

Organization, Management and Control Model pursuant to Legislative Decree No. 231/2001

Easy Market has adopted an Organization, Management and Control Model pursuant to Italian Legislative Decree No. 231 of 8 June 2001, with the aim of promoting a corporate culture based on ethics, legality and transparency, as well as preventing the commission of criminal offenses in the conduct of its business activities.

The Model pursuant to Legislative Decree 231/2001 applies to all individuals acting on behalf of the Company, including employees, collaborators, consultants and business partners, in accordance with the principles of responsibility and professional integrity.

The Company has established a Supervisory Body (*Organismo di Vigilanza*), entrusted with monitoring the effectiveness and compliance with the Model and ensuring its updating. The Supervisory Body may be contacted at the following email address: odv@easymarket.travel.

Any reports concerning non-compliant conduct or violations of the Company's principles may be submitted through the dedicated reporting channels, in compliance with confidentiality requirements and applicable legislation.

The Code of Ethics, which sets out the values and principles inspiring the Company, is available at the following link: <https://hbxgroup.integrityline.com/>. This channel is dedicated exclusively to the submission of reports and may also be used by external parties, in accordance with applicable laws and regulations.