

Code of Ethics

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1. Introduction

Established in 2019, **Unobravo is the** online psychology service that aims to be a reliable, competent and empathetic reference point in people's lives to help them achieve **psychological well-being** and support them in their **personal growth**.

Since its founding, Unobravo (also, the "Company") has been working to break down the stigma that still persists around the issue of mental health, using **technology as a facilitator** to promote accessibility to therapy to as wide an audience as possible. In March 2022, Unobravo acquired the status of a **Benefit Corporation**, a testament to its strong sense of social responsibility and willingness to pursue common benefit - as embedded in its bylaws - which is embodied in the creation of value for both internal and external stakeholders. In addition, Unobravo began an internationalization effort in the summer of 2023 with the creation of its first Spanish subsidiary Buencoco S.L.U.

The pursuit of a positive impact in terms of sustainability is in Unobravo's DNA, and is embodied in a commitment that implies an ethical, sustainable and transparent approach to people, communities, territories, the environment, cultural and social assets, as well as entities, associations and other stakeholders. Moreover, this commitment is aligned with Unobravo's **mission** to help define an empathetic, welcoming and reliable dimension of therapy, constantly improving the quality of the services offered through scientific and technological progress.

This **Code of Ethics** represents a true compass, intended to guide employees and collaborators at all levels, therapists, as well as corporate bodies, in the daily actions and relations with the stakeholders of Unobravo and all Unobravo Group companies (the "Group").

1.1 Unobravo's mission and vision.

Unobravo aims to be a reliable, competent and empathetic point of reference in people's lives to help them achieve their **psychological well-being** and support them in their **personal growth**.

We work every day to create a world in which **taking care of one's psychological well-being is perfectly normal**. We are committed to generating well-being in society through overcoming the stigma that still persists around the topic of mental health and making the path of therapy accessible to more people, based on their real needs.

Unobravo also promotes communication that can generate **awareness** on specific issues such as mental health, self-care, prevention, women's empowerment, social inclusion, as well as lasting, inclusive and sustainable economic business growth based on full and productive employment and decent work for employed and nonemployed staff.

1.2 Unobravo's values

Unobravo's guiding values are:

- **Excellence:** Unobravo is able to offer cutting edge online therapy services through the preparation and continuing education of therapists and the informed use of modern media.
- **Empathy:** Unobravo was created to best meet the needs of its patients by humanely approaching listening and solving their problems.
- **Welcoming:** Unobravo makes sure that sessions with its therapists are always safe places for all patients who come to you, whatever difficulties arise.
- **Reliability:** the team of Unobravo professionals is carefully trained and supervised to conduct all sessions according to Unobravo's standards of excellence and safety.

At Unobravo, respect for ethics and the Deontological Code of Italian Psychologists is the primary foundation that guides the work of every therapist, collaborator and clinical supervisor.

1.3 Addressees of the Code of Ethics

The following are required to abide by the Code of Ethics: (i) each employee (fixed-term and non-fixed-term), manager, (ii) members of the various corporate bodies, (iii) consultants and collaborators (with any type of contract or assignment, such as cococo and consultants with VAT, including but not limited to therapists) third-party suppliers of products or services and customers (collectively the "Recipients").

All Recipients are required to abide by and, to the extent of their competence, enforce the principles contained in the Code of Ethics.

The Code of Ethics is valid both in Italy and abroad and is applicable to the Recipients of the companies that belong and will belong to the Group as direct subsidiaries.

Compliance with the rules of the Code of Ethics must, in particular, be considered an essential part of the contractual obligations of the Company's employees pursuant to and in accordance with the provisions of Article 2104 et seq. of the Civil Code.

Violation of the rules of the Code of Ethics may lead to disciplinary action and compensation for damages, up to and including the breach of the fiduciary bond established with the Company and termination of the employment contract (disciplinary dismissal) and/or collaboration agreement, without prejudice, for employees, to compliance with the procedures set forth in the Workers' Statute, collective bargaining agreements and any company regulations adopted by the Company and other Group companies.

1.4 The Unobravo Team

Unobravo consists of a team of professionals united by one, common goal: to provide a **highly qualified service**, at an **affordable price** and **wherever** the user is.

Each team member proudly carries forward and actively participates in the company's mission through a model of **shared leadership**, marked by trust, bringing with them enthusiasm, experience and, most importantly, a desire to make a positive impact on the lives of people and the community.

2. General Principles

2.1 Honesty and transparency

Unobravo is committed to operating in an honest, **legal, and transparent** manner, respecting the principles of fairness and loyalty in dealing with stakeholders. In fact, we are committed to treating everyone with fairness, consistency, and respect. We cultivate relationships with professional orders of psychologists, with local and national expertise in order to promote constant educational and informational dialogue with the aim of always ensuring the utmost professionalism of our therapists in the care of our patients.

2.2 Social responsibility

Unobravo aims to **maximize access to qualified psychological support** to as wide an audience as possible. With this in mind, it therefore monitors the impact of its activities, collecting impressions, suggestions and feedback from/to patients, inherent to the quality of the received service and useful for its constant improvement, through appropriate monitoring and measurement systems, such as CSAT (Customer Satisfaction Score).

In addition, Unobravo promotes transparency to its patients and external stakeholders by offering users the opportunity to offer public feedback with respect to the quality of service and care received through easily accessible tools (such as a company page on Trustpilot could be).

In conducting its business, Unobravo is committed to orienting its actions in a logic of **sustainability**, respecting the environment, human rights and the welfare of communities. In this sense, the company has also championed, in Italy, the concept of **Corporate Emotional Sustainability**, in the belief that for a company to truly boost virtuous business, it must be, before anything else, sustainable for all its people.

Unobravo also cooperates, including through donations, with associations, foundations, and nonprofit organizations that pursue the same **goals of social inclusion and attention to mental health issues** (by way of example but not limited to: associations against gender-based violence, LGBTIQ+ associations, associations for children and the elderly).

2.3 Value of human resources and labor protection

Unobravo's people are the most valuable asset of our reality and, for this reason, we are committed to taking care of them, through the protection of their work. Therefore, the company promotes policies geared toward preserving their **work-life balance** and valuing them, in every aspect of daily life.

The trust that the company places in its employees and contractors is also revealed in the work mode chosen, with the adoption of a formula that allows flexible working and the use of remote working.

Unobravo protects and promotes the value of human resources in order to offer all of its employees and collaborators **equal opportunities** and **professional development**, based on merit criteria, through appropriate training and career plans.

In addition, the company is committed to maximizing **staff well-being** by promoting initiatives identified each year during collegial and individual moments of sharing and co-creation, such as team building initiatives or company retreats.

2.4 Respecting People and Promoting Diversity and Inclusion

Unobravo proposes, in human resource management and governance, internal and external communication, special attention to the development of an inclusive culture to overcome aesthetic and cultural stereotypes, **combating any form of discrimination** related to race, sexual orientation, religion, political opinion or other. It also repudiates all forms of discrimination in **hiring and compensation policies**, promoting the elimination of gender inequality.

All people are committed to contributing to, promoting and maintaining a climate of mutual respect in the work environment, with special attention to respecting the sensitivities of others and their **psychological well-being**.

2.5 Sustainability and the environment

Since 2022, Unobravo has identified itself as a **Benefit Corporation and is** committed to promoting lasting, inclusive and sustainable economic growth. Pursuant to this, the company implements sustainability policies aimed at reducing its environmental impact, favoring hybrid work policies and the use of smart working, and encouraging each of its

employees and collaborators to cultivate sustainability practices in their corporate and non-business lives.

2.6 Compliance with internal rules, guidelines and regulations

Unobravo considers compliance with regulations - primary and secondary - national and international as a binding and unavoidable condition of its actions and therefore undertakes to comply with them. Likewise, the employees of Unobravo and the companies of the Group must conform their behavior to compliance with the applicable legislation, guidelines and internal regulations.

In addition, therapists working with Unobravo and all members of the clinical team must act in full compliance with the Deontological Code of Psychologists in force at the time in their country of residence and according to the corporate guidelines dedicated to therapists.

2.7 Confidentiality and privacy protection

Unobravo is committed to **protecting the personal information** of our employees, contractors, customers and partner companies. We treat data transparently and legally, in compliance with the GDPR and privacy laws. Confidentiality of information is essential and misuse of such information is prohibited.

2.8 Proper use of computer systems

Unobravo and the companies of the Group pursue the objective of the correct use of computer or telematic services, so as to guarantee the integrity and genuineness of the data processed, in order to protect the interests of the companies of the Group, the Recipients and third parties, with particular reference to the patients.

3. Principles of Conduct

3.1 Internal relations

Unobravo believes in diversity and the importance of creating a welcoming and inclusive work environment. Personnel selection is based on merit and on assessments that have in mind not only hard skills but also soft skills, avoiding favoritism, and promoting equal opportunities for all and in internal career paths.

3.2 Responsibility of persons



Unobravo is committed to providing a respectful and dignified work environment for everyone. Each team member is encouraged to behave in a fair and professional manner, abiding by the company's Code of Ethics. This means:

- Maintain an attitude of **mutual respect** and behave courteously.
- Actively collaborate and improve one's skills through experience and **collaboration** with colleagues.
- Contribute to the achievement of company goals with **commitment** and proper behavior.
- **Avoid** situations of **conflict of interest** and refrain from receiving favoritism or gifts from third parties.
- Do not speak or write publicly on behalf of Unobravo without prior written permission from the appropriate apex functions.

3.3 Confidentiality and data protection policies

All employees and contractors must respect the confidentiality of corporate information, follow corporate data protection policies, and adhere to copyright and corporate asset protection laws. They must also avoid misuse of company tools and follow company security policies.

All employees and contractors and therapists must respect, in accordance with the company's privacy policy, the confidentiality of information about patients.

Therapists and all members of the clinical team must respect the confidentiality of information taken from patients in accordance with their privacy and the Deontological Code of Psychologists in force at the time in their country of residence.

3.4 Social and communication

Unobravo expects employees and collaborators to respect the company's policies on information sharing and intellectual property. They must avoid defamatory, offensive or threatening content and not make inappropriate comments, as well as on their social profiles the posting of content - of any kind - that may be harmful to the law, morals and decency. Employees and collaborators in charge of social media management must coordinate with the Marketing and Communications department, avoid unwarranted deletion of comments and correct misleading content.

3.5 External Relations

Unobravo recognizes the importance of cultivating positive relationships with diverse stakeholders. These include patients, therapists, partners, customers, suppliers, competitors, shareholders, investors, funders, government agencies, communities, and

the media. Unobravo respects its clients' codes of ethics and policies where they exist and are duly communicated.

- **Patients:** we prioritize the welfare of the patients, providing high quality services with transparency, respect and protection of privacy.
- **Therapists:** we build relationships based on transparency and professional fairness, honoring contracts and providing complete information.
- **Partners and suppliers:** we seek professional and objective partnerships, selected on the basis of quality, sustainable costs, and proper time management.
- **Competitors:** we promote a spirit of positive competition in compliance with competition laws, viewing competition as an opportunity for market improvement. We pledge not to engage in any activities that may have the effect of distorting competition.
- **Shareholders, investors and lenders:** we offer clear, timely and complete information, following principles of transparency.
- **Public Administration:** our relations with the Public Administration are marked by maximum transparency and fairness. In particular, we maintain necessary relations, in compliance with the roles and functions assigned under the law, as well as in a spirit of maximum cooperation with State Administrations, whether in Italy or in other countries.
- **Corporate clients:** we conduct the necessary research to ascertain the nature and integrity of any potential new clients.
- **Media and communications:** we base communications on fairness, transparency and respect and act in line with the Deontological Code of Italian Psychologists, promoting awareness and combating discrimination.

3.6 Use of computer systems

Employees, collaborators (including therapists) and individuals who perform activities in the interest of Unobravo Group companies, in the performance of their professional activities:

1. must use computer or telematic tools and services, social networks in full compliance with the relevant regulations in force (and, particularly, with regard to computer malfeasance, computer security, privacy and copyright) and internal procedures;
2. may not load borrowed or unauthorized software onto the company's computer systems, just as it is prohibited to make unauthorized copies of programs, licensed, for personal, corporate or third-party use;
3. are required not to send threatening and insulting e-mail messages, not to resort to linguistic expressions not in accordance with Unobravo's style, or otherwise

inappropriate language therein included in interactions on personal pages and profiles on various social networks.

3.7 Administrative integrity and prevention of corruption

Unobravo complies with applicable laws and regulations, promoting full transparency in accounting records through detailed records and accurate financial statements. Every transaction is properly documented, reducing the risk of errors. Accounting records faithfully reflect supporting documentation, prohibiting false entries.

In addition, Unobravo is committed to conducting business honestly and preventing corruption and money laundering by working only with legal and trustworthy partners. Employees and collaborators are required to promptly report omissions, falsifications, and violations of laws, including anti-money laundering, and in particular to report suspicious behavior among customers, suppliers, and business partners, as specified in paragraph 5 below.

4. Communication, monitoring and updating of the Code of Ethics

Unobravo is committed to ensuring timely internal and external dissemination of the Code of Ethics.

The Code of Ethics can be consulted by the Recipients in an accessible place, in the most appropriate manner and in accordance with local norms and customs. The Code of Ethics can be consulted on the website <https://www.unobravo.com/chi-siamo> from which it can be freely downloaded.

With reference to third-party recipients (e.g., customers, suppliers), Unobravo will also ensure that it: (i) informs these parties about the commitments and obligations imposed by the Code of Ethics, by making it available; (ii) disseminates the Code of Ethics through the company's information systems.

The Code of Ethics is subject to periodic review by Unobravo. It is understood that any amendments and/or additions to this Code of Ethics must be made in the same manner as was adopted for its initial approval.

5. Reporting Misconduct

Every person involved in Unobravo, from managers to non-management subordinate staff, is committed to the Code of Ethics. We also ask our suppliers and partners to do the same.

Personnel and third parties are required to report any actual or suspected misconduct, such as fraud or irregularities, in writing to senior corporate figures. This helps the company maintain a culture of transparency and integrity, as well as address and resolve problems before they can cause harm.

Reports are confidential and are handled carefully and seriously, without retaliation. If necessary, the company may take appropriate corrective action, such as disciplinary proceedings for employees or contractual termination for suppliers.

The company also expects Recipients involved in an investigation to be fully cooperative and provide complete and honest answers to all questions.

Reports should be addressed to the Board of Directors, either orally or in writing or the company channels set up for this purpose can be used, in particular the **Whistleblowing** platform accessible at the following link: <https://unobravo.integrity.complylog.com/>.