



CODE OF ETHICS



INTRODUCTION

The purpose of CITY GREEN LIGHT Group is:

- The operation and maintenance of technological, special and telecommunications installations.
- The management, operation and maintenance of public lighting installations, including the supply of energy and related works.

The rules of this Code of Ethics are addressed and apply to the Company's top management, statutory auditors, department heads, all employees, suppliers, consultants, and anyone else who for any reason establishes a relationship of collaboration with CITY GREEN LIGHT Group. The Company will monitor compliance with the rules contained in the Code of Ethics, also ensuring the transparency of the corrective actions taken in the event of any violation thereof.

CITY GREEN LIGHT Group is committed to disseminating this Code internally and externally through all corporate communication channels, and to posting it in places within the Company accessible to all personnel. A copy of the Code of Ethics is delivered to each employee and contractor and published on the company website so that every stakeholder can access and become aware of it. The existence of the Code of Ethics and its binding nature shall be recalled in all business relationships established by CITY GREEN LIGHT Group.

All Company personnel, including contractors, are expected to be familiar with the Code, to actively contribute to its implementation and to report any shortcomings. CITY GREEN LIGHT Group is committed to promoting awareness of the Code among its employees and contractors and facilitating their constructive input on its contents.

This code consists of three sections, each of which represents an element of CITY GREEN LIGHT Group's overall system of ethics.

1. **The General Principles:** the ethical principles that inspire the company's operations.
2. **The Charter of Values:** identifies the set of Sustainability Values that incorporate the general principles in the conduct of the Company's activities.
3. **The System of Conduct:** identifies the criteria of conduct to be followed in relations with stakeholders.

GENERAL PRINCIPLES

The "General Principles" contained in this Code reflect CITY GREEN LIGHT Group's core values and are the foundation for the conduct we wish to pursue at all organisational levels and with our stakeholders.

Reputation is a valuable asset for CITY GREEN LIGHT Group, and it is everyone's duty to protect and safeguard it.

Compliance with the rules of the Code must in any case be considered an essential part of the contractual obligations of the Company's employees and external contractors pursuant to the law.

Respect for the law

CITY GREEN LIGHT Group is committed to conducting its business in compliance with applicable international, national, regional, provincial and municipal laws in any field (administrative and fiscal, labour law, health and safety in the workplace, environmental, etc.) and therefore rejecting any illegal practice and punishing any behaviour contrary to the law, the principles of this Code of Ethics or internal procedures.



Equality and impartiality

In its decisions affecting relations with its stakeholders, CITY GREEN LIGHT Group recognises equal rights for all, without any discrimination of age, gender, sexuality, health, race, nationality, political opinions and religious beliefs.

CITY GREEN LIGHT Group is committed to paying special attention to the handicapped, the elderly and people belonging to weaker social groups.

CITY GREEN LIGHT Group is committed to acting objectively, fairly and impartially in compliance with applicable laws and regulations, as compliance with applicable laws and regulations is an indispensable principle.

Responsibility and honesty

In fulfilling its corporate mission, the conduct of all recipients of this Code of Ethics must be inspired by the ethics of accountability.

When engaged in any activity, situations must always be avoided where the parties involved in the transactions have or even simply appear to have a conflict of interest. A conflict of interest arises whenever a director, statutory auditor, function head, employee, consultant or contractor of the Company acts or fails to act with the intent of obtaining a personal benefit or in any case in pursuit of an interest – even on behalf of third parties – different from the legitimate goals of CITY GREEN LIGHT Group's good performance and professional gratification for the work done and the results achieved.

Continuity, diligence and accuracy in the execution of tasks and contracts

CITY GREEN LIGHT Group is committed to ensuring the continuity of its strategic activity and the direction and coordination of all company structures. It is also committed to minimising any inconvenience to Customers/Users in the event of disruptions occurring due to force majeure.

The recipients of the Code of Ethics must operate with diligence, accuracy and professionalism in order to provide high quality services.

Transparency and completeness of information

The directors, executives, employees and contractors of CITY GREEN LIGHT Group are required to provide complete, transparent, comprehensible and accurate information so that, when establishing relations with the Company, stakeholders are able to make autonomous decisions, aware of the interests involved, any alternatives and the relevant consequences. Indeed, when drafting any contracts, CITY GREEN LIGHT Group takes care to specify to the contractor the conduct to be adopted in all circumstances foreseen, drafting the clauses in a clear and comprehensible manner, and always ensuring that the condition of parity with Customers is maintained.

In drafting any communication to Customers/Users, CITY GREEN LIGHT Group pays the utmost attention to the use of languages and simple, easy-to-understand writing.

Competition

The company intends to develop the value of competition by adopting principles of propriety, fair competition and transparency towards all operators in the market. All recipients of this Code of Ethics must refrain from engaging in and/or encouraging conduct that may constitute forms of unfair competition.

Community relations and environmental protection

CITY GREEN LIGHT Group is aware of the direct or indirect influence that its activities may have on the conditions, economic and social development and general well-being of the community, as well as the importance of social acceptance of the communities it operates in.



For this reason, in carrying out its activities CITY GREEN LIGHT Group is committed to safeguarding the surrounding environment and contributing to the sustainable development of the local region. To this end, it plans its activities considering the Charter of Values for Sustainability, seeking a balance between economic initiatives and unavoidable environmental needs in consideration of the rights of future generations.

CITY GREEN LIGHT Group is therefore committed to improving the impact of its activities on the environment and landscape, as well as to preventing risks to populations and the environment, not only in compliance with current law but also taking into account the development of scientific research and the best experience in the field.

Confidentiality

The Company ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of express, conscious authorisation and in accordance with current law. Furthermore, CITY GREEN LIGHT Group employees are required not to use confidential information for purposes unrelated to the performance of their duties.

Effectiveness, efficiency and quality of products/services

CITY GREEN LIGHT Group aims to promote the development of products and services based on the principles of effectiveness and efficiency, ensuring that every action is aligned and consistent with meeting the needs and requirements it is intended to address. In every endeavour, the goal is to ensure the cost-effectiveness of resource management and to commit to providing a service that meets the Customer's needs while adhering to the highest standards.

CITY GREEN LIGHT Group is committed to continuously improving the efficiency and effectiveness of the products/services offered directly or through its subsidiaries by means of the adoption of appropriate technological and organisational solutions, as well as the constant training of human resources.

Fairness of authority

In entering into and managing contractual relationships involving the establishment of hierarchical relations, particularly with personnel, CITY GREEN LIGHT Group is committed to ensuring that authority is exercised fairly and correctly, avoiding any abuse. Specifically, CITY GREEN LIGHT Group will operate in such a way that authority does not turn into a mere exercise of power, detrimental to the dignity and autonomy of personnel.

Integrity and safety of the person

CITY GREEN LIGHT Group is committed to protecting the safety, health and moral and physical integrity of its employees, consultants and its Customers, Users and Suppliers. To this end, it promotes responsible and safe behaviour and adopts all the safety measures required by technological developments to ensure a safe and healthy working environment, in full compliance with current prevention and protection laws.

CITY GREEN LIGHT Group is committed to protecting people in all areas.

It works constantly to achieve a collaborative, non-hostile working environment and to prevent discriminatory behaviour of any kind.

The recipients of the Code of Ethics must cooperate with the company in order to maintain a climate of mutual respect for the dignity, honour and reputation of each individual.

Discrimination does not include unequal treatment based on objective criteria that are not contrary to law or collective agreements.

Requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to engage in behaviour detrimental to their moral and personal convictions, are not tolerated and will



therefore be appropriately addressed.

CHARTER OF COMMITMENTS FOR SUSTAINABILITY

Aware of market trends and the importance today of the **VALUES** of Sustainability, understood as the integration of organisational, social and environmental requirements into its business strategies and operational processes, CITY GREEN LIGHT Group has decided to embark on a path to manage and improve these Values.

The Charter of Values therefore summarises the **VALUES** and **COMMITMENTS** that CITY GREEN LIGHT Group has defined to be integrated into its policy, operations and management, which all organisational structures must be guided by.

Values and goals

Establish sustainability-oriented policies and values and pursue the related goals in the business. Adopt management choices geared towards safeguarding capital soundness and current and prospective profitability.

Sustainable supply chain

Orient and sensitise the supply chain towards the values and requirements of the Sustainability Protocol. Keep suppliers updated on sustainable initiatives and monitor their behaviour.

Optimise material handling.

Choice of materials

Evaluate the inclusion of raw materials/materials with a lower social and environmental impact and made according to criteria of environmental protection and biodiversity as well as from producers who implement the same ethical values.

Improvement of environmental performance

Ensure legal compliance, better manage resources with the aim of reducing environmental impact, with a focus on energy resources.

Improvement of social performance

Ensure legal compliance, manage human resources in the best possible way, respect the basic requirements of international human rights conventions, raise awareness and monitor the supply chain.

Carefully manage legal compliance and the improvement of occupational health and safety.

Reputation

Comply with the requirements of the Sustainability Protocol for the business and behave in a manner consistent with the commitments made. Transparently communicate the result of actions taken and monitor the outcome.

Be open and available for surveillance and monitoring visits of the company and its supply chain.



SYSTEM OF CONDUCT

Relations with personnel and contractors

Personnel selection

CITY GREEN LIGHT Group guarantees equal opportunities in the access to employment, without any discrimination on grounds of sex, ethnicity, nationality, language, religion, political opinions, sexual orientation, personal and social conditions, in compliance with the regulations in force, and in particular with the Equal Opportunities Code.

CITY GREEN LIGHT Group ensures compliance with regulations on hiring workers in protected categories, guaranteeing them the necessary support for a full and rewarding work performance.

In its hiring processes, the Company adopts procedures based on transparency, ensuring that the principles and general rules outlined in this Code are fully respected at every stage. These procedures are designed to clearly demonstrate the criteria and methods used in the selection of human resources. The aforementioned criteria and methods are made known before the selections take place.

Top management, the Head of Human Resources, as well as the managers involved in the selection process avoid any situation that may lead to conflicts of interest, favouritism, nepotism or forms of patronage (in particular towards employees or former employees of the Public Administration with whom they have or have had working relations, or towards public decision-makers).

In fact, the company wants to ensure that applicants are always selected based on the professional and competence requirements for the role to be performed, thus excluding any form of favouritism or patronage.

Development of human resources

Human resources represent a key factor for the development of the CITY GREEN LIGHT Group. Therefore, the Company protects and promotes their professional growth in order to increase the wealth of skills possessed.

CITY GREEN LIGHT Group believes that human resources are a fundamental factor in the company's development, recognises their value and respects their autonomy.

Duties of personnel

CITY GREEN LIGHT Group personnel must comply with the Code of Ethics, and in the performance of their duties must respect the law and base their conduct on the principles of integrity, propriety, loyalty and good faith.

It is hereby emphasised that employees must take care to avoid any situation or activity that could generate conflicts of interest with this Company or that could interfere with their ability to make impartial decisions. It is therefore specified that all information acquired while working must remain strictly confidential and may not be disclosed inside or outside the Company.

Conflicts of interest

CITY GREEN LIGHT Group recognises and respects the right of its Persons to participate in investments, business or other activities other than those carried out in the interest of CITY GREEN LIGHT Group, provided these are activities permitted by law and compatible with the obligations undertaken towards CITY GREEN LIGHT Group.

All the recipients of this Code of Ethics must maintain a position of freedom of judgement, integrity and impartiality, avoiding making decisions or carrying out activities constituting a conflict of interest, even if only potential or apparent. Any activity that conflicts with the proper performance of one's duties or that may harm the interests and image of the company must be avoided.



Company assets

CITY GREEN LIGHT Group personnel carefully use and safeguard the assets made available to them for work. The misuse of company-owned assets and resources is not allowed.

Each employee is directly and personally responsible for the protection and lawful use of the property and resources entrusted to them for the performance of their duties.

In compliance with applicable laws, CITY GREEN LIGHT Group takes the necessary measures to prevent their misuse.

Use of IT tools

CITY GREEN LIGHT Group personnel use IT tools within the limits and for the sole purpose of performing their duties.

Personnel are responsible for the security of the systems used and are subject to the applicable regulations and the conditions of the licence agreements.

Without prejudice to the provisions of civil and criminal laws, the misuse of company assets and resources includes the use of network connections for purposes other than those related to the employment relationship or to send offensive messages or messages that may damage the image of CITY GREEN LIGHT Group.

Particular emphasis is placed on the prohibitions that fall under the offences of child pornography (Article 600-ter of the Italian Criminal Code) and possession of pornographic material (Article 600-quer of the Italian Criminal Code), which harm the image of CITY GREEN LIGHT Group.

CITY GREEN LIGHT Group declares that it extends the prohibitions set forth in the preceding paragraph also to all kinds of pornographic activity as well as to all forms of prostitution, even if performed between consenting adults.

Personnel are also required not to disclose their passwords to access the computer system, and to pay the utmost attention and commitment in order to prevent the possible commission of offences through the use of IT tools.

Proper management of cash flows

With regard to accounting in general, CITY GREEN LIGHT Group employees are required to observe the following principles: transparency, truthfulness, integrity, consistency and reliability.

The company is also committed to applying ethical principles in the management of its administrative-accounting systems, ensuring that the data generated are clear, truthful and correct for the purposes of internal and external transparency towards its stakeholders.

Moreover, the Company implements appropriate controls to identify, prevent and manage financial and operational risks.

Protection of confidentiality

CITY GREEN LIGHT Group protects the privacy of its employees in accordance with the relevant regulations in force, committing not to disclose or disseminate their personal data without the prior consent of the data subject, without prejudice to any legal obligations. The acquisition, processing and storage of this information takes place according to specific procedures aimed at ensuring that only authorised persons can see it, as well as full compliance with the regulations on the protection of privacy.

External relations

Corporate governance system

The governance system adopted by the Company complies with current law and is consistent with



the most authoritative guidelines and best practices on the subject. It is aimed at ensuring the maximum, most balanced collaboration between its components through a balancing of the different roles of management, policy and control.

The members of corporate bodies must conduct themselves in a manner consistent with the principles of propriety and integrity, refraining from engaging in situations constituting a conflict of interest with their activities in the Company.

Relations with the public administration

In order to guarantee the utmost clarity in institutional relations, high-profile relations are maintained exclusively through the company's top management or other formally delegated persons who have received an explicit mandate and who have no conflict of interest with the representatives of the institutions in question.

Within the scope of inspections carried out by Public Officials or Public Service Officers, as well as within the scope of audits performed by Certifying Bodies, the Company's employees are required to observe the following principles: loyalty, propriety, cooperation, integrity and transparency.

CITY GREEN LIGHT Group employees must also avoid any relationship with institutional interlocutors and/or inspecting bodies unless expressly authorised. At the same time, the Company commits to making available to institutional interlocutors and/or inspecting bodies the data and documents requested during any inspections in order to facilitate its proper execution.

Furthermore, the Company guarantees that its employees engage with Certifying Bodies only when previously authorised. At the same time, CITY GREEN LIGHT Group commits to making available to the Certifying Bodies the data and documents requested during each audit, guaranteeing maximum collaboration for the proper performance of such activity.

Customer relations

The Company bases its activities on the criterion of quality, essentially understood as the objective of fully satisfying Customers' expectations. Investors are also Customers of CITY GREEN LIGHT Group.

The Company establishes a relationship with its Customers that is characterised by a high degree of professionalism and based on helpfulness, respect, courtesy, and the search for and offer of maximum cooperation.

In its relations with customers, the Company ensures propriety and clarity in business negotiations and in the assumption of contractual obligations, as well as faithful and diligent performance of the contract.

In accordance with the relevant regulations, the Company protects the privacy of its Customers, committing not to disclose or disseminate their personal, economic and consumption data, without prejudice to any legal obligations.

The Company resorts to litigation only when its legitimate claims are not adequately satisfied by the other party.

When engaged in any negotiations, situations must always be avoided where the parties involved in the transactions have or even simply appear to have a conflict of interest.

Relations with suppliers and external consultants

All purchases made by CITY GREEN LIGHT Group must be carried out with loyalty, integrity, confidentiality and diligence by internal personnel who take responsibility for their actions as well as ensure compliance with all relevant regulations in their purchasing.



All employees involved in the purchasing process must therefore abide by the principles of impartiality and independence in exercising their functions within CITY GREEN LIGHT Group, remaining free from personal obligations towards suppliers.

The way suppliers are chosen must comply with current regulations and competition procedures. Furthermore, any deviation from this principle must be authorised and justified. Suppliers are contractually committed to compliance with this Code of Ethics and monitored on an ongoing basis.

When selecting a supplier, the Company must also take into account its ability to guarantee the implementation of adequate company management systems, where applicable, the availability of means and organisational structures and the ability to meet confidentiality obligations.

Any selection procedure must be carried out under the broadest conditions of impartiality and neutrality.

The Company and the supplier must work to build a collaborative relationship of mutual trust.

CITY GREEN LIGHT Group undertakes to inform the supplier in a proper and timely manner about the characteristics of the activity, the forms and timing of payment in compliance with the regulations in force as well as the expectations of the counterparty, considering the circumstances, the negotiations and the content of the contract.

The performance of contractual services by the supplier must be in accordance with the principles of fairness, propriety, diligence and good faith and must be carried out in compliance with applicable regulations.

The Company makes use of suppliers or subcontractors who operate in accordance with current law and the rules set out in this Code of Ethics.

Competition

CITY GREEN LIGHT Group acts in such a manner as to achieve competitive results that reward capability, experience, effectiveness and efficiency.

The Company and its employees must behave properly in the Company's business dealings and in relations with the public administration.

Any action aimed at altering the conditions of fair competition is contrary to CITY GREEN LIGHT Group's corporate policy and is prohibited to any person acting on its behalf.

Under no circumstances may the pursuit of the Company's interest justify conduct by senior management or its employees or contractors that does not comply with the laws in force and with the rules of this Code.

In any communication with the outside world, information concerning the company and its activities must be truthful, clear and verifiable.

Institutional relations

All relations with State institutions (Ministries, Regions, Municipalities, Provinces, Local Health Authorities, etc.) are exclusively attributable to forms of communication aimed at assessing the implications of legislative and administrative activity on CITY GREEN LIGHT Group, at responding to informal requests and acts of scrutiny (audits, inspections, etc.) or in any case at making known the position on issues relevant to the Company.



Criteria for conduct with respect to gifts, sponsorships and donations

Employees must observe the following principles when handling gifts, sponsorships and donations: loyalty, propriety, integrity and transparency.

The Company prohibits all forms of illicit and unauthorised payments, as well as the direct or indirect offer of money, gifts, benefits of any kind to any third party.

Acts of business courtesy, such as gifts or forms of hospitality, are therefore permitted with prior authorisation and only if they are of modest value, so as not to compromise the integrity, impartiality and reputation of the parties involved.

CITY GREEN LIGHT Group may also accede to requests for contributions and sponsorships only if they come from entities and associations declared to be non-profit and of high cultural, social or charitable value. The Company pays particular attention to and commits to disclose any possible conflict of interest – personal or company – in the choice of the aforementioned proposals (e.g. in the case of family relationships with the parties concerned or links with third parties who may unduly favour their activities by virtue of the functions they perform).

Relations with the public administration

In order to guarantee the utmost clarity in institutional relations, high-profile relations are maintained exclusively through the company's top management or other formally delegated persons who have received an explicit mandate and who have no conflict of interest with the representatives of the institutions in question.

Relations with the environment

The company's activities are managed in compliance with current environmental laws.

The company is committed to protecting the environment in all its activities, using processes, technologies and materials that allow for the reduction of energy consumption and natural resources, avoiding or limiting the impacts of the company's activities in terms of pollution, greenhouse gas emissions, waste production and inconvenience to local communities, as well as restoring the job site areas at the end of the work.

All recipients of the Code must always assess and manage environmental aspects with great care and in a preventive manner, and actively strive to avoid improper environmental situations and conduct.

The company is committed to spreading the culture of the environment in the workplace, involving all personnel in information and training initiatives.

The company is also committed to developing the environmental values referred to in the Charter of Values for Sustainability and to ensuring that its suppliers are also similarly committed.

Anti bribery & Anti-corruption

The Company adopts a zero tolerance policy towards any corruption and is committed to complying with the anti-corruption laws in force in all the countries where it operates, requiring all its stakeholders to act with honesty and integrity at all times.

Under no circumstances is conduct aimed at improperly influencing the decisions of representatives of public or private bodies allowed.