



CODE OF ETHICS

NEXI GREECE PROCESSING SERVICES SINGLE MEMBER S.A.

1. INTRODUCTION

This Code of Ethics states the corporate and ethical values, as well as the rights, duties and responsibilities of NEXI GREECE with respect to all the subjects and stakeholders it has relations with, in the pursuit of its corporate objectives. The Code of Ethics also sets the standards of reference and the rules of conduct that must guide the behavior and the activities of those who operate within NEXI GREECE, be they Personnel, Members of the Corporate Bodies and external collaborators.

The Company carries out its activities in complex and highly competitive environments which are at the same time governed by numerous laws – the respect of which is a fundamental duty – and lacking in institutions and rules: this is the framework in which ethics is positioned, where ethics is intended as a means to orientate the conduct of all those who operate on behalf of the Company by referring to general ethical principles, in addition to and beyond legal provisions. It is the belief of NEXI GREECE that business ethics is the primary condition for the Company's success.

The Code of Ethics reflects the spirit by which NEXI GREECE employees should act and dictates the general management, supervisory and control principles forming the foundations of the organizational models, as well as governing cases and behavior specific to the Company.

The Code of Ethics is supported and adopted by NEXI GREECE Board of Directors and the entire leadership team, in subsequent alignment with Nexi Group model and the version of Code of Ethics (CC-007) approved by the Board of Directors of the parent Company Nexi S.p.A.. The Organizational Model also reflects the aim to prevent violation of the principles of legality, transparency, fairness and loyalty by "persons in top management positions" and by employees and collaborators.

NEXI GREECE undertakes to make the Code of Ethics known to all the internal and external addressees through the activation of the appropriate communication channels.

Adherence to this Code of Ethics is a condition of employment at NEXI GREECE. Failure to follow its standards, or failure to report a known violation can lead to disciplinary actions.

NEXI GREECE also undertakes to ensure that the content of the Code of Ethics is fully and actively applied to the corporate activities.

2. SCOPE OF APPLICATION

This Code of Ethics is binding, with no exceptions, on all Group employees of both the parent Company and the subsidiaries - also foreign (even hired after the adoption of the Code) and all persons connected by any employment relationship with the Group, including temporary workers (hereinafter also "Personnel"), the Members of the Corporate Bodies (partners, members of the Board of Directors, members of the Board of Statutory Auditors and members of the Supervisory Body, where set up) as well as all external collaborators

(i.e. consultants, external auditors, suppliers of goods and services, other partners or external professionals etc.) generally referred to below as "external collaborators" of NEXI GREECE who are, therefore, the recipients (hereinafter "Recipients") of this Code of Ethics.

Conduct in line with the principles expressed by the Code of Ethics is also demanded of contractors, business partners and all of those who, either directly or indirectly, have relations of any kind with NEXI GREECE.

3. THE MISSION

The mission of Nexi Group is to build the future of digital payments and be a dominant player across Europe, contributing to PayTech industry evolution and constantly improving customer experience.

With reference to Code of Ethics (CC-007), in order to achieve this mission, the Group and subsequently NEXI GREECE aims at:

Continuous innovation - to study global trends, carefully analyze the behaviour and needs of different customers, constantly invest in technology and skills in order to always be ready to offer the most innovative payment solutions, in response to everyday needs.

Unique skills - a staff of people with many years of experience in the payment market, which is combined with the skills of managers and specialists from companies with excellence in the world of innovation, services and technology.

Total reliability, that is to hold the commitments by doing the utmost to guarantee high levels of service and constantly improving our processes, always aiming for excellence.

Maximum simplicity - to do everything possible to put the customer always at the center of ideas and daily work, with the aim of creating and proposing products and services that are designed to simplify payments and daily life.

4. PRINCIPLES AND ETHICAL VALUES

The Recipients of the present Code of Ethics, pursuing the mission of Nexi Group, adopt and adhere to the principles and ethical values as follows, in every case entering into relations with all our stakeholders.

Customer-centric principle and Excellence are our guiding pillars.

The **customer** is the driving force of every project and initiative, the reference point orienting the behaviors and choices of strategic initiatives, as well as our everyday activities.

Excellence is the ultimate goal of everything we do and the result of the daily practice of the values in which we believe and we reflect.

Our values inspire the conduct of the individuals and the Company in relations with all our stakeholders and are an integral part of the NEXI GREECE culture.

In particular, NEXI Greece adopts and adheres to the below principles and values, as part of Nexi Group, in alignment to Code of Ethics (CC-007) and in order to achieve the aforementioned mission:

4.1 Honesty, fairness, transparency and impartiality

The Company encourages the creation of an environment characterized by a strong sense of ethical integrity, in the belief that this element is also decisive for an effective internal control system and positively influences the achievement of the Company's success. Recipients adopt behaviours based on maximum honesty, fairness and transparency.

In particular, in the behaviour towards third parties, it is forbidden to:

- take action and communicate information, in any way and form, that may be misleading, mislead the representatives of the Company, and violate the right to make independent and informed choices;
- give or promise money or other benefits (including, gifts, charity, sponsorships, etc.) - even following influence by the third parties themselves - with the aim of promoting or unduly favouring the interests of the Company.

The Company also encourages the diffusion of a culture based on compliance and tax risk prevention, raising awareness of all Recipients on tax issues aiming at a prior assessment not only of risks, but also of opportunities.

Specifically, it requires compliance with principles based on values of honesty and integrity in the management of tax variables, and compliance with the tax rules applicable in the countries in which it operates.

Recipients direct their activities to the general principles of impartiality and fairness, scrupulously following - in any assessment - objective criteria and not accepting any discrimination based on age, state of health, sex, religion, race, opinion and / or political, trade union and cultural affiliation.

4.2 Management of conflicts of interest

Recipients must avoid incurring conflicts of interest, both actual and potential, that could compromise their independence of judgment and choice.

Without prejudice to the principles set forth in this Code, Recipients have the duty to perform their activities on behalf of the Company in its exclusive interest, avoiding any situation of conflict of interests that could prejudice or cause situations of unlawful advantage in its favour, even though family members. In the event that a conflict situation occurs, the Recipients involved must notify the Company departments concerned from time to time.

In addition, situations of conflict of interest, even if only potential, with customers must be prevented.

4.3 Confidentiality, management of confidential information and management of privileged information

Recipients shall keep processed personal data and privileged information confidential or of which they are in possession in the execution of the activities carried out within the Company, ensuring full and timely compliance with the security and protection measures.

To this end, the Company ensures the implementation of appropriate physical and logical measures for the

correct management and protection of personal data and confidential and privileged information, ensuring access only to authorized subjects and safeguarding the confidentiality, integrity and the methods of conservation, also in compliance with current regulations.

It is also forbidden to use and / or disclose any privileged information acquired in the context of the activity performed for the Company under personal interest, where this is outside the specific activities for which said information has been lawfully acquired.

The Company undertakes to keep total confidentiality on confidential information concerning customers, external collaborators and commercial and financial partners with whom it maintains relationships and to use said information only for strictly professional reasons and in any case following specific consent, if necessary.

The obligation of confidentiality does not apply to data or information that is already in the public domain or whose disclosure is required by law.

4.4. Compliance with applicable laws and regulations

Compliance with applicable laws and regulations represents a fundamental commitment of the relationship between the Company, as part of NEXI Group and its stakeholders.

Therefore, this commitment is extended to the Recipients of this Code and to anyone who has or intends to maintain relations with the Company. Relations with those who do not align with this principle will not be undertaken or will be interrupted.

The Recipients of this document are obliged to:

- observe and respect the rules of the legal system in which they operate;
- abstain from committing violations of laws and regulations;
- diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of their functions, and adapt their behaviour to them.

The Company does not accept unlawful and / or illegitimate conduct to the stakeholders and encourages the adoption of measures to prevent the violation of legal provisions by the employees.

The Company also offers specific training and awareness programs concerning certain issues regulated by law.

It also implements control activities and other measures (for example, the provision of specific contract terms) aimed at preventing non-compliance with certain provisions of the law by external collaborators, in the context of the relations maintained by them with the Company.

4.5 Fight against corruption

The Company believes that, as essential elements for the development of its business, compliance with the

laws, regulations, international standards and guidelines, both national and foreign, applicable in the field of anti-corruption is fundamental.

Any practice and form of corruption, unlawful favors, collusion, solicitations, direct and / or through third parties, personal and career advantages for oneself or others are strictly prohibited and, therefore, it is forbidden to start or continue any kind of relationship with those who do not intend to respect these principles.

It is never permitted to pay or offer, directly or indirectly, payments, material benefits and other benefits of any kind to third parties, government representatives, public officials and public or private employees, to influence or compensate an act of their office.

4.6 Environment and working conditions

The Company encourages the creation of safe and healthy workplaces and working conditions that are respectful of individual dignity and personal orientations, as elements to support the physical and moral integrity and serenity of the Recipients, as well as to avoid any discrimination.

The Company encourages the creation and maintenance of adequate environments and workplaces in terms of the health and safety of workers, ensuring compliance with national and international directives on the subject.

The Company endeavours to comply promptly with all applicable legal provisions in the environmental field, also through the involvement and awareness of the personnel directly involved in the management of the impacts generated, as well as those who, although not involved in the Company, are linked to each Group Company by contractual relationships for the management of activities with environmental impact.

4.7 Innovation and technological excellence

The Company, as part of NEXI Group, ensures quality, security, confidentiality, reliability and continuity of services through the constant alignment of IT architecture with technological evolution.

It identifies the best opportunities offered by the national and international market to achieve innovative solutions and services through partnerships.

5. INTERNAL RELATIONS

The ethical principles and values previously described must represent a constant and systematic duty in the operative conduct of every NEXI GREECE employee.

One of the factors in NEXI GREECE's reputation is the ability to carry out its business in compliance with law and following the principles of loyalty, appropriateness, transparency and honesty.

NEXI GREECE condemns all cases of public and private corruption and takes all the most appropriate measures to prevent said offences from being committed.

Practices of corruption, illegitimate benefits, collusion, requests of personal advantages for oneself or for

others are explicitly prohibited. In particular, the following are expressly forbidden: offers, promises, giving money, goods or other benefits (in any form, including Company gifts) with the aim of promoting or furthering the interests of NEXI GREECE.

Whomsoever holds a role of responsibility must represent through their conduct an example for their staff and is bound to promote respect of the provisions contained in this Code so that they are perceived by the personnel as an essential part of the contractual obligations.

5.1 RELATIONS - PERSONNEL

NEXI encourages the protection, motivation, enhancement and integration of employees, as a primary resource in the value creation chain.

To this end, career paths take account of the specific professional profiles and inspire the continuous growth of the skills of the employees, as well as transmitting them the principles and values established in this Code of Ethics.

Appropriate training and awareness programs are encouraged to promote the expansion of each person's skills and competences.

Equal opportunities and professional developments are offered on the basis of merit criteria.

The Company implements all actions aimed at preventing any form of harassment - psychological, physical and sexual - towards employees.

Selection and recruitment

As part of the process for selecting and hiring employees (identifying the need to recruit new resources, evaluating and selecting candidates, hiring), the Company adopts criteria of objectivity, competence, professionalism and compliance with current regulations, applying the principle equal opportunities and without favouritism, with the aim of securing the best skills available on the labor market.

In particular:

- It is forbidden to favour the recruitment of subjects linked to a public official , even following a request from this official - or to representatives of private companies / their subordinates, in order to influence the independence of judgment or influence to assure any advantage for the Company;
- If the recruitment concerns:
 - Disabled personnel, the recruitment of candidates must take place within the lists of subjects belonging to protected categories, to be requested by the competent Labor Office, or in line with what set up by applicable legal framework;
 - Foreign workers must be guaranteed compliance with current legislation on the subject and verification of possession, even for the duration of the employment relationship, of residence permits, where required;
 - Former civil servants, compliance with the statutory prohibitions and with similar acts must be guaranteed.

Protection of personal data

NEXI GREECE complies with the current privacy legislation (also European) and informs each employee on the nature of the personal data being processed, the methods of processing, the areas of communication, taking the appropriate measures to ensure confidentiality.

NEXI GREECE also establishes the list of data that each employee is entitled to deal with. To this end, it provides for the preparation and delivery of specific letters of appointment to the persons in charge of data processing.

The following general recommendations are defined for all employees:

- The subjects in charge of processing personal data will have to operate guaranteeing the utmost confidentiality of the information in their possession, considering, however, all personal confidential data and in some cases subject to professional secrecy;
- The work procedure and the conduct held during data processing must be oriented to prevent risks that may affect data, in particular by preventing personal data from being subject to destruction and loss, even accidental, data being accessed by unauthorized persons, and processing that is not allowed or does not comply with the purposes for which the data were collected. The subjects in charge must therefore act with the utmost diligence and attention in all the processing phases, from the exact acquisition of the data, to their possible updating, as well as regarding the conservation and possible cancellation or destruction;
- The subjects in charge will not be able to carry out data processing for purposes not provided for by the company for which they work.

Diligence and good faith

Personnel must know and observe the contents of this Code.

Their conduct must be based on respect, cooperation and mutual cooperation, acting loyally and in good faith, respecting the obligations contractually signed and ensuring the requested services.

Personnel, regardless of the function carried out and / or the level of responsibility assumed, must know and comply with company regulations and procedures, with particular reference to those pertaining to the activities within their competence, which the Company always undertakes to make available.

Gifts and benefits

It is not allowed to accept benefits (both direct and indirect), gifts, acts of courtesy and hospitality if not of modest value or otherwise such as not to compromise the image of Company, and be interpreted as aimed at obtaining a favourable treatment that is not legitimate and / or determined by market rules.

The above provisions also extend to all of NEXI GREECE's external collaborators.

Selection and management

In the selection process of external collaborators, the Company adopts the utmost transparency and efficiency, ensures impartiality at every stage of the process, maintains the confidentiality of information not susceptible to disclosure, promptly reports any potential or potential conflict of interest.

In selecting external collaborators, the Company guarantees all potential contractors a level playing field, as the selection process is based on objective assessments, according to principles of fairness, cost-effectiveness, quality, innovation, continuity and ethics.

The Company must request assurances from external Collaborators for the adequacy of the means, including financial resources, organizational structures, capabilities, know-how, quality systems and resources in order to carry out the assignment and fulfilment of the requirements of the Company and those of its Customers, as well as the relevant external legislation in the context of collaboration / supply.

To guarantee integrity, independence and the aforementioned principles and criteria in its relations with external collaborators, the Company encourages the definition of internal regulations to regulate the purchasing process, to which employees must strictly comply.

This legislation, inter alia, provides for:

- Separation of roles - where practically feasible - between the subjects and the company functions involved in the various stages of the process (request for collaboration / supply, selection of the external collaborator, contract signing, payment, etc.);
- Adoption of appropriate formalities to adequately document the choices made (so-called "traceability" of the phases of the purchasing process);
- Conservation of information and official documents relating to the selection of external collaborators, as well as contractual documents, for the periods established by the regulations in force and referred to in the internal purchasing procedures.

Employees are not allowed to:

- Influence external collaborators to enter into an unfavourable contract with the prospect of subsequent benefits;
- Give / receive money or give / receive other benefits and gifts not directly attributable to standard courtesy relations.

They are also required to carry out, during the selection of external collaborators and during the management of the relationship, checks on the identity of the counterparty and - as far as possible - carry out in-depth analysis of the activity carried out by the collaborators in order to avoid engaging in relationships with subjects that - considering the information available - may be involved in illegal activities (such as those described in the paragraph "Customer Relationships") and, in any case, without the necessary requirements of seriousness, reliability and commercial professionalism. To this end, employees are required to act in full compliance with external regulations and with the applicable internal control procedures.

Contract execution

Employees are required to scrupulously observe, where adopted, the internal procedures relating to the management of relations with external collaborators and to observe and enforce, in their relations with them, the applicable legal provisions and the contractual conditions provided for.

Fees

The fees and / or sums paid to external collaborators for any reason must be justified in the contract signed with the Company and be proportionate to the service actually provided, also in consideration of market conditions. Payments must be adequately documented and accompanied by all the related justifications - to be kept by the competent organizational units - and cannot in any way be made to a person other than the contractual counterparty.

5.2 RELATIONS – SHAREHOLDERS, BOARDS AND AUDITORS

All NEXI Group Companies adopt the above-mentioned principles and values with respect to the shareholders, All Boards and the Auditors, and in particular the criteria of maximum transparency and fairness, ensuring appropriate, timely and complete information on aspects relating to company management.

In particular reference to relations with shareholders, the Company undertakes to guarantee equality of information, without discrimination and / or preferential behaviour, and to take due account of the indications expressed by these at the appropriate time and places.

Any act, simulated or fraudulent, is forbidden aimed at influencing the will of the members of the Shareholders' Meeting, to obtain the irregular formation of a majority and / or a resolution different from what would otherwise have resulted.

6. EXTERNAL RELATIONS

Both the corporate bodies and the personnel must act with the utmost fairness and integrity in all their relations with persons and entities outside the Company.

NEXI GREECE is active in the fight against public and private corruption. For this reason, the Company asks all its stakeholders to adopt ethical behavior in order to avoid the occurrence of episodes of corruption.

6.1 RELATIONS - CUSTOMERS

In relations with its customers, NEXI GREECE ensures the best execution of the tasks entrusted by directing its choices towards increasingly advanced and innovative solutions, with a view to integration, effectiveness, efficiency and cost-effectiveness.

The full satisfaction of the needs of its Customers constitutes a priority objective for NEXI Group as a whole also for the purpose of creating a solid relationship inspired by the general principles and values laid down in this Code.

The contracts signed with Customers must comply with the provisions of the law and are based on criteria of transparency, simplicity, clarity and completeness, avoiding the use of any deceptive and / or incorrect practice.

When initiating business relationships with new customers and managing existing ones, it is necessary to carry out the checks required by the anti-money laundering legislation and by the procedures adopted by and in force by the Company, in order to avoid relations with subjects that - considering the information

available - can be involved in illegal activities (including, but not limited to activities related to the receipt, laundering and use of money, goods or benefits of unlawful origin, with the purpose of terrorism or subversion of the democratic order, not respecting individual personality and environment, as well as criminal and / or mafia-type associations) and, in any case, lacking the necessary requisites of seriousness and commercial reliability.

Business negotiations and tenders

Subjects who, in the interest and / or on behalf of the Company, intervene in business negotiations or tenders must not engage in any type of behaviour aimed at preventing or disturbing their standard process, and must act in accordance with the procedures planned and in compliance with the principles of the code of ethics.

In particular, it is forbidden to threaten participants in public tenders to cause them unfair damage in order to deter them from participation or obtain information about their offers, with the aim of favouring the Company.

Contractual fairness

The Company sets up contracts with its Clients in a correct, complete and transparent manner.

Even where unexpected events or situations occur, the Company respects the Client's expectations, executing contracts with fairness, without exploiting any conditions of weakness or ignorance at the occurrence of unforeseen events.

The Company undertakes to ensure the quality and reliability of the services and products offered, monitoring that they are fully compliant with the contracts and with the regulations in force.

Gifts and benefits

It is forbidden to offer / receive, directly or indirectly, money or other benefits (gifts, benefits, favours, etc.) to / from customers (including officials and subjects referable to them) - even as a result of influence by them - if not of modest value and in any case such as not to be interpreted as aimed at obtaining favourable treatment that is not legitimate and / or determined by market rules.

Acceptance of money from persons or companies that are in or intend to enter into business relationships with the Company is prohibited. Anyone who receives proposals for gifts or favours or hospitality that is not an act of commercial courtesy of modest value, or the request of these by third parties, must refuse them and immediately inform their supervisors, or managers, or report to Compliance function.

6.2 RELATIONS – PUBLIC ADMINISTRATION

The relations between the Company and the Public Administration - for this reason the Public Administration bodies, public officials and public service agents (hereinafter, in general, also "public officials", Italian and non-Italian ones) - must be inspired by the most rigorous observance of the applicable legal and regulatory provisions and cannot in any way compromise the integrity or reputation of NEXI Group.

Only the corporate functions assigned to this are authorized to undertake commitments and to manage relationships of any kind with the Public Administration.

The Recipients of this Code - including external Collaborators who may be responsible for representing the Company in relations with the Public Administration - must abstain from:

- Offering or promising, even through a third party, money or other benefits (which may also consist of job or commercial opportunities) to public officials, their relatives or subjects in any way connected to them, even if influenced by them;
- Seeking or unlawfully establishing personal relationships of favor, influence, interference that condition, directly or indirectly, the outcome of the relationship.

The Company must not be represented, in relations with the Public Administration, by external Collaborators when conflicts of interest can arise.

Finance and public funds

In relations with the Public Administration, the Company cannot take advantages except on the basis of contractual relationships, provisions obtained lawfully, or through the granting of provisions of any kind duly obtained and destined for the purposes for which they are granted.

It is strictly forbidden to unjustly, to the detriment of the Public Administration, provide - in favor of the Company - contributions, loans, subsidized loans or other disbursements of the same type in any way denominated, granted or provided through the use or presentation of false or fraudulent documents or the omission of due information.

It is forbidden to use contributions, subsidies or loans to the Company for purposes other than those for which they were granted. The Company is also not allowed to withhold or delay unduly the transfer to third parties benefiting from sums disbursed for grants, subsidies or public loans granted, nor knowingly intervene for the purposes of the misappropriation of public disbursements by the third parties themselves.

It is not allowed to carry out actions aimed at providing the Company or third parties with any kind of benefits (for example, licenses, authorizations, social security contributions, etc.) to the detriment of the Public Administration, with contrived or fraudulent acts (for example, sending false documents or certifying things that are not true).

6.3 RELATIONS – JUDICIAL AUTHORITY and INSTITUTIONS WITH INSPECTION AND CONTROL POWERS

The Recipients of this Code must scrupulously observe the current legislation and the provisions issued in the sectors related to their respective areas of activity.

The Company requires maximum availability, collaboration, transparency and fairness towards representatives of the judicial authorities, law enforcement agencies and institutions with inspection and control powers, the latter referring to any Competent / Supervisory Authority as well as any other Public Authority.

It is forbidden for all Recipients to perform corrupt conduct towards these representatives - even if influenced by them - to obtain an advantage for the Group.

Institutions with inspection and control powers

The Recipients of this Code are required to promptly comply with any request from representatives of institutions with powers of inspection and control.

Within the scope of inspections carried out by the representatives of the institutions in question at the Company's premises, the presence of two subjects in meetings with the representatives must be provided - subject to various indications by the Institutions.

Furthermore, it is forbidden to:

- omit or delay the transmission of any information required by the Supervisory Authorities;
- obstruct / delay the production and / or sending of feedback to requests received from these Authorities;
- ask or influence the representatives of the Supervisory Authority to offer preferential treatment or omit information required in order to obstruct the Supervisory functions.

Judicial proceedings

It is forbidden to, even though external lawyers appointed by the Company:

- in court proceedings:
 - make undue requests or exert pressure on Judges or Members of Arbitration Boards (including auxiliaries and office experts);
 - influence anyone to overcome constraints or critical issues for the protection of the interests of the Company;
 - influence the person not to make statements or to make false statements who is called to make statements that can be used in criminal proceedings before the Judicial Authority;
 - unduly influence the decisions of the judicial body or the positions of the Public Administration, when this is a party to the dispute / arbitration;
- influence, on the occasion of inspections / checks / verifications, the judgment, opinion, report or report of public bodies or appointed by the judicial authority or the judicial police.

6.4 RELATIONS- POLITICAL AND TRADE UNION ORGANIZATIONS

NEXI GREECE does not make direct or indirect contributions, in any form, to political parties, movements, committees and organizations, to their representatives and candidates, except those provided for by specific regulations.

NEXI GREECE does not finance political parties, their representatives or candidates, neither does it sponsor political propaganda congresses or events. NEXI GREECE does not directly or indirectly influence political representatives.

It is forbidden to behave in any way with the aim of preventing, obstructing or conditioning the free exercise of the right to vote during election consultations.

6.5 EXTERNAL COMMUNICATION AND RELATIONS WITH MEDIA

The criteria of conduct in external communications and relations with the media are based on principles of

transparency, fairness and timeliness.

The information relating to the Company and directed to the mass media may be disclosed only by the function in charge of corporate communication, or with the authorization of the CEO or Managing Director or by the function delegated by him.

External communication of data or information must be truthful, timely, transparent and inspired by the principle of respect, integrity and consistency with NEXI Group and local policies. Therefore, Recipients will abstain from conduct or statements that can in any way damage the image of the Company.

6.6 RELATIONS - COMPETITORS

The Company undertakes to compete fairly in accordance with antitrust laws and other applicable laws, refraining from abuse of a dominant position or jeopardizing free competition.

The use of names or distinguishing marks to create confusion with names or distinguishing marks legitimately used by others, or the servile imitation of products of a competitor, or the fulfilment by any other means of acts capable of creating confusion with products and with the activity of a competitor is prohibited.

Furthermore, the dissemination of news and appreciation on the products and the activity of a competitor, to discredit, or to acquire the merits of a competitor's product or company is prohibited.

It is forbidden to use, directly or indirectly, any other means that do not comply with the principles of professional correctness and that may damage the company.

It is forbidden to falsify or alter, under any form, national or foreign trademarks or distinguishing marks of industrial products, or patents, national or foreign industrial designs or models and to use or import such trademarks, distinguishing marks, patents, designs or counterfeit or altered industrial models.

6.7 CORPORATE GOVERNANCE SYSTEM

NEXI GREECE has adopted a corporate governance system that complies with the legislation in force and with administrative best practices. The system is aimed at the maximization of value for the shareholders, risk control and the prevention of enterprise risks, market transparency, and the balancing of the legitimate interests of all the stakeholders. It is also aimed at ensuring maximum collaboration among the Company components through a harmonic equilibrium of the various management, guidance and control roles.

6.8 ENVIRONMENTAL PROTECTION

NEXI GREECE operates in the belief that the environment is a precious resource to be safeguarded in the interests of all and complies with the principles of environmental protection, employing the best technologies available to minimize environmental impact. It has always recognized the great value of environmental protection, also with a view to the sustainable development of the country. In compliance with national and regional regulations, NEXI GREECE is committed to ensuring that every activity is conducted in full respect of the environment, minimizing both the direct and indirect impacts of its activities in order to preserve the natural environment for future generations.

7. NOTIFICATION, REPORTING OF VIOLATIONS AND DISCIPLINARY SYSTEM

The Recipients of this Code of Ethics are bound to inform the Group Supervisory Body or to the local Compliance Office promptly in case they become aware of – also potential – violations of the Code itself.

The disciplinary sanctions in the event of violation of the measures contained in this Code are intended to contribute to the effectiveness of the Code itself.

NEXI, for this purpose, has adopted a system of sanctions through provisions, differentiated according to the role of the internal and / or external parties potentially involved, suitable to sanction the violation, that is, the unequivocal direct attempt to violate the principles set in the Code of Ethics.

In order to facilitate notification process and reporting of any fact that may lead to the violation of principles and provisions of this Code by the Personnel and External Collaborators, the Company has a dedicated mailbox exclusively to the attention of the Group Supervisory Body (OdV_Nexi@nexi.it) or to the local Compliance Office (compliance.gr@nexigroup.com).

In case of anonymous reporting, to the attention of NEXI GREECE Compliance Office at compliance.gr@nexigroup.com

In any case, the Company, also in collaboration with the Group Supervisory Body, undertakes to protect the senders of the above notifications against retaliation, discrimination or any other penalization, thus ensuring an appropriate level of confidentiality (with the exception of legal obligations which dictate otherwise).

For further clarification please contact the Compliance function at compliance.gr@nexigroup.com

8. RELATED DOCUMENTS

Conflict of Interest Policy (PP-028)

Antibribery Group Policy (PP-041)

Code of Conduct - Code of Ethics (CC-007)

End-User Security Code of Conduct (CC-009)

Privacy Notices and Authorization to Process Letters