

CODE OF ETHICS

Preamble and Purpose of the Code of Ethics

The Code of Ethics of Eazy Group (comprising Eazy Bunker srl and Eazy Yachting srl) serves as the fundamental charter outlining the rights, duties, and responsibilities of the company toward all its stakeholders: employees, directors, customers, non-profit organizations, suppliers, public administration, shareholders, and the financial market. This document establishes the ethical and social responsibility of every member of the organization and defines the standards of conduct that safeguard the reputation, and financial, social, and human integrity of Eazy Group.

Additionally, the Code of Ethics does not replace or supersede existing laws or national collective labor agreements, whose validity and relevance remain in full effect.

Through this Code, Eazy Group aims to:

- Define and clarify the core ethical values and principles that guide the company's operations and relationships with customers, suppliers, shareholders, employees, collaborators, directors, public institutions, and all other parties involved in the company's activities.
- Formalize its commitment to act in accordance with the principles of moral legitimacy, fairness and equality, human rights protection, diligence, transparency, honesty, confidentiality, impartiality, and the safeguarding of health and the environment.
- Provide employees, collaborators, directors, and all stakeholders in general with clear guidance on the principles of conduct, values, and responsibilities expected during work activities.
- Define the implementation methods and control systems to ensure compliance with the Code.

Strict adherence to these principles is essential not only for the company's success but also for maintaining and strengthening the trust that stakeholders place in Eazy Group.

Importance of Corporate Social Responsibility (CSR)

In the current context, Corporate Social Responsibility (CSR) is not merely a complement to existing regulations but represents a cornerstone of Eazy Group's business strategy. Its significance is recognized in every aspect of the company's operations, where CSR not only shapes the approach to business but actively directs the vision toward the future.

Through CSR, Eazy Group commits not only to integrating ethical and sustainable practices into daily operations but also to actively promoting products and services that respect the environment.

1 FUNDAMENTAL PRINCIPLES

1.1 Code of Ethics Recipients

This Code of Ethics applies to all individuals within the Eazy Group organization, encompassing every level and function within the company. It includes not only full-time and part-time employees but also executives, directors, external collaborators, consultants, suppliers, and business partners. The Code serves as a guide for all involved parties, emphasizing the importance of both individual and collective responsibility in promoting ethical and professional behavior in all business activities. Eazy Group actively promotes the acceptance and respect of the principles outlined herein, contributing to the company's ethical culture and reinforcing its commitment to high standards of integrity and mutual respect.

1.2 Development and Enhancement of Human Resources

Eazy Group firmly believes in the value of human capital and is committed to supporting the professional and personal development of each team member. The company strives to create and maintain a working environment that fosters not only professional growth but also the personal well-being of its employees. This includes offering continuous training opportunities, clear and accessible career paths, and supportive policies that help employees balance work demands with personal and family needs.

Eazy Group is also dedicated to ensuring an inclusive and respectful work environment, free from any form of discrimination, harassment, or abuse. Recognizing that diversity enriches the organization, the company is committed to valuing individual differences as a key strategic resource for success and innovation. Through these practices, Eazy Group aims to build a workplace that not only attracts but also retains top talent, fostering a sense of belonging and satisfaction that translates into greater productivity and commitment to the company's goals.

2 INTERNAL RELATIONS

2.1 Compliance with Applicable Laws and Regulations

Eazy Group is committed to ensuring that all its operations, from fuel brokerage to yacht services and office activities, comply with national and international laws, as well as the professional and ethical standards specific to the nautical sector. Regulatory compliance is essential to maintaining the company's credibility and reputation in the global market.

2.2 Specific Duties of Department Heads

Department heads within Eazy Group are required to carry out their responsibilities with the utmost diligence, integrity, and loyalty. This commitment involves careful and responsible management of operations, which is crucial for the continued success and growth of the company in the yacht brokerage sector.

2.3 Employee Duties

All employees of Eazy Group must perform their duties with a high level of professionalism, efficiency, and honesty. It is essential for every individual to actively contribute to the company's success by working ethically and adhering to the high standards that define us, both in fuel brokerage and yacht services.

2.4 Use of Corporate Resources and Tools

Corporate resources—whether physical, digital, or intellectual—must be used with the utmost care and exclusively for professional purposes. This includes everything from company vehicles to IT tools, ensuring their use always supports operational efficiency and safeguards corporate assets.

2.5 Conflict of Interest

It is essential that employees and collaborators avoid any situation that could create a conflict between their personal interests and those of the company. Conflicts of interest can undermine the transparency and objectivity required in business decisions, which is particularly critical in our brokerage sector.

2.6 Confidentiality

Maintaining the confidentiality of company information is vital for Eazy Group. Confidential information, including details regarding fuel negotiations and yacht service agreements, must not be disclosed without prior authorization. Protecting this information is crucial to preserving our competitiveness and honoring confidentiality agreements with clients and partners.

3 BUSINESS MANAGEMENT

3.1 Corporate Commitments and Governance

Eazy Group is committed to operational excellence through transparent and responsible management and strict adherence to good governance practices. In the fuel brokerage and yacht service sectors, the company pledges to uphold the industry's best practices, making strategic decisions aimed at financial, social, and environmental sustainability. This commitment includes ensuring transparency in corporate decisions, with all activities monitored and guided by principles of integrity and fairness.

3.2 Compliance with Internal Procedures

Eazy Group requires that all operations, from brokerage processes to customer service, be conducted in strict accordance with the established internal procedures and policies. This ensures a high standard of service and consistency across all areas of activity. Internal policies are continuously reviewed and updated to reflect changes in the market and regulatory landscape, ensuring the company remains agile and compliant.

3.3 Accounting Transparency

The integrity of accounting practices is fundamental to maintaining stakeholder trust. Eazy Group is committed to keeping accounting records that are not only accurate and complete but also timely and compliant with both national and international accounting standards. This ensures the company can provide a clear picture of its financial position, enabling informed decision-making at both management and stakeholder levels.

3.4 Workplace Health and Safety, Environmental Protection

Eazy Group is committed to workplace safety and environmental protection by adopting operational practices that not only meet but aim to exceed safety standards. In the fuel brokerage and yacht service sectors, where risks can be significant, the company actively implements strict measures to prevent accidents and minimize the environmental impact of its operations.

This includes the responsible use of resources, careful waste management, and the adoption of technologies that reduce pollution and promote energy efficiency. Continuous employee training on safety practices and the integration of advanced environmental protection technologies are cornerstones of the company's health and safety policies.

4 IMPLEMENTATION MECHANISMS OF THE CODE OF ETHICS

4.1 Dissemination and Communication

The Eazy Group Code of Ethics will be widely disseminated through various internal and external channels to ensure that every employee, partner, supplier, and other stakeholders are fully informed. Specific training programs will be regularly organized to ensure the effective understanding and implementation of the Code across all business areas. Informative materials will be made available at all operational sites and on digital platforms, with periodic updates reflecting any changes or new company policies.

4.2 Oversight of Code of Ethics Implementation

To ensure compliance with the Code of Ethics, Eazy Group will commit to ongoing activity monitoring through regular internal reviews.

4.3 Reporting Issues and Suspected Violations

Eazy Group promotes a transparent and fair corporate environment, encouraging employees and all stakeholders to report any behavior that may contravene the Code of Ethics.

The company will implement a confidential and secure system for reporting such behaviors, ensuring that whistleblowers are protected from any form of retaliation. Eazy Group is committed to investigating all reports with seriousness and discretion, taking appropriate measures to address any violations and prevent future occurrences.

5 DISCIPLINARY MEASURES FOR VIOLATIONS

Violations of the Code of Ethics will result in appropriate disciplinary actions applicable to employees, managers, directors, and external collaborators, proportionate to the severity and circumstances of the non-compliance. Penalties may include warnings, fines, suspensions, or, in the most serious cases, termination of employment or collaboration contracts.

5.1 Employees

Employees who violate the provisions of the Code of Ethics will be subject to disciplinary actions, determined based on the nature and severity of the violation.

5.2 Managers

Managers are held to an even higher standard of compliance due to their leadership roles and responsibility to set an example for others. Violations by managers may result in severe penalties, including dismissal.

5.3 Directors and Statutory Auditors

Directors and statutory auditors are responsible for ensuring that the company's governance aligns with ethical and legal principles. Failure to comply with the Code may result in penalties, including the non-renewal of their mandate.

5.4 Collaborators and External Consultants

Collaborators and external consultants are required to adhere to the Code of Ethics during their interactions with and on behalf of Eazy Group. Violations may lead to the early termination of contracts and legal actions, if necessary.

5.5 Partners, Clients, and Suppliers

Eazy Group expects its partners, clients, and suppliers to operate ethically. Non-compliance with the Code may influence future decisions regarding the continuation of business relationships.

5.6 Supervisory Body

A supervisory body will be established to monitor compliance with the Code and investigate reports of unethical or illegal behavior.

5.7 General Rules

All stakeholders are required to familiarize themselves with the Code of Ethics and seek clarification if they have any doubts regarding the interpretation or application of its provisions.

6 FINAL PROVISIONS

6.1 Updates and Revisions

The Code of Ethics will undergo periodic reviews to ensure it remains up-to-date with legal, regulatory, and market developments. Any revisions will be promptly communicated to all stakeholders.

6.2 Acceptance and Adherence

By signing an employment or collaboration contract, each employee or external collaborator agrees to comply with the terms of this Code of Ethics. Eazy Group is committed to providing adequate training to facilitate the understanding and implementation of the Code.

The Code of Ethics was approved by the shareholders' assembly on October 11, 2024, following consultation with the company's employees.