



CODE OF ETHICS AND CONDUCT

INTERNAL REGULATION LEGISLATIVE DECREE 231/01 - 10/2024

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1 – Introduction

This Code of Ethics has the MANDATORY force of an INTERNAL REGULATION and forms part of the company's disciplinary system.

The company undertakes to ensure the best techniques and methods, in terms of appropriateness, timeliness, effectiveness, consistency and continuity, as required by business sciences and the most modern management methods.

The guiding principles of the Code of Ethics are set out in this document.

The company encourages the spontaneous sharing, endorsement and dissemination of the Code and requires its observance and application by every person acting in the name or on behalf of the Company or coming into contact with it.

Disciplinary and/or contractual sanctions are provided for any violations of the Code.

2 – General principles

2.1 General ethical principles

In carrying out its activities, the company is guided by the ethical principles set out below and requires strict compliance with them by all parties involved.

The company conducts its business in compliance with EU, national and international regulations, rejecting corruption and any illegal practice.

No conduct contrary to the legislation in force, to this Code of Ethics or to sector regulations, engaged in by the corporate governance bodies, by company management and, in general, by all employees and collaborators in performing the duties or assignments entrusted to them, may be considered tolerated or justified, even if motivated by the pursuit of an interest or advantage for the Company, and any such conduct shall entail the adoption of sanctions.

The Company considers it of fundamental importance that employees and collaborators perform their duties with diligence, competence, professionalism and efficiency, also in order to ensure high-quality services.

The Company considers impartial treatment a fundamental value in every relationship, both internal and external, and regards the individual, their values and their rights, including the right to health, as primary values to be protected.

The Company considers its image and reputation to be values which, as a common corporate asset, must be protected and developed, including through the full dissemination, sharing and observance of the ethical and behavioural principles contained in this code. All those who act, operate and collaborate in any capacity with the company have the duty to maintain, and to ensure that their collaborators and contacts maintain, conduct consistent with the general principles of absolute honesty, loyalty, good faith, fairness and diligence, as well as with the specific obligations that may derive from professional ethics and, in any case, from those principles deemed due by virtue of the context and the purposes of its mission.

Under no circumstances may the belief that one is acting in the interest or to the advantage of the Company justify conduct that conflicts with the principles set out in this Code.

2.2 Recipients of the Code of Ethics

The rules of the Code of Ethics apply without exception to the company's employees and to all persons who, directly or indirectly, permanently or temporarily, establish relationships and collaborations of any kind with it, co-operating in the performance of its activities and the pursuit of its objectives. The principles of the Code of Ethics must guide the members of the Governing Body (Board of Directors or Sole Director and/or Managing Director) and, in any case, of the management bodies, in every decision or action relating to the management of the company; likewise, executives, where appointed, shall be guided by the same principles in implementing management activities, also in order to serve as a role model for employees and collaborators.

Each Manager of the Company:

- sets an example for their collaborators through their own conduct;
- informs their collaborators clearly, precisely and completely of their obligations, including compliance with the Code, while specifying that any violation of the Code is disapproved of and may constitute a breach of contract or a disciplinary offence;
- promotes compliance with the rules of the Code by the "Recipients";
- works to ensure that the "Recipients" understand that **compliance with the rules of the Code is an essential part of the quality of their work performance and of their activities**;
- promptly reports to the Supervisory Body appointed pursuant to Legislative Decree 231/01 any violation of the Code directly ascertained or learned of from others;
- adopts immediate corrective measures when required by the situation;
- endeavours to prevent, within the limits of their competences and powers, any conduct that does not comply with the legislation in force, this Code or internal rules.

2.3 Obligations of the Recipients

All actions, operations, negotiations and, in general, conduct engaged in by the "Recipients" of this Code in the course of their work must be based on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect. The "Recipients" undertake to cooperate actively with audit activities – both internal and external – in accordance with the rules in force and internal procedures.

All activities must be carried out with commitment and professional rigour. Each "Recipient" must provide professional contributions appropriate to the responsibilities assigned and must act so as to protect the prestige and image of the organisation for which they work.

In addition to fulfilling the general duties of loyalty, fairness and performance of the contract in good faith, the company's employees must refrain from carrying out activities in competition with those of the Company, comply with company rules and abide by the precepts of the Code.

The "Recipients" must avoid situations and/or activities that could lead to conflicts with the interests of the company or that could interfere with their ability to make impartial decisions in the best interest of the company.

Employees and all those who collaborate with the company are required to bring their conduct into line with the provisions and principles of the Code of Ethics and of the 231/01 Control Model, refraining from any initiative that conflicts with the Code. In particular, the recipients of the Code of Ethics are required to comply with the provisions and principles contained therein, even where these are expressed as criteria of corporate conduct rather than as precepts addressed directly to the recipients themselves.

To protect the company's image and reputation, it is essential that relationships with parties outside the Company be based on:

- full transparency and fairness;

- compliance with the law, with particular reference to the provisions on offences against the Public Administration;
- independence from any form of influence, whether internal or external.

2.4 Contractual value of the Code of Ethics

Compliance with the rules and provisions contained in the Code of Ethics and in the 231/01 Control Model is an integral and essential part of the contractual obligations arising from employment relationships, for employees, and from contractual arrangements, for non-employee collaborators.

Any violation of the aforementioned rules shall constitute a breach of the obligations arising from the employment or collaboration relationship, with all consequences provided for by law or by contract.

3 – Principles in relations with third parties

3.1 General principles

In its relations with third parties, the Company is guided by the principles of loyalty, fairness, transparency and efficiency. Employees and external collaborators shall behave correctly in business matters of interest to the Company and in relations with the Public Administration.

All practices of corruption, fraud, deception, illegitimate favours, collusive behaviour and solicitation (directly and/or through third parties) of personal and career advantages for oneself or others are expressly prohibited.

The Company undertakes to identify and define specific methods for the transparent, documented and traceable management of incoming and outgoing financial resources, suitable for preventing the commission of offences.

3.2 Relations with customers

Customers are the Company's fundamental asset.

The Company and all its collaborators must pursue the highest level of customer satisfaction, providing customers with truthful and comprehensive information on the services offered so as to enable them to make informed decisions regarding the purchase and use of the service. All of this is in implementation of the ethical principles underlying the Company's activities.

Relations with Customers or potential Customers must be based on maximum transparency and fairness and always managed in compliance with the law in force and the applicable company procedures.

In their relations with Customers, the "Recipients" are required to:

- operate in full compliance with the regulations and good practices governing the sector;
- base their activities on fairness and transparency, refraining from any disparaging assessment of competing activities, services or products;
- actively facilitate informed choices by the Customer through adequate and accurate information, and in particular:
 - ensure the most appropriate information on the levels of effectiveness of the service offered;
 - not use persuasion tools, whether scientific or otherwise, that are misleading or untruthful;
 - ensure compliance with the customer's requirements in the production, distribution and marketing of the service;

- respect the customer’s freedom to negotiate, refraining from inducing them to make decisions that have not been adequately considered and made independently;
- scrupulously observe internal procedures for managing relations with the Customer;
- promptly report to the Supervisory Body any conduct that appears to conflict with the principles of the Code.

In order to establish a better relationship with customers, the company also undertakes to periodically verify the proper conduct of the functions responsible for market relations and to achieve and maintain high quality standards in the services offered, with the aim of ensuring the highest possible satisfaction, the protection of its Customers, compliance with the requirements requested and fulfilment of the commitments undertaken.

The Company further undertakes to ensure adequate control mechanisms to prevent the service provided from differing in nature and quality from what was declared or agreed.

3.3 Relations with employees

The Company ensures the widest possible dissemination of the Code of Ethics among employees, regardless of the type of employment contract. The Company identifies and selects employees with absolute impartiality, autonomy and independence of judgement, in full compliance with the legislation in force, internal procedures and gender equality.

Employees are required to:

- refrain from conduct contrary to the rules of the Code of Ethics and demand compliance with them;
- contact their superiors or the designated functions whenever clarification is needed on how to apply the Code;
- promptly report to their superiors or the designated functions:
 - any information, whether directly observed or reported by others, regarding possible violations of the rules of the Code of Ethics;
 - any request made to them to violate the rules;
- cooperate with the designated functions in verifying possible violations.

Employees may not conduct personal investigations or report information to anyone other than their superiors or the functions designated for this purpose, including the Supervisory Body.

Anonymous reports are not permitted, whereas **the anonymity of the reporting person is guaranteed**.

Reports made in compliance with the so-called whistleblowing legislation are also considered legitimate, and **no retaliatory and/or discriminatory act shall be taken against the reporting person**. Employees are therefore required to report to the Supervisory Body any violation of the Code of Ethics of which they become aware. The SB shall preserve the anonymity of the reporting person. Any unfounded report made in bad faith with the aim of harming colleagues and/or collaborators shall be considered an infringement and shall be subject to disciplinary sanctions.

The Company pays the utmost and constant attention to the development of the human resources working for it. To this end, it considers merit, professional competence, honesty and correct behaviour to be the key foundations for every decision concerning an employee’s career and any other aspect relating to the employee. Employees, including indirect employees, are required to behave at all times with respect for the rights and personality of colleagues, collaborators and third parties, regardless of their hierarchical position within the Company. Employees, including indirect employees, must make proper use of the company assets made available to them, safeguarding, in general, the value of the company’s assets.

The company recognises and respects the right of employees of the consortium member companies to participate in investments, business or other activities outside those carried out in the interest of the Company, provided

that such activities are permitted by law and/or by the applicable national collective labour agreement (CCNL) and are compatible with the obligations undertaken towards the company. In any case, employees, whether direct and/or indirect, must avoid all situations and activities in which a conflict with the interests of the Company may arise or which may interfere with their ability to make impartial decisions in the best interest of the Company and in full compliance with the rules of the Code of Ethics.

Any situation that may constitute or give rise to a conflict of interest must be promptly reported to one's superior or to the designated function. In particular, all employees are required to avoid conflicts of interest between their personal and family economic activities and the duties/functions they perform within their organisation. They are required to maintain their skills and cultivate their professionalism, gaining experience and fostering collaboration, encouraging the professional growth of their collaborators; to contribute, through constant professional commitment and correct personal conduct, to achieving and maintaining the Company's objectives of excellence; to keep themselves independently up to date on the legislation in force; and to scrupulously observe the precepts set out in the Codes of Professional Conduct to the extent applicable to their work.

In particular, employees are expressly prohibited from:

- using scientific or other persuasion tools whose content is misleading or otherwise untruthful;
- duplicating the invoicing and/or delivery notes for the same sale, or failing to issue credit notes where non-existent sales have been invoiced, even by mistake, or invoices have been duplicated.

3.4 Relations with industry operators

Relations with all industry operators must be managed in full compliance with the applicable laws, the relevant ISO UNI EN standards and the rules of conduct laid down in the Code of Professional Conduct of the relevant trade association.

3.4.1 Direct information

The content of the information that the company or its staff provide to third parties, and in particular to current and/or potential customers, must always be documented or capable of being documented.

The information material prepared and used by the company must refer to official documentation.

3.4.2 Scholarships and consultancy

All collaboration activities must always comply with the legislation in force, the provisions of the Code of Professional Conduct and the company procedures in force, including within the framework of the Quality System and the Organisational Model. Collaboration may also be established through scholarships and consultancy, provided that the appropriateness, adequacy and documentability of the initiative are always ensured.

Decisions regarding such initiatives shall in any case be reserved to the company's top management.

3.5 Relations with collaborators and consultants

The company identifies and selects collaborators and consultants with absolute impartiality, autonomy and independence of judgement.

The provisions set out in the previous section for employees also apply to external collaborators and consultants, within the limits of their relationship with the Company. Conduct contrary to the principles expressed in the Code of Ethics may be considered a serious breach of the duties of fairness and good faith in the performance of the contract, grounds for loss of trust and just cause for termination of the contractual relationship.

3.6 Relations with suppliers

In carrying out its activities and managing relations with customers, suppliers and consultants, the company and the consortium member companies scrupulously comply with the law, the principles of this Code, the contracts in place and internal procedures. Employees responsible for relations with suppliers and service providers must select them and manage the related relationships according to criteria of impartiality and fairness, avoiding situations of even potential conflict of interest with them and reporting the existence or emergence of such situations to the competent office.

In procurement relationships and, in general, in the supply of goods and/or services, the “Recipients” of the rules of this Code are required to:

- observe internal procedures for the selection of suppliers and the management of relations with them;
- not prevent any supplier meeting the required criteria from competing for a supply contract, adopting objective evaluation criteria in the selection process, in accordance with declared and transparent procedures;
- maintain an open dialogue with suppliers, in line with good commercial practice, while remaining free from personal obligations;
- not accept goods or services from external or internal parties in exchange for confidential information or for initiating actions or conduct intended to favour such parties, even where there are no direct repercussions for the company;
- immediately report to the SB any attempt or case of unjustified alteration of normal commercial relations.

Acts of commercial courtesy, including those in favour of managers (private and/or public) or their delegates, such as gifts or forms of hospitality, are permitted only if they are of modest value and in any case such as not to compromise the integrity or independence of judgement of either party and not to be construed as aimed at obtaining improper advantages. In any case, this type of expenditure must always be authorised by the Director and adequately documented, in compliance with the specific provisions of the 231/01 Organisational Model adopted.

Likewise, corporate bodies, management, employees and external collaborators are prohibited from receiving and/or requesting gifts or favourable treatment not attributable to normal courtesy. In the latter case, they are required to formally report the situation to the Governing Body and to the SB.

For certain types of goods/services, in addition to the normal selection criteria, the actual existence of adequate corporate quality systems must also be taken into account.

3.7 Relations with other providers

The Company strictly complies with the provisions of law on competition and refrains from any misleading or collusive conduct and, more generally, from any conduct that may constitute a form of unfair competition.

3.8 Relations with the Public Administration

In its relations with the Public Administration, with Entities carrying out activities of public utility or public interest or, in any case, relating to relationships of a public-law nature, the Company adopts the strictest compliance with the applicable EU, national and regional regulations.

The conduct of negotiations, the undertaking of commitments and the performance of relationships of any kind with the Public Administration, with Entities carrying out activities of public utility or public interest or in any case of a public-law nature are reserved exclusively to the company functions designated and/or authorised for this purpose. In relations with the Public Administration, the Company and each of its employees, collaborators or consultants must not seek to improperly influence the decisions of the institution concerned in order to obtain the exercise of one of its functions or powers or the performance of acts that do not comply with or are contrary

to official duties, in particular by offering or promising, on their own initiative or following inducement, directly or indirectly, gifts, money, favours or benefits of any kind.

Any employee or collaborator who receives instructions to act in breach of the terms set out above is required to notify the Supervisory Body immediately, suspending all dealings.

In any case, the Company ensures full transparency and completeness of information in preparing communications, statements and notices addressed to the Public Administration.

The Recipients are required to strictly refrain from submitting false and/or altered documents to the Public Administration, or from removing and/or omitting to submit, where required, documents, information or data of any kind, or from engaging in conduct intended to mislead the Public Administration, in particular with regard to the exercise of its authorisation, licensing and/or sanctioning powers.

3.9 Relations with bodies and associations

The Company:

- does not finance political parties, their representatives or candidates and refrains from any improper pressure (direct or indirect) on political figures;
- may accept requests for contributions from non-profit Entities and Associations, but every decision is reserved to the Company's Director, after verifying the absence of any conflict of interest, even indirect;
- any sponsorship activities may concern the fields of medicine and scientific research, social affairs, the environment, sport, entertainment and the arts, and are intended only for events that offer a guarantee of quality. In any case, in choosing which proposals to support, the Company is careful to prevent and avoid any possible conflict of interest, whether of a personal nature or concerning the Company as such.

3.10 Relations with the Judicial Authorities and with supervisory and control bodies

The Company, in all its divisions, bases its relations with the bodies responsible for supervision and control on the utmost cooperation, in full respect of their role, autonomy and power of initiative, and undertakes to promptly implement their instructions. The Company undertakes to provide – also, if necessary, in advance – all the information requested by the supervisory and control bodies in a complete, correct, adequate and timely manner. To this end, the Company prepares and implements appropriate organisational procedures to identify the persons responsible for coordinating with the supervisory and control bodies and for collecting, processing and transmitting the information requested by them. During audits or inspections by the competent Public Authorities, the “Recipients” are required to adopt an attitude of availability and cooperation towards the inspection and control bodies and must provide the requested information clearly and truthfully.

The Company's staff, collaborators and members of the corporate Bodies may not attempt to persuade others not to provide information or to provide false or misleading information to the competent authorities, nor may they undertake economic activities, confer professional assignments, or give or promise gifts, money or other benefits to those carrying out checks and inspections, or to the competent judicial authorities.

3.11 Relations with trade unions

The Company does not make contributions of any kind, directly or indirectly, to trade unions or to their representatives or candidates, except in the forms and manner provided for by the regulations in force. Relations with trade unions, where applicable, are based on the principles of fairness and cooperation, in the interest of the Company, its employees and the community.

3.12 Relations with the mass media

The Company deals with the press and mass media exclusively through the management function designated for this purpose, with an attitude of utmost fairness, availability and transparency, in accordance with the communication policy defined by the Company and the regulations in force. Employees may not provide information of any kind to representatives of the press and the media in general, nor have any kind of contact with them aimed at disseminating company news, without the authorisation of the Management.

4 – Environment, health and safety

The company regards the environment and nature as fundamental values and a heritage belonging to everyone, to be protected and defended. To this end, the Company, within the scope of its activities, is committed to contributing to the development and well-being of the communities in which it operates, pursuing the objective of ensuring the safety and health of employees, external collaborators and customers. The company undertakes to manage its activities in full compliance with the legislation in force on the environment, health and safety at work. Operational management must refer to advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work. Research and technological innovation must be dedicated in particular to promoting products and processes that are increasingly environmentally friendly and characterised by growing attention to the safety and health of operators. The Company undertakes to spread a culture of safety at work, developing risk awareness and promoting responsible behaviour by employees and collaborators who, within the scope of their duties and functions, participate in the process of risk prevention, environmental protection and the protection of health and safety at work for themselves, their colleagues and third parties.

The general measures for the protection of workers' health and safety that the company undertakes to adopt are:

- assessment of risks to the health and safety of employees, including those of the consortium member companies;
- reduction of risks at source;
- planning of prevention;
- hygiene measures and health surveillance of workers, including those of the consortium members, according to specific risks;
- emergency measures to be implemented in the event of first aid, firefighting, evacuation of workers and serious and imminent danger;
- regular maintenance of premises, equipment, machinery and installations;
- information, training, consultation and participation of workers or their representatives on matters concerning health and safety in the workplace.

5 – Principles in accounting and data processing activities

5.1 Accounting records

The company complies with the rules of correct, complete and transparent accounting, in accordance with the criteria laid down by the relevant legal provisions, including those of criminal, civil and tax law, as well as with the current Accounting Principles defined by the relevant professional Commissions.

In recording the facts relating to the management of the Company, employees and collaborators are required to scrupulously comply with the legislation in force and internal procedures so that every transaction is not only correctly recorded but also authorised, verifiable and legitimate.

Employees and collaborators are required to act transparently towards the firm responsible for the statutory audit, the Statutory Auditors and the Supervisory Body (where such Bodies have been appointed) and to provide them with the utmost cooperation in carrying out their respective audit and control activities.

For each transaction, adequate supporting documentation of the activity carried out is kept on file so as to allow:

- easy accounting entry;
- identification of the different levels of responsibility;
- accurate reconstruction of the transaction, also in order to reduce the likelihood of interpretative errors.

Each entry must accurately reflect what is shown in the supporting documentation.

It is the duty of each “Recipient” to ensure that the documentation is easily traceable and organised according to logical criteria. Any “Recipients” who become aware of omissions, falsifications or negligence in the accounts or in the documentation on which the accounting entries are based are required to promptly report the facts to the Governing Body or to the competent function, so that the verification procedures can be initiated by the control bodies.

5.2 Protection of privacy

The Company’s databases may contain, including on electronic or telematic media:

- personal data protected by privacy legislation;
- data which, under contractual agreements, may not be disclosed externally;
- data whose inappropriate or untimely disclosure could harm the company’s interests.

All activities relating to the processing of personal or confidential data, including through IT or telematic systems, must be managed in strict compliance with the applicable legislation in force.

Each “Recipient” is required to ensure the confidentiality required by the circumstances for any information learned by virtue of their work function. The company undertakes to protect information relating to its employees and third parties, generated or acquired internally and in business relations, and to avoid any improper use of such information. All of this is in compliance with the GDPR, the directives of the Italian Data Protection Authority (Garante) and internal regulations.

Information, knowledge and data acquired or processed by the “Recipients” during their work or through their duties belong to the Company and may not be used, communicated or disclosed without the specific authorisation of their superior or the competent function. Without prejudice to the prohibition on disclosing information concerning the organisation and production methods of the business or using it in a way that may be detrimental to it, each “Recipient” must:

- acquire and process only the data necessary and appropriate for the performance of their duties;
- acquire and process such data only within specific procedures;

- store such data in such a way as to prevent unauthorised persons from gaining knowledge of it;
- communicate such data within established procedures and/or with the explicit authorisation of their superiors and/or the competent functions and, in any case, only after ascertaining that the data may be disclosed in the specific case;
- ensure that there are no absolute or relative restrictions on the disclosure of information concerning third parties linked to the Company by a relationship of any kind and, where necessary, obtain their consent;
- aggregate such data in such a way that any person authorised to access it can easily obtain an overview that is as accurate, comprehensive and truthful as possible.

6 – Personnel policies

6.1 Relations with human resources

The company recognises the central role of human resource development, respect for their autonomy and the importance of their participation in the pursuit of the corporate mission, and reaffirms its commitment to combating any type of discrimination in the workplace on the grounds of sex, nationality, religion, political, trade union and personal opinions, or economic conditions. Employees who believe they have been discriminated against may report the incident to the Human Resources function and/or to their manager, who will verify whether the Code of Ethics has actually been violated. The Company reaffirms its commitment to preserving the moral and physical integrity of its employees, suppliers, collaborators and consultants.

6.2 Harassment in the workplace

The company requires that no harassment occur in internal and external working relationships, harassment being understood as:

- the creation of an intimidating, hostile or isolating working environment towards individual workers or groups of workers;
- unjustified interference with the work performance of others;
- obstruction of other people's individual career prospects for mere reasons of personal competitiveness;
- demotion or the removal of duties that in fact humiliate or may humiliate the dignity of the worker.

The Company prevents, as far as possible, and in any case takes action against workplace bullying (*mobbing*) and personal harassment of any kind, including sexual harassment.

6.3 Alcohol and drug abuse

The company requires each "Recipient" to contribute personally to maintaining a working environment that respects the sensitivities of others. During working activities and in the workplace, the following are strictly prohibited and shall therefore be regarded as knowingly accepting the risk of prejudicing these characteristics of the working environment:

- working under the effects of alcohol abuse, narcotic drugs or substances with similar effects;
- consuming or supplying narcotic substances in any capacity during working hours.

The Company undertakes to support the social initiatives provided for in this area by the legislation in force.

6.4 Smoking

In accordance with the legislation in force, smoking is prohibited in the workplace.

6.5 Use of company assets

Every employee is responsible for looking after company assets with care and respect, avoiding improper use of the assets at their disposal for work purposes.

The Company's assets and resources provided to staff and collaborators for the performance of their duties may not be used for purposes other than those intended.

7 – Verification

7.1 Internal controls

The "Recipients" must be aware that an Organisation, Management and Control Regulation has been adopted in compliance with Legislative Decree no. 231 of 8 June 2001, structured into multiple, specific and codified procedures, systematically updated to ensure their compliance with current legislation and their full effectiveness, and must be aware of the contribution and importance of this organisational, management and control model in achieving the company's strategic and operational objectives and efficiency.

Internal controls mean all the tools necessary or useful to direct, manage and verify the activities of the Company in all its divisions, with the primary objective of ensuring compliance with national and regional laws and measures, protecting company assets, performing activities efficiently and providing accurate and complete accounting and financial data.

Within this framework, in light of the applicable legislation, the said model shall also serve to protect the Company from the risk of incurring "administrative liability arising from offences" and the resulting sanctions pursuant to Legislative Decree 231/2001 as subsequently amended and supplemented.

Responsibility for creating an effective internal control system is shared at every operational level. Consequently, all "Recipients", within the scope of their functions, are responsible for defining, implementing and ensuring the proper functioning of the controls relating to the operational areas entrusted to them.

Within their areas of competence, function managers are required to participate in the company control system and to involve their collaborators in it. Every operation and transaction must be correctly recorded, authorised, verifiable, legitimate, consistent and appropriate.

7.2 Recording of operations

All services must be adequately recorded in order to ensure their effective and concrete traceability.

It must also be possible to verify the decision-making, authorisation and execution process. For each operation, there must be adequate supporting documentation so that checks can be carried out at any time to certify the characteristics of and reasons for the operation and to identify who authorised, performed, recorded and verified it.

7.3 Reports and duty to notify the Company's management or the SB

All Recipients of the Code are required to promptly report to the company's Supervisory Body any conduct contrary to the provisions of the Code itself, the Organisational Model for the prevention of offences pursuant to Le-

gislative Decree 231/2001, national and regional laws and internal procedures. The Company has set up dedicated communication channels (e.g. a dedicated e-mail address to which any reports of non-compliance with the provisions of this Code may be sent). Reporting persons shall be protected against any form of retaliation, discrimination or penalisation. The confidentiality of the reporting person's identity shall also be guaranteed, without prejudice to legal obligations and the protection of the rights of the company or of persons wrongly accused and/or accused in bad faith.

8 – Consequences of violating the provisions of the Code of Ethics

8.1 Supervisory Body

Pursuant to Legislative Decree 231/2001 as amended, the company has established internally a Supervisory Body characterised by the requirements of autonomy and independence, and consequently endowed with autonomous and effective powers of initiative, inspection and control, for which a specific “Internal Operating Regulation” has been drawn up and adopted, periodically updated to ensure its relevance, efficiency and operational effectiveness.

The Supervisory Body is responsible for:

- monitoring, among other things, compliance with the Code of Ethics and with the Organisation, Management and Control Regulation, promptly reporting any violations thereof to the Board of Directors;
- ensuring the widest possible dissemination of the Code of Ethics and of the Organisation, Management and Control Regulation through an adequate information and awareness plan designed to promote knowledge of the principles and rules contained therein;
- ensuring the constant updating of the Code of Ethics and of the Organisation, Management and Control Regulation in relation to their actual effectiveness and to changes in company needs and in the legislation in force;
- carrying out checks, including preventive checks, on any report of violation of the rules of the Code of Ethics and of the Organisation, Management and Control Regulation, assessing the facts and proposing to the Governing Body – in the event of an ascertained violation – appropriate sanctions;
- providing protection against possible retaliation of any kind resulting from having reported possible violations of the Code of Ethics and of the Organisation, Management and Control Regulation.

Information and reports acquired by the Supervisory Body and by the structures it uses are considered confidential and may not be disclosed except in the cases provided for by the legislation in force. In carrying out its operational activities, the Supervisory Body will avail itself of the cooperation of the Internal Auditing function (if any).

8.2 Dissemination of the Code of Ethics

In any case, the company undertakes to communicate to all “Recipients” of this code the values and principles contained therein and to ensure its internal and external dissemination by means of:

- distribution to all members of the Corporate Bodies, Collaborators and Employees;
- posting in an accessible place and publication on the company website;
- making it available to third-party recipients and to any other stakeholder on the company's website.

All employees, directors, statutory auditors and auditors (where appointed), consultants and main suppliers must read the Code and undertake to follow the requirements and rules contained therein.

In addition, the Supervisory Body organises periodic training initiatives on the principles set out in the Code.

8.3 Consequences of violating the Code for employees

Failure to comply with and/or violation of the rules of conduct imposed by the Code of Ethics and company procedures by employees of the Company constitutes a breach of the obligations arising from the employment relationship and a disciplinary offence.

The sanctions that may be imposed shall be applied in accordance with the disciplinary system currently in force for the various professional categories, and their adoption must comply with the provisions laid down in the aforementioned regulations. Such sanctions shall be applied according to the significance of the individual cases considered and shall be proportionate to their seriousness. The management of disciplinary proceedings and the imposition of sanctions remain the responsibility of the company functions appointed and delegated for this purpose.

8.4 Consequences of violating the Code for executives, directors and statutory auditors

In the event of a violation of internal procedures and of the Code of Ethics by executives, the Director shall assess the facts and conduct and take the appropriate action against those responsible, bearing in mind that such violations constitute a breach of the obligations arising from the employment relationship.

In the event of a violation of the Code of Ethics by the Governing Body, the Supervisory Body shall inform the shareholders' meeting.

8.5 Consequences of violating the Code for collaborators, consultants and third parties

Any conduct by collaborators, consultants or third parties linked to the company by a contractual relationship other than employment, in violation of the provisions of the Code of Ethics, may result, in accordance with the specific clauses included in the letters of appointment, in the termination of the contractual relationship, without prejudice to any claim for damages should such conduct cause harm, even independently of the termination of the contractual relationship.

Signed: The Sole Director