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ACF FIORENTINA S.r.l.

Code of Ethics

HISTORY OF THE DOCUMENT

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1. FOREWORD

In June 2019, the Fiorentina Group underwent a change in its shareholding structure: on 6 June, the shares in the parent company, previously held by Diego Della Valle & C. S.r.l., were acquired by the entrepreneur Rocco B. Commisso.

With effect from 1 July 2020 (following a specific merger plan, pursuant to Article 2501-ter of the Italian Civil Code), the merger by incorporation of the three subsidiaries (Fiorentina Women's Football Club S.D. a r.l, Promesse Viola S.r.l. and Firenze Viola S.r.l.) into ACF Fiorentina S.p.A.

With effect from 3 December 2021, for reasons relating to the need to streamline the corporate structure, the Company was converted from a joint-stock company (S.p.A.) into a limited liability company (S.r.l.), the term of which was extended to 31 December 2100.

ACF Fiorentina (hereinafter also "**the Company**") operates in the professional football sector in Italy and is of significance not only nationally but also at European and international level.

The Company, determined to ensure the utmost integrity in the conduct of its business and related corporate activities, including to protect its image and reputation, has chosen to comply with the provisions of Legislative Decree No. 231/2001 by adopting the organisation, management and control model (hereinafter "**Model 231**"), which introduced the administrative liability of legal entities into the Italian legal system, as well as to those set out in Article 7 of the Code of Sports Justice and Article 7, paragraph 5 of the Federal Statutes of the F.I.G.C., which introduced the Company's responsibility to prevent the commission of acts contrary to the principles of loyalty, fairness and

integrity in all relationships, by adopting the so-called prevention model (hereinafter, **the “Prevention Model”**).

The Company has therefore decided to set out in this document (hereinafter **the “Code of Ethics”**) the set of values and principles that have always characterised its activities and its dealings with internal and external parties with whom it maintains business relationships.

2. COMPANY VALUES

Today, the Company’s primary objective is to achieve the best sporting results, in order to provide its supporters with the greatest sporting satisfaction, whilst upholding values such as: ethics, fairness, respect and sporting loyalty.

The Company aims to embark on a path that will lead to a re-evaluation of the ‘football system’ as an educational tool, not only from a physical and sporting perspective but also in terms of ethics, culture and social integration, for young people, disadvantaged groups and the wider community; to this end, it intends to enhance and direct its sporting activities, its communications and its operational structures, in full and constructive collaboration with the local, political and social institutions with which it has relationships. It is within this context that the project to establish a corporate and sporting organisation is situated: on the one hand, one that is efficient and capable of enhancing its role of excellence and achieving results of the highest standard; on the other, one capable of diversifying its areas of activity beyond the sporting sector or event, whilst maintaining, throughout its growth, an equally high standard of corporate ethics and respect for the values of fairness and loyalty in the conduct of all internal activities, whilst also projecting an image and a message capable of engaging the community and its representatives—both public and private, entrepreneurs and institutions—in an effort to improve people’s living conditions, not only materially but also ethically and intellectually, so that they may find in sporting events a source of comfort, recreation, inspiration, solidarity and integration, in conditions of safety and peace of mind.

The Company, both as a business operating in the sports sector and as an entity engaged in economically significant activities, is fully aware of the importance of the ethical message that must be adopted, shared and conveyed within the scope of its activities, in a sector as sensitive as professional sport, in its relationship with the

media and communication and information channels, reconciling it and making it compatible with its corporate objectives and in relation to the needs of its shareholders and *stakeholders*.

The Company rejects all forms of racism and anti-Semitism in accordance with the definition of the IHRA (International Holocaust Remembrance Alliance) and the national strategy for combating anti-Semitism, and is committed to combating such forms of discrimination amongst members, registered players and supporters at all levels of the Club.

3. RECIPIENTS OF THE CODE OF ETHICS

3.1 The following are the recipients of the Code of Ethics, obliged to observe the principles contained therein and subject to sanctions for breaching its provisions:

- the legal representatives and statutory directors of the Company; the general attorneys, special attorneys, persons holding special power of attorney ad acta, and any agents and authorised representatives;
- the members of the Board of Statutory Auditors and persons (natural and/or legal persons) who perform supervisory and control functions for the Company in accordance with the law and the Articles of Association;
- the Company's managers and employees;
- the following persons working for the Company: persons employed under temporary agency contracts, on a casual basis or in ancillary employment (persons treated as employees), persons in quasi-subordinate employment, persons in a coordinated and continuous collaboration arrangement, persons providing occasional services, and persons under a training and work experience placement agreement (internship);
- members of the Company;
- any person exercising management and control, regardless of their formal legal status.

3.2 The Code of Ethics also applies to suppliers, customers, and partners in commercial initiatives, individuals (natural and/or legal persons providing self-employed services) who have consultancy and/or professional service relationships with the Company, agency and mandate relationships with or without representation, representation, mediation and business procurement relationships, as well as all individuals who have dealings with the Company in various capacities. Compliance with the Code of Ethics by such

Compliance with these requirements is an essential condition for establishing and maintaining a relationship with the Company, in accordance with the provisions of Article 11.4 below.

4. GENERAL PRINCIPLES

Compliance with applicable laws

4.1 A fundamental and non-derogable principle governing all the Company's activities is compliance with the laws and regulations in force in the Italian Republic and with European Union rules; as well as with the laws and regulations of the territories, countries and foreign states within which the Company operates. With regard to activities carried out abroad, the Company prohibits conduct and behaviour that, whilst lawful under the provisions of the country in question, is in breach of the laws and regulations of the Italian Republic and/or European Union rules. It is understood that, pursuant to Article 4 of Legislative Decree No. 231/2001, the Company may also be held liable for offences committed abroad, in the cases and under the conditions set out therein.

4.2 The Company therefore adopts as an essential principle for all persons operating within and in relation to it, compliance with the laws and regulations in force in Italy and in all countries in which it operates.

Social commitment

4.3 The Company considers its role in enhancing, transmitting and promoting sport and football to be of primary importance, including as a message of social significance and the transmission of the values associated with sport.

4.4 The Company also considers it important, within the scope of its activities, to focus not only on the technical and sporting aspects, but also and above all on the human, social and ethical-moral dimensions of sporting events, with regard to male and female players, spectators and all those involved.

Sportsmanship and Fair Play

4.5 In the course of its activities, the Company is guided by the principles of sportsmanship, fairness and loyalty in competitions, both towards opponents and the referee and their assistants, as well as the various institutional bodies, and considers the value of *fair play* to be paramount in all competitions and events in which it participates or is involved.

4.6 The Company's employees, collaborators and registered members adhere to the principles of *fair play*, as set out by the sporting bodies.

Corporate Communication

4.7 The Company considers it a fundamental duty to ensure that communication, both internal and external, is accurate and truthful, whilst respecting the undeniable requirements of confidentiality and caution that characterise its activities. When information is disclosed, it must therefore be such as to avoid misleading situations that could give rise to liability or damage of any kind.

4.8 Relations with the media and communication and information channels must be managed by those delegated to do so.

Transparency, completeness and reliability

4.9 In the performance of their work or professional activities, the actions, transactions, negotiations and, more generally, the conduct of the addressees shall be guided by the utmost transparency and reliability.

4.10 Those responsible are required to provide information that is transparent, truthful, complete, comprehensible and accurate, so that, when establishing relations with the Company, *stakeholders* are able to make independent and informed decisions.

4.12 Directors, management, employees and external collaborators are required to conduct any liquidation of the Company with due regard for the overriding interests of the Company's creditors; therefore, it is prohibited to divert the Company's assets from their intended destination to creditors by distributing them amongst the shareholders before paying the entitled creditors, or before setting aside the sums necessary to satisfy them.

Fairness, honesty and good faith

4.13 The Company operates in accordance with ethical principles and the values of fairness in its business conduct and towards third parties. All conduct, actions and transactions carried out by any individual, whether an employee, contractor or consultant of the Company, in the performance of their duties or assignment, are guided by the principles of honesty and good faith, as well as by formal and substantive legality, in accordance with applicable regulations and internal procedures.

4.14 The pursuit of the Company's interests can never justify conduct contrary to the principles of fairness, honesty and good faith.

Confidentiality and prohibition on misuse of confidential information

4.15 The Company guarantees, in accordance with the provisions of the law, the confidentiality of the information in its possession. Employees, members, collaborators and consultants of the Company are prohibited from using confidential information for purposes unrelated to the performance of their duties and/or from improperly disclosing such information.

4.16 It is expressly prohibited to use or disclose to others, without just cause and/or authorisation from the Company, confidential information or information internal to the Company itself.

4.17 The Company's directors, employees, members, collaborators and consultants are obliged to refrain from spreading false information.

Conflicts of interest

4.18 Employees, collaborators, members or consultants of the Company shall, in the performance of their duties and/or assignments, pursue the objectives and general interests of the Company itself.

4.19 In carrying out all activities, the Company avoids situations of conflict of interest, whether actual or merely potential, in compliance with applicable regulations on transactions with related parties and the relevant internal procedures adopted by the Company for the identification and management of such transactions. In addition to those defined by law, the term "*conflict of interest*" also includes cases where an employee, contractor, member or consultant acts, in the course of their duties and/or role, to satisfy an interest other than that of the Company, in order to gain a personal advantage.

Market and free competition

4.20 In the course of its business, the Company is guided by the principles of legality, loyalty and fairness, and recognises free and fair competition in a market economy as a decisive factor for growth, development and continuous business improvement.

Environmental protection

4.21 In the course of its business activities and relations with third parties, the Company undertakes to adopt responsible practices to safeguard the environment, acting in strict compliance with applicable regulations, as well as with the limits defined by any authorisations and requirements received from the competent authorities.

4.22 The Company is committed to making continuous improvements to protect the environment, minimising the environmental impact arising from the conduct of its business activities and from the management, construction and maintenance of its sites and facilities.

Sustainability and social impact

4.23 The Company actively contributes, within the framework proposed by the United Nations, to the achievement of the 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs). Furthermore, aware of the role it plays in society, ACF Fiorentina recognises the importance of integrating sustainability into its business.

Respect for international principles and fundamental rights

4.24 By adopting this Code of Ethics, the Company intends to promote compliance with general principles and with national, European Union and international laws, regulations, rules and decisions, including those of the UN and any other supranational body applicable to its activities, with particular reference to:

- the principles of the Universal Declaration of Human Rights;
- the fundamental conventions of the International Labour Organisation;
- the principles of the United Nations Global Compact;
- the principles of the United Nations Convention against Corruption adopted in 2003 (the so-called Merida Convention), ratified in Italy by Law No. 116/2009;
- the principles of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

The Company also adheres to the principle enshrined in Article 41 of the Constitution, firmly believing that private economic initiative “cannot be carried out in conflict with the public interest or in such a way as to harm security, freedom or human dignity”.

Protection of cultural and landscape heritage

4.25 The Company attaches great importance to the protection and enhancement of cultural and landscape heritage and is committed to promoting actions aimed at its safeguarding and conservation. The Company rejects any conduct that may damage, compromise or jeopardise the integrity of cultural or landscape heritage and requires compliance with the relevant regulations in force.

5. INTERNAL RELATIONS

Professionalism, responsibility, development and protection of human resources

5.1 The Company ensures an appropriate level of professionalism in the performance of the tasks assigned to its employees, consultants and collaborators. The management and development of human resources is based on respect for the individuality, competence and professionalism of each person.

5.2 Each individual must carry out their work and perform their duties with diligence, efficiency and fairness, making the best use of the tools and time available, in accordance with the delegated powers and/or instructions given and/or functions performed, whilst assuming the responsibilities associated with the required tasks and respecting the hierarchical structure.

5.3 Each manager and/or supervisor must exercise their powers with objectivity and balance, with a view to developing and empowering their employees and collaborators. Each employee must demonstrate a cooperative attitude and carry out their duties with responsibility, efficiency and diligence.

5.4 The Company regards the principle of employee protection as a core value. Every employee, member or collaborator, within the scope of their role, undertakes to foster a working environment free from prejudice and in accordance with merit-based criteria.

5.5 Relationships between employees, including registered members, regardless of their level of responsibility, must be based on the values of loyalty, fairness and mutual respect, as well as on the values of civil coexistence and tolerance of others' rights and duties, whilst respecting the rights and freedoms of individuals.

Discrimination and harassment

5.6 The Company does not tolerate any discriminatory conduct, nor any form of harassment and/or personal offence. The Company is therefore committed, in line with the principles of the corporate diversity policy, equity and inclusion, and in accordance with the Company's procedural framework, to provide a working environment that excludes any form of discrimination or harassment based on gender, religion, nationality, ethnicity, age, sexual orientation, disability, political views, or other personal characteristics not relevant to the job.

Prohibited conduct in the workplace

5.7 Any illegal conduct or any form of abuse, threat or aggression towards individuals or company property is strictly prohibited in the workplace.

5.8 Staff are required to report such behaviour to their line manager, who will report it, with appropriate guarantees of confidentiality, to the HR & Organisation Department. Following the necessary checks and assessments, the Department will act in an advisory capacity to Senior Management, providing an opinion on any measures to be taken.

Health and safety in the workplace

5.9 The Company regards the principle of safeguarding and protecting health and safety at work as a primary objective.

5.10 The Company considers full and complete compliance with health and safety legislation to be of fundamental importance, and actively works to prevent accidents and ensure the safety and hygiene of its workers.

5.11 Employees, members, collaborators or consultants of the Company, whose physical and moral integrity is considered a primary value, are guaranteed working conditions that respect individual dignity, in safe and healthy working environments.

5.12 Employees, members, collaborators or consultants of the Company, who in any capacity and for any reason operate within the Company, must endeavour to ensure the prevention of accidents at work, guarantee the safety and hygiene of workers and personally contribute to maintaining the safety and quality of the working environment in which they operate, scrupulously adhering to the established safety system and all company procedures forming part of it.

5.13 In the performance of all work activities, the Company provides training and information on the safety risks to which employees are exposed from time to time and ensures they are provided with the personal protective equipment required by current legislation in relation to the type of activity carried out. Furthermore, it periodically reviews and continuously monitors the performance and efficiency of its system designed to manage safety-related risks, in order to maintain safe workplaces to protect the well-being of its staff, and to achieve the Company's established objectives for continuous improvement in the areas of safety, health and the environment.

5.14 Through its medical department, the Company ensures compliance with obligations regarding medical examinations and fitness for sport, as well as the preparation of medical records and health files for professional footballers.

Relations with the supervisory body

5.15 The recipients of this Code of Ethics are required to ensure the utmost cooperation and transparency in any dealings they may have with the Company's supervisory body, in relation to the activities carried out by the latter. In particular, those subject to this Code must refrain from any conduct, whether by commission or omission, that could result in a refusal to cooperate with the supervisory body or that is intended to obstruct the investigation or divert the attention of the supervisory body and the company departments responsible for supervisory activities in the performance of their respective institutional duties.

Specific principles applicable to the youth sector

5.16 A primary value for the Club is the promotion of positive values in youth sport, in the knowledge that setting a good example to young people is the most immediate form of education and mutual respect. To this end, the Company requires all employees, registered members, collaborators and all persons working within the youth sector to comply with the general principles, obligations and prohibitions set out above and with the specific ones set out below.

5.17 The Club is obliged to exercise constant supervision over minors entrusted to its care.

5.18 Relationships with young people must be conducted in an irreproachable manner from the point of view of moral correctness; the Club does not tolerate any form of abuse of young people, whether psychological or physical.

5.19 The Club supports young people in their education, ensuring at least a basic school education.

5.20 The guidance and education of young people must be conducted in accordance with models that promote ethical and human principles in general, and '*fair play*' in sport in particular, whilst at the same time instilling the professional footballer's code of conduct.

5.21 The Club demands the utmost commitment to safeguarding the psychological and physical well-being of young people: to this end, it reaffirms its efforts to prevent the practice of

doping and behaviour that may imply, even indirectly, the abuse and commercial exploitation of young people.

5.22 The Club condemns the use, even occasional, of drugs.

5.23 The Club strives to ensure that training and competitions foster the development of technical and motor skills, a safe and healthy competitive style, a positive self-image and good social relationships.

6. RELATIONS WITH THIRD PARTIES

6.1 The Company is particularly committed to building a relationship of trust with all its stakeholders – that is, individuals, groups or institutions whose contribution is essential to the pursuit of its corporate mission – as well as with employees, customers, suppliers, business partners, public institutions and authorities, the market, and political, trade union and social organisations, whose interests may be directly or indirectly affected by the Company's activities.

6.2 In carrying out its activities, the Company adheres to the principles of loyalty and fairness, requiring all those acting on its behalf to behave honestly, transparently and in accordance with the law in all their dealings, and does not tolerate corrupt and/or collusive conduct, nor undue favouritism.

6.3 Employees, members and collaborators are prohibited from giving/offering and/or accepting/receiving gifts, benefits and/or any other advantage, whether personal or otherwise, in the course of activities carried out for the Company, such as to give rise to even the slightest suspicion of having acted in the interest and on behalf of the Company, with the exception of gifts of modest value attributable to normal courtesy or commercial practices.

Relationships with customers, suppliers and collaborators (consultants, agents, representatives, business partners, etc.)

6.4 The Company bases its relationships with customers, suppliers and collaborators exclusively on criteria of trust, quality, competitiveness, professionalism and compliance with the rules of fair market competition.

6.5 In particular, the Company ensures that the selection of suppliers and collaborators and the procurement of goods and services are carried out exclusively on the basis of objective criteria of ethics, quality, value for money, price, capacity and efficiency, such as to allow

establish a relationship of trust with these parties, avoiding agreements with suppliers of dubious reputation, for example, regarding compliance with “ESG”¹ criteria, European regulations, working conditions and/or human rights. To this end, the Company adopts a “Supplier Code of Conduct” which sets out the general principles and criteria required of ACF Fiorentina’s suppliers regarding environmental and social sustainability. These criteria constitute an essential requirement for the establishment and maintenance of any relationship with ACF Fiorentina.

6.6 The Company expects its customers, suppliers and collaborators to behave in accordance with the principles contained in this Code of Ethics and, in the case of suppliers, as set out in the Supplier Code of Conduct. Any deviation from these principles may be considered a serious breach of the duties of fairness and good faith in the performance of the contract, a breach of the relationship of trust and just cause for termination of contractual relations.

Relations with Public Institutions, Sports Justice Bodies, Judicial Authorities and Independent Administrative Authorities

6.7 Relations with public institutions, whether national, EU or international, with sports justice bodies, as well as with public officials or persons entrusted with public service duties, or bodies, representatives, agents, officials, members, employees, consultants, or persons entrusted with public functions, of Public Institutions, Judicial Authorities, Supervisory Authorities and/or other Independent Administrative Authorities, must be conducted in strict compliance with the applicable legal provisions; such relations are entrusted exclusively to persons authorised to do so on the basis of the current powers of attorney and delegations of authority granted by the Company.

6.8 The Company undertakes to maintain, in its dealings with the aforementioned parties, with whom it interacts in any capacity, an attitude of full cooperation, based on the principles of transparency and fairness. In the event of sporting offences and breaches of the prohibition on placing and accepting bets, it is mandatory to comply with the reporting obligations to the Federal Prosecutor’s Office as provided for by the Code of Sports Justice.

6.9 The Company undertakes to scrupulously observe the rules laid down by the Supervisory Authorities (e.g.: Communications Regulatory Authority, Data Protection Authority

¹ Acronym for “Environmental”, “Social” and “Governance”.

of Competition and the Market, Data Protection Authority, etc.) to ensure compliance with current legislation in sectors related to its activities.

6.10 Directors, employees, members and collaborators undertake to comply with any requests from the entities referred to in point 6.7 and to cooperate fully during preliminary investigations, inspections and audits of the Company's operations.

6.11 In anticipation of legal proceedings, an investigation or an inspection by the Judicial Authorities, and/or the bodies of Sports Justice and/or Independent Administrative Authorities, no one must destroy or alter records, minutes, accounting records or any other type of document, or lie or make false or misleading statements to the competent authorities. Furthermore, no one must persuade others to provide false or misleading information to the same authorities.

6.12 To ensure maximum transparency, the Company undertakes not to find itself in situations of conflict of interest with officials/employees of the entities referred to in point 6.7 or their family members.

6.13 In dealings with these authorities, no form of gift is permitted that is, in any way, intended to secure favourable treatment in the conduct of any activities in any way connected with the Company. This rule applies to both gifts promised or offered and those received, with 'gift' meaning any type of present, benefit and/or any other advantage.

Relations with the Public Administration and Sports Authorities

6.14 Relations with public officials entrusted with public service duties and with public and/or private entities providing public services, healthcare providers, hospital trusts, local health authorities (hereinafter collectively referred to as the "Public Administration"), with sports and refereeing authorities as well as national and international judicial authorities, or bodies responsible for federation oversight (hereinafter collectively referred to as the "Sports Authority") and, in any case, any relationship of a public law nature, must always be guided by the strictest compliance with applicable legal provisions, the principles of transparency, honesty and fairness, and must not in any way compromise the integrity and reputation of the Company.

6.15 The management of relations with the Public Administration, with the Sports Authority or of relations of a public law nature in any case, is reserved exclusively for the corporate functions designated and authorised for this purpose.

6.16 In relations with the Public Administration and the Sports Authority, the Company must not improperly influence the decisions of the relevant administrations and authorities, in particular those of officials who negotiate or make decisions on their behalf.

6.17 During negotiations, agreements or business dealings, including commercial ones, with the Public Administration, in Italy or in other countries, the Company shall refrain from conduct contrary to the principles set out above, including, but not limited to:

- offering or granting employment opportunities and/or commercial advantages to Public Administration staff involved in the negotiation or relationship, or to their family members;
- offering or receiving gifts or other benefits, unless these are acts of commercial courtesy of modest value;
- providing untruthful information or failing to disclose relevant facts, where requested by the Public Administration.

6.18 In dealings with the Public Administration and the Sports Authority, in Italy and abroad, representatives and/or employees of the Company are not permitted to pay or offer, either directly or through third parties, sums of money or other benefits and advantages of any kind or amount, whether to public officials, government representatives, public servants or private individuals, to compensate or reward them for an act performed in the course of their duties, nor to secure or delay the performance of an act contrary to the duties of their office.

6.19 In any case, the benefit granted, even if courteous and of modest value, must be such that it does not constitute a breach of the integrity and good reputation of the parties and, furthermore, cannot be interpreted as intended to achieve any purpose in favour of the company or to the detriment of other parties.

Relations with political, trade union and social organisations

6.20 The Company contributes to the economic well-being and growth of the community in which it operates. To this end, the Company operates with respect for local and national communities, fostering dialogue with social organisations.

6.21 The Company bases its relations with political parties, their representatives or candidates on the strictest compliance with current legislation and internal guidelines.

6.22 The Company promotes and supports social, humanitarian and cultural initiatives, including, where appropriate, through the provision of grants to foundations,

institutions, organisations, non-profit organisations or other non-profit bodies, and organisations dedicated to carrying out social and cultural activities and, more generally, aimed at improving living conditions and promoting a culture of peace and solidarity.

6.23 The undertaking of commitments and the management of relationships of any kind are reserved exclusively for the company departments responsible for such matters and for staff authorised to do so in accordance with the company's system of delegated powers and procedures. The process of disbursing such contributions must comply with current regulatory provisions and be correctly and adequately documented.

6.24 The Company does not promote or maintain any kind of relationship with organisations, associations or movements that pursue, directly or indirectly, objectives that are criminally unlawful or otherwise prohibited by law.

7. ACCURACY AND TRANSPARENCY OF CORPORATE INFORMATION AND INTERNAL CONTROLS

Corporate communications and accounting records

7.1 Every action, operation or transaction must be correctly recorded in the company's accounting system in accordance with the criteria set out by law, applicable accounting standards and the recommendations and rules laid down by the Italian Football Federation (FIGC) and Co.Vi.So.C., and must also be duly authorised, verifiable, legitimate, consistent and appropriate.

7.2 To ensure that the accounts meet the requirements of truthfulness, completeness and transparency of the recorded data, for each transaction, adequate and complete supporting documentation of the activity carried out must be kept on the Company's books, so as to enable:

- accurate accounting records;
- the immediate identification of the characteristics and reasons underlying the transaction itself;
- the easy formal and chronological reconstruction of the transaction;
- verification of the decision-making, authorisation and implementation processes, as well as the identification of the various levels of responsibility.

7.3 Each employee and collaborator shall, within the scope of their responsibilities, ensure that any matter relating to management is correctly and promptly

recorded in the Company's accounts. Those responsible for the collection, processing and presentation of data and information relating to the financial position and results of operations are required to facilitate all forms of corporate governance oversight provided for by law.

7.4 Each accounting entry must accurately reflect the findings of the supporting documentation. Therefore, it shall be the responsibility of each employee and collaborator designated for this purpose to ensure that the supporting documentation is easily accessible and organised according to logical criteria.

7.5 It is expressly forbidden for any person involved in any capacity in the economic, financial and asset management of the Company to engage in conduct that, in any way, may impede the control and audit activities falling within the remit of the relevant bodies; to this end, in particular, it is strictly forbidden to conceal materials and/or documents in such a way as to mislead, prevent or obstruct such control activities.

Control culture

7.6 The Company promotes and fosters a culture of control at every level, raising awareness among its employees of the importance of the internal control system and of compliance, in the performance of their duties, with applicable regulations and company procedures, in order to:

- ensure the adequacy of the various business processes in terms of efficiency, effectiveness and cost-effectiveness;
- guarantee the reliability and accuracy of accounting records and the safeguarding of the company's assets;
- ensure that accounting and tax obligations comply with current legislation and internal guidelines.

7.7 Internal control systems comprise the set of control activities that individual company functions carry out on their own processes, in order to protect company assets, manage corporate activities effectively and provide clear information on the financial position, results of operations and cash flows, as well as all activities aimed at identifying and mitigating business risks.

7.8 Employees and contractors are required, within the scope of their responsibilities, to actively contribute to the proper and effective functioning of the internal control system

and to safeguard company assets responsibly, whether tangible or intangible, that are instrumental to the business carried out, and not to misuse them.

7.9 Free access to data, documentation and any information useful for carrying out control activities is guaranteed to the relevant company bodies, to the Supervisory Body established pursuant to Legislative Decree No. 231/2001 and to the Guarantee Body established pursuant to Article 7, paragraph 5 of the F.I.G.C. Federal Statutes.

8. ANTI-MONEY LAUNDERING REGULATIONS, RECEIPTS AND PAYMENTS

8.1 The Company undertakes to comply with all national and international rules and regulations concerning anti-money laundering and the financial fight against international terrorism.

8.2 Directors, employees, members and collaborators, within the scope of their various relationships with the Company, must not, in any way or under any circumstances, be involved in matters relating to the laundering of money derived from illegal or criminal activities.

8.3 Before establishing relationships or entering into contracts with non-occasional suppliers and other business partners and/or clients, the Company and its employees and/or collaborators must act in accordance with company procedures and avoid engaging in transactions that are suspect in terms of fairness and transparency. In particular, employees and collaborators must ensure, as a precautionary measure, the moral integrity, reputation and good standing of the counterparty. They also undertake to act in such a way as to avoid involvement in transactions that could potentially facilitate the laundering of money derived from illegal or criminal activities, acting in full compliance with anti-money laundering legislation.

8.4 With particular regard to the traceability and retention of records, the recipients must comply with the following requirements:

- financial transactions made by or on behalf of the Company may be carried out in cash, within the limits imposed by law;
- bearer passbooks may not be used;
- all financial transactions made by or on behalf of the Company must be accurately and fully recorded in the accounting books and mandatory records;

- all payments must be made only to recipients in respect of whom the Company has an obligation, for contracted activities, and/or as approved by authorised persons.
- no payments must be made to entities (natural or legal persons) included on lists related to the fight against international financial terrorism (UN lists, EU lists and OFAC lists available on the Bank of Italy website, Financial Intelligence Unit section).
- No false, incomplete or misleading accounting records must be created, and no hidden or unrecorded funds must be established; furthermore, funds must not be deposited into personal accounts or accounts not belonging to the Company, nor may any unauthorised use be made of the Company's funds and resources.

9. RULES OF CONDUCT IN THE CONDUCT OF SPORTING ACTIVITIES

9.1 Without prejudice to the principles of conduct set out above, employees, collaborators, registered members and directors shall, in the course of their specific sporting activities, comply with the following additional rules of conduct, whilst also adhering to the provisions of the Prevention Model and the Safeguarding Framework adopted by the Company.

9.2 Each of the persons referred to in the previous point must behave in accordance with the principles of loyalty, fairness and compliance with applicable laws in any relationship relating to sporting activities. In particular:

- with regard to relations with Sports Justice Bodies and Sports Authorities: Anyone who, in the course of their duties, maintains relations of loyal cooperation with the Authorities shall cooperate with them whilst safeguarding both their and their own autonomy. In particular, they shall produce and provide all documents requested by the Authorities and CO.VI.SO.C. and provide complete, relevant and comprehensive answers to the questions posed by those Authorities. It is, however, prohibited to give and/or request from third parties news or information concerning matters subject to ongoing disciplinary proceedings;
- as regards relations with male and female footballers, registered members in general and sports agents: It shall refrain from carrying out any activity whatsoever relating to the registration, transfer or assignment of the sporting services of footballers and coaches unless in the exclusive interest of the Club and in full compliance with the applicable

. In any event, they shall not use intermediaries or registered members to enter into contracts not permitted by current sporting regulations, where such persons are suspended or disqualified. It is prohibited to agree upon or otherwise pay compensation, bonuses or allowances that are unjustified and/or in breach of current sporting regulations;

- As regards relations with supporters: it promotes fair and responsible support. In all cases, it refrains from providing financial support for the establishment or maintenance of groups of its supporters, whether organised or not. Furthermore, it shall refrain from having dealings with representatives and/or groups of supporters who are not members of associations affiliated with the Club. In any event, such dealings must be authorised by the Club's Fan Relations Officer;
- with regard to sporting competitions: It shall refrain from carrying out any act intended to alter the conduct or result of a match or competition, or to secure an advantage in the league table for any party.

9.3 Each of the persons referred to in point 9.1 shall refrain from publicly expressing judgements or comments that are detrimental to the reputation of other persons, whether registered or not, of organisations and of the Company.

9.4 Directors, employees, collaborators and registered members are required to comply with the content of the company documentation (policies, procedures, operating instructions and company rules in general) issued by the Company over time.

10. PREVENTION OF OFFENCES CONSTITUTING THE PREDICATE OFFENCES OF MODEL 231

10.1 The Company expects its directors, employees, members, collaborators and consultants, in the performance of their duties, not to engage in unlawful conduct constituting the predicate offences for the administrative liability of organisations pursuant to Legislative Decree No. 231/2001. To this end, the Company has identified, within the scope of Model 231, the business activities and processes in which the offences provided for by the aforementioned decree may be committed, adopting specific prevention protocols and procedures.

10.2 The Company has established internal procedures in order to significantly limit the risk of committing the offences provided for by the decree itself and, at the same time, to enable it to benefit from the exemption provided for by the provisions of the aforementioned legislation. This Code of Ethics is also an essential element of the 231 Model,

as it complements its content in terms of the expression and communication of ethical principles, rules of conduct and prohibitions relevant to the prevention of predicate offences. The Supervisory Body established pursuant to Article 6, paragraph 1, letter b), of Legislative Decree No. 231/2001, within the scope of the functions assigned to it, monitors the adequacy of this Code of Ethics in relation to the prevention objectives pursued by the 231 Model. The tasks of implementing, monitoring compliance with and updating the Code of Ethics are governed by Article 11 below.

11. IMPLEMENTATION, GUARANTEES AND REPORTING IN THE EVENT OF A BREACH OF THE PROVISIONS OF THE CODE OF ETHICS

11.1 The tasks of monitoring compliance with and updating the Code of Ethics, disseminating the Company's ethical principles and values, proposing any improvements and clarifying any interpretative doubts are entrusted to the Company's "Employer".

11.2 In addition to the "Employer", those at the head of each company Department/Division are required to ensure compliance with the Code of Ethics; where there are doubts regarding the conduct to be adopted, they shall provide clarifications and explanations to staff working within their respective Departments/Divisions.

11.3 In order to safeguard the integrity of the Company, a "Whistleblowing System" has been established to enable the reporting of:

- alleged or actual breaches of the Code of Ethics,
- alleged or actual breaches of the 231 Model and/or unlawful conduct relevant under Legislative Decree No. 231/2001,
- alleged or actual breaches of relevant legislation and/or conduct not in line with the rules of conduct set out in the Prevention Model or contrary to the ethical principles of loyalty, fairness and integrity,
- alleged or actual breaches of the Safeguarding Framework (a tool implemented by the Company to protect the welfare of minors and to prevent and combat abuse, violence and discrimination),
- conduct resulting in forms of secondary victimisation against Members who file or express the intention to file a complaint with the judicial authorities or an Internal Report regarding information on breaches of the Safeguarding Framework or, in general, cases of abuse, violence or

discrimination occurring in the course of sporting activities, who assist other Members in filing a complaint or an Internal Report on the same information, who act as witnesses in proceedings concerning abuse, violence or discrimination, or who take initiatives in relation to safeguarding policies,

- offences falling within the scope of the European Union or national acts listed in Annex 1 to Legislative Decree No. 24/2023 or of national acts implementing the European Union acts listed in the Annex to Directive (EU) 2019/1937, even if not listed in Annex 1 to Legislative Decree No. 24/2023, relating to the following sectors: public procurement; services, products and financial markets, and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and animal health and welfare; public health; consumer protection; the protection of privacy and personal data, and the security of network and information systems;
- acts or omissions detrimental to the financial interests of the European Union as referred to in Article 325 of the TFEU, as specified in the relevant secondary legislation of the European Union,
- acts or omissions relating to the internal market as referred to in Article 26(2) of the TFEU, including infringements of European Union competition and State aid rules, as well as infringements concerning the internal market linked to acts that breach corporate tax rules or arrangements designed to obtain a tax advantage that undermines the object or purpose of the applicable corporate tax legislation,
- acts or conduct that undermine the object or purpose of the provisions set out in the European Union acts referred to in the points above,

which have occurred or are currently being carried out and which may cause harm to the Company.

The Company has adopted a specific policy governing the operation and management of reports. Reports may be made in accordance with the procedures set out in the whistleblowing procedure and Model 231, to which reference is made. The Company protects the confidentiality of the whistleblower's identity and prohibits any form of retaliation or

discrimination against whistleblowers, as further detailed in Model 231 and the relevant whistleblowing procedure.

11.4 This Code of Ethics, considered as a whole, is to be regarded as an integral part of the employment relationship established with the Company, pursuant to and for the purposes of Article 2104 of the Italian Civil Code, where such legislation is applicable, or of the contract for collaboration, the provision of intellectual services or the supply of goods or services. The signing of, or in any case adherence to, the provisions and principles set out herein constitutes an essential and necessary condition for the conclusion and performance of contracts of any nature between the Company and the Recipients; therefore, the approved, published and accepted provisions form an integral part of the contracts themselves. Any breach of the Code's provisions may therefore constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, including in relation to the continuation of the employment relationship, without prejudice to the Company's right to compensation for any pecuniary and non-pecuniary damage suffered as a result. For Recipients who are not employees, compliance with the Code is an essential prerequisite for the commencement or continuation of the existing professional or collaborative relationship with the Company.

11.5 Without prejudice to the provisions of paragraph 11.4 above, breaches of the Code of Ethics are subject to sanctions proportionate to the seriousness of the breach and determined according to the type of relationship the relevant Recipient has with the Company. In the most serious cases, such measures may also include the termination of the relationship of trust with the Company and the contractual consequences provided for and permitted by applicable regulations.

11.6 Any disciplinary measures against Recipients for breaches of the Code of Ethics — or, in the case of suppliers, also the Supplier Code of Conduct — shall be adopted in accordance with applicable legislation, as well as with the "Labour Code", where applicable. For footballers, the relevant contracts and legislation apply.

12 APPROVAL, AMENDMENTS AND DISTRIBUTION OF THE CODE OF ETHICS

12.1 This Code of Ethics has been approved by the Company's Board of Directors. Any amendments and/or updates to it will be approved by the same body and promptly communicated to the recipients.

12.2 The Company undertakes to ensure the widest possible dissemination of the Code of Ethics, providing an appropriate training and awareness programme regarding its contents. The Code of Ethics will be distributed to all relevant parties by HR & Organisation, and will be available on the company intranet. It will also be available on the corporate website. The Supplier Code of Conduct is made available to the Company's suppliers and forms an integral part of contractual relationships.

12.3 Finally, the Company actively works to communicate and disseminate the rules set out in this document amongst organised supporters and to promote, including amongst fans, the principles of integrity, fair play and the maintenance of safety, respect for others and tolerance within the context of sporting events or competitions.