

Mia-Platform Code of Ethics

February 2026

Preamble and Structure of the Code

Mia-Platform's Activities and Mission

Mia S.r.l. (operating under the brand name Mia-Platform) is a leading company in building platforms for Cloud Native solutions. Headquartered in Milan, the company serves major Italian and international clients across the EMEA, North America, and LATAM regions, operating across multiple industry sectors.

Vision and Core Business

Mia-Platform's business focuses on the strategic integration of:

- **Platform Engineering**
- **Data Fabric**
- **Application Composability**

These capabilities support large companies in designing and implementing Internal Developer Platforms (IDPs), fully covering end-to-end software development.

Our vision is to empower technology to improve everyone's life. Our mission is to promote better development for everyone, everywhere. Our technology enables development teams to access resources via self-service, abstracting complexities and significantly improving the Developer Experience, which results in increased productivity and efficiency.

Sustainable Innovation and Strategy

A core value of our strategy is to drive scalable and sustainable innovation. We deliver solutions that give clients the flexibility to adapt to their specific needs while avoiding vendor lock-in. This approach ensures the longevity of our solutions and helps reduce waste and energy consumption, in line with our sustainability commitments.

History, Structure, and Offerings

Mia S.r.l. was founded in 2012. Following an initial B2C phase (Makeitapp), the company launched the B2B brand Mia-Platform in 2016. This evolution led to the expansion of the group: Mia-Care S.r.l. (Healthcare sector) was established in 2020, followed by Mia-Fintech S.r.l. (Financial Services sector) in 2021, and the opening of a UK branch in London in 2022.

In addition to software licensing, Mia-Platform provides:

- Support and Software Assurance (AMS) for its products.
- Expert consulting on Cloud Native, DevOps, and Platform Engineering technologies.
- Cloud Native solution development.
- Training on its products and Cloud Native topics.

Awards and Culture

Our technological leadership and ongoing commitment to innovation and sustainable development are widely recognized internationally. Key milestones and awards include:

- **Gartner® Recognition:** We were included in the Gartner Magic Quadrant for Cloud Application Platforms 2024 (as one of 12 selected vendors worldwide) and named a Gartner Cool Vendor 2021™ for Software Engineering Technology.
- **Economic Performance:** Our solid and sustainable growth has been recognized for the fourth consecutive year by the Financial Times, which included us in the prestigious FT1000: Europe's Fastest Growing Companies (ranking 15th among Italian tech companies in 2023).
- **Company Culture:** Reflecting our strong corporate culture and focus on employee well-being, the organization has been certified as a Great Place to Work from 2019 through 2024 inclusive (the latest available certification at the time of writing)

Purpose and Structure

The Mia-Platform Code of Ethics aims to define the value framework within which the company operates. It sets out the rules of conduct and the responsibilities that Mia-Platform assumes towards all its stakeholders, as well as the values it promotes within its community.

The Code is built upon the Mia-Platform Manifesto and the values of Transparency, Honesty, Loyalty, Quality, Teamwork, Fairness, Compliance with the Law, and Freedom of Expression. These values ensure that Mia-Platform operates efficiently and reliably, and that its impact on society is positive and constructive.

Mia-Platform's value system is also shared with all group companies across their offices, ensuring that all current and future decisions are grounded in the same ethical foundation. Through internal communication, training, and corporate culture initiatives, the company ensures that this ethical framework is consistently shared with everyone who works at the company or comes into contact with it.

This Code of Ethics consists of four core parts:

- **Addressees:** The values expressed in this Code apply to all individuals and entities who operate within the company, influence its operations, or are affected by them. The Code and its guiding value system are shared with them, and everyone is directly responsible for promoting and safeguarding it.

- **Ethical Principles and Values:** Building on the Manifesto, this section defines a set of principles and values to guide every decision-making process. The corporate mission is embedded within a fundamental ethical framework, and all the values driving the company align with the framework set by the Sustainable Development Goals (SDGs).
- **Relations with Stakeholders:** This section defines and regulates conduct based on the specific relationship between the company and each type of stakeholder (employees, clients, institutions, the environment, etc.).
- **Implementation of the Code:** This outlines how the Code is put into practice, including control mechanisms, reporting systems, and update procedures.

Ethical Principles and Values

The Mia-Platform Manifesto

In an increasingly digital world, software touches, pervades, and empowers our every activity, influencing our daily quality of life, relationships, and democracy. As software creators, Mia-Platform recognizes its profound responsibility and is committed to promoting better development for everyone, everywhere.

"For better development" is our claim, and our work is driven by the desire to help generate value in line with the three pillars of Sustainability:

Better economic development

- **Long-term stability:** We want to build a company that is economically sound, resilient, and sustainable over the long term.
- **Community contribution:** We are committed to generating structural profit, contributing to the well-being of communities through taxes, and ensuring the growth and stability of the Group and its stakeholders.
- **Client ROI:** Our goal is to guarantee a measurable ROI for our clients by promoting scalable and durable technological solutions, avoiding vendor lock-in, and reducing waste.

Better social development

- **Access and inclusion:** We believe that information technology should expand access to information, education, and essential services, thereby strengthening communities and promoting inclusion.
- **Diversity and equity:** We are committed to ensuring that every activity and communication promoted by Mia-Platform is grounded in respect, equity, and the celebration of diversity.
- **Workplace well-being:** We promote a work environment that is a Best Workplace, based on professional growth, equal opportunities, and the protection of health and safety.

Better environmental development

- **Infrastructure awareness:** We recognize that the digital world is tangible, rooted in infrastructure and servers that consume energy.
- **Efficient code:** We feel a responsibility to minimize the ecological footprint of our operations, committing to writing high-quality and highly efficient code to reduce the energy consumption of the solutions we create.
- **Responsible consumption:** Our management of workspaces and waste is focused on Responsible Consumption, in line with the principles of Agenda 2030 and our environmental risk management system.

Values: I am Mia

Mia-Platform's values form the foundation of our culture and guide our daily operations. They are not abstract principles, but practical elements that steer decision-making, collaboration, and innovation.

At Mia-Platform, we believe that individual and collective identity is captured in the mantra:

"I am Mia and I see, I care, I act. I innovate with ambition, team spirit, positive attitude, integrity to deliver excellence for better development."

Our values are structured into five behavioral guidelines:

Innovate with ambition

Innovation is our engine, requiring both courage and preparation.

- **Dream Big:** We aim high in everything we do. We do not work simply to execute tasks, but to constantly improve processes and products. Our only limit is our vision.
- **Innovation First:** We are curious and committed to continuous learning. We tackle challenges by deepening our knowledge to build true technical expertise. We experiment and learn from mistakes so we do not repeat them.

Team Spirit

The success of Mia-Platform is a collective success.

- **Make It Together:** We look beyond personal interests. We are team players who value inclusion, human relationships, and knowledge sharing (Unconferences, Breakfast sessions). We actively collaborate with partners, clients, and the entire community.
- **Challenge & Commit:** During the decision-making and planning phases, we provide direct and constructive feedback. We listen openly to others' feedback. Once a decision is made, we commit to its success with positivity and determination.

Positive Attitude

Enthusiasm and proactivity are the hallmarks of our work environment.

- **Enjoy the Road:** We are proud of what we are building. We do not get discouraged by changes in direction or challenges; instead, we embrace them as opportunities. We celebrate successes with enthusiasm.
- **Be the Change:** At Mia-Platform, the concept of "that's not my job" does not exist. We are proactive, apply critical thinking, and take the initiative to make things better by proposing solutions to the problems we find.

Integrity

Integrity is the fundamental safeguard of our compliance and reputation.

- **Be Conscious:** We are aware of the impact of our actions. Before acting, we consider how our messages and behaviors affect colleagues, clients, and society as a whole. We avoid waste and use resources (environmental, financial, and time) responsibly.
- **Play with Integrity:** We act with fairness and respect. We do not seek short-term gains; instead, we aim to build trust and long-lasting relationships. We respect our competitors, believing that market diversity is a value for the community.

To deliver excellence

We strive for excellence to generate sustainable development.

- **We Care:** We feel a strong end-to-end responsibility for what we do. We go beyond individual tasks to ensure the success of the entire initiative, working together to cover any "gray areas."
- **Chase Impact:** We focus on the value generated, not just on completing tasks. We are mindful of how our work impacts end-users and act for the ultimate benefit of Mia-Platform and society.

Sustainable Development Goals (SDGs)

Mia-Platform recognizes the importance and centrality of the 2030 Agenda and its 17 Sustainable Development Goals (SDGs) adopted by the United Nations. The Company's commitment to driving "better development" translates into concrete actions aligned with these global targets, focusing our impact where our technology and corporate culture can deliver the most meaningful contribution.

SDG 4: Quality Education

Mia-Platform is committed to providing high-quality education and promoting lifelong learning. This is achieved through continuous professional development programs (*upskilling* and *reskilling*) for our employees, as well as sharing our technology expertise and consulting with our stakeholders to democratize access to Cloud Native skills (contributing to Target 4.4 on technical skills acquisition).

SDG 8: Decent Work and Economic Growth

We pursue sustained, inclusive, and sustainable economic growth. The company guarantees respect for human and labor rights, ensuring a fair and productive working environment, as evidenced by our *Great Place to Work* certification. Our 231 Model ensures compliance with labor, social security, and

safety laws, safeguarding equity and equal opportunities throughout every stage of the employment relationship.

SDG 9: Industry, Innovation, and Infrastructure

As a leader in technological innovation (Platform Engineering and Composable Technologies), we contribute to building resilient, scalable, and adaptable digital infrastructures. We design platforms that foster long-term sustainability for solutions by avoiding vendor lock-in and supporting more responsible technological industrialization.

SDG 12: Responsible Consumption and Production

Our responsibility extends to both product governance and operational management. We are committed to building solutions that make it easier for our clients to write more efficient and less energy-intensive code. Our focus on environmental risk management ensures that waste disposal (particularly *e-waste*) is handled responsibly, adhering to sustainable consumption and production models.

SDG 13: Climate Action

We tackle the climate challenge through digital energy efficiency. Designing optimized software and focusing on operational efficiency helps mitigate the indirect energy impact of the solutions we develop.

SDG 16: Peace, Justice, and Strong Institutions

The Organization, Management, and Control Model pursuant to Legislative Decree 231/2001 (MOG) and this Code of Ethics represent Mia-Platform's contribution to this SDG. They ensure the principle of legality, transparency, and the adoption of effective measures to prevent corruption, thereby promoting more accountable, responsible, and transparent partnerships and institutions.

SDG 17: Partnerships for the Goals

We believe that achieving sustainability goals requires close collaboration. We actively work with internal and external stakeholders, clients, partners, and the community, sharing knowledge and technology to support more equitable and sustainable global development.

Stakeholder Relations

Mia-Platform is committed to maintaining transparent, fair, and constructive relations with all stakeholders (employees, clients, suppliers, public administration, community, and partners). The ethical principles and values described above form the foundation of these relationships.

Compliance

In line with our goals of transparency, fairness, and legality, the company has adopted an Organization, Management, and Control Model (MOG) pursuant to Legislative Decree 231/01. Mia-Platform's MOG is integrated with the sustainability goals pursued by the company.

In addition to the Organizational Model, Mia-Platform has implemented an Integrated Management System based on international guidelines (such as those for information security, quality management, and processes) to support compliance and the quality of its operations.

Employees and Future Employees

Mia-Platform believes in the centrality of the individual and the healthy growth of the company, in full compliance with the principles of legality and non-discrimination.

Our commitment to employees is always long-term; we prioritize permanent contracts and treat internships as genuine training pathways with a long-term goal of permanent conversion. Company contracts are governed by the National Collective Labor Agreement (CCNL) for Commerce and include basic health insurance.

In compliance with occupational health and safety regulations, all required safety officers have been appointed (internal Workers' Health and Safety Representative - RLS, Prevention and Protection Service Manager - RSPP, and company doctor).

Career paths, selection processes, and performance reviews are transparent, documented, and accessible to everyone.

Mia-Platform rejects all forms of discrimination and is committed to making all job openings, career development paths, and evaluations accessible and inclusive, basing them solely on individual progress.

Obligations of Employees

Employees are required to respect and promote internal regulations, the manifesto, and the core values guiding the company. They are also expected to report any discrepancies and work to ensure that the corporate culture increasingly aligns with the values expressed in the manifesto.

Employees must comply with the GDPR and maintain the confidentiality of internal, private documents, as well as everything concerning the development and maintenance of the software produced by Mia-Platform.

Employees are strictly prohibited from accepting money, goods, services, benefits, or favors that exceed normal commercial courtesy and that could be interpreted as attempts to secure preferential treatment or influence business decisions.

Clients, Partners, Suppliers, and Prospects

Mia-Platform deeply believes in the value of transparent, fair, and law-abiding relationships with clients, partners, suppliers, and prospects.

Clients, partners, suppliers, and prospects are required to respect the confidentiality of shared information and data across all stages of the relationship, comply with the law, and fulfill contractual obligations.

The relationship with these stakeholders is guided by the principle "We create value for the client," which requires a harmonious relationship among all project participants.

Suppliers are selected according to guidelines that closely align with company values, including respect for people and the environment.

Mia-Platform is committed to maintaining a transparent, fair, and professional relationship with all its clients, partners, suppliers, and prospects.

Community, Institutions, and the Environment

Mia-Platform is committed to full respect and active collaboration with its local territory, working primarily with local organizations to support their digitization processes, and extending this commitment nationally and internationally.

The company allocates resources to Corporate Social Responsibility (CSR) initiatives that can have a positive impact on the local area and community. In doing so, it commits to involving staff whenever possible to further strengthen the impact of these actions.

Regarding workspace usage, Mia-Platform is committed to respecting the environment by adopting measures to reduce its footprint. In particular, suppliers with sustainable packaging are always preferred.

Relations with Public Administration

Mia-Platform bases its relations with Public Administration on the principles of legality, fairness, and transparency. Any form of pressure or promise of benefits aimed at influencing the actions of public officials is prohibited. Gifts and tokens of hospitality are permitted only if they are of modest value, authorized, documented, and do not compromise the integrity or reputation of the parties involved.

The principles in this section also apply to third parties, collaborators, and agents who represent Mia-Platform in any capacity in relations with Public Administration. Consequently, Mia-Platform will ensure that these parties are legally bound by the same directives applicable to its employees.

Employees or external collaborators who receive offers of benefits from public officials must immediately report them to their supervisor, the Supervisory Body (OdV), or, in the case of collaborators, to their company contact person.

Accounting and Management Reporting

All corporate operations must be recorded in a truthful, complete, and verifiable manner. Mia-Platform ensures the transparency of accounting information and strict compliance with tax and revenue regulations. Every transaction must be supported by adequate documentation that allows for the clear reconstruction of responsibilities and the rationale behind the actions taken. Every employee is required to report, promptly and confidentially, to their supervisor or directly to the Supervisory Body (OdV), any omission, inaccuracy, or falsification of accounting records or supporting documents of which they become aware.

In managing accounting and tax obligations, Mia-Platform is also committed to ensuring the transparency and accuracy of information included in tax returns (such as IRES and VAT), working to guarantee the objective and subjective truthfulness of the operations performed and reported in these returns, as well as the completeness and correctness of all tax documents.

Implementation and Updates of the Code

Communication and Implementation of the Code

The Code of Ethics is disseminated internally through company channels and is always accessible within the company's cloud storage system. Employees, clients, suppliers, and all addressees of this Code are required to fully comply with it and act in accordance with the values described herein.

Monitoring and implementing this Code is the responsibility of Mia-Platform and the people who make up the company and to whom the Code is addressed. They are required to report any discrepancies to the designated company channels, including the internal contact person for the Code of Ethics.

The Supervisory Body (OdV)

Mia-Platform, by resolution of the Board of Directors, has appointed the Supervisory Body (OdV) referred to in Article 6 of Legislative Decree no. 231 of June 8, 2001.

The Supervisory Body established within the Company is tasked with the following functions:

- It promotes the application of the Organization, Management, and Control Model to reduce the risk of offenses and unlawful activities;
- It promotes awareness of rules and procedures within the Company and among external collaborators through informational and update initiatives;
- It monitors the correct application of legal regulations, this Code of Ethics, and the Organization, Management, and Control Model, informing the competent corporate bodies of the audit results to adopt appropriate measures;

- It verifies the adequacy of the Organization, Management, and Control Model to prevent violations of regulations, ensuring it is updated as necessary;
- It promotes and monitors periodic training initiatives on the principles of this Code of Ethics and the Organization, Management, and Control Model.

All employees and external collaborators are required to report promptly and confidentially to their supervisors or company contacts, and, if appropriate, to the Supervisory Body, any information learned within the scope of their assigned duties or activities carried out in the interest of Mia-Platform regarding violations of legal or company regulations that could, in any way, involve the Company and cause damage, including reputational harm.

Information received by the Supervisory Body in writing and non-anonymously will be treated with the utmost confidentiality.

The operational heads of Mia-Platform's corporate functions are required to supervise the actions of their subordinates and the external collaborators for whom they are the primary contact, in order to prevent and halt any violation of regulations, reporting as necessary to Management and the Supervisory Body.

Operational function heads must be aware of the potential unlawful acts within their activities and cooperate with the Supervisory Body to establish or update rules and procedures suitable for preventing them.

To submit communications or reports to the Supervisory Body, an email detailing the request or report can be sent to the designated email address.

Whistleblowing System

Mia-Platform guarantees all Addressees the possibility to report violations with the highest level of protection and confidentiality, in compliance with current Italian legislation (Legislative Decree 24/2023).

Subject Matter of Reports

The following may be the subject of a report (whistleblowing):

- Violations of this Code of Ethics and Model 231.
- Unlawful or suspected unlawful conduct committed or attempted to the detriment of the Company.
- Violations of the regulations within Model 231 related to sustainability (Environmental, Social, or Governance) and non-compliance with the Sustainable Development Goals (SDGs) formalized in the Manifesto.

Protection of the Reporting Person: Mia-Platform absolutely guarantees the anonymity of the Reporting Person and protects them from any retaliation, discriminatory act, or punitive measure, direct or indirect, resulting from the report.

Reporting Methods: Reports must be made **exclusively** through the dedicated IT channel published on the Company's website and formalized in the Whistleblowing Procedure, which forms an integral part of Model 231 and guarantees the obligation of confidentiality and autonomous management by the Supervisory Body (OdV).

Updating the Code and Training

Mia-Platform is committed to keeping the Code of Ethics updated and ensuring its maximum dissemination and awareness among all Addressees.

Updates: This Code of Ethics is periodically reviewed by the Supervisory Body to ensure consistency with regulatory developments (in particular, Legislative Decree 231/01 and sustainability laws), the corporate structure, and the economic context.

Training: The implementation of the Code of Ethics is supported by a targeted and periodic Training and Information plan (SDG 4). *Ad hoc* training is provided for Addressees holding high-risk roles or greater decision-making responsibilities, to ensure the dissemination of ethical values and a full understanding of compliance and crime prevention regulations.

Violations and Sanctions

Any violation of the rules contained or referenced in the Code of Ethics breaches the relationship of trust established with the Company; therefore, Mia-Platform may protect itself using the most appropriate measures, namely the imposition of disciplinary sanctions, claims for damages, and, in cases of serious non-compliance, termination of employment.

For the purposes of the Code of Ethics, serious non-compliance refers to any persistent non-compliant behavior that results in sanctions against Mia-Platform.

For employees, compliance with the rules of the Code is an essential part of their contractual obligations under Articles 2104, 2105, and 2106 of the Italian Civil Code. The disciplinary system must comply with collective bargaining agreements and corporate disciplinary rules.

This Code of Ethics is approved by the Board of Directors of Mia-Platform.

Any future updates, due to regulatory adjustments or evolving civic sensitivity, will be approved by the Board of Directors of Mia-Platform and promptly disseminated to all Addressees.