Recipients are therefore called upon to provide truthful, precise, and comprehensive information about the services offered by the Company.

In particular, Italy Car Rent undertakes to:

Provide all relevant information regarding the rental contract and rates in a clear, unequivocal, structured, comprehensible, and accurate manner;

Clearly inform the customer of what is included in the indicated price to avoid additional charges that could later be perceived by the customer as undue, hidden, or incorrect;

Ensure that the indicated price includes all mandatory insurance and other applicable mandatory charges and taxes;

Ensure that the customer can read and understand all the terms of the contract and clarify any doubts raised before signing the contract;

Ensure that the vehicle provided to the customer is safe, clean, and compliant with the Road Code regulations.

Commercial communication includes advertising and any other form of communication, including institutional, aimed at promoting the sale of goods or services, regardless of the methods used.

To this end, the Company is committed to ensuring that commercial communication is honest, truthful, and fair to avoid statements or representations that could mislead the customer, and that it does not contain misleading, deceptive, or untruthful messages in violation of current regulations.

### **USE OF BANKNOTES, PUBLIC CREDIT CARDS, AND STAMP VALUES**

The Company, sensitive to the need to ensure fairness and transparency in business conduct, demands that Recipients comply with current regulations regarding the use and circulation of coins, non-cash payment instruments, and stamp values; therefore, any behavior contrary to the aforementioned regulations on non-cash payment instruments or aimed at the illegal use and falsification of stamp values, coins, and banknotes is strictly prohibited.

### **USE OF EQUIPMENT AND COMPUTER SYSTEMS**

All users authorized to use the Company's equipment and computer systems must use corporate IT resources in compliance with current regulations; therefore, it is expressly forbidden to engage in conduct that could damage, alter, deteriorate, or destroy the Company's or third parties' computer or telematic systems, programs, and data.

All users protect the integrity of internal equipment and computer systems, refraining from manipulations that could modify their functionalities in any way.

It is also forbidden to illegally access computer systems protected by security measures, as well as to obtain or disseminate access codes to protected computer or telematic systems.

It is expressly forbidden to use corporate equipment and computer systems for purposes contrary to the law, public order, or morality, as well as to commit or induce the commission of crimes or acts of racial hatred, glorification of violence, discriminatory acts, or human rights violations.

## **PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY**

The Company ensures, in compliance with the principle of lawfulness, the respect of internal, community, and international norms protecting industrial and intellectual property.

Recipients are required to protect the Company's intellectual property, such as trademarks, copyrights, trade secrets, and patents, and promote the correct use of all intellectual works, including computer programs and databases, to protect the author's economic and moral rights.

## **FISCAL FRAUD PREVENTION**

The Company ensures compliance with all current tax regulations, committing to respect tax obligations within

any way acquired, for purposes of defamation or diversion of customers, and refrains from any unfair competition activities.

## **TRANSPARENCY AND FAIRNESS IN THE MANAGEMENT OF CORPORATE INFORMATION**

Italy Car Rent is firmly convinced that the transparency of information represents an inalienable value; therefore, the keeping of accounting records is based on principles of truthfulness, completeness, clarity, precision, and accuracy.

The corporate assets are managed correctly and honestly. All Recipients contribute to safeguarding their integrity to achieve the maximum protection of the same.

In managing corporate activities, Recipients are required to provide transparent, truthful, complete, and accurate information to the outside world, refraining from disseminating false information or engaging in simulated transactions.

No Recipient may provide information to the press or other media without prior authorization from the officials responsible for external communication.

With particular reference to the preparation of financial statements, the truthfulness, correctness, and transparency of financial statements, reports, and other corporate communications required by law constitute an essential principle in business conduct and guarantee fair competition.

## **CONFIDENTIALITY AND PERSONAL DATA PROTECTION**

The Company protects the confidentiality of information that constitutes corporate assets, or in any case, information or personal data of third parties in its possession, in strict compliance with the current legislation on personal data protection.

The confidentiality obligation extends, therefore, beyond corporate data that are not already public and the management methods of corporate processes, to information

relating to customers, suppliers, and business partners, whose personal data the Company acquires and processes.

No Recipient may derive any direct or indirect benefit from the use of confidential information or personal data obtained in the course of activities carried out for the Company, nor disclose such information to others or recommend or induce others to use it.

In communications to third parties of information, allowed for professional reasons, the confidential nature of the information must be explicitly declared, and the third party must be required to observe a similar confidentiality obligation.

In the case of access to electronic information protected by passwords, only the assigned individuals may know these passwords, and they are obliged to guard them carefully and not disclose them.

### **PROTECTION OF CORPORATE ASSETS**

Corporate assets must be used diligently, responsibly, and to ensure their protection and integrity.

Each employee is required to use the corporate assets at their disposal according to the principles of maximum diligence, good faith, and correctness, respecting the purposes for which they were granted.

With reference to the use of computer equipment and, in particular, email services and internet access, Italy Car Rent requires behavior inspired by fairness standards as well as compliance with legal provisions. Employees use company computers exclusively for the performance of work activities authorized by the Company, except for specific authorizations issued by the relevant company manager.

### **VALUE OF THE PERSON AND HUMAN RESOURCES**

The value of Italy Car Rent lies in the people who, through their daily work, allow the Company to grow in its sector.

The Company protects the value of the human person and, in this perspective, does not tolerate discriminatory conduct, harassment, and/or personal offenses.

The Company is committed to ensuring that the work environment and the conduct of all corporate activities are free from harassment or discriminatory behavior based on age, gender, sexual orientation, race, color, language, nationality, political and union opinions, religious beliefs, marital and family status, disability, genetic information, or other personal characteristics unrelated to work.

In the selection and management of personnel, the Company adopts criteria of equal opportunity, merit, and the enhancement of individual skills, competencies, and potential.

The Company respects regulations relating to working hours, rest periods, weekly rest, compulsory leave, and vacations and does not subject workers to degrading working conditions, surveillance methods, or living conditions.

In personnel selection procedures, within the limits of available information, the Company carries out necessary checks to avoid favoritism, nepotism, or forms of clientelism.

The Company supports gender equality and the full participation of all people, regardless of gender and sex, in corporate life and/or choices, essential elements for building an inclusive society.

### **HEALTH AND SAFETY AT WORK**

Italy Car Rent promotes the health and safety of its employees and all those who access its offices and work environments.

The Company is committed to ensuring working conditions that respect individual dignity and safe and healthy work environments, also through the dissemination of a culture of safety and risk awareness, promoting responsible behaviors by all, including through training activities, in compliance with corporate procedures and current safety legislation.

In particular, the Company commits to:

Spreading and consolidating a safety culture, developing risk awareness, and promoting responsible behaviors;

Seeking the best available safety standards applicable to corporate activities based on consolidated scientific and technological knowledge;

Implementing preventive actions to ensure workers' health and safety;

Promoting training programs to raise awareness among all corporate personnel about health and safety at work, ensuring an understanding of the risks associated with work activities within the Company;

Involving and sensitizing all corporate subjects, at all levels, in managing safety issues;

Applying and maintaining correct procedures at all levels of the corporate organization.

In this perspective, each Recipient is called to contribute personally, within the scope of their activities, to maintaining the safety of the work environment in which they operate and to adopt responsible behaviors to protect their health and safety and that of others.

### **ENVIRONMENTAL PROTECTION AND CULTURAL AND LANDSCAPE HERITAGE**

In managing corporate activities, Italy Car Rent considers environmental protection and the preservation of cultural and landscape heritage of utmost importance, pursuing the

improvement of environmental conditions and the protection of cultural and landscape assets of the community in which it operates, in full compliance with current legislation.

In particular, the Company pays attention to the following aspects:

Implementing all necessary actions to ensure compliance with and adaptation to current regulatory provisions;

Constantly updating on legislative and regulatory developments in environmental matters;

Monitoring technological progress and possibly implementing it if it can ensure greater environmental protection;

Collaborating with internal subjects (e.g., Environmental Management Officer, employees, etc.) and external subjects (e.g., Institutions responsible for control) to optimize the management of environmental issues;

Pursuing adequate levels of environmental protection through the implementation of management and monitoring systems;

Promoting actions aimed at differentiating collection, recycling, and proper waste disposal.

### **ANTI-MONEY LAUNDERING**

The Company requires maximum transparency in commercial operations and relationships with third parties, in full compliance with national and international regulations on combating money laundering and self-laundering.

All financial transactions must have adequate justification in the related contractual relationships and be carried out using payment methods that ensure traceability.

Recipients, therefore, cannot establish business relationships on behalf of the Company with partners, customers, intermediaries, suppliers, or third parties who do not provide guarantees of integrity, do not have a good reputation, or whose names are associated with incidents related to money laundering or, in general, to criminal activities of any kind.

### **SERVICE QUALITY AND COMMERCIAL COMMUNICATION**

Italy Car Rent has always based its activities on compliance with the highest standards in providing vehicle rental services, as well as on the principles of transparency and fairness in relations with customers.

Recipients are therefore called upon to provide truthful, precise, and exhaustive information about the services offered by the Company.

In particular, Italy Car Rent commits to:

Providing all pertinent information about the rental contract and rates clearly, unambiguously, structured, comprehensible, and accurate;

Clearly informing the customer of what is included in the indicated price to avoid any additional charges that may later be perceived by the customer as undue, hidden, or incorrect;

Ensuring that the indicated price includes all mandatory insurance and other compulsory charges and applicable taxes;

Ensuring that the customer can read and understand all the contract terms and clarifying any doubts raised before signing the contract;

Ensuring that the vehicle provided to the customer is safe, clean, and compliant with road regulations.

Commercial communication includes advertising and any other form of communication, even institutional, aimed at promoting the sale of goods or services, regardless of the methods used.

To this end, the Company commits to ensuring that commercial communication is honest, truthful, and correct, to avoid statements or representations that may mislead the customer, and that it does not contain misleading, deceptive, or untruthful messages in violation of current legislation.

### **USE OF BANKNOTES, PUBLIC CREDIT CARDS, AND STAMP VALUES**

The Company, sensitive to the need to ensure correctness and transparency in business conduct, requires Recipients to comply with current legislation on the use and circulation of coins, non-cash payment instruments, and stamp values; therefore, any behavior contrary to the aforementioned legislation on non-cash payment instruments or aimed at the illicit use or falsification of stamp values, coins, and banknotes is strictly prohibited.

### **USE OF EQUIPMENT AND COMPUTER SYSTEMS**

All users authorized to use the Company's equipment and computer systems use corporate IT resources in compliance with current legislation; to this end, it is expressly forbidden to engage in conduct that may damage, alter, deteriorate, or destroy the Company's or third parties' IT or telematic systems, programs, and data.

All users protect the integrity of internal equipment and IT systems, refraining from manipulations that may in any way modify their functionality.

It is also forbidden to illegally access protected IT systems, as well as to obtain or disseminate access codes to protected IT or telematic systems.

It is expressly forbidden to use corporate equipment and IT systems for purposes contrary to legal norms, public order, or decency, as well as to commit or induce the commission of crimes or promote racial hatred, glorification of violence, discriminatory acts, or human rights violations.

## **PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY**

The Company ensures, in compliance with the principle of lawfulness, respect for internal, community, and international rules for the protection of industrial and intellectual property.

Recipients are required to protect the Company's intellectual property, such as trademarks, copyrights, trade secrets, and patents, and promote the proper use of all works of the intellect, including computer programs and databases, to protect the author's property and moral rights.

## **FISCAL FRAUD PREVENTION**

The Company ensures compliance with all applicable tax regulations, committing to fulfilling tax obligations within the prescribed terms and methods established by law or the competent Tax Authority.

Italy Car Rent is committed to keeping accounting records truthfully, accurately, completely, and timely, in compliance with corporate accounting procedures.

The Company is also committed to representing the acts, facts, and transactions undertaken to apply tax forms that conform to the real economic substance of the operations.

# **CHAPTER III - RELATIONS WITH THIRD PARTIES**

## **RELATIONS WITH PUBLIC ADMINISTRATION**

Relations and interactions with Public Administrations, public officials, including foreign ones, with Public Service Officers, and, in any case, any relationship of a public nature, are inspired by the strictest compliance with applicable legal provisions and principles of transparency, honesty, and correctness.

In such relations, Recipients must not improperly influence the decisions of officials who handle or decide on behalf of the Public Administration. The management of relations with officials, representatives, or public administration representatives is, in any case, exclusively reserved for corporate roles authorized based on the delegation and power of attorney system.

Therefore, it is prohibited to offer or give financial benefits, gifts, or other utilities, personal or otherwise, to favor or reward decisions favorable to the Company and, in any case, to recognize benefits that would raise doubts about their correctness or appropriateness in an impartial third party.

It is prohibited to use documents containing untruthful data or to omit relevant information to obtain, in the interest of Italy Car Rent, national or community contributions or financing.

Public contributions received cannot be used for purposes other than those for which they were assigned.

It is prohibited to exploit existing or alleged relationships with a public official or a public service officer to get or promise money or other financial advantage as consideration for illicit mediation with the public official or public service officer, or to compensate them in relation to the performance of an act contrary to their official duties, or even for the omission or delay of an act of their office.

Inspection visits by control authorities and relations with judicial authorities must be managed by authorized personnel in a spirit of cooperation, correctness, and transparency, with an absolute prohibition on obstructing the regular conduct of verification activities through the concealment or destruction of documentation.

### **RELATIONS WITH CUSTOMERS, SUPPLIERS, PARTNERS, INTERMEDIARIES**

Italy Car Rent aims for the maximum satisfaction of its customers, ensuring professionalism, competence, availability, and timeliness, conducting itself according to the principles of transparency and fairness in relations with customers from the first contact, in the subsequent phase of commercial negotiations, throughout the execution of the contract, and finally in the eventual complaint/assistance phase.

The Company is committed to selecting suppliers, including consultants, from among professional, qualified, and responsible individuals of proven moral integrity and fairness.

The selection of suppliers and the determination of purchase conditions are the responsibility of the competent corporate functions, which act based on objective and impartial criteria, mainly based on the evaluation of reliability, quality, efficiency, and economy.

In any case, the Company requires suppliers to operate in compliance with all applicable laws, including, by way of example, labor laws related to child labor, minimum wages, overtime pay, hiring, and workplace safety.

The choice of intermediaries (e.g., brokers) and any commercial partners must also fall on operators who meet criteria of ethics, reliability, good reputation, credibility in the reference market, and professional seriousness, demanding equally correct behavior from them towards customers.

### **RELATIONS WITH THE MEDIA**

Italy Car Rent communicates exclusively complete, truthful, and transparent information.

Relations with the media are based on this principle and are managed exclusively by delegated corporate subjects.

Employees/collaborators do not provide information externally, nor commit to providing it, without the authorization of the competent functions.

### **RELATIONS WITH INSTITUTIONS AND OTHER ORGANIZATIONS**

Relations with Institutions are conducted with the utmost rigor, transparency, and fairness, respecting institutional roles. Similar behavioral rules characterize any political and union relations that Italy Car might engage in.

Direct or indirect contributions to parties, unions, political candidates, or events with political purposes are not allowed.

Italy Car Rent may contribute to funding associations and supporting foundations, committees, organizations, and the like, provided they are not of a political nature, in compliance with the Corporate Statute, applicable regulations, and the Model.

Relationships, even in the form of financing, with organizations, associations, or movements, national or foreign, that pursue, directly or indirectly, purposes prohibited by law, contrary to ethics or public order, or that violate fundamental human rights are not permitted.

External communication of data or information must be truthful, transparent, and consistent with the Company's policies. Therefore, employees/collaborators must refrain from behaviors and statements that could damage Italy Car Rent's image.

### **RELATIONS WITH AFFILIATED COMPANIES**

Recipients of the Ethical Code, in relations with entities, companies, or affiliated enterprises of Italy Car Rent, act in compliance with the law and in respect of the principles of transparency, correctness, and ethical standards expressed in the Ethical Code.

## **CHAPTER IV - SANCTIONING AND FINAL PROVISIONS**

### **REPORTING**

The task of monitoring compliance with this Ethical Code is entrusted to the Supervisory Body established by the Company pursuant to Legislative Decree 8 June 2001, n. 231. Therefore, each Recipient can address this Body with any doubts regarding its interpretation.

The Whistleblowing Committee is responsible for managing whistleblowing reports received pursuant to Legislative Decree 10 March 2023, n. 24, according to the modalities and terms provided by the Whistleblowing Policy, available at the following link

<https://www.italycarrent.com/whistleblowing.pdf>

Any violation or alleged violation of the principles and provisions contained in the Ethical Code must be promptly reported by the Recipients who become aware of it in the course of their work activities or in the context of ongoing relationships with the Company.

For this purpose, the following channels are available to the whistleblower:

Email, by sending the communication to the address [odvitalycurrent@gmail.com](mailto:odvitalycurrent@gmail.com), access to which is reserved exclusively for the members of the Supervisory Body;

Whistleblowing report, through one of the internal reporting channels established by the Company (registered letter, oral form, direct meeting). For any details on how to submit a report, reference should be made to what is stated in the Whistleblowing Policy <https://www.italycurrent.com/whistleblowing.pdf>

The Supervisory Body and/or the Whistleblowing Committee, having verified the report, submit the outcomes to the Company's Administrative Body.

Italy Car Rent ensures the confidentiality of the whistleblower and guarantees protection from any possible retaliatory acts and does not allow any disciplinary and/or sanctioning consequences for reports made in good faith.

If the reports received require confidential treatment in compliance with current regulations, such confidentiality will be protected, subject to the provisions of the law, the applicable National Collective Labor Agreement, regulations, or procedures.

[odvitalycurrent@gmail.com](mailto:odvitalycurrent@gmail.com)

## **SANCTIONING CONSEQUENCES**

Violations of the Ethical Code are subject to the disciplinary system provided by the Model pursuant to Legislative Decree 231/2001 adopted by the Company.

In case of confirmed violations of the rules, principles, and values expressed in the Ethical Code, Italy Car Rent will adopt sanctioning measures proportional to the severity of the facts and in line with corporate rules, current legal provisions, and the relevant National Collective Labor Agreement.

In particular, it is reiterated that compliance with the provisions of the Ethical Code must be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of art. 2104 of the Civil Code.

Any violation of the provisions of the Ethical Code may constitute a breach of the obligations arising from the employment relationship and represents a disciplinary offense (concerning workers and collaborators based on a labor relationship) or a violation of a fiduciary mandate (concerning the members of the corporate bodies).

Third parties who, in engaging in relationships, even of a commercial nature, with Italy Car Rent, have accepted the norms established here and engage in behaviors contrary to the

Ethical Code will be subject to contractual remedies (ratified in specific clauses accepted by the parties) and, in the most serious cases, may be barred from engaging in relationships with the Company and/or be required to compensate the Company for damages suffered due to the violations found.

### **COMMUNICATION AND DISSEMINATION OF THE ETHICAL CODE**

The Company commits to giving maximum dissemination to the Ethical Code to make it known to all Recipients, as well as to ensure adequate training on its contents to corporate personnel. To this end, this document is brought to the attention of internal and external stakeholders through specific communication activities, such as:

Delivery to all Recipients of a paper or digital copy of the Ethical Code;

Publication in dedicated sections in physical or virtual spaces for sharing documents and communications;

Publication of the Ethical Code on the corporate website;

Inclusion of an informative note on the adoption of the Ethical Code in contracts.

### **APPROVAL AND AMENDMENTS TO THE ETHICAL CODE**

The Ethical Code was approved by the Company's Board of Directors on 24/04/2024.

Any amendments and/or updates to the same must be approved in the same manner and promptly communicated to the Recipients.