

HYDEA SpA Code of Ethics
(rev 03/2025)

Art. 1

Application

The regulations in this Ethical Code apply to company employees, associates, and consultants operating in name and on behalf of the Company.

Employees and consultants undertake to observe the provisions of this Code upon hiring in service, in whatever role they operate.

Art. 2

General Principles

Employees and consultants must display behavior which reflects loyalty, impartiality, diligence, and honesty, avoiding all abuse of power that aims to give them or others undue advantages.

In particular, the behavior of employees and consultants must be based on the maximum inclusion of colleagues in the working process, without distinction of gender and age.

Art. 3

Behavior

Employees will be committed and assiduous in their work, diligently adhering to their job description and assigned tasks on a daily basis, in accordance with applicable laws and norms.

While using goods and services for work purposes, employees must be able to justify said use at all times in accordance with correct job practices.

Employees and consultants will operate with the maximum transparency. They will neither induce nor contribute to the creation of privileged situations and will not partake in such.

While working, an employee or consultant:

- a) Will neither accept commitments nor make promises regarding matters that fall under another person's competency;
- b) Will not take part in informal meetings regarding matters related to company business with interested parties unless expressly authorized by the project manager.

Art. 4

Prohibition of accepting gifts or other benefits

It is prohibited for employees to accept, on any occasion, for themselves or others, gifts or other benefits from individuals who are in any way connected with company business, with the exception of customary gifts of moderate value.

An individual who inadvertently receives a gift or other benefit which is not of moderate value will promptly communicate this in writing to the Audit Committee, taking steps, at the same time, to return the gift or other benefit in question.

Similarly, it is prohibited for employees to offer gifts or other benefits, with the exception of customary gifts of moderate value.

Art. 5

Conflict of Interest

Employees and consultants will neither make decisions nor carry out activities incident to their responsibilities if this places them in a situation of conflict of interest. Any individual who finds himself in a situation that conflicts with the interests of Hydea must immediately inform the Audit Committee.

Art. 6

Obligation of confidentiality and professional secrecy

Employees and consultants are required to rigorously uphold office confidentiality and every other obligation of confidentiality inherent to information regarding the company. Anyone who should become aware of the improper use of reserved or privileged information or of the leak of any type of information which is property of the Company and/or of a violation of privacy must immediately inform the Audit Committee.

Art. 7

Privacy Obligations

Employees, consultants and collaborators are required in compliance with the legislation on privacy (see Eu Regulation 2016/679 and Legislative Decree 196/03 and following modifications) to the obligation of confidentiality regarding the personal data of which Hydea is the Data Controller, in accordance with the instructions provided by Hydea and the appointments received.

Art. 8

Organizational, Management and Supervisory Model according to D.Lgs. 231/2001

Employees and consultants are obligated to rigorously adhere to the Organizational Model published on the website and to punctually and thoroughly follow it when reporting events indicated in said model to the appropriate company authorities.

Art. 9

Penalties and Compensation for Damages

Violations of the present ethical code or of the norms and procedures referred to in the Organizational Model will result in sanctions by the Disciplinary Board.

Hydea S.p.A., in all cases, reserves the right to resort to any remediation provided for by law or justice in its own favor in case of violations of the aforementioned conditions, including the right to compensation for damages.

Art. 10

Gender Equity

The Company recognizes gender equality as a foundational principle of its corporate culture and is committed to promoting a fair, inclusive, and diversity-respecting work environment. In line with UNI/PdR 125:2022, the Company has adopted a Gender Equality Policy that outlines objectives, actions, and tools aimed at ensuring equal opportunities and the recognition of merit,



while preventing all forms of discrimination.

Compliance with the principles of equality is mandatory for all employees, collaborators, and consultants of the Company. Behavior contrary to these principles will be considered a violation of this Code of Ethics.

Signature