

CODE OF ETHICS

DREAMSTEAM GROUP

*"If you want to be the fastest,
run alone.*

*If you want to reach far,
travel together."*

(African proverb)

PEOPLE AT THE HEART OF THE JOURNEY

Established in 2005 from the vision of industry leaders, Dreamsteam was created to set a new benchmark for excellence in Italian luxury travel. Our team specializes in meticulously tailored journeys, drawing upon an elite global network of partners and the world's most prestigious brands to curate experiences in the most exclusive destinations.

We place the Individual at the very center of our philosophy. We believe that true success is rooted in the holistic well-being of our entire ecosystem: employees, consultants, partners, and suppliers alike. Integrity, transparency, and the celebration of unique talents are the non-negotiable pillars of every relationship we build. We are committed to fostering an inspiring and inclusive environment where everyone can achieve their full potential.

It is only by nurturing these values internally that we can authentically project them to the world. A cohesive, respected team is the natural engine of our commitment to social and environmental stewardship. We recognize that privileged access to the world's wonders carries a profound responsibility. Thus, we advocate for a form of tourism that not only enriches our clients but also generates a lasting positive legacy for local communities and the preservation of the natural and cultural heritage we are proud to share.

VALUES AND GUIDING PRINCIPLES

Our Code of Ethics is rooted in a philosophy that views professional conduct as a profound expression of respect, accountability, and collective excellence. Dreamsteam Group is committed to fostering a work environment built upon:

- Respect for human dignity, integrity, and the unique identity of every individual;
- Inclusion, equity, and the celebration of diversity;
- Absolute transparency in professional relationships and a culture of individual ownership;
- Social and environmental stewardship as an essential daily commitment;
- Culture of legality and continuous improvement.

Every action and strategic decision we take is guided by these core values, the true foundation of our identity and the cornerstone of our shared success.

PREAMBLE: SCOPE OF APPLICATION

This Code of Ethics applies to all personnel within the DreamsTeam Group entities, including: Dreams Team Srl, Taver Viaggi Srl, Dreams Team Concierge Srl and 19 Holding Srl. These standards are binding for all employees, regardless of their contractual status, tenure, or specific employment terms (full-time, permanent, part-time, or fixed-term).

Furthermore, these provisions extend to independent travel agents, freelance consultants, and any occasional collaborators engaged by the aforementioned companies.

The term "worker" refers to all the aforementioned categories, the term "employee" refers solely to employed workers; the term "collaborators" refers to VAT number holders.

The provisions of this Code of Ethics apply to all branches and representative offices of the DreamsTeam Group. Furthermore, these standards remain binding in all professional contexts outside company premises where workers represent the Group's brand identity and reputation. This includes, but is not limited to: FAM trips, site inspections, training seminars, corporate events, industry receptions, and business hospitality (lunches, dinners, or social engagements with suppliers and clients).

All the workers are required to comply with any additional internal regulations, provided they are consistent with this Code of Ethics, remain in accordance with applicable laws, and fall within the scope of the employer's managerial authority.

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1. WORKING HOURS AND PERSONAL HYGIENE

For full-time employees, the standard working week consists of 40 hours, typically distributed over six days. To ensure the punctual commencement of business activities, employees are expected to be at their designated stations with all necessary systems and equipment fully operational at the scheduled start of their shift. This includes ensuring the premises are open and ready for business, as directed by management. For this reason, it is recommended to organize oneself to be ready at the start of the shift, in order to begin work activities punctually, in a spirit of collaboration and efficiency.

The same respect for punctuality is required of all collaborators, in case of scheduled appointments for meetings, events, training sessions, etc.

All the workers are required to maintain high standards of professional grooming and wear appropriate attire. A polished personal presentation is essential, reflecting respect for colleagues, suppliers, and clients, while consistently upholding the prestigious image of the DreamsTeam brand.

2. DELAYS, ABSENCES AND LEAVE/PERMITS FOR EMPLOYEES

For employees, it is mandatory to observe working hours and comply with the formalities prescribed by the company for attendance control (specifically: submit via email by the 1st day of the following month, one's absences from the previous month; record absences and appointments in the apps designated for branch management, etc.), as well as to perform assigned tasks with diligence and care, observing the provisions of this contract, as well as the consequent instructions given by superiors.

Sick leave absences

According to the provisions of the CCNL, the worker is obliged to immediately notify their employer of their health status upon the occurrence of illness; the medical certificate is sent electronically, directly by the doctor or the healthcare facility that issues it, to the National Institute of Social Security, according to the procedures established by current regulations.

In the absence of such medical certificates, except for justified reasons of impediment, the absence is considered unjustified, without prejudice to the sanctions provided by law for delays in transmitting the certification of the start or continuation of illness.

The company reserves the right to evaluate, in full autonomy, case by case, the justifications provided by the employee; if deemed plausible, it will provide supplementary payment at its own expense, regardless of decisions made by INPS.

Justified absences

Justified absences are considered unauthorized absences from work that are caused by serious and exceptional circumstances that constitute, also due to their unpredictability, objective impediment to work attendance. Communication of the aforementioned causes justifying the absence must be sent to the company as soon as possible.

Unjustified absences

Absences are considered unjustified when the worker has not provided justification for their absence either during the absence or upon return to work, or in cases where the company is able to demonstrate that the justification provided by the individual is not truthful.

Employee vacation and leave

The vacation days that each employee accrues are those contractually provided, and their use must occur, except in cases of impediment, within the timeframes established by current legal regulations. In the absence of such use, the company will arrange vacation periods to clear the remaining balance.

Vacation requests submitted by employees will be approved by the company after evaluation. In the absence of individual requests, the company itself will decide vacation periods, taking into account particular needs.

Permission to leave before the end of working hours and to be absent from work must be requested from the owner or the person delegated by them, normally 48 hours before taking such leave, accompanied by the relevant reason, or in shorter timeframes in cases of proven urgency or unpredictability.

3. SAFETY AND ACCIDENT REGULATIONS

Without prejudice to the obligations and duties imposed on the company regarding workplace hygiene and accident prevention, and given that all workers are required to provide maximum cooperation in the common intent to avoid anything that may cause or occasion injury to persons or damage to property, it is the duty of every worker (Legislative Decree No. 81/2008):

- to observe accident prevention regulations;
- to use safety devices and personal protective equipment punctually and diligently: gloves, protective masks, disinfectant, etc.;
- to immediately report to the owner or the person delegated by them any fact or event that may, in itself, create a state of danger for persons or property;
- to immediately report to the owner or the person delegated by them every accident, even if, at the time of its occurrence, it does not appear to have any consequences.

Workers who, through negligence, fail to report and fail to use accident prevention protections arranged by the company and installed in accordance with the law, may be considered responsible or co-responsible for the accident and as such reported to INAIL.

4. COMMUNICATION OBLIGATIONS

Each employee is required to promptly communicate to the company:

- changes of residence and tax code,
- changes in marital status,
- details of any pensions received.

Failure to comply with the aforementioned provisions not only relieves the company of any responsibility for the consequences that may arise from such delays, but also relieves it from applying, for contribution purposes, those benefits to which the employee would be entitled following timely notification.

Each collaborator is required to promptly communicate to the company any changes to their VAT number or business name.

5. BEHAVIORAL STANDARDS

Privacy

Every worker is required to maintain absolute confidentiality regarding the company's interests, refraining from disclosing any data relating to the company, Clients, suppliers, or colleagues in the broadest sense. Strict compliance with all PRIVACY regulations and company directives on the matter is also mandatory.

Employees are prohibited from profiting in any way, to the detriment of the company, from what constitutes the subject of duties pertaining to their assigned position; it is also prohibited to carry out activities and/or accept assignments contrary to the obligations arising from the employment relationship, pursuant to Article 8 of Royal Decree-Law of November 13, 1924, No. 1825.

Respect for the Person and Whistleblowing

Every worker is required to use courteous manners and utmost politeness with the public, suppliers, and colleagues in the broadest sense: the language used in all conversations must always be based on maximum respect for any interlocutor. Voice tone must be kept medium/low in all conversations, in order not to disturb colleagues and/or clients and not to create confusion, facilitating everyone's concentration; office activities must be carried out with respect for others' activities.

It is also mandatory to maintain relationships based on maximum respect for the dignity and rights of persons toward colleagues, clients, and third parties, and consequently to refrain from behaviors attributable to forms of sexual harassment as well as systematic and prolonged actions contradictory to the aforementioned respect.

Respect toward other people also translates into refraining from any offensive behavior or conduct harmful to the dignity of others, even in conversations in the absence of the persons themselves; by way of example but not limited to: it is prohibited to use any offensive or derogatory terms toward colleagues, suppliers, clients, or third parties whether in their presence or absence. The conversations referred to in this code of ethics include both oral ones, in person or by phone/video call, and written ones, conducted via email, WhatsApp (group and individual chats), SMS, etc. Social media activities (Instagram, Facebook, TikTok, etc.) and any other communication channel used to communicate or interact with colleagues, suppliers, clients, or third parties are also included.

In order to maintain a climate of positivity and effective collaboration in the various branches/offices and also to preserve everyone's well-being, each worker is invited to refrain from expressing complaints, negative comments, and criticisms for their own sake; in case of unresolvable problems or critical issues, each worker is required to contact their supervisor or the company owners.

It is also reminded that workers are recommended to maintain behaviors dictated by good manners and the rules of civil living.

For situations of extreme severity, the "Whistleblowing" procedure is available to workers, suppliers, and clients, accessible from the company website, which guarantees the possibility of submitting reports anonymously and with protection.

Equality and Fairness

The company is committed, through the contribution of all workers, to ensuring a work environment based on the essential principles of equality and fairness, rejecting all forms of discrimination, ensuring equal opportunities for all workers, current and potential, regardless of gender, ethnic origin, nationality, language, religion, political opinions, sexual orientation, gender identity, age, disability, or any other personal or social condition.

This commitment is implemented through fair, transparent, and merit-based processes of selection, hiring, training, career development, compensation, and employment relationship management.

The company recognizes that equity goes beyond simple formal equality, working to understand and address any obstacles, providing each person with the necessary support to fully express their potential. Diversity is valued as a source of enrichment and innovation, actively promoting an inclusive culture where every individual feels respected, heard, and an integral part of collective success.

The company does not tolerate any form of harassment, bullying, or discriminatory behavior and is committed to maintaining a safe, welcoming, and respectful work environment for all.

Access to company premises

Employees are permitted access to the premises outside working hours for service needs with prior agreement, except as otherwise provided by current contractual regulations and legal provisions; collaborators may access company premises only with prior authorization and only during previously agreed times.

Use of personal devices and digital communications

Employees are prohibited from using mobile phones, iPads, or other personal devices to engage in calls during working hours, messages, or other types of communication and/or activities of a personal nature (by way of example but not limited to: use of personal social media). Company WhatsApp groups must be used solely for work purposes, favoring concise messages of interest to all group members; for more specific communications, concerning a more limited sphere of colleagues, the relevant WhatsApp groups should be used (e.g., Taver / Dt only / Groups / etc.).

6. CONSERVATION, USE AND RETURN OF MATERIALS AND TOOLS

The worker is responsible for the tools and materials they receive as regular equipment and, in case of termination of the employment relationship, must return them before leaving service. By way of example but not limited to: mobile phones, iPads, tablets, laptops, power banks, etc. In the event that they fail to return them, the corresponding amount for unreturned items may be charged upon settlement. It is the worker's specific obligation to keep in good condition the materials made available by the company, as well as to keep the aforementioned tools adequately charged for daily use.

The worker is liable for the loss and any damage to the items in question that are attributable to their fault or negligence.

Electrical equipment provided must be used in strict compliance with their instruction manuals and only for the necessary time. All workers must turn off lights and other electrical devices immediately after use, to avoid electrical waste and increased bills charged to the Company.

During working hours, employees are prohibited from using mobile phones, email, iPads, or other personal devices, except in cases of absolute urgency.

Every worker must maintain order and cleanliness at their workstation, in common areas (meeting rooms, storage rooms, back office, etc.) and at any workstation they occupy, both for the decorum of the offices, for the company's image and for better work management, but also to avoid potentially dangerous situations from a fire risk perspective, and to facilitate office cleaning staff. It is specifically prohibited to consume food and beverages near workstations, computers, printers, and other office machines. The desk/workstation must be clear of personal items (bags, backpacks, etc.) and other unused objects (PC cases, binders, etc.). All tools used must be immediately put away after use, all cabinet doors must be immediately closed after use.

7. ENVIRONMENTAL RESPONSIBILITY POLICY

All workers must strictly comply with waste separation regulations in force in their work municipality.

A reduction in paper consumption is also encouraged, urging document printing only when strictly necessary, with a view to environmental sustainability and conservation of exhaustible resources.

Purchasing managers must prioritize the procurement of eco-sustainable and recycled materials; by way of example but not limited to: biodegradable cups and cutlery, recycled paper A4 sheets, etc.

8. SUSTAINABLE SUPPLIER MANAGEMENT

The company and all its workers are committed to the selection, evaluation, and continuous monitoring of their suppliers, particularly Hotels, Tour Operators, DMCs, and tourism service providers in general. The goal is to promote a progressively more sustainable supply chain from an environmental, social, and economic perspective, in line with the company's commitment to its clients.

For details, please refer to the sustainable supplier management policy document available on the company website.

9. DISCIPLINARY MEASURES AND SANCTIONS

For employees' non-compliance with the provisions indicated in this code of ethics, reference is made to the content and procedures established by relevant regulations and the CCNL (National Collective Labor Agreement) for Public Establishments, Catering. Regarding violations committed by collaborators, the following sanctions will be applied:

- Financial penalties, if provided for in the contract, in case of infractions
- Termination of the collaboration relationship for the most serious violations (i.e., relating to privacy and respect for the person) or repeated violations.

Delays, absences and sick leave of employees

Any delay must be justified to the owner or the person in charge appointed by them. Delays without objective justification may result in the application of disciplinary sanctions provided for by Article 7 of Law No. 300 of May 20, 1970, and by the relevant current contractual articles. Delays will in any case be evaluated in consideration of their quantity, severity, and repetitiveness. The content of Article 7 of Law No. 300/1970 and the disciplinary measures provided for by the CCNL for travel and tourism companies constitute an integral part of this code of ethics.

Unjustified absences are not paid, and the disciplinary regulations provided for pursuant to Article 7 of Law No. 300/1970 and Articles 144 et seq. of the current CCNL for Public Establishments, Catering and Tourism will be applied.

In the absence of communications from the employee regarding any changes of address, during the period of absence due to illness or accident, the company assumes that they reside at the last communicated address. For employees absent from home health control visits or who do not present themselves for outpatient visits, the contractually provided financial sanctions apply, as well as, in the most serious cases, disciplinary measures.

Waste separation

In case of sanctions applied to the company by the Municipality due to violation of waste separation regulations, the relevant amounts will be charged to employees whose responsibility has been established, through regular disciplinary procedure and deduction from their paycheck.

In case of established responsibility of consultants, the amounts of the sanctions will be deducted from their due commissions.

10. REVIEW, TRAINING AND INFORMATION

This code of ethics will be subject to periodic review to ensure its continued adequacy and effectiveness, and to integrate any new sustainability objectives that the company will define over time, with a view to continuous improvement.

Training and information on the code of ethics are essential processes to ensure that everyone within the company respects the established principles and rules of conduct: the company is committed to providing practical training on the content of this code of ethics, with the aim of creating a corporate culture based on ethics.