MYGOLD

GOLD SAVINGS PLANS

Code of Ethics

MYGOLD S.P.A.

Foreword

This Code of Ethics sets out the values, principles of behaviour and rules of conduct that MyGold S.p.A. follows in carrying out its activities. It applies to directors, employees, collaborators, consultants, business partners, suppliers and all those who act, in any capacity, in the interest or on behalf of the Company (the "Recipients").

MyGold regards ethics, legality, fairness, transparency and responsibility as essential elements for building trustworthy relationships with clients, counterparties, partners, suppliers, collaborators and institutions. Compliance with this Code forms an integral part of the professional and contractual obligations undertaken by its Recipients.

Mission

MyGold operates in the field of services connected with gold savings plans, adopting a business model founded on reliability, transparency, traceability of transactions, quality of service and fairness in relationships. The Company directs its activities towards protecting the trust of clients and the market, valuing professionalism, operational rigour and risk control.

MyGold promotes a corporate culture based on integrity, responsibility, confidentiality and clarity, including in relations with third parties acting on its behalf in organisational and commercial activities. Every decision must be consistent with applicable law, internal procedures and the long-term interest of the Company.

1. General rules and principles of conduct

1.1 Scope of application

This Code applies to all Recipients, who are required to be familiar with its content and to conform their conduct to the values expressed herein. Anyone acting on behalf of MyGold must act in compliance with the law, internal procedures and the instructions received.

1.2 Legality and compliance with the rules

Under no circumstances may the pursuit of an interest or advantage of the Company justify conduct contrary to the law, to the duty of good faith or to the principles of this Code. All activities must be carried out in accordance with the applicable provisions and the internal control measures in place.

1.3 Fairness, honesty and transparency

All Recipients are required to act with fairness, honesty, diligence and transparency. Information, communications, data and documents must be truthful, clear, complete, understandable and always traceable.

1.4 Impartiality and protection of reputation

MyGold rejects favouritism and arbitrary discrimination and adopts objective criteria in decisions concerning clients, collaborators, suppliers and partners. The Company's reputation is an essential asset and must be protected by all Recipients through professional and responsible conduct consistent with their role.

Guiding principle

Every decision must be assessed not only in terms of its immediate result, but also of the impact it may have on legality, reliability, client trust, corporate reputation and the sustainability of the relationship over time.

This principle guides every activity of MyGold, from commercial communications to document management, from partner relations to compliance checks.

2. Principles in relations with third parties

2.1 Clients and prospective clients

Relations with clients and prospective clients must be based on fairness, clarity, availability, confidentiality and professionalism. The information provided must be understandable, not misleading and consistent with the true nature of the services offered by MyGold.

2.2 Business partners and parties acting on behalf of the Company

Business partners, including external support structures such as RealMoneyWorld, must operate in accordance with the values and principles of this Code, with particular attention to transparency, confidentiality, prevention of conflicts of interest and protection of the Company’s reputation.

2.3 Suppliers and consultants

Suppliers and consultants are selected on the basis of competence, quality, reliability, fairness, cost-effectiveness and regulatory compliance. Relationships must be managed objectively and in a documentable manner, avoiding undue pressure or favouritism.

2.4 Refiners, supply-chain operators and counterparties

In relations with refiners, specialised operators, custodians and other supply-chain counterparties, MyGold adopts criteria of seriousness, reliability, traceability and consistency with the risk level of the relationship. Every relationship must be supported by adequate documentation and proportionate checks.

Reliability, traceability and clarity are the guiding criteria in every relationship with external parties.

3. Anti-money laundering, economic legality and traceability

MyGold attaches particular importance to preventing money laundering, terrorist financing, the use of resources of illicit origin and any transaction that is not transparent or not adequately justified. All Recipients must contribute, within their remit, to the correct application of the identification, verification, traceability and record-keeping rules laid down by the applicable legislation and internal procedures.

Prohibited conduct

Recipients shall not:

- maintain relationships with parties involved, or suspected of being involved, in unlawful activities;
- accept or execute transactions lacking adequate economic, commercial or documentary justification;
- obstruct internal controls or omit relevant information;
- engage in conduct aimed at circumventing traceability, control or reporting obligations.

Required safeguards

Any anomaly, inconsistency or potentially relevant circumstance must be promptly brought to the attention of the competent internal contacts in accordance with company procedures. The quality of controls depends on the completeness of the information collected, its timely sharing and the proper retention of supporting documents.

The Company promotes an approach based on:

- know-your-customer and counterparty checks
- verification of the economic consistency of the transaction
- traceability of flows
- adequate document retention
- immediate escalation of risk profiles

4. Accounting, records and internal controls

MyGold ensures that every transaction is properly authorised, recorded, verifiable, lawful, consistent and documented. Accounting records, administrative documentation, information flows and all company records must be complete, truthful, accurate and timely.

The Company promotes an internal control system appropriate to the nature of its activities, with the aim of preventing errors, irregularities and abuse, ensuring the traceability and verifiability of processes, and managing operational, reputational, legal and compliance risks.

5. Data processing and confidentiality

MyGold protects personal data, company information and any confidential information it becomes aware of in the course of its activities. Recipients must treat such information confidentially, in compliance with applicable law and internal procedures, avoiding unauthorised access, improper use, undue disclosure or processing that exceeds the permitted purposes.

Essential rules

- use data only for legitimate and authorised purposes
- protect documents and credentials
- do not disclose information to unauthorised parties
- retain documentation in accordance with internal rules
- promptly report losses, breaches or anomalous access

6. Company resources and IT tools

Company resources, whether tangible or intangible, must be used properly, responsibly and consistently with work purposes. IT tools, communication systems, access rights and credentials must be used in compliance with security rules, internal procedures and applicable law.

Recipients shall not use company resources for unlawful purposes or purposes unrelated to the business, compromise the security of systems, install unauthorised software or disseminate content that is offensive, discriminatory or contrary to company values.

7. Conflicts of interest, gifts and benefits

Recipients must avoid any situation, whether actual or potential, in which personal or third-party interests may interfere with those of MyGold or compromise the objectivity of decisions. Any conflict of interest, including potential conflicts, must be promptly disclosed to the competent company contacts.

Gifts and benefits

Recipients shall not offer, promise, request or accept money, gifts, benefits or other advantages that may improperly influence decisions, negotiations or professional relationships. Only forms of business courtesy of modest value are allowed, provided they comply with internal procedures and do not undermine the integrity of the parties.

8. Relations with personnel and the working environment

MyGold recognises the central value of people and promotes a working environment founded on respect, dignity, collaboration, responsibility and the recognition of merit. The Company opposes all forms of discrimination, harassment, abuse, intimidation or conduct detrimental to personal dignity.

8.1 Recruitment and development

Decisions concerning recruitment, onboarding and professional development are based on criteria of competence, reliability, ability and merit.

8.2 Training

MyGold promotes the professional growth of its people and the dissemination of a corporate culture oriented towards legality, quality of work and risk awareness.

8.3 Equal opportunities

The Company ensures working conditions based on fairness, respect and inclusion, free from arbitrary discrimination based on irrelevant personal factors.

8.4 Health and safety

Occupational health and safety are primary values. All Recipients must behave prudently and responsibly, and comply with prevention rules.

9. Relations with authorities, public bodies and supervisory institutions

In its relations with supervisory authorities, public bodies, institutions and the public administration, MyGold acts with the utmost fairness, transparency, cooperation and respect for the rules. The Company also operates in compliance with the safeguards and controls attributable, within their respective remits, to the OAM (Organismo Agenti e Mediatori) and the Bank of Italy.

Recipients shall not provide false, incomplete or misleading information, conceal data or documents, promise or offer undue benefits, or exert improper pressure on officials, authorities or persons in charge of a public service.

10. External communication and protection of the Company’s image

External communications must be accurate, consistent, truthful and authorised in accordance with company procedures. No recipient may disclose externally any statements, data, documents or confidential information relating to MyGold without prior authorisation.

The Company’s name, trademark and image may be used exclusively for lawful purposes and in the Company’s interest, in a manner consistent with MyGold’s institutional and reputational positioning.

11. Reporting, oversight and implementation of the Code

MyGold promotes the dissemination and effective application of this Code of Ethics and encourages the prompt reporting of conduct contrary to its principles, to applicable law or to internal procedures. Reports must be handled with confidentiality and seriousness, and without retaliation against those who make them in good faith, through the channels and procedures adopted by the Company.

Oversight safeguards

The implementation of this Code is overseen by the competent corporate bodies and functions. The Company also operates in compliance with the obligations and controls applicable vis-à-vis the OAM and the Bank of Italy, within their respective remits.

12. Violations and disciplinary system

Any violation of the principles and rules contained in this Code constitutes a breach of the obligations undertaken towards MyGold and may result in the application of the measures provided for by applicable law, the relevant contracts, internal procedures and any disciplinary system adopted by the Company.

Any sanctions shall be applied in accordance with the principles of proportionality, consistency and the right to be heard, taking into account the seriousness of the violation, the intentionality of the conduct and the circumstances of the specific case.

Dissemination, updating and approval

This Code of Ethics is brought to the attention of its Recipients in a manner suitable to ensure its dissemination and effective knowledge. MyGold reserves the right to update its content in light of regulatory, organisational or operational developments.

MyGold promotes a business model founded on legality, transparency, traceability, professional fairness and the protection of client trust.