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CODE OF BUSINESS ETHICS

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INTRODUCTION

Our corporate Code of Business Ethics, also called Code of Conduct, contains the set of social and moral rules the company embraces and to which all company members should adhere. **It is the charter of fundamental rights and duties where the company's ethical and social responsibilities** (both internally and externally) **and the values it embraces are defined.** Its purpose is to remind everyone of the spirit that drives the company constantly and why it was created.



The express reference to the Code of Business Ethics is an **organizational model** embodied in a true code of conduct that all members must adopt and apply. Thus, adopting a Code of Business Ethics constitutes an essential element in the exchange system. The expression of ethical values finds its place within the organizational model, posing itself as an effective means, available to the entire supply chain, to prevent irresponsible or unlawful behavior on the part of those who work for it.

The codification of values and ethical principles such as fairness, transparency, loyalty, and anti-corruption that characterize the legal entity represents the source of the behavioral rules expressed in duties, obligations, and prohibitions contained in the organizational model to which all members must conform their behavior.

GENERAL PRINCIPLES

The Company's image and reputation depend on the behavior of its staff, managers, and ownership.

Every employee and collaborator (Corporate functions and its members, managers, employees, consultants, partners, and suppliers) must contribute to the establishment of a corporate culture that legitimizes the Company as an entity capable of pursuing its purpose while at the same time not adversely affecting the welfare of the Community in which it operates.

Consequently, the actions, relationships, transactions, human resource management, and conduct carried out in exercising assigned responsibilities and functions must be oriented toward compliance with the following ethical principles.

To ensure complete compliance with the behaviors and standards contained within the Code of Business Ethics, the company adopts a **compliance board**, which is always available for elucidation and ready to enforce the best practices to be followed by every individual inside and outside the company.

Failure to comply with these rules will result in sanctions and measures by the company, depending on the severity of the non-compliance.



In its relations with third parties, Real Throughput follows the principles of maximum **transparency and fairness** to allow its interlocutors to make decisions with the awareness of the interests and the relevant consequences involved. To this purpose, all personnel undertakes to give complete, transparent, understandable, and accurate information.



Any suggestions to develop a positive and inclusive work environment for employees, who must be the prime example of compliance, are and will always be welcomed.

The Company undertakes to conduct its business **in compliance with EU and national regulations**, rejecting corruption, forms of money laundering and financing of terrorism, and any illegal practice, also in the forms of conduct that directly or indirectly may integrate forms of collaboration with criminal associations. Only in the case of absolute necessity does the company make payments and financial transactions of an amount exceeding the threshold set by the law in force on the regulation of the use of cash exclusively in accordance with the methods provided for in Determination No. 4 of July 7, 2011 of the Supervisory Authority on Public Contracts, making use of payment traceability systems for any transaction.

The members of the corporate governance structure, the company management, and in general, the employees and collaborators of Real Throughput within the scope of their professional activities are required to comply with current regulations diligently, this Code of Ethics, procedures, protocols, and internal regulations diligently. All transactions that may result in the use of money, goods, or utilities of illicit origin and any activity and/or form of money laundering are expressly prohibited. The pursuit of an interest of the Company shall not, under any circumstances, be considered a failure to comply with the law, nor shall it justify dishonest conduct.



RESPECT FOR THE INDIVIDUAL



Human Resources Development

Real Throughput considers the individual, his values and rights, intangible and to be protected. It affirms **respect for the individual and his or her dignity** and condemns all hurtful, abusive, and/or prevaricating behavior, psychological and physical harassment, and sexual harassment.

We recognize human resources as an indispensable and fundamental element for achieving the goals pursued. Our employees and collaborators have the widest **freedom to express their ideas and convictions** while respecting company regulations, the rights and dignity of others, and orderly coexistence in the workplace. The criteria of fairness, cooperation, loyalty, and mutual respect should also shape relations with third parties outside the Company. Among the activities that distinguish Real Throughput, training assumes a central role. Thanks to its accreditation to the European Social Fund, it will offer **orientation, higher education, job training, and continuing education** courses to disseminate the most advanced principles in best practices.

The dissemination of these principles becomes more and more fundamental every day for the constant and continuous evolution of any environment in which the Community realizes its social purposes.

Diligence, efficiency, and professionalism

For the Company, it is paramount to provide its clients and those with whom it has relationships arising from the conduct of its business with **high-quality services**. To this purpose, the professional services of Real Throughput's employees and collaborators must be performed with the utmost **diligence, accuracy, and professionalism**.



Resource efficiency must be pursued in all work activities while maintaining and ensuring the highest degree of professionalism. Under no circumstances shall the conviction of acting for the company's benefit justify any conduct contrary to the principles expressed and referred to in this Code.



Impartiality



The Company considers impartiality of treatment a fundamental value in the performance of all internal and external relations. Therefore, it **rejects, opposes, and sanctions any discrimination** with regard to age, sex, sexual aptitude, health status, race, nationality, political opinions, and religious beliefs of all its interlocutors. Members of the corporate governance structures, the company's management, and, in general, employees and collaborators of the Company,

in the performance of their respective professional duties, must adhere to the principle of impartiality, avoiding preferring or facilitating persons or solutions that are not based on technical-professional assessments.

RELATIONSHIPS WITH THIRD PARTIES

Reciprocity and Confidentiality

The Company requires conduct in line with the principles set forth in this Code of Business Ethics from its main suppliers and all those who have dealings with it. In its relations with clients and suppliers, the Company undertakes its duty to inform its counterparties of the principles contained in this Code.

The Company **ensures the utmost confidentiality of the information** in its possession. It refrains from seeking confidential information except for express and conscious authorization from the person concerned and in accordance with current national and international legal regulations. In addition, the Company's employees and collaborators are required to maintain the confidentiality of information of a confidential nature acquired from customers or which they otherwise possess by reason of their function; therefore, they may not disclose it to third parties or misuse it.

Relations with suppliers

The Company applies the **utmost transparency and fairness** in its relations with suppliers of goods and services, in compliance with applicable laws and regulations, the Organization and Management Model, the Code of Business Ethics, and internal procedures on purchasing and supplier selection. In fact, it is the Company's policy to negotiate in good faith and transparently with all potential suppliers.

Management

The Company guarantees decorum, seriousness, and fairness in its activity management and ensures the strictest quality control, efficiency, and effectiveness of its services.



Reputation

The reputation of Real Throughput is a value to be protected and developed through the full dissemination, sharing, and observance of the ethical principles established in this Code. Real Throughput is **committed to transmitting the ethical principles** contained in this Code to every employee and collaborator of the Company (Corporate Bodies and its members, managers, employees, consultants, partners, suppliers) for the achievement of the highest value that is ethics in the game that distinguishes its culture of doing business.

ENVIRONMENT

Real Throughput's vision is based on the idea that energy and the environment are inextricably linked and that the responsibility to preserve them is critical to the future. Real Throughput is actively **committed to reducing the environmental impact of its operations** by adopting innovative practices and technological solutions that minimize carbon emissions and promote energy efficiency. Real Throughput's mission is not limited to the sustainability of its internal operations but also extends to promoting a broader environmental culture. It collaborates with **local communities, institutions, and organizations** to raise awareness and educate people on eco-sustainable practices, encouraging a harmonious lifestyle with the environment.

DISCLOSURE AND COMPLIANCE

Disclosure and training on the Code of Business Ethics

The Company is committed to ensuring timely internal and external dissemination of the Code of Ethics through:

- **training** to all personnel and members of the governance functions;
- **disclosure** of the principles, values, and behavioral norms to third parties who have relations with the Company.

In contracts with third parties, provision is also made for the introduction of clauses and/or the signing of declarations aimed at formalizing the commitment to compliance with the Code of Ethics and regulating contractual sanctions in the event of violation.

Disciplinary system

Compliance with the prescriptions contained in this Code is a **contractual obligation** for all parties that have business relations with Real Throughput (consultants, partners, and suppliers). Any violation is sanctioned in accordance with the provisions of the specific contractual clauses included in the relevant contracts, based on the provisions of applicable laws, of acts of termination for cause, with any possible consequences also in terms of compensation. Compliance with the requirements contained in this Code obliges all parties involved, without exception, to respect and apply it.



Where there is misconduct and voluntary actions to harm other parties, disciplinary, legal or criminal sanctions will be evaluated and applied, consistent with current National and International laws.

Employees are required to cooperate unreservedly in the investigative stages and provide all information regarding such violations, regardless of whether the violations are considered relevant.

The Code of Ethics is integral to the agreements signed by the parties concerned.

Date: 18/07/2024

Gianluca Davico

CEO