Code of Ethics of the Rosa Riganti Foundation

Preamble

The **Rosa Riganti Foundation**, with its registered office in Lugano, Switzerland (hereinafter, the "**Foundation**"), has defined a series of core values and principles that inspire and guide the conduct of all those who operate within it.

This document (hereinafter, the "**Code of Ethics**"), adopted by the Foundation Board, sets out the principles, ethical values and rules of conduct that inspire and guide the Foundation's activities, and whose strict observance is required by the Foundation from all those who cooperate and collaborate with it in pursuing its mission.

1. General Provisions

1.1. Scope and Recipients

This Code of Ethics applies to all members of the Foundation Board, employees, volunteers, consultants, suppliers and all persons who maintain significant relationships with the Foundation (hereinafter, the "**Recipients**").

Compliance with this Code of Ethics is an essential condition for the proper functioning, reliability and reputation of the Foundation.

1.2. Mission and Principles

The Foundation operates exclusively to pursue its statutory purpose, in a transparent and independent manner and in compliance with applicable laws.

The Foundation's activities are carried out on a non-profit basis, in the public interest and in accordance with the principles of integrity, gratuitousness, transparency and equality, as well as with respect for the local communities in which it operates.

2. Ethical Values and Responsibilities

2.1. Core Values

The Foundation inspires all its activities through a set of ethical values that serve as a compass for its conduct. In particular, *inter alia*:

i. **Integrity and honesty**: every decision and action must be guided by moral rectitude, loyalty and consistency, avoiding any conduct that may raise doubts as to the integrity of the Foundation or the persons acting on its behalf;
ii. **Transparency and accountability**: the Foundation is committed to ensuring that its activities are clear and accessible, assuming full responsibility for its decisions and ensuring the proper and efficient use of the resources entrusted to it;
iii. **Gratuitousness of intervention**: every action of the Foundation is aimed exclusively at the welfare of its beneficiaries, without pursuing economic benefits or personal gain for board members or staff members. This is without prejudice to legitimate remuneration paid to third parties for professional services or other services rendered to the Foundation;

iv. **Equality and non-discrimination**: the Foundation ensures equal dignity and opportunities for all persons involved, regardless of sex, age, origin, religion, culture, sexual orientation, political opinions or personal and social conditions;
v. **Promotion of the common good**: all activities are designed and implemented with a view to generating collective benefit, with the objective of contributing to the educational, social and human development of the communities in which the Foundation operates.

2.2. Respect

The Foundation recognizes the central importance of the human person. Every relationship must be characterized by respect for human dignity, cultural and social differences, and the opinions of others.

2.3. Responsibility

All Recipients of this Code of Ethics are accountable for their actions and decisions and contribute to the proper pursuit of the Foundation's mission.

The management of funds and resources must always be accurate, responsible and transparent.

2.4. Growth and Development

The Foundation promotes the personal and professional growth of its members and volunteers by fostering a positive, inclusive and collaborative environment.

2.5. Integrity and Passion

Persons acting on behalf of the Foundation must act with passion, commitment and a sense of duty, maintaining conduct that is honest, loyal and consistent with the Foundation's founding values.

3. Rules of Conduct in Internal Relations

3.1. Foundation Bodies

Members of the Foundation Board shall act in compliance with the law, the Articles of Association, this Code of Ethics and the instructions of the supervisory authority.

In particular, members of the Foundation Board are required to:

i. conduct themselves according to the principles of autonomy, transparency and independence in dealings with public institutions, private entities, business associations and political organizations, providing accurate information necessary for the performance of internal and external supervisory activities;
ii. act with integrity, loyalty and a sense of responsibility, safeguarding the dignity and reputation of the Foundation;
iii. participate regularly and in an informed manner in meetings;
iv. remain fully aware of their role and responsibilities; and
v. share and uphold the Foundation's mission.

3.2. Value of Human Resources

The Foundation recognizes and protects the dignity and safety of all persons working within it and opposes all forms of discrimination, harassment and exploitation.

The Foundation safeguards the value of the individual, preserving both physical and moral integrity and promoting the continuous development of technical and professional skills.

The Foundation recognizes merit and individual abilities and undertakes to prevent favoritism, nepotism and improper preferential treatment.

3.3. Obligations of Staff Members and Volunteers

Anyone acting on behalf of the Foundation must:

i. comply with the law, the Articles of Association, this Code of Ethics and the instructions of the supervisory authority;
ii. use the Foundation's resources correctly and responsibly, exclusively for activities aimed at achieving its statutory purpose;
iii. maintain the confidentiality of confidential information;
iv. avoid conduct that may harm the reputation and standing of the Foundation; and
v. promote a collaborative and respectful environment both within and outside the Foundation.

No person acting for or in the interests of the Foundation may, directly or indirectly, offer, promise, solicit or accept money, gifts, benefits, services or any other advantage, or submit to improper pressure, for the purpose of granting or obtaining an undue advantage.

3.4. Conflicts of Interest

Each member of the Foundation Board, as well as any other person involved in the Foundation's activities, must avoid situations involving actual or potential conflicts of interest with the Foundation's activities.

In the event of a conflict, the member of the Foundation Board or individual concerned must promptly disclose it and, where appropriate, refrain from participating in related deliberations or exercising voting rights.

4. Rules of Conduct in External Relations

In all external relations, the Foundation requires compliance with the same ethical principles set forth in this Code of Ethics.

The Foundation shall not maintain relationships with persons or entities pursuing objectives that are inconsistent with the Foundation's purpose or values.

The Foundation shall process and protect personal data in accordance with applicable data-protection laws and its internal policies.

4.1. Relations with Beneficiaries

The selection criteria for beneficiaries of the Foundation's programs (the "**Beneficiaries**") must be transparent, properly documented and non-discriminatory.

Beneficiaries must be treated with respect, dignity and confidentiality, particularly minors and women in vulnerable situations.

4.2. Relations with Suppliers and Partners

Relations with suppliers, entities, partners and institutions must be based on transparency, fairness and consistency with the Foundation's values.

No granting or acceptance of undue advantages shall be permitted.

4.3. Relations with Institutions and the Public

The Foundation maintains transparent and collaborative relations with authorities, institutions and the media, ensuring that communications are truthful, accurate and respectful.

5. Transparency and Management of Funds

The Foundation's assets shall be used exclusively for the achievement of its statutory purpose.

The management of the Foundation's assets shall be guided by principles of efficiency, effectiveness and transparency. Every allocation or use of resources must be documented and traceable.

Financial statements and reports must be prepared rigorously and clearly, in compliance with applicable regulations and the instructions of the supervisory authority.

6. Prevention of Money Laundering and Self-Laundering

All persons having dealings with the Foundation must refrain from any involvement in activities related to money laundering, including the laundering of proceeds of their own criminal activities (self-laundering), handling stolen goods, or dealing with any other assets of illicit origin.

All applicable national and international laws and regulations must be complied with at all times.

7. Protection of Beneficiaries

The Foundation undertakes to ensure the utmost respect for and protection of the dignity and privacy of its Beneficiaries, particularly minors and women in vulnerable situations.

Any form of abuse, exploitation or discrimination is strictly prohibited.

8. Communication and Image of the Foundation

Institutional communications must be transparent, truthful and respectful of the persons involved.

In particular, when disseminating images or testimonies of Beneficiaries, their privacy and dignity must always be protected.

9. Reporting Unethical Conduct

Anyone who becomes aware of conduct contrary to this Code of Ethics is encouraged to report it to the Foundation Board. Reports shall be handled confidentially and, where requested, anonymously.

10. Responsibility and Internal Sanctions

A breach of this Code of Ethics may result in measures proportionate to the seriousness of the breach and appropriate to the nature of the person’s relationship with the Foundation, including removal from office or termination of the relevant contractual, employment, volunteer or other relationship.

The right to be heard shall always be guaranteed.

11. Communication and Dissemination of the Code of Ethics

This Code of Ethics shall be distributed to all Recipients and made publicly accessible.

Each new staff member or volunteer shall receive a copy thereof and undertake to comply with its provisions.

12. Entry into Force and Amendments

This Code of Ethics was approved by the Foundation Board on 6th August 2026 and enters into force with immediate effect.

It may be updated and amended by decision of the Foundation Board.

Lugano, 6 August 2026