

P R I M A T E[®]

evolutionary purpose company

Ethical code

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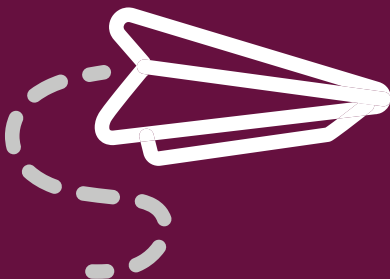
1. WHO IS PRIMATE AND WHAT IS ITS PURPOSE

PRIMATE Srl – Benefit Corporation was born with the aim of contributing to the evolutionary leap of people, companies and communities, freeing positive energies, innovating organizational models and managerial practices and co-creating spaces for the development of the skills, the business and the eco-system where people live and work.

Business and common good. Primate Srl-SB does not want to give up neither of them, and believes That they both represent a powerful development tool. For this PRIMATE chose to become a Benefit Corporation (Società Benefit).

As the Nobel laureate for Economics Robert Shiller said: “benefit corporations will be a winning model in which the most profitable companies will be part of, thanks to their ability to inspire employees and the community that supports them”

BENEFIT CORPORATION



As a Benefit Corporation we formally undertake the commitment to pursue goals of common benefit in addition to the goal of the proper functioning of the company.

2. ETHICAL PRINCIPLES

In the exercise of its economic activity, Primate Srl-SB pursues goals of "common benefit". It operates in a responsible, sustainable and transparent way towards people, companies, communities, territories, the environment, cultural goods and activities, companies, bodies, non-profit entities and other stakeholders.

Every action and intervention of Primate Srl-SB is guided by ethical values and principles that satisfy the fundamental responsibilities in the fields of human rights, work, environment and anti- corruption. We have in fact defined our ethical principles inspired by the Ten Principles of the United Nations Global Compact, which derive from: the Universal Declaration of Human Rights, the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work, the Rio Declaration on environment and development and the United Nations Convention against Corruption.

Below, the eight ethical principles that guide the conduct of Primate Srl-SB:

WE SUPPORT



Since 2020 Primate is part of the global corporate responsibility action of UNGC-United Nation Global Compact and formally adheres to its principles in the area of human rights, work, environment and anti-corruption. Primate is also Founder of the GCNI-Global Compact Network Italia.

Human rights



Principle 1 - Respect for human rights

Primate Srl-SB operates in full respect of human rights and is committed to support good practices or the development and respect of human rights proclaimed at international level, as indicated by principle no. 1 of the United Nations Global Impact. It also pays particular attention to the rights of the most vulnerable groups: the majority of the company's members are women and offer students from all over the world the opportunity to carry out an internship experience.

The company is also particularly careful to select the companies with which it collaborates, making sure not to forge relationships with those involved in the violation of human rights (principle No. 2 of the United Nations Global Impact).

Work



Principle 2 - Confidentiality and privacy

Primate Srl-SB guarantees compliance with the current legislation on privacy towards all stakeholders. In fact, all information that the company becomes aware of is covered by confidentiality. The company therefore protects both its collaborators and customers with respect to the data it possesses through the observation of the GDPR (EU Regulation 2016/679) and the Italian Legislative Decree 101/2018.

Principle 3 - Respect for personal freedoms

The company respects the right to freedom of expression, opinion and decision in all areas of working life, promoting a working climate which is free of violence, pressure, fear and threats, just as indicated by the principle no. 3 of the United Nations Global Impact.

Furthermore, Primate Srl-SB, in compliance with the principle no. 4 of the United Nations Global Impact, guarantees the complete freedom of the parties in the working relationship: the company is free to undertake collaborative relationships with people selected by you and to interrupt the working relationship at all times, in compliance with the agreements established between the parties.

In the same way, each collaborator is free to start a working relationship with the company and to interrupt it at any time, always in compliance with the established agreements.

Finally, the company aims to contribute to the satisfaction and well-being of the people who are part of society and to those with whom it collaborates by guaranteeing understanding, identity, participation, affection, creation, freedom, energy.

Principle 4 - Impartiality

Primate Srl-SB respects the right of members and collaborators to exercise their personal freedoms in terms of participation in employers' associations, political, religious and sexual orientation. Furthermore, through recruitment and selection processes, it guarantees equal access to professional opportunities and conditions of economic and employment treatment, without any discrimination. The collaborators, in fact, are selected based on their skills and professionalism and there is no preference due to other reasons (principle No. 6 of the United Nations Global Impact). The company implements policies and initiatives in favor of civil society, the local community and the territory to which it belongs. PRIMATE Srl-SB does so by signing agreements with universities to host internships and to hold specialist lectures, and with secondary schools to help students to maximize the knowledge acquired in the study path and thus enhance and empower new generations, facilitating their insertion into the labour market.

Principle 5- Sustainable innovation

Primate Srl-SB aims to inspire and contribute to the design and introduction of sustainable innovation practices and models in companies and institutions, to accelerate a positive transformation of the cultural paradigms of the organizational world. It also develops partnerships with non-profit organizations, foundations whose purpose is aligned and synergistic with that of the company, to contribute to their development and expand the positive impact of their work.

Principle 6 - Beauty and passion

Primate Srl-SB pursues the goal of beauty in every project that is carried out and puts passion in everything it realizes. Beauty means being able to satisfy the soul through the senses, becoming an object of deserved and worthy contemplation: this is the essence of the action of Primate Srl-SB.

Partners and collaborators work with passion, with intensity of sentiment, with enthusiastic and totalitarian dedication. The distinctive elements of the company approach are the beauty expressed in all its aspects and the passion acted by each person who collaborates with the company and by the customers who decide to design their development together with Primate Srl-SB.

Environment



Principle 7 - Respect for the environment

The company undertakes not to cause damage to the surrounding environment, to research and apply ways to take as little as possible from natural systems, to use low environmental impact tools and consumables, as well as not to do waste in general. The approach adopted is a precautionary one, as indicated by the principle no. 7 of the United Nations Global Impact. In this sense, the company undertakes to prevent the risk of environmental impact through the use of products and services that guarantee greater respect for the environment. Furthermore, Primate Srl-SB, in accordance with principle no. 8 of the United Nations Global Impact, promotes the spread of greater environmental responsibility among its main stakeholders (partners, collaborators, customers, companies). Finally, the company uses environmentally friendly technologies and services, as indicated by principle no. 9 of the United Nations Global Impact (e.g. waste cycle, energy sustainability).

Anti-corruption



Principio 8 – Fairness and honesty

In compliance with principle no. 10 of the United Nations Global Impact, Primate Srl-SB exercises in full compliance with national and international laws and against any type of corruption that may bring financial and non-financial advantages. The company constantly monitors financial activities through periodic checks by all shareholders. In addition, the accounts and the preparation of corporate financial statements are entrusted to a third party commercial entity to the company and their approval is entrusted to the board of shareholders.

3. AREAS AND METHODS OF IMPLEMENTATION

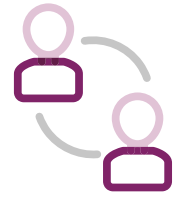


Relationship with clients

Building a long-term partnership with customers is at the heart of Primate Srl-SB's purpose and is based on the elements of trust, transparency, fairness, honesty and professionalism. This means:

- Always offering services of the highest possible quality
- Imposing every business relationship on the basis of the ethical and legal principles in force
- Seeking a continuous and reciprocal comparison to collect feedback and evaluations relating to specific and general activities. For this reason, in addition to a continuous measurement of customer satisfaction made through the identification of specific KPIs monitored in the annual Impact Report, Primate Srl-SB has equipped itself with a qualitative feedback register, and invites a customer to a meeting at least once a year, to participate and collect suggestions, ideas, indications.

Relationship with collaborators



The collaborators of Primate Srl-SB constitute its wealth and its most precious asset. For this reason, fundamental rights are protected, professional characteristics are enhanced, potential is developed. The principle of non-discrimination is pursued starting from the selection: each research declares from the beginning that the selection focuses on people's skills, regardless of gender, ethnicity or religion characteristics.

To make the selection process as objective as possible, the different candidates face both written and oral tests that are the same and comparable, so that the final decision rests on elements actually linked to the skills and not to the subjective aspects of the person or recruiter. The collaborations are carried out in full compliance with current legislation, both from a contractual and remuneration point of view. The creation of the work teams is based on the consistency between personal skills and motivations.

The physical and moral integrity of the collaborators is considered an important value. For this reason, healthy and respectful working conditions are guaranteed, both in the offices in which the company operates and, within the limits of the company's possibilities, in the activities that take place with customers, both in relation to work spaces and times. Whenever possible, collaborators can choose whether to participate in meetings, discussions, interviews, group work in the presence or remotely, in order to facilitate work-life balance and also limit traffic increase, use of private and public means and therefore of CO2 emissions.



Relationship with suppliers

In establishing a partnership with its suppliers, Primate Srl-SB intends to abide above all by principles of correctness, impartiality and transparency.

Given that the choice of a supplier is essentially dictated by the objective competitiveness of the products / services offered, for the same competitiveness, those suppliers belonging to the social groups represented below will be privileged.

Relationship with the environment



Primate Srl-SB considers the environment a primary asset for itself and is committed to promoting its respect and protection by all stakeholders. In particular, it undertakes to use, where possible, ecological and / or recycled materials, to correctly and continuously comply with the indications relating to the correct disposal of waste, and to limit the use of energy and CO2 emissions:

- Limiting printing of documents to the bare minimum and instead favoring the use of digital documentation both internally and with customers
- By purchasing environmentally friendly stationery and unbleached paper
- By suggesting to their consultants, through the indication of possible suppliers to contact, the use of environmentally friendly stationery and other equipment for work with a low environmental impact
- By choosing whenever it is possible to use the train for one's own trips instead of the car or plane
- Checking that the buildings in which the offices reside respond to ecological criteria both in the structure and in the management of energy, water and the waste cycle

4. DISCLOSURE



Read and approved by the members, the code is published with adequate prominence on the company's website www.primate.consulting. A copy of it is also delivered to each new collaborator, to whom it will be presented for further information and, if necessary, training.

5. CONTROL SYSTEM

In the event of violations of the Ethical Code, Primate Srl-SB adopts disciplinary sanctions which (based on the regulations in force) can go as far as those responsible for the violations.

Infringement reports must be sent in writing and not anonymously to info@primate.consulting, specifying in the most objective and detailed way what has been observed and how an ethical principle has been violated.

Those who report the violations are guaranteed anonymity and are guaranteed against any form of retaliation, discrimination or penalty.

The report will be accepted and verified by one of the company's members within 30 days and a response will be given to the person who made the report, as well as giving rise to any measures if this is correct.



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