



# VISA S.p.A. s.u.





## GENERATING SETS and POWER SOLUTIONS

### HEADQUARTERS & HEAD OFFICE

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Specifically, I call on you, individually through your firms, and collectively through your business associations, to embrace, support and enact a set of core values in the areas of human rights, labor standards, and environmental practices.

(The address of Secretary-General Kofi Annan to the World Economic Forum in Davos, Switzerland, on 31 January)

## OUR THOUGHT

Within our Group, every behaviour, action and decision are based on precise values: integrity; responsibility; diversity, commitment and inclusion; customer success; innovation; continuous improvement and professional performance, with a sense of effectiveness and urgency.

The Group's Code of Ethics and Business Conduct reiterates these values by providing guidance and examples. A company's culture is built day by day and revolves around the entire organization.

Improper or illegal activities of even one person can damage our reputation and all of us!

By understanding and respecting our Code, we help strengthen our corporate culture and ensure our long-term success.





The Code applies to all our employees, directors and collaborators. Acceptance of the Code is a prerequisite for recruitment. The principles of this Code also apply to suppliers, contractors, agents and business partners.



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**OUR ETHICAL VALUES AND PRINCIPLES**

The core values that inspire the definition of our governance and guide our strategies, choices and our behaviour, while conducting business activities to create medium- to long-term value for Stakeholders, are the following:

<b>LAWFULNESS AND COMPLIANCE</b>	Compliance with applicable laws and regulations in the countries where the Group conducts business.
<b>INTEGRITY</b>	Fairness, honesty, loyalty and good faith in day-to-day activities and relationships within and outside the Group
<b>RESILIENCE</b>	Ability to react flexibly, quickly and resourcefully to market changes.
<b>RESPONSABILITY</b>	Sense of responsibility to all Stakeholders in daily activities or decisions.
<b>TRANSPARENCY AND FAIRNESS</b>	It is essential to consider the needs and expectations of stakeholders by ensuring accurate and timely disclosure of information, avoiding misleading communications, and complying with laws, best market practices and OECD Guidelines.
<b>CONFIDENTIALITY</b>	Protection of the confidentiality and privacy of information learned while working, ensuring correctness, completeness, uniformity and timeliness of information, along the lines dictated by laws and market best practices.
<b>SUSTAINABILITY</b>	Create sustainable value over time for Stakeholders by emphasizing the implementation of sustainable projects, products and services through efficient use of resources.
<b>INNOVATION</b>	Promotion of research and innovation through the development of new technologies and applications, considering them a key element for sustainable business development.
<b>PROFESSIONALISM AND COLLABORATION</b>	Valuing and developing everyone's abilities and skills, team spirit, sharing and comparing ideas.
<b>SAFETY AND QUALITY OF THE PRODUCT</b>	Maximum attention and care to customer service in terms of product quality, safety and reliability through a certified quality management system that integrates the different skills in the existent companies.

*We are committed to respect and implement the following ethical principles in our relations with all stakeholders.*



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## COUNTERING CORRUPTION

We reject and discourage all forms of corruption, practiced at any level, both in Italy and abroad. We are committed to preventing, addressing and actively combating it, by complying with current anti-corruption legislation in all countries where we operate, requiring our Stakeholders to operate with honesty and integrity.

## COUNTERING ORGANIZED CRIME, LAUNDERING AND TERRORISM

We conduct our business in compliance with current anti-money laundering and terrorist financing regulations and we do not facilitate in any way groups, associations or individuals who pursue illicit purposes or who are not aligned with our ethical principles.

We hinder all those operations that prevent the proper identification of the origin of money, goods and other utilities, for that purpose we undertake to check in advance, with the utmost diligence, the information available on our counterparties also operating at an international level, in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them.

## PROTECTION OF HUMAN RIGHTS AND HUMAN CAPITAL

We operate by ensuring respect for people and applicable labour regulations.

We protect and promote human rights in the conduct of our business for which adherence is required from everyone who has dealings with the Group.

We pay close attention to equal opportunity and we are committed to creating an inclusive work environment free from discrimination and any kind of violence or harassment.

We value human capital according to meritocratic criteria, professional skills, fairness of behaviour, honesty and trust, while also encouraging a safe, inclusive work environment that is open to diversity.

We manage human capital, enhancing our talents through development and training programs.

The Group is committed to respecting the right of all staff to form and join unions of their choice and the right to collective bargaining, also ensuring constant and constructive dialogue between employees and employers in order to best resolve any issues that may arise.

## OCCUPATIONAL HEALTH AND SAFETY PROTECTION

We ensure a healthy and safe working environment in all workplaces and for all parties involved by providing facilities, working conditions, PPEs, and training and information activities in the matter.

We consider of primary importance to safeguard the safety and health of workers, setting as our goal not only the compliance with the requirements of the specific regulations on the subject, but also constant action aimed at continuous improvement of working conditions.

Each Recipient of the Code must take the utmost care in carrying out their activities, strictly observing all established safety and prevention measures to avoid any possible risk and to their co-workers and colleagues.



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## PRODUCT SAFETY AND QUALITY

Our Group is committed to providing our customers a high level of performance, by promoting innovation, quality, punctual delivery, responsibility and cost efficiency. Our mission is to create products of excellence, ensuring maximum safety for the uses for which they are intended. We actively collaborate to identify solutions that contribute to the continuous improvement of the reliability and safety of our products while respecting the legal regulations, current regulations and specific requirements of our customers.

Our company stands out for the adoption of strict quality controls and the implementation of high production standards. During our activities, we are committed to operating with maximum effectiveness, avoiding any shortcut that could compromise the quality of the work done.

The goal is always to ensure that our products are in line, if not above, the high-quality standards and industry regulations. This reflects our ongoing commitment to providing cutting-edge solutions to our customers.

We also maintain a culture of transparency and accountability. Any identified problem, especially those related to product safety, are promptly reported. This readiness to address and resolve issues allows us to maintain high levels of trust among our customers and to always respect the ethical and regulatory standards of the industry sector in which we operate.

## PROTECTION OF THE ENVIRONMENT AND BIODIVERSITY

We protect and defend the environment, nature and the territory, and we commit to ensure that every activity of the Company minimizes negative impacts on the environment, operating in compliance with current national and international regulations and standards.

We constantly monitor our energy consumption and emissions, in order to evaluate and adopt any useful initiative in terms of energy savings, emission reduction and noise remediation. We are committed to using Life Cycle Assessment (LCA) to analyze the impact of products at every stage of the value chain and identify the best ways to properly dispose of the various components of the product.

We manage waste in accordance with regulatory requirements both within our offices and facilities, ensuring where possible its recycling, recovery and/or reuse, thus promoting "the circular economy".

## PERSONAL DATA PROTECTION AND PRIVACY PROTECTION

We protect the information and personal data of all our Stakeholders to which we have access by reason of or during work, by adopting appropriate and preventive security measures for all databases, in order to avoid risks of destruction and loss or unauthorized access or processing.

We guarantee that the processing of personal data is carried out lawfully, in accordance with fairness and with respect for the fundamental rights and freedoms, as well as for the dignity of the persons concerned, as provided for in the current regulatory provisions. Only personal data necessary for specified, explicit and legitimate purposes are collected and recorded, and are kept for a period of time not exceeding that necessary for the purposes of collection.

Individuals who share personal data with us must be able to rely on the fact that we will treat it responsibly, use it and store it only for legitimate business purposes, and as required by current legislation.



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## FINANCIAL AND NON-FINANCIAL REPORTING

We prepare periodic financial and non-financial reports (Sustainability Report) in compliance with the principles of transparency, truthfulness, correctness, completeness and traceability of the data contained therein.

We observe the rules of correct, complete and transparent accounting, according to the criteria indicated by the relevant legislative provisions, as well as the current Accounting Principles, so that every transaction is not only correctly recorded, but also authorized, verifiable, legitimate, consistent and appropriate.

We comply with current tax regulations in order to ensure the correct determination, certification and settlement of taxes.

## WORKING ENVIRONMENT

- **Child labour:** The Group undertakes not to employ child labour (i.e., workers under the age of 15) in the production of any products or in the provision of any services.
- **Compulsory work / undeclared work:** the Group commits not to employing non voluntary personnel (prisoners, people insolvent against the company), who are subject to non-legal restrictions in their freedom to terminate their employment (seizure of documents, wages not paid and kept as deposit), which is not protected by a form of contract. We do not grant credit to workers at rates above the average level granted by credit institutions. We check that suppliers do not employ forced labour in their activities.
- **Discrimination:** the Group guarantees the intention not to implement or support any discrimination in recruitment, remuneration, access to training, promotion, dismissal or retirement, based on race, class, national origin, religion, disability, sex, sexual orientation, union membership, political affiliation, age; We do not interfere with the exercise of the right of staff to follow principles or practices, or to satisfy needs related to race, class, national origin, religion, disability, sex, sexual orientation, trade union affiliation or political affiliation; we do not allow behaviour, including gestures, language or physical contact, that are sexually coercive, threatening, offensive or aimed at exploitation.
- **Working Hours:** in addition, the Group is committed to being compliant with applicable laws and standards on working hours. We guarantee at least one day off in seven and to remunerate overtime work, which does not exceed, except for situations of proven and unavoidable necessity, 12 hours per week per employee, with due percentage increases.
- **Remuneration:** finally, the Group ensures that the wages paid always correspond to legal or contractual standards and are therefore sufficient to meet the basic needs of the staff and a decent living.







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## OUR CONDUCT RULES WITH SUPPLIERS

We adopt a Corporate Governance system inspired by the highest standards of transparency and fairness in the management of our company, in order to ensure compliance with the principles and ethical values that the Group is inspired by in its relations with all stakeholders.

Our suppliers are an essential part of our business and therefore we select them carefully. To achieve success, we partner with suppliers who guarantee the quality of the products and services offered and who share our policy of proper business management. In our relations with supplier, we emphasize the importance of creating safe and healthy workplaces. This implies an explicit request for suppliers to ensure that their employees are treated with respect and dignity in the workplace. This is a key part of our commitment to ensuring ethical and responsible practices throughout the supply chain.

At the same time, we ask our suppliers to scrupulously comply with current regulations and laws, including specific requirements relating to the management of limited or hazardous substances. This commitment reflects our willingness to operate in compliance with regulations and to promote high standards not only within our organization but also among our business partners.

The protection of confidential information is another crucial aspect. We maintain the utmost confidentiality of our suppliers' sensitive information and expect reciprocity in this regard. This approach is part of our responsible information management policy, helping to build mutual trust that is fundamental to the success of our collaborations.

## OUR CONDUCT RULES WITH CUSTOMERS

### GENERAL RULES

The managing of negotiations, taking on commitments and establishing customer relationships are the exclusive prerogative of designated and/or authorized corporate offices, in accordance with the powers granted to them.

Employees are required to accurately follow internal procedures related to customer relationship management. It is essential that they provide accurate, truthful and complete information regarding the products and services offered by the Group in order to enable customers to make informed decisions. It is prohibited to improperly influence customer decisions in order to encourage an act related or contrary to their official duties, or to cause the omission of an act in violation of the obligations associated with their job.

The Group is committed to offering and/or accepting the offer of gifts, meals, or entertainment only when these can be found to be useful in initiating a business relationship, or helping to keep existing relationships strong, and when based on common sense or corporate guidelines. Scriptural choices have no utility and may damage the reputation of Group Companies, or be considered corrupt actions.







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## MEASURES AGAINST MONEY LAUNDERING AND FRAUD

Businesses of any size can be vulnerable to money laundering practices or fraudulent actions. In order to prevent such situations, we commit exclusively toward clients engaged in legitimate business activities and who manage their funds through legal sources. It is essential that we pay attention to warning signs and that we take reasonable measures to identify and avoid any relationships with clients that could expose us to risks.

Before entering into negotiations with a business partner, such as representatives, distributors, and third-party agents, we undertake rigorous due diligence procedures. At this stage, all relevant information and conditions are carefully reviewed.

In the event of specific conditions, such as customers or customer representatives providing untruthful information, payments in cash or cash equivalents, requests for payment through third parties or to a third party, business contacts in locations commonly associated with terrorism or drug trafficking, or attempts to structure transactions to avoid accounting records and verification requirements, we immediately forward such reports to the Reporting Team.

This approach reflects our commitment to ensuring an ethical, transparent, and compliant business environment where unfair practices and fraud schemes are promptly identified and dealt with.

## CONTROLS ON INTERNATIONAL TRADE

We are a leading company that conducts business across many national borders.

International trade control regulations establish the proper way of conducting business and require nations to interact fairly. Due to the complexity and technical nature of trade control laws and regulations on trade, it is essential to gain a thorough understanding and adapt to any changes, regardless of the geographic location where we conduct business.

In our daily actions, we are firmly committed to complying with policies and procedures regarding the export and import of our products. This commitment is fulfilled with a series of actions aimed at ensuring the compliance and integrity of our business operations.

First, we work to obtain the necessary authorizations for the export of our products. In this context, we conduct a thorough assessment of our customers to ensure that they are duly authorized to receive the products we intend to export. We also ensure that we submit all required documentation in a timely, accurate and complete manner, even when prepared by other parties. Keeping accurate record is an integral part of our commitment, especially when required by applicable regulations.

We demand clear answers regarding our customers' corporate owners, operations, locations and end users of our materials, thus maintaining a complete and transparent picture of our activities.

It is of prime importance to avoid exporting to restricted nations, groups or individuals, or to anyone who might subsequently re-export our products to the same restricted areas. This commitment reflects our willingness to operate ethically and responsibly, thus helping to promote fair business conduct that complies with international regulations.

## RELATIONS WITH MEDIA AND SOCIAL MEDIA

We promote communication through the media and social media with due regard to the principles of transparency, accuracy, and timeliness in the offices and in the whole Group.

When using social media for personal purposes, it is important to avoid acting as a spokesperson for the Group companies. It is strictly forbidden to post contents on behalf of the group companies without specific authorization. Awareness of the public nature of social media is essential and requires to respectfully behave by avoiding the use of language that could be inappropriate,



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discriminatory or offensive.

In addition, we must be mindful of obligations related to the protection of trade secrets and other confidential information. For this reason, it is essential to refrain from posting on social media any information that could compromise the confidentiality of such data. Responsibility in the use of social media should reflect awareness of these principles and help preserve the integrity and reputation of the Group.

## PROMOTION AND DISSEMINATION OF THE CODE OF ETHICS

The Code is made accessible to all Stakeholders and can be consulted on the websites of Visa S.p.A. ([www.visa.it](http://www.visa.it)) and the individual Group Companies.

It is mandatory for all the Group companies to adopt this Code through a resolution of the Board of Directors (or equivalent administrative body) and to ensure compliance with it at all levels of the organization, taking into account cultural, social and economic diversity and applicable regulations.

The Human Resources Department acts as a reference point for the correct interpretation of the Code, ensures its effective dissemination and promotes awareness through specific communication and training programs.

## CODE VIOLATION REPORTS

To facilitate the reporting of possible violations of the Code of Ethics, VISA S.p.A. has established special internal channels that are accessible to anyone with knowledge of such violations. It is the responsibility of all Recipients to promptly report any alleged violations of this Code using the reporting channels specified and indicated in the "Whistleblowing Policy" section of the Visa website.

All reports are treated confidentially and transparently following a predefined process and for which please refer to the specific "Whistleblowing Policy". VISA S.p.A. does not tolerate any form of retaliation, discrimination or penalization against those who report in good faith. In any case, the confidentiality of the identity of the whistleblower and of the information transmitted is guaranteed, except for legal obligations and is in compliance with the protection of the rights of the Company or of the persons wrongly and/or in bad faith involved.

## CONSEQUENCES OF VIOLATION OF THE CODE

The consequences of any violation of this Code by the employees of the Group companies result in a breach of contractual obligations derived from the employment relationship, constituting a disciplinary offence.

Regarding the applicable sanctions, it is important to specify that they will be adopted in compliance with local regulations which govern the labour relations. The choice of sanctions will be based on the specific gravity of single violations, adjusting them to the applicable legal provisions.

The ascertaining of violations, the management of disciplinary proceedings and the application of sanctions remain a responsibility of the corporate offices and bodies appointed and delegated for this purpose.

Whenever collaborators, consultants, suppliers or other third parties connected to the Group by a non-employee contractual relationship violate the provisions of this Code, the contractual remedies provided by law will be applied.

Fontanelle, 31 May 2024

Visa S.p.A.

Il presidente del C.d.A.  
Barro Lorenzo