Code of Ethics

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Introduction and general principles

Unieuro S.p.A. (hereinafter "the Company" or "Unieuro"), part of the FNAC Darty Group, bases its business on fundamental ethical values such as respect, loyalty, transparency and integrity, which are essential elements for long-term sustainable growth and for strengthening its reputation on the market. Company's daily operations, extended throughout the country and characterized by a plurality of relationships – with customers, suppliers, Public Administration, etc. – requires a constant commitment to the responsible and conscious management of relations with all stakeholders.

In line with the provisions of Legislative Decree no. 231/2001 and in line with the best national and international standards on ethics, social and environmental responsibility, Unieuro has chosen to formalize its Code of Ethics (hereinafter referred to as the "Code"), the observance of which by all those who work in Unieuro and for Unieuro is of fundamental importance for the reliability and reputation of the Company, factors that constitute a decisive asset for its success.

Within this value-based framework, and in continuity with the principles set out in the Code, the Company has also adopted an Anti-Corruption Policy inspired by best practices and the ISO 37001 standard. The Anti-Corruption Policy strengthens the system for the prevention and control of corruption risks by defining principles of conduct, prohibited behaviors, and reporting obligations, and constitutes a regulatory instrument complementary to the Code of Ethics, aimed at safeguarding the integrity, transparency and legality of the Company's activities.

In the light of the foregoing, Unieuro:

- Guarantees the timely dissemination of the Code to all recipients, as defined in the following chapter " Recipients";
- ensures that all updates and changes are promptly brought to the attention of all recipients of the Code;
- provides adequate training and information support, providing adequate support in case of doubts regarding the interpretation of the Code;
- ensures that employees who report violations of the Code are not subject to any form of retaliation;
- adopts sanctioning measures that are fair and commensurate with the type of violation of the Code and guarantees that they are applied without distinction to all categories of employees, taking into account the provisions of the law, contract and internal regulations in force in the jurisdictions in which it operates;
- adopts corrective measures proportionate to the type of violation of the Code and guarantees to apply them indiscriminately to all categories of recipients, having as reference the provisions of the law, contract and internal regulations in force in the jurisdictions in which it operates.

1. Recipients

Moral integrity is a constant duty of all those who work for Unieuro and characterizes the behavior of the entire organization.

The rules of this Code of Ethics apply to anyone who operates or collaborates in any capacity with Unieuro, in particular:

- ***to persons who are in apical positions within the Company Organization*** (members of the corporate bodies, executives): the members of the Company's Board of Directors are required to be inspired by the principles of the Code, as identified herein; likewise, managers, in giving concrete implementation to their management activities, must be inspired by the same principles, thus strengthening cohesion and the spirit of mutual collaboration;
- ***to subjects who hold a subordinate position within the company organization with respect to the former*** (e.g. employees): actions, operations, negotiations and in general any other activity, carried out by employees in the performance of their work activities, must be based on managerial correctness, transparency and completeness of information and compliance with internal procedures;
- ***to collaborators*** (suppliers, consultants, external professionals, agents): who carry out, directly or indirectly, activities connected with or interesting to the company's activities;
- ***to partners and interlocutors***, who have a role in projects and operations.

The Recipients, each in their own area, are required to comply with the contents of the Code in the performance of their work, inspired by the principles of fairness and legitimacy of management, completeness and transparency of information, in order to pursue the sustainable success of the Company and the creation of value for all stakeholders. In any case, all business activities must be carried out with commitment and professional rigor.

Each Recipient, in particular, has the duty to:

- be aware of the rules outlined in the Code and has the obligation to refrain from engaging in behaviors that go against the provisions of the Code;
- report to their superiors any information relating to violations of the Code;
- collaborate with the internal control structures to verify violations;
- not to undertake any other type of initiative contrary to the contents of the Code.

Depending on the Recipient’s functional responsibilities and geographical scope of activity, the most stringent ethical rules and standards shall apply.

2. Promotion and communication of the Code of Ethics

This Code of Ethics is given maximum circulation to all Recipients through appropriate communication methods.

The Code, in its updated version, comes into force from the date of its approval by the Board of Directors of Unieuro S.p.A., which has the right to amend, supplement and update it, giving immediate notice and information to all Recipients. A copy of the current Code is published on the company intranet, as well as on the Unieuro corporate website. Unieuro also undertakes to make available every possible means of information and clarification regarding the interpretation and implementation of the provisions contained in the Code. In addition, Unieuro organizes training programs on the Code of Ethics and aspects related to its application.

Lastly, Unieuro undertakes to ensure compliance with this Code of Ethics and to carry out checks on any notice of violation of the rules contained therein, as well as, in the event of an ascertained violation, to apply appropriate sanctions.

3. General principles

The Code is founded upon a collection of general principles whose observance is of utmost significance for the smooth operation, trustworthiness of management and the reputation of Unieuro itself.

These general principles constitute rules of conduct that govern corporate relations, both internal and external, thereby serving as guiding principles that each Recipient is required to respect.

3.1 Transparency

Unieuro guarantees complete transparency to all *stakeholders* regarding its activities by using simple and easily understandable language. However, this commitment does not compromise the confidentiality required for conducting business or the need to safeguard free and fair competition.

Moreover, Unieuro is diligent in providing accurate information to customers, also through commercial communications that are designed not to unduly influence consumer's judgment.

3.2 Fairness and honesty

Unieuro operates in compliance with applicable laws, professional ethics and internal regulations. Pursuing Unieuro's interest should never justify behaviors that contradict principles of fairness and honesty.

Its employees and the other Recipients of the Code commit to upholding the highest standards of integrity, honesty and fairness in all internal and external relations of Unieuro.

No employee shall directly or indirectly accept, solicit, offer or provide monetary or non-monetary benefits (including gifts or gifts, with the exception of items of modest value commonly accepted in commercial practices, for a commercial value not exceeding 150 euros per year in relation to each counterparty) even under undue pressure.

Unieuro prohibits any form of corruption involving private individuals, public officials, or any other party connected or associated with public officials, regardless of the jurisdiction, even in cases where such activities might be commonly accepted or not prosecuted judicially.

Considering the above, employees and other Recipients are strictly forbidden from offering business courtesies, gifts or other benefits that may constitute violations of laws or regulations, contravene the Code, or harm Unieuro's reputation, even if only perception-wise.

Similarly, employees (including their family members) are prohibited from accepting gifts, presents, or other benefits that could compromise their impartiality. To ensure this, every employee and individual should avoid situations where personal interests may conflict with Unieuro's interests.

Any requests or offers of money or favours of any kind unduly formulated to those, or by those, operating on behalf of Unieuro must be immediately brought to the attention of the Supervisory Body.

3.3 Protection of competition

Unieuro recognises the fundamental importance of a competitive market, in which free competition is a decisive factor in ensuring the growth and constant improvement of the company. Consequently, Unieuro refrains from practices that would constitute a violation of competition laws.

Unieuro undertakes not to adopt aggressive or misleading commercial policies and not to engage in misleading communications aimed at influencing consumer choices. The Company recognises and promotes the value of free competition in a market economy as a decisive factor for growth, and is therefore committed to operating in compliance with EU and national principles and laws protecting competition.

All situations that may have a distorting effect on competition, especially agreements containing exclusivity clauses, price-fixing constraints, and so forth, are subject to antitrust legislation.

In every potential conflict with antitrust regulations, it is essential to seek prior legal advice from experts.

3.4 Prohibition of corrupt practices

Corruption consists in offering, promising, soliciting, or receiving, directly or indirectly, any undue advantage so that a third party acts or refrains from acting in order to obtain or retain business or other benefits.

These corrupt practices, whether directed towards public or private entities and individuals, constitute a criminal offense and represent a serious detriment to the economic system as a whole, also entailing significant legal and reputational risks, capable of compromising the trust of *stakeholders* and the integrity of the organization.

For this reason, Unieuro adopts a zero-tolerance policy towards any form of corruption, committing itself to preventing and combating any corrupt behaviour, whether originating from its employees or from third parties acting on behalf of or in the interest of the Company, towards both public officials and/or persons entrusted with public services, as well as private entities, whether domestic or foreign.

The Company explicitly prohibits the giving or acceptance of money or any other form of benefit (goods, services, favors, or performance of value) to or from any party (a partner, a customer, a supplier, a public entity, etc.) for an undue interest or advantage.

In particular, when engaged any business transaction, request or interaction with a public or private entity, the following actions are prohibited:

- providing privileges to the party involved or their family members, such as employment and/or commercial opportunities;
- supplying, pledging, accepting, or promoting money, favors, gifts, or any form of utility to the party involved or their family members. Where it is customary to present gifts to clients or others, this may be permissible under the condition that the gifts are of an appropriate nature and modest value, without any implication of seeking favoritism, and always in accordance with the relevant laws;
- offering or receiving confidential information that may provide personal advantages to the involved party or violate the principles of equal treatment and the established negotiation procedures;
- providing donations or complying with any requests for contributions/sponsorships that may influence business negotiations;
- encouraging the party to manipulate the outcome of inspections or audits conducted by authorities.

Real estate activities aimed at acquiring new premises for the Company's operations (e.g. opening of new retails stores, upgrading logistics facilities) and/or adapting existing locations where the company operates (e.g. renovating existing stores) are strategic endeavors for Unieuro. Therefore, the **management of commercial negotiation/commercial transaction activities** and the undertaking of commitments for real estate purchases or leases, including related investments, must be conducted by duly authorized individuals and in compliance with principles of fairness and transparency. This entails ensuring the traceability of agreed-upon commercial agreements with counterparties and the underlying economic reasons.

It is prohibited to offer or pledge money or any other form of benefit to an employee or representative of a counterparty, and likewise, it is prohibited to request or accept money or other benefits in the context of negotiations involving real estate activities, with the aim of obtaining or granting an undue advantage. The relationship with any real estate intermediaries acting on behalf of Unieuro must be conducted in compliance with legal principles and must not be used as a means for engaging in corrupt practices.

3.5 Prevention of conflict of interest

In carrying out their activities, the Recipients must avoid all situations and all activities that could give rise to a conflict, even a potential one, with the interests of the Company, or that could interfere with their ability to make impartial decisions in the best interest of the Company and in full compliance with the provisions of the Code.

Any situation that could constitute or give rise to a conflict of interest, even a potential one, must be promptly reported to the hierarchical supervisor, who in turn is obliged to immediately notify the Supervisory Body of the conflict. In particular, all Unieuro's directors and employees are required to avoid conflicts of interest between their personal and family economic activities and the duties they perform within their respective organizational structures.

By way of example and without limitation, the following circumstances are considered conflicts of interest:

- economic and financial interests;
- using the name of Unieuro to obtain personal advantages;
- carrying out acts, entering into agreements, or engaging in any conduct that may, directly or indirectly, cause harm to the Company, including damage to its image and/or credibility in the market;
- using one's position within the Company or information acquired through work in a way that creates a conflict between your interests and corporate interests;
- performing any type of work activity for clients, suppliers, or competitors;
- accepting money, favors, or benefits from individuals or companies that have or intend to establish business relations with the Company.

3.6 Confidentiality and protection of privacy

Unieuro recognizes the strategic value of information and establishes precise rules on confidentiality and on the protection of personal data to prevent improper and/or non-compliant use and any unauthorized and/or arbitrary disclosure. In particular, Unieuro requires specific caution and awareness when handling information related to business activities, employee and/or collaborators data, and third parties in general (including customers). Unieuro is committed to protecting all information generated or acquired within the corporate structure and/or in the course of business relationships.

Unieuro's databases may contain personal data, confidential information and/or data which, due to negotiation agreements, cannot be disclosed to external parties, as well as data whose inappropriate or untimely disclosure could harm the company's interests. Accordingly, Unieuro processes such information and/or data in compliance, inter alia, with with the principles of lawfulness, fairness, transparency, data minimization, purpose limitation, security and accountability, in full alignment with the applicable laws and with the requirements issued by the Italian Data Protection Authority ("GPDP" or "Garante Privacy") and/or the European Data Protection Board ("EDPB").

The disclosure of information to third parties should only occur by authorized individuals for institutional or work-related purposes and according to criteria of necessity, relevance, and proportionality, and must in all cases comply with applicable regulations and with the principles of equal and consistent dissemination of information. When sharing confidential information with third parties, the confidential nature of the information must be explicitly stated, and the third party must be required to observe confidentiality obligations.

All information obtained in connection to an individual's employment or collaboration with Unieuro is property of the Company. Confidentiality obligations regarding acquired sensitive or confidential information also applies to third parties with whom Unieuro has business relationships, through specific contractual clauses or confidentiality agreements.

No employee may derive any direct or indirect, personal or financial benefit from the use of confidential information, nor may such information be disclosed to others.

Without prejudice to the prohibition on disclosing information regarding the Company's organization or methods of service delivery, or using such information in ways that could harm the Company, every Unieuro employee must:

- collect and process only the data strictly necessary and appropriate for the purposes of their Unit/Function and directly connected to their duties;
- collect and process such data solely within specific procedures;
- store data in a manner that prevents unauthorized people from gaining access;
- communicate the data only within predefined procedures and/or upon explicit authorization from higher positions and, in any case, only after verifying that disclosure is permitted in the specific instance;
- ensure that there are no absolute or relative restrictions on the disclosure of information concerning third parties connected to the Company by any type of relationship and, where applicable, obtain their consent;
- associate the data in such a way that any authorized person can easily obtain a picture that is as accurate, complete, and truthful as possible;
- retain the data for a period limited to what is necessary for the purposes of collection;
- adopt adequate, appropriate, and preventive security measures for all systems where personal data is collected and stored, in order to avoid risks of destruction, data loss, unauthorized access, or unlawful processing;

- maintain the duty of confidentiality even after termination of employment.

3.7 Compliance with current regulations

Unieuro sets the objective of pursuing its purposes and operating in strict compliance with the laws and regulations in effect in Italy and in all countries where Unieuro operates.

Unieuro does not endorse or engage relationships with organizations, associations or movements that directly, or indirectly, pursue purposes prohibited by law.

In fact, Unieuro requires full compliance with all national and international laws prohibiting terrorist activities and any actions aimed at undermining the democratic order. To this end, Unieuro prohibits the use of its resources to finance or support connected to such purposes as well as any affiliation with associations pursuing subversive or terrorist objectives.

Unieuro also requires adherence to international sanctions against States, entities or individuals included in the relevant blacklists, prohibiting any transaction with States, entities or individuals subject to such restrictions.

4. Human Resource policies

Unieuro acknowledges the professional contribution of individuals as one of the primary success factors for any enterprise. It establishes a framework of loyalty and mutual trust, building its competitive advantage on the competence and commitment of each individual. Human resources are an essential element for the existence and reputation of the Company. The dedication and professionalism of employees are key values and conditions for achieving Unieuro's objectives.

The Company is committed to developing the skills and competencies of each employee so that individual energy and creativity can be fully expressed in realizing their potential.

The assessment of personnel is conducted based on the alignment of candidates' profiles with the expected requirements and the company's needs, while upholding equal opportunities for all relevant parties.

Unieuro extends equal opportunities to all employees, ensuring that each individual receives fair treatment based on merit.

Unieuro respects diversity and avoids any form of discrimination, whether in the selection phase or in the management and career development of personnel.

Therefore, the competent functions must:

- adopt merit- and competence-based criteria for decisions concerning employees;
- select, hire, train, and remunerate employees without any form of discrimination;
- create a work environment where personal characteristics cannot give rise to discrimination;
- comply with labor laws and regulations.

The physical and moral integrity of employees is considered a primary value.

For this reason, Unieuro is committed to safeguarding the physical and psychological integrity of employees, respecting their moral personality and ensuring that they do not suffer unlawful pressures or undue discomfort, while guaranteeing the right to working conditions that respect human dignity. To this end, Unieuro protects employees from acts of psychological violence or workplace bullying and opposes any attitude or behavior that is discriminatory or harmful to the individual, their beliefs, or personal inclinations.

The following are fundamental principles of human resources management:

- offer equal employment opportunities;
- ensure fair and merit-based treatment;
- promote and strengthen a culture of workplace safety and act to preserve employees' health and safety—both physical and psychological—primarily through preventive measures;
- ensure the protection of employees' privacy and their right to work without unlawful pressures;
- ensure that employees contribute to maintaining a corporate environment of mutual respect and refrain from any behavior that could harm the dignity, honor, or reputation of others.

Unieuro is committed to providing equal employment and career development opportunities to all employees and helps them maximize their potential through training and development.

Unieuro is committed to offering equal career opportunities to those who possess the qualifications required for higher positions, without any discrimination, solely based on meritocratic criteria and acquired professional competence.

Unieuro, in compliance with the Conventions of the International Labour Organization, undertakes to respect fundamental human rights, to prevent child exploitation and not to use forced or coerced

labor carried out in conditions of slavery or servitude.

Employees must be hired under a regular employment contract in accordance with legal obligations, in full compliance with applicable regulations on employment, remuneration, social security contributions, taxation and insurance.

Unieuro, in observance of the law, does not make use of the work performed by minors and, in any case, rejects any form of employment or collaboration with minors that is contrary to legal provisions. In particular, the Company does not engage in activities involving the direct or indirect use of child labour provided by third-party companies.

The Company expects employees at all levels to help maintain a workplace climate of mutual respect for the dignity, honor, and reputation of each individual and is committed to intervening to prevent offensive or defamatory interpersonal behavior.

Unieuro is committed to ensuring that all work relationships, both internal and external, are conducted without harassment, defined as:

- creating an intimidating, hostile, or isolating work environment toward individuals or groups of employees;
- unjustified interference with the performance of others' work;
- hindering others' career prospects for mere reasons of personal competitiveness.

Unieuro does not tolerate sexual harassment, understood as:

- making decisions relevant to the recipient's working life conditional upon the acceptance of sexual favors;
- persisting in proposals for private interpersonal relationships despite explicit or reasonably evident disinterest, where such conduct, given the specific circumstances, may disturb the recipient's peace of mind with objective implications for their work performance.

Furthermore, Unieuro fully upholds the value of freedom of association and the right to collective bargaining, encouraging free and open dialogue within the Company on matters related to the conditions under which employees perform their duties.

In compliance with applicable laws, the Company guarantees all employees the right to join trade unions of their choice, to engage in collective bargaining, and to participate in peaceful meetings, as well as the right to refrain from such activities. Employees and/or their representatives must be able to communicate openly and share ideas and concerns with management regarding working conditions and management policies without fear of discrimination, retaliation, intimidation, or harassment.

5. Safety at work and environmental protection

Unieuro promotes and ensures the health and safety of its employees in all locations where its personnel are engaged in work activities.

It also commits to providing working conditions that respect individual dignity and safe and healthy

work environments. This includes fostering a culture of safety and risk awareness, promoting responsible behavior among employees and collaborators who, within their roles and responsibilities, participate in risk prevention, environmental protection, and the safeguarding of health and safety for themselves, colleagues, and third parties.

In this regard, every employee is called upon to personally contribute to maintaining a safe work environment and to act responsibly for their own and others' well-being.

In terms of environmental protection, Unieuro conducts its activities with consideration for the need to safeguard the environment and a sustainable use of natural resources, in accordance with applicable environmental regulations.

Specifically, regarding environmental respect and protection, Unieuro:

- complies with current environmental legislation and the applicable authorization requirements, working to ensure environmental protection and pollution prevention;
- manages waste generated in compliance with current regulations through selected suppliers, ensuring that third parties have the necessary permits, registrations, or notifications for their operations, and strives for traceability and control throughout the supply chain;
- makes development and investment choices by considering and limiting potential impacts on the territory and the environment.

Unieuro condemns any type of action or behaviors potentially harmful to the environment and the territory.

In line with the general prohibitions imposed by applicable regulations, Unieuro does not allow smoking in enclosed work premises. The Company is committed to ensuring the safety and health of its employees, while maintaining the prohibition on smoking in any areas where it could pose a risk to people’s safety or compromise the healthiness of the environment.

Similarly, Unieuro does not permit alcohol abuse or the use and distribution of illegal drugs in the workplace.

It is therefore prohibited, during work and in the workplace, to:

- work under the influence of alcohol abuse, narcotic substances, or substances with similar effects;
- consume, transfer, or distribute narcotic substances in any form during working hours.

Chronic dependency on such substances, when impacting the work environment, is treated—due to contractual implications—in the same manner as the cases above. Unieuro is committed to supporting the social initiatives provided for under collective bargaining agreements.

All employees, within the scope of their duties, must contribute to risk prevention, environmental protection, compliance with applicable environmental regulations, and safeguarding health and

safety for themselves, colleagues, and third parties.

Unieuro recognizes the protection of health and safety as a priority—not only for its employees but also by ensuring high safety and health standards for customers in physical stores.

As a company open to the public, Unieuro adopts all necessary measures to guarantee safe, healthy, and compliant environments for its customers and visitors. Protecting the health of customers and visitors who come into contact with Unieuro is a priority and a fundamental value.

6. Sustainability

Unieuro recognises sustainability as a key and cross-functional factor and is committed to making responsible choices throughout all stages of its business activities.

For this reason, over the years the Company has embarked on a journey aimed at strengthening its sustainability approach, translating this commitment into environmental, social, and governance projects and initiatives. In particular, Unieuro continues to direct its efforts along the following lines:

- integrating sustainability into decision-making processes and promoting awareness and a strong sustainability culture within the organization;
- responding to the growing expectations of key stakeholders regarding sustainability matters;
- strengthening ESG governance through clear accountability and a holistic approach that enables the Company to effectively manage the risks and challenges in a rapidly evolving context;
- identifying new business opportunities linked to sustainability, capable of enhancing the Company's overall value proposition;
- continuously monitoring the evolution of the ESG regulatory framework in order to respond promptly, effectively and proactively to current and anticipated changes.

7. Relations with the media

Relations between the Company and the mass media are the exclusive responsibility of the corporate functions and roles delegated for this purpose and must be conducted in compliance with the communication policy defined by the Company.

Employees and Collaborators may not provide information to media representatives without the authorization of the relevant competent functions. In any case, information and communications intended for external audiences must be accurate, truthful, complete, transparent, and internally consistent.

The participation of Employees, on behalf of the Company or representing the same, in committees and associations of all kinds, whether scientific, cultural or professional, must be duly authorized in compliance with internal procedures.

Employees who are invited to participate in conferences, congresses or seminars, or to write articles, essays or publications in general, are required to obtain approval from their immediate

supervisor regarding texts, reports and any other document prepared for this purpose.

8. Protection of Unieuro's reputation and image on Social Networks

The reputation and image of the Unieuro brand constitute a valuable asset and, as such, must be protected. This therefore requires responsible use of social media both inside and outside the organization. In this regard, the corporate functions expressly authorized to communicate in the name and on behalf of Unieuro, whether on internal or external social networks, undertake not to engage in behaviors that could harm the collective interest of the Company and to ensure the consistency and accuracy of published messages.

Furthermore, Unieuro encourages all its employees who express themselves privately on social networks to respect the Company's principles and values. Employees are therefore subject to a duty of discretion, confidentiality, and loyalty.

9. Relations with Customers

Unieuro's activity, in line with its vision, is focused on the satisfaction and protection of its customers by listening to requests that can lead to an improvement in the quality of products and services.

Unieuro focuses on promptly seizing market opportunities, aiming to anticipate customer needs and meet their requests in the shortest possible time, while always acting with fairness, courtesy, and the highest level of cooperation.

10. Relations with suppliers and external collaborators

Unieuro's relationships with its suppliers and external collaborators, aimed at achieving the greatest mutual benefit, are generally based on compliance with applicable regulations and the principles set out in this Code.

In particular, new potential suppliers and/or collaborators are assessed and selected using objective criteria, taking into account, in addition to quality, costs and services provided, requirements of integrity, respectability and professionalism, as well as the absence of any past or present suspicion of involvement in terrorist activities or actions intended to undermine public order.

In **contractual**, **purchasing** or **procurement relationships** as well as in the general supply **goods and services**, employees are required to comply with the principles set out in this Code, as well as with internal procedures.

In any case, the selection of suppliers must be carried out in a manner that ensures compliance with requirements of quality, price, cost-effectiveness, capability and efficiency.

In their dealings with Unieuro, suppliers must commit to safeguarding the protection of child labour rights and workers' rights, as well as ensuring a safe workplace environment. In particular, suppliers and/or collaborators who have a relationship with Unieuro are required to observe the following rules:

- prohibition of child labour;
- prohibition of the use of any form of slavery, human trafficking, debt bondage and forced labour, as well as of products or services obtained through such means;
- pay due attention to categories of workers vulnerable to exploitation, including migrants, ensuring non-discriminatory recruitment, employment, freedom of movement and remuneration practices, while guaranteeing that their rights are fully understood;
- prohibition of any type of work which, by its nature or the conditions under which it is carried out, may compromise health, integrity or morality;
- prohibition of any conduct detrimental to dignity and well-being at work, including any practice contrary to social regulations, in particular regarding remuneration and the right to a decent wage, working hours and working conditions;
- compliance with directly applicable rights of representation, expression, freedom of association and collective bargaining;
- prohibition of any form of discrimination, including racial, ethnic, gender-based or disability-related discrimination, and promotion of working conditions that foster diversity;
- prohibition of any form of psychological harassment, including sexual harassment, in particular any intimidation, threat or coercion of a sexual nature or any promise of rewards in exchange for sexual favours;
- fair, just and respectful treatment of all men and women in the workplace, with particular attention to eliminating all forms of intimidation, harassment, violence and unequal treatment towards women, including pay inequality;
- compliance with directly applicable occupational health, safety and environmental regulations.

Unieuro employees must:

- scrupulously observe current legislation and internal procedures relating to the selection and management of relationships with suppliers;
- adopt objective and transparent evaluation criteria in the selection of suppliers, in possession of the required requirements;
- obtain the collaboration of suppliers in ensuring the satisfaction of customer needs in terms of quality, cost and delivery times;
- observe and comply with the applicable legal provisions and contractual conditions in supply relationships;
- be inspired by the principles of fairness and good faith in correspondence and dialogue with suppliers, in line with the strictest commercial practices.

If the supplier, in carrying out its activities for the Group, adopts behaviors that are not in line with these principles, Unieuro is entitled to take appropriate measures, including the possibility of discontinuing any further collaboration opportunities.

11. Relationships with interlocutors and business partners

Any relationship with stakeholders or business partners must be based on principles of utmost fairness and transparency.

Each business partner must be assessed on the basis of requirements of integrity and professionalism of a subjective nature (e.g. their institutional background as evidenced by documents such as criminal records and chamber of commerce certificates) as well as objective criteria (e.g. activity usually carried out by the customer/partner and consistency between these activities and the type of operation requested from the company).

As a general rule, relationships of any kind should not be established with partners if, upon the exercise of reasonable diligence, any exceptions regarding reliability, integrity, or professionalism are identified.

Unieuro repudiates and sanctions any form of corrupt conduct (including, for example, the offering or promise of payment or other benefits—whether in the form of gifts, facilitation of any kind, employment of individuals, etc.) in dealings with stakeholders or business partners.

Employees who receive gifts or other forms of benefits that are not directly attributable to normal courtesy relationships must take all appropriate steps to refuse such gift or other form of benefit and inform their superior without delay.

12. Relations with competitors

Unieuro aims to safeguard the value of fair competition by refraining from collusive and abusive behaviour, firmly believing that cooperation and constructive dialogue is an opportunity to improve its quality standard.

Unieuro, in fact, believes in free, open and fair competition as a driver of economic and social progress, both in terms of prices and in the quality and breadth of what consumers and end customers can expect. Unieuro is also committed to strictly comply with the competition regulations applicable in the European Union and in every market in which the Company operates.

Therefore, everyone is free to take into account what competitors do (provided this information is obtained independently, i.e. without direct or indirect communication with them), but it is strictly forbidden to agree on and set prices together with them. It is also prohibited to divide or allocate markets among competitors based on geography or product, as well as to set purchase and sales quotas between competitors.

It is strictly forbidden to communicate any information regarding prices or costs to competitors, or more generally, any information that may be deemed commercially sensitive.

13. Relations with the Public Administration

13.1 General principles

Relations with the Public Administration by employees and, more generally, by Unieuro must be guided by the strictest compliance with the applicable legal and regulatory provisions and must in no way compromise Unieuro's integrity and reputation.

In particular, all interactions with Public Administration involving corporate functions, including through Collaborators, must adhere to principles of diligence, transparency, and honesty, and must be conducted with behaviour inspired by the utmost correctness and integrity.

The undertaking of commitments and the management of any type of interaction with Public Administration are reserved exclusively for the corporate functions specifically designated and authorized for this purpose.

If Unieuro engages a consultant or a third party to represent it in dealings with Public Authorities, the same directives issued to employees shall apply to such party.

Unieuro must not be represented in relations with the Public Administration by a third party when conflicts of interest may arise.

13.2 Duties and prohibitions of relations with the Public Administration

- **Representation expenses and gifts** to public employees and officials, provided that they are of modest value, must comply with internal expense procedures, as well as the laws and regulations of involved public bodies.

  In any case, it is not permitted to offer money or gifts to managers, officials or employees of Public Administration or to their relatives, whether Italian or foreign, except for gifts or customary items of modest value, meaning a commercial value not exceeding €150 per year for each counterparty.

  It is forbidden to offer or accept any object, service, performance, favor or other benefit to obtain more favorable treatment. It is also forbidden to apply for the benefit of public entities or a person designated by them or connected to them, abnormal discounts, not due or contrary to normal commercial practice and company procedures.
- Unieuro promotes and supports **the supervisory and control activities of public authorities**, including investigative ones, and requires its employees and/or collaborators to provide full collaboration and ensure strict compliance with laws and regulations.

  It is therefore forbidden to deny, conceal, or delay information requested by a public authority or to make false statements in legal proceedings. It is not permitted to submit untruthful declarations in order to obtain public disbursements, grants, or subsidized loans, or to obtain concessions, authorizations, licenses or other administrative acts. It is also forbidden to allocate sums received from national or EU public bodies as disbursements, grants or financing for purposes other than those for which they were granted.

  Any information and/or communication intended for public entities must therefore be

accurate, truthful, correct, complete, clear, timely, and always strictly compliant with applicable provisions.

- In its relations with the Public Administration, Unieuro must not try to improperly influence the decisions of the institution concerned.

  In the specific case of participating in a **tender with a Public Authority**, operations must comply with the law and proper commercial practice, with an express prohibition on engaging in conduct that, in order to benefit Unieuro or pursue its interests, constitutes a criminal offence.
- All Unieuro employees and collaborators who, in any capacity, directly or indirectly **access IT or telematic systems of Public Authorities** are prohibited from altering their functioning in any way by intervening without authorisation and by any means on data, information, or programs.

All the aforementioned rules of conduct relating to relations with members of Public Authorities must also be observed with reference to the European Union and foreign countries.

14. Relations with political parties, trade unions

Unieuro refrains from any form of undue pressure, whether direct or indirect, on political or trade union representatives, including through its managers, employees or collaborators.

Unieuro does not provide contributions, whether direct or indirect and in any form, to political parties, movements, committees, and political and trade union organizations, their representatives and candidates, except for those required under specific legal provisions.

15. Taxation, control and accounting transparency

Unieuro undertakes, in accordance with respective roles and duties, to ensure that matters relating to its management are represented accurately and truthfully in the accounts.

For every accounting entry, adequate supporting documentation must be retained. This documentation must allow to identify the reason for the transaction that generated the entry and the related authorization.

Tax returns are signed by individuals with appropriate signing authority and sent to the regulatory authorities as required by current regulations, in compliance with the principles of transparency, accuracy and truthfulness of information.

Supporting, accounting, and tax documentation must be easily accessible and archived according to appropriate criteria, enabling easy consultation by both internal and authorized external bodies.

Reports, communications, and filings with the companies register that are mandatory for Unieuro must be made by the subjects identified by the law in a timely, accurate manner and in compliance with applicable regulations.

16. Relations with shareholders and Control Bodies

Unieuro undertakes to make available to shareholders and Supervisory Bodies any information and/or documents requested by them and/or necessary for the performance of their control activities, ensuring compliance with the relevant regulation.

17. Protection of company assets

Unieuro safeguards and protects its company assets, also by adopting tools to prevent instances of embezzlement, theft, and fraud to its detriment.

Everyone must feel that they are the custodian and responsible for Unieuro's assets (tangible and intangible) that are instrumental to the activity carried out and must comply with the provisions of the Internal Regulations.

Employees are required to use the company assets and resources to which they have access or are made available to them with efficiency, responsibility and reasonableness, in ways that protect their value and in Unieuro's best interests.

Any use of such assets and resources that conflicts with Unieuro's interests or is motivated by professional reasons unrelated to employment or contractual relationship is prohibited.

18. Prevention of money laundering

The recipients, in the context of the various relationships established with Unieuro, must not, under any circumstances or in any way, be involved in events related to money laundering from illegal or criminal activities.

Before establishing relationships or entering into contracts with regular suppliers and other business partners, Unieuro and its employees and/or collaborators must ensure the moral integrity, reputation, and good name of the counterparty.

Unieuro is committed to complying with all national and international regulations and provisions regarding anti-money laundering.

19. CSR campaigns and "non-profit" initiatives

Unieuro promotes CSR campaigns and "non-profit" activities to demonstrate its commitment to pursuing the satisfaction of widespread interests deserving of recognition from an ethical, legal, and social perspective within the community in which it operates.

Employees, in line with their respective roles, are required to actively participate in the definition of individual initiatives undertaken, ensuring consistency with and respect for Unieuro's intervention policies, and to implement them in accordance with the principles of transparency and honesty.

In compliance with the principles set out in the Code of Ethics, contributions may therefore be made

to non-profit associations (subject to verification of the statute and deed of incorporation) and of high cultural or charitable value at national level.

Sponsorships, which may relate to social, sporting, entertainment, artistic, or cultural topics, are reserved exclusively for events of significance and interest to the communities involved.

In any case, when selecting proposals to support, careful consideration must be given to any potential conflicts of interest, whether personal or corporate.

20. Prevention of cybercrime

Unieuro's IT equipment must be used in full compliance with current laws and internal company directives.

Therefore, any improper use of Unieuro's IT equipment that may lead to unauthorised access to third parties' IT or telecommunication systems, interception, unlawful interruption of communications, damage to private, public or public information, data or programs is prohibited.

Furthermore, the unauthorised possession and dissemination of access codes to computer or telematic systems is strictly prohibited, as is the distribution of equipment, devices, or software intended to damage or disrupt a computer or telematic system, as well as the installation of devices designed to intercept, impede, or interrupt computer or telematic communications.

Unieuro is committed to ensuring that its websites are accessible and usable in a secure, reliable, and inclusive manner by all users.

21. Intellectual property protection

Unieuro ensures, in accordance with the principle of compliance with the law, the observance of internal, European and international regulations established for the protection of industrial and intellectual property.

Recipients promote the proper use, for any purpose and in any form, of trademarks, distinctive signs, and all works of a creative nature, including computer programs and databases, in order to protect the author's economic and moral rights.

Unieuro prohibits any conduct contrary to the following principles, such as, but not limited to:

- reproducing, promoting, or marketing third-party models and ornamental designs that may cause confusion regarding the identification or origin of the product;
- reproducing or disseminating, in any form and without authorisation, another party's intellectual work without formalised written contractual agreements with the rightful owners for economic exploitation, or in violation of the terms and conditions set out in such agreements;
- distributing through internal channels music, photographs, or videos to support promotional activities without the express authorisation of the author and in breach of the regulations concerning payment of the rights for the exploitation of the work.

All recipients, with particular reference to those involved in marketing and communication activities (e.g. in the use of images while carrying out their duties in the interest of Unieuro), must pay the utmost attention to fully respect the copyrights of others.

22. Use of Artificial intelligence

In Unieuro we regard Artificial Intelligence (hereinafter "AI") as a strategic lever to foster innovation and corporate transformation. AI represents a tool capable of enhancing process efficiency, driving innovation, and supporting the development of professional skills. The adoption and use of AI solutions are guided by the principles of human-centricity, reliability, transparency, oversight and control, in compliance with applicable Italian and European regulations and with the values set out in this Code.

While offering significant opportunities, the use of AI also entails potential risks. For this reason, Unieuro is committed to ensuring an approach that is grounded, inter alia, in the principles of human oversight ("human in the loop"), data minimization, transparency, and the protection of confidential information and intellectual property rights.

In this context, for Unieuro, the responsible use of Artificial Intelligence specifically means:

- Using only AI tools approved by the company, in compliance with the rules on security, confidentiality and the protection of information and personal data;
- Employing corporate information exclusively on authorised platforms, in compliance with confidentiality and information-security rules;
- Promoting an informed, ethical, and transparent use of AI, in full respect of individuals' fundamental rights, privacy protection, data security, and principles of fairness and non-discrimination;

- Preventing bias and distortions in models and algorithms, avoiding any form of discrimination based on personal characteristics.

Unieuro also encourages a corporate culture oriented toward the ethical, mindful and responsible use of AI, including through awareness and training initiatives, and by promoting the reporting of any improper or non-compliant uses that may conflict with the principles set out in this Code.

23. Effectiveness of the Code of Ethics and sanctioning consequences

Compliance with the provisions of this Code of Ethics must be considered as an essential part of the contractual obligations of Unieuro employees pursuant to and for the purposes of art. 2104 and 2105 of the Italian Civil Code.

Any violation of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, in accordance with the procedures set out in Article 7 of the Workers' Statute, with all legal consequences, including those regarding to the continued employment, and may result in compensation for damages arising therefrom.

Adherence to the principles of this Code of Ethics forms an essential part of the contractual obligations of those who have commercial relations with Unieuro. Consequently, any breach of the provisions contained herein may constitute a failure to fulfil such obligations, with all legal consequences, including termination of the contract and compensation for damages.

This Code of Ethics is approved by the Board of Directors of Unieuro. Any amendments shall be approved by the managing body.

24. Reports

Unieuro has adopted adequate regulatory and legal tools for the management of reports, including anonymous ones, (Whistleblowing) concerning potential offences, unlawful acts or irregular behaviour committed in violation of the Code of Ethics, the Model, internal regulations (manuals, policies, procedures, instructions, etc.), laws or regulations, or measures issued by Authorities, or in any case acts likely to cause damage or harm of any kind to Unieuro.

Unieuro’s regulatory and legal tools outline: (i) protection mechanisms (for the whistleblower and the person reported), (ii) the methods for submitting reports and the content required, (iii) the process for handling reports, indicating the parties involved and defining clear roles and responsibilities, (iv) reporting to other company bodies, (v) management of disciplinary measures, and (vi) monitoring of corrective actions.

In any case, Recipients, in accordance with the provisions set out in the company's regulatory and legal tools, may report any and all violations or suspected violations of this Code at any time, including anonymously. Unieuro is committed to protecting the confidentiality of the whistleblower’s identity, subject to legal obligations and the protection of the rights of individuals who are accused mistakenly or in bad faith. Unieuro guarantees whistleblowers protection against

any form of retaliation, discrimination or penalisation connected to reports made.