



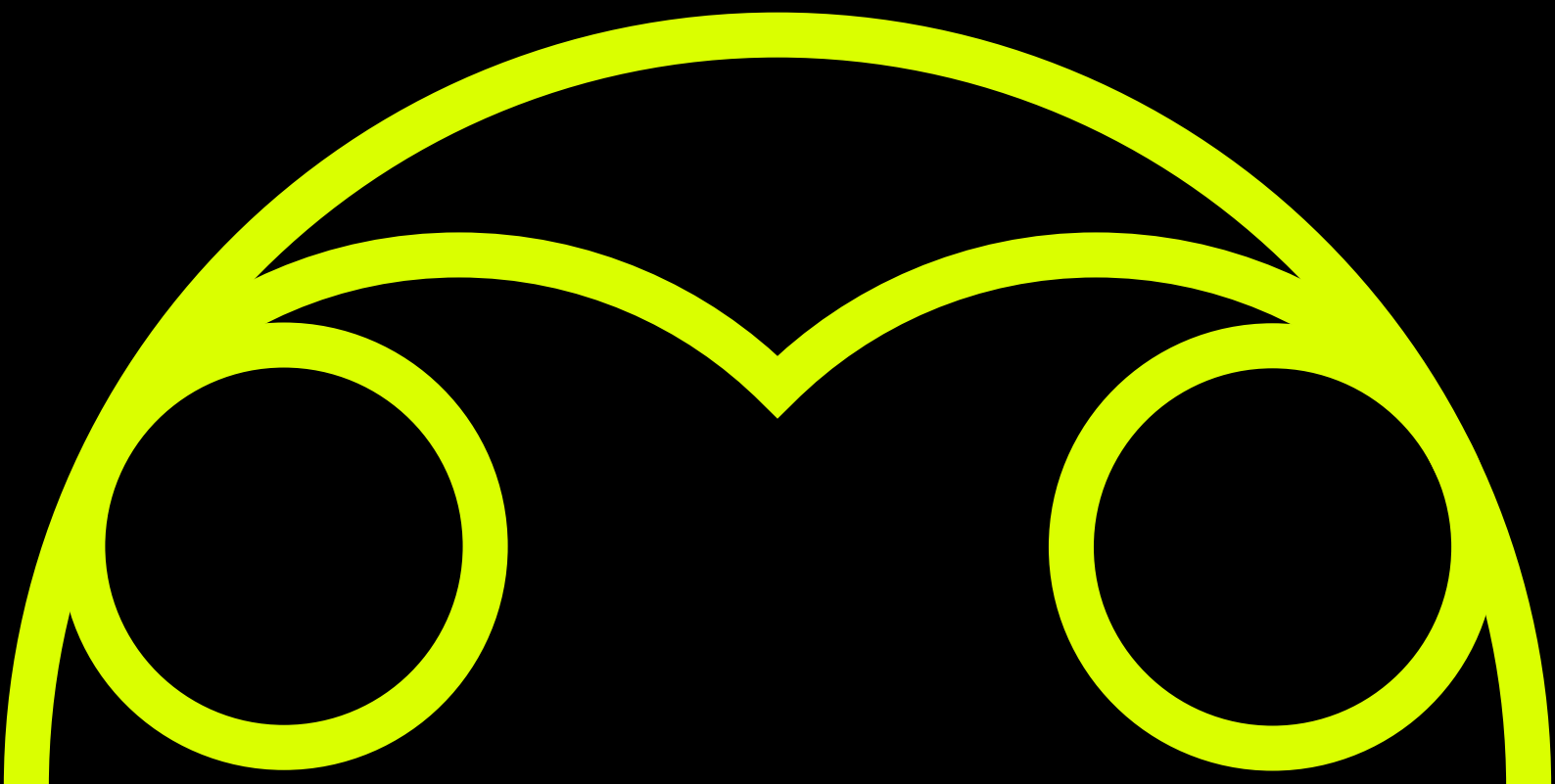
DATA STREAMS FOR
ECO-INNOVATION.

PEOPLE, ENVIRONMENT AND SOCIAL RESPONSIBILITY

Code of Ethics

Fore's Code of Ethics sets out the general principles and rules of conduct to which Fore adheres, recognising in them a foundational ethical value. It defines the ethical and social standards on which our working community is built and guides relations with all parties the company interacts with.

Fore promotes respect for and protection of the centrality of the person, human dignity, the rejection of all discrimination, and respect for fundamental freedoms and rights. At the same time, Fore recognises environmental and social responsibility as an integral part of its identity: eco-innovation and care for the common good are not an appendix to the company's business, but its foundation.



PREAMBLE

Fore draws up and adopts this Code of Ethics in order to affirm the dignity of the person, to prevent conduct amounting to harassment, mobbing and discrimination in the workplace, and to set out the principles of integrity, legality and responsibility that guide the company in its dealings with people, the environment and society.

The Code is adopted in the awareness that all workers have the right to be treated with respect and dignity. Any form of harassment, mobbing, discrimination or violence has damaging effects on the health, confidence, morale and performance of those who are its victims and, to a lesser extent, of those who become aware of it.

Protection of the working environment and the right to working conditions that respect the dignity of the person are guaranteed by the constitutional principles of substantive equality (ARTICLES 3, 37 AND 51 OF THE ITALIAN CONSTITUTION), by European recommendations and directives, and by national legislation on equal treatment and protection against harassment, violence and discrimination.

The Charter of Fundamental Rights of the European Union affirms the right of everyone to work and to pursue a freely chosen or accepted occupation (ARTICLE 15), prohibits any form of discrimination (ARTICLE 21), and affirms the right to equal treatment between women and men in all areas, including employment, work and pay (ARTICLE 23).

General Principles

ARTICLE 1

Scope

This Code of Ethics protects the dignity of all Fore workers and governs the conduct of the company and of those who act on its behalf. It applies to employees, trainees, freelance contractors, occasional collaborators, directors, working partners and, more generally, to anyone who has an employment or collaboration relationship with the company. In what follows, the term “worker” is used to refer interchangeably to all the categories listed, regardless of sex.

The Code applies in every context in which work is carried out, including physical workplaces, remote working and any form of digital communication (email, messaging, video conferencing and collaborative tools).

In defining its principles, Fore refers in particular to:

- The constitutional principles of substantive equality (ARTICLES 3, 37 AND 51 OF THE ITALIAN CONSTITUTION);
- Recommendation 92/131/EEC on the protection of the dignity of women and men at work;
- Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment;
- Legislative Decree 198/2006 and subsequent amendments (the “Code of Equal Opportunities between Men and Women”);
- ILO Convention No. 190 of 2019 on the elimination of violence and harassment in the world of work, ratified by Italy with Law No. 4 of 15 January 2021;
- Legislative Decree No. 24 of 10 March 2023 on the protection of persons who report breaches (whistleblowing);
- National and European legislation on the protection of personal data (Regulation EU 2016/679 – GDPR).

ARTICLE 2

Integrity, legality and fairness

- Fore carries out its activity in compliance with the law, applicable regulations and the principles of honesty, fairness and transparency. Every worker is required to act with integrity and to refrain from conduct that is unlawful or harmful to the company's reputation.
- Fore rejects all forms of corruption and does not permit unlawful practices to obtain advantages for itself or for the company.
- Every worker is required to prevent situations of conflict of interest, even potential, between their personal activities and their duties towards the company, and to report them promptly should they arise.

ARTICLE 3

Confidentiality and data protection

- Fore processes personal data and confidential information in compliance with applicable legislation and the principles of lawfulness, fairness and minimisation. Workers are bound to confidentiality regarding the information they become aware of in the course of their activity.
- Confidential information relating to the company, its clients or third parties is used solely for purposes connected with work and is protected against unauthorised access or disclosure.

ARTICLE 4

Principles and aims

- Every Fore worker has the right to a safe, peaceful working environment conducive to interpersonal relations, in compliance with the fundamental principles of inviolability, equality, freedom and dignity of the person. The company undertakes to remove any obstacle to the fulfilment of these rights.
- Fore recognises and guarantees to every worker the right to protection from unwanted conduct of a sexual nature, from moral violence and psychological persecution, and from discrimination based on sex, race or ethnic origin, religion or personal beliefs, disability, age or sexual orientation, also adopting the training, information and prevention initiatives needed to foster a culture of mutual respect.
- It is the duty of every worker to refrain from conduct harmful to the dignity of the person, to foster full compliance with this Code and to contribute to maintaining a working environment and organisation consistent with the principles set out here.
- It is forbidden to take advantage of a position of hierarchical superiority to engage in harassing or discriminatory acts or conduct. Fore provides protection and support to workers in particular situations of personal, family or social disadvantage.
- A worker who has suffered sexual harassment, moral violence or psychological persecution has the right to the cessation of the harassing conduct, including through diversified, prompt and impartial procedures that ensure the confidentiality of those involved.
- Any violation of the dignity and freedom of the worker constitutes a disciplinary offence and must be sanctioned.

ARTICLE 5

Definition and types

Harassment, moral violence and mobbing

Harassment and violence are unacceptable forms of conduct, carried out by one or more individuals, which may take different forms. Moral harassment means any unwanted act or conduct that produces, even indirectly, a detrimental effect on the dignity and the psychological and physical health of the worker in the course of work. Vexatious acts, criticism and mistreatment take on the character of moral violence when they are aimed at discriminating against, discrediting or harming the worker in their career, status, personal integrity or professional role.

Mobbing means any form of moral or psychological violence exercised through systematic and habitual, persecutory and aggressive conduct towards a

worker who becomes the repeated target of abuse by superiors or colleagues, with the effect of undermining their psychological balance, capacity for work and self-confidence. Mobbing may be exercised both between peers and along hierarchical lines.

Conduct qualifies as mobbing when it is:

- repeated and sustained over time;
- systematic;
- inspired by a premeditated design, not necessarily explicit.

Examples of moral harassment and mobbing may include:

- the continuous undermining of a person's image;
- discrediting, slandering or defaming a worker in the workplace;
- humiliating, or carrying out acts intended or having the effect of harming the worker's career;
- exclusion or marginalisation from company communication, deliberately withholding work-related information or providing incorrect information;
- the use of threats, insults or deliberately hostile attitudes, and the systematic exclusion of the worker from projects in which they should be involved by reason of their role and function.

Sexual harassment

Sexual harassment is defined as any unwanted act or conduct – physical, verbal or non-verbal – of a sexual nature or based on sex, that offends the freedom, dignity and inviolability of the person to whom it is directed (E.C. Recommendation of 27 November 1991 and Article 26 of Legislative Decree 198/2006, as amended by Legislative Decree 5/2010). Sexual harassment is more serious where it is carried out in connection with decisions concerning recruitment, training, retention of the post, promotion, pay or any other employment-related decision, or where it creates an intimidating, hostile or humiliating working environment.

Examples of sexual harassment may include:

- sexist verbal remarks and conduct implying an inferior view of the other sex or of the sexual orientation of the person to whom they are directed;
- requests for sexual favours or unwanted proposals of a sexual nature;
- inappropriate and offensive conduct aimed at obtaining unwanted physical contact;
- conduct aimed at proposing sexual acts, aggravated by threats of sanctions or negative work consequences, or by the promise of advantages;
- intimidation, threats and blackmail suffered for having rejected conduct aimed at sexual relations;
- the display or posting of pornographic material in the workplace, including in electronic form;
- the adoption of sexist criteria in any kind of interpersonal relationship.

Discrimination

Discrimination occurs in the case of unwanted conduct, carried out for reasons connected with sex, religion, personal beliefs, disability, age, sexual orientation, race, ethnic or social origin, language or political opinions, having the purpose or effect of violating the dignity of a worker and creating an intimidating, hostile or degrading climate.

Pursuant to Article 25 of Legislative Decree 198/2006, as amended by Legislative Decree 5/2010, a distinction is drawn between direct discrimination – any provision, criterion, act or conduct that produces less favourable treatment on grounds of sex compared with another worker in a comparable situation – and indirect discrimination – an apparently neutral provision, criterion or practice that places workers of a given sex at a particular disadvantage, unless objectively justified by a legitimate aim pursued by appropriate and necessary means. Less favourable treatment on grounds of pregnancy, maternity or paternity, including adoptive, also constitutes discrimination.

ARTICLE 6

Preventive measures

In order to ensure a working environment in which equal dignity and respect are recognised for all, Fore:

- undertakes to counter offensive attitudes which, by harming human, civil, cultural and religious rights, conflict with a civil and democratic society;
- acts to overcome moral violence and hostile forms of communication;
- promotes a relational climate in which conflicts are managed consciously;
- monitors the situation of personnel across the company's areas of activity;
- appoints the Trusted Counsellor and supports their activity, promoting awareness of their role, functions and actions.

ARTICLE 7

Responsibility for applying the Code

On the understanding that every worker is required to foster an organisational climate consistent with this document, managers are required to oversee the correct implementation of the Code's provisions and to promote a relational climate and organisational conditions that prevent forms of isolation or discrimination.

The Trusted Counsellor

The Trusted Counsellor is the company's internal point of reference, tasked with providing advice and assistance to anyone who is the subject of mobbing, sexual harassment or discriminatory conduct. Where an unwanted act or conduct falling within one of the categories defined above occurs, the worker may turn to the Trusted Counsellor, who initiates a procedure aimed at resolving the case and helping to overcome the situation of distress in order to restore a peaceful working environment.

- The Trusted Counsellor ensures that personnel reporting cases of mobbing, discrimination or harassment are heard and protected, proposing to the company and the competent bodies appropriate measures for their removal and resolution, and explaining the procedures available.
- The Trusted Counsellor is a person internal to Fore, appointed by the President from among those who possess the moral qualities and professional experience suited to the role. The President makes the appointment known to all workers.
- They initiate action aimed at resolving the problem, which must be concluded within a reasonably short time given the sensitivity of the matter.
- They report annually to the Board of Directors on the activity carried out, suggest positive actions and take part in training and information initiatives on the matters covered by this Code.
- They may be removed by a reasoned decision of the President in cases of serious failures, omissions, delays or breaches of the obligations of impartiality, fairness and confidentiality.
- The role of Trusted Counsellor is performed free of charge.

Examples of moral harassment and mobbing may include:

- receives and assesses reports against this Code;
- consults the parties concerned and undertakes initiatives aimed at overcoming situations of distress;
- may draw on the company's offices according to the expertise required and seek the support of the competent Equality Counsellor;
- requests from the President or the competent manager copies of documents relating to the cases being handled, which are provided promptly.

Procedures for handling cases

Informal procedure

A worker who has suffered or is exposed to sexual harassment, moral violence or psychological persecution may use the informal procedure, by turning directly to the Trusted Counsellor, or the formal procedure under the legislation in force on disciplinary responsibility. The company is obliged to make the Trusted Counsellor's contact details known to workers, including by electronic means of communication.

In the informal procedure, the Trusted Counsellor:

- examines the case and provides the person concerned with all useful information on the forms of protection available and the relevant time limits;
- in agreement with the injured party, assesses the appropriateness of a direct meeting, in their presence, with the alleged perpetrator;
- proceeds, confidentially, to gather the information needed to assess the case, respecting the rights of both the injured party and the alleged perpetrator;
- communicates to the injured party, with their consent, the initiatives intended and the proposals for an amicable solution;
- reports to the President on the outcome of the procedure so that arrangements can be made to settle the matter;
- may propose the reassignment of one or more of the persons concerned;
- where the person proposed for reassignment is the injured party, their consent must first be obtained.

The informal procedure must be concluded within 60 days of the request for intervention; this term may, at the reasoned request of the Counsellor and after notifying those concerned, be extended by a maximum of a further 60 days. Participation in meetings may take place during working hours. The injured party may at any time request that the procedure not continue, in order to make use of other forms of protection.

Formal procedure

Recourse to the formal procedure is also permitted where the injured party considers the attempts at an informal solution to be insufficient or ineffective.

- The formal procedure begins with a written report of the harassing conduct, addressed to the competent manager who exercises disciplinary authority;
- Where it is the latter who has engaged in the conduct, the report is addressed to the President.
- The disciplinary proceedings are conducted with the forms and safeguards provided for by the legislation in force; all documents are recorded in a confidential register.
- On request, the Trusted Counsellor provides assistance to the injured party and technical advice to the authorities competent for the investigation and the imposition of sanctions.
- Disciplinary sanctions are applied to those responsible for harassing

conduct according to the criteria of graduality and proportionality provided for by law.

- Once the report is found to be well-founded, the company protects the worker who submitted it from any form, even indirect, of retaliation or penalisation and ensures that the harassing conduct actually ceases; the same protection is afforded to those who have given evidence consistent with the report and to the Trusted Counsellor.
- A worker who knowingly reports non-existent facts, solely to denigrate someone or to obtain advantages at work, is liable to disciplinary action; in such cases the company acts to restore the good name of the accused, including through publicity where requested by the person concerned.

ARTICLE 10

Confidentiality, protection and retaliation

- All persons involved in cases of mobbing, sexual harassment and discriminatory conduct are bound to secrecy regarding the facts and information they become aware of. The person who has suffered such conduct has the right to request the omission or deletion of their name from any document subject to publication.
- The right of access to documents is guaranteed to the direct addressees and to third parties whose knowledge is necessary to protect or defend their legal interests, save where access to preparatory documents may disrupt the proper conduct of the proceedings.
- In the case of measures subject to publication, arising from or connected with harassment proceedings, the worker concerned has the right to confidentiality of their name in the published document.
- Any form of retaliation, direct or indirect, against those who report cases of harassment or mobbing, including witnesses and third parties, may also be assessed from a disciplinary standpoint, without prejudice to the right of the person affected to seek protection in any forum.

ARTICLE 11

Discriminatory acts

- The company acts without delay to annul, by way of self-remedy, any acts that worsen the worker's position and that derive from discriminatory acts following harassment.
- Detrimental measures taken within one year of the reports referred to in Article 9, against the injured party or those who have given consistent evidence, are presumed to be discriminatory in nature, unless proven otherwise.
- Acts favourably affecting the worker's position, obtained through improper conduct, may be annulled, including at the request of the injured party, in accordance with the legislation in force.

ARTICLE 12

Environmental commitment

Fore recognises the protection of the environment as a foundational value of its activity. The company works for eco-innovation and places its expertise at the service of more efficient and sustainable infrastructure management, contributing to the reduction of waste and the safeguarding of natural resources. Fore undertakes to operate in compliance with environmental legislation and to promote, in its own choices and those of its partners, the responsible use of resources.

ARTICLE 13

Responsible use of resources

Fore promotes the conscious use of energy and material resources in carrying out its activity, favouring lower-impact solutions and encouraging behaviour

ARTICLE 14

Responsibility towards clients and the community

Fore operates in the awareness that its work affects services essential to the community. The company undertakes to provide its clients with reliable, transparent solutions that respect the public interest, placing the quality and integrity of the service above short-term advantages, and recognises its responsibility towards the communities served by the infrastructure on which it works.

ARTICLE 15

Ethical use of artificial intelligence and data

Fore develops and uses artificial intelligence tools to support the work of professionals, in the conviction that technology should assist rather than replace human judgement. The company undertakes to use artificial intelligence systems in a responsible, transparent and verifiable way, ensuring that significant decisions remain under the control and responsibility of competent people.

Fore handles its clients' data confidentially and in compliance with applicable legislation, adopting adequate measures to ensure its security, integrity and proper use, and using it solely for purposes connected with the service.

ARTICLE 16

Relations with suppliers and partners

Fore bases its relations with suppliers and partners on the principles of fairness, transparency and mutual respect. The company favours collaboration with parties who share the values expressed in this Code, in particular regarding respect for people, legality and sustainability.

ARTICLE 17

Reporting

- Anyone who becomes aware of a breach of this Code or of unlawful conduct connected with the company's activity may make a report. Fore guarantees accessible reporting channels and the confidentiality of the reporter's identity, in line with Legislative Decree 24/2023 on whistleblowing.
- Fore ensures that no person suffers direct or indirect retaliation for having made a report in good faith. Reports concerning harassment, mobbing and discrimination are handled in accordance with the procedures set out in Title II.

ARTICLE 18

Entry into force

This Code enters into force on the day following its adoption by the Board of Directors and, from that date, all workers are required to comply with it.

ARTICLE 19

Amendments

- Amendments to this Code are decided by the Board of Directors, including on the proposal of the Trusted Counsellor.
- The Board of Directors periodically reviews the results of the Code's adoption and makes any amendments or additions that become necessary, including following the enactment of new national or European rules relevant to the matters covered here.

fore

DATA STREAMS FOR
ECO-INNOVATION.

the algorithm is the easy part

– RICCARDO DE SOCIO, CEO

LEGAL HQ

via Chiesanuova 127/A
35136 Padova

MAIL AND WEBSITE

info@foredata.ai
www.foredata.ai

VAT

05413560284
Fore srl