

Policy & Procedures Code of Ethics

Kampaay S.r.l. (hereinafter also "**Kampaay**" or the "**Company**") is a company established under Italian law having as its object the provision of services for the organization of corporate events through a digital platform managed by the same.

Kampaay is willing to enable the business users to configure and manage their events in a simple, fast and reliable way through process standardization and technology as well as to unlock the corporate events' potential by making digital planning the norm, not the exception. Kampaay's mission is to simplify and digitalize the corporate event organization & management. Empower every company to get the most out of their corporate events by providing HR, Marketing and Facilities teams with a smart digital tool to simplify planning, amplify impact of every event.

This code of ethics (the "**Code of Ethics**") provides the general principles to which all its Recipients, as defined below, shall conform in the relationship between the Company and any external interlocutor as well as the set of values that the Company deems binding (the "**Values**"). This Code of Ethics applies to the Company's directors, managers, employees as well as to all external collaborators and consultants acting in the name and on behalf of the Company, whatever the legal qualification of the relationship in place, to suppliers and to anyone who deals or has relations with the Company (hereinafter also referred to as the "**Recipients**"). It will be a Company's liability to bring to the attention of all Recipients the adoption of the content of this Code of Ethics as well as to procure the strict observance of the same.

The Company hereby states to deem binding the following Values:

• The use of child labor is forbidden.

Company's suppliers and service providers shall assure the Company that they do not use, even indirectly, personnel younger than the minimum legal requirements. Suppliers, service providers and business partners of the Company shall not use forced labor. Labor must always be voluntary, and employees must have the freedom to leave the workplace after normal working hours or terminate employment by giving reasonable and legal notice. The following practices, both direct and indirect, are strictly prohibited:

- servitude: physical or psychological enacted through illegal loans, deposits or expenditures;
- forced labor: prison labor, forced labor under threat of punishment or confiscation of personal documents;
- human trafficking.
- In the management of any activity undertakes to ensure that those involved in transactions do not find themselves, or may find themselves, in conflict of interest with the Company.

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Anyone who is found to be operating in a conflict of interest shall give immediate notice of his or her condition to his or her supervisor.

Conflict of interest includes, but is not limited to:

- personal economic and/or financial interests directly or through a relative of suppliers or competitors of the Company;
- labor relations of any kind, in existence with suppliers or competitors of the Company;
- relationship of kinship, marriage or affinity within the fourth degree with suppliers.
- <u>The Company is actively engaged in ensuring the best conditions of health and</u> <u>safety at work</u> through the adoption of the most suitable and necessary means for the performance of work;
- <u>Recipients must ensure that in the workplace where they work there is no moral,</u> <u>sexual or any other kind of harassment</u> such as, but not limited to, physical contact, physical or other threats as well as offensive forms of conduct;
- **Recipients shall not discriminate or permit discriminatory practices** in hiring, employment, retirement or leave policies on the basis of racial origin, maternity, age, political affiliation, national origin, disability, sexual and/or religious orientation;
- <u>The Company is committed to fostering gender equality</u> in the workplace by providing equal opportunities for all employees.
- In dealing with suppliers it is necessary to:
- preliminarily carry out a <u>verification</u> of all available information in order to avoid undertaking or maintaining business relations with suppliers of whom there is news or well-founded suspicion of involvement in illegal activities;
- select suppliers on the basis of <u>objective criteria</u> such as, but not limited to, financial soundness, territorial extent, quality of service offered in relation to the price proposed;
- **<u>comply with the rules</u>** of conduct set forth in the internal regulations as well as in the provisions set forth under this Code of Ethics.

Furthermore, the Company hereby represents to adopt the following Values:







Speak openly, build trust.

We started with the basics - total transparency and trust. Simple yer huge. At the centre of our open conversations, ideas, businesseming, you'li find hearth. That's whatit takes for us to build trust.

Own it and get it done.

"Over it" - a phrase that's so very Kampany, it had to make the list to represent our roll-up-your-sloores spirit.



A Ruble's cube, just missing one piece. That's the puzzle of overy Kampaayer. With a can-de spirit and accountable mindset, we complete the pieture.



Work, play, live your way.

A glayful shyme to eclobrate our gassion for fun and inclusion.

A dynamic balance of different shapes, free to transform and reach new heights embracing unique lifestyles and respecting all ways of working

Raise the bar 1% everyday.

True to our Rampany spirit, we had to include a number to represent our pursuit of better.

A staticase, or oven boner, a digital staticase, is our symbol for continual growth. **Together**, we climb, stop by meg, always staticing for that cores 14.





Shake up the corporate event world.

Yes, the conjectus overtiwer's can be a chaotic. But with our expert and visionary eye, and berrowing a work from on of our party's minologist, we've already covisioning and shaying the industry's future.