



Etical Code

Organizational Model pursuant to Legislative Decree 231/01

Esart Fonderie S.r.l.

Approved by the Board of Directors

Public Document

"Public" documents can circulate liberally within and outside the Company.

INDEX

INTRODUCTION	3
MISSION AND VALUES	3
THE ETHICAL CODE - RECIPIENTS	4
ETHICAL PRINCIPLES	5
<u>COMPLIANCE WITH LAW</u>	6
<u>RESPECT AND ENHANCEMENT OF THE PERSON</u>	6
<u>FAIRNESS AND HONESTY</u>	7
<u>ENVIRONMENTAL PROTECTION</u>	7
<u>SECURITY</u>	7
<u>TRANSPARENCY OF ACCOUNTING RECORDS AND TAX OBLIGATIONS</u>	8
<u>TRANSPARENCY, CORRECTNESS AND ACCESSIBILITY OF INFORMATION</u>	8
<u>CONFIDENTIALITY OF INFORMATION</u>	9
<u>VALUE OF CORPORATE REPUTATION AND CREDIBILITY</u>	9
<u>ANTITRUST</u>	9
<u>ANTI-MONEY LAUNDERING</u>	10
<u>SMUGGLING</u>	10
CODE OF CONDUCT	11
<u>CODE OF CONDUCT FOR MEMBERS AND CORPORATE BODIES</u>	11
<u>CODE OF CONDUCT FOR STAFF</u>	12
<u>RELATIONS WITH CUSTOMERS</u>	14
<u>RELATIONS WITH SUPPLIERS</u>	14
<u>RELATIONS WITH THE PUBLIC ADMINISTRATION</u>	15
COMPANY ASSETS	16
USE OF INFORMATION SYSTEMS	17
PROTECTION OF CONFIDENTIALITY	17
IMPLEMENTATION AND DIFFUSION OF THE ETICAL CODE	17
<i>Distribution, information and training</i>	17
<i>Watch Structure</i>	17
<i>Reports</i>	18
<u>Violations of the Ethical Code</u>	18

Introduction

The Ethical Code is a charter of rights and duties that defines the ethical and social responsibility of each participant in the organization of the Company.

This document clearly sets out the values to which the company's shareholders, managers, executives, employees, collaborators and suppliers must comply.

It will be the Company's responsibility to distribute this document and any changes or additions to all interested parties.

The ethical and behavioural principles set out are linked to the long, consolidated and successful history of the company and above all to the professionalism, quality and far-sightedness that have always characterized the work of its shareholders, of the administrative bodies and of the staff who he managed.

Mission and values

Esart, aware of the impacts that the activity can have in the ethical-social-environmental context, pays attention to the respect of some fundamental principles, with reference to which it carries out information activities to its personnel and of which it emphasizes the importance towards operators with whom for any reason comes into contact:

- compliance with the law, starting from the correct keeping of accounting records up to compliance with sectoral regulations with which employees or collaborators can be in contact for any reason;
- respect for people, understood as:
 - o opposition to any form of discrimination of a racial, sexual or other nature;
 - o opposition to any form of exploitation or in any case to any behaviour that offends the dignity of people;
 - o construction of a solid and equitable human resource management policy, which allows the meritocratic growth of people;
 - o primary importance of people's health, which is also expressed through an important attention to safety in the workplace.
 - o respect for the environment, aware of the impact that mismanagement could have.

Therefore, in order to implement its mission, Esart recognizes as its fundamental principles:

- compliance with laws, with particular attention to regulations: fiscal, food and labour safety, environmental and social;
- correctness in the management of relations with employees, favouring their satisfaction and professional growth;
- trust, cooperation, and transparency towards members;

- customer satisfaction through the quality of the products and services provided;
- fairness and clarity in relations with suppliers;
- effective and fair competition on the market.

The Ethical Code - Recipients

The recipients of the Ethical Code are all shareholders, employees, collaborators and directors of the company as well as all those who, directly or indirectly, permanently or temporarily, establish relationships with the company itself.

Therefore, Esart promotes the widest distribution of the Ethical Code to all interested parties, the correct interpretation of its contents, and provides the most appropriate tools to facilitate its application.

The Company also implements the necessary measures in order to carry out verification and monitoring of the application of the Code itself.

It's emphasized that the shareholders and members of the corporate bodies, aware of their responsibility, are required to comply with the provisions of the 231/01 Model and the Ethical Code, which is an integral part of it.

It is also clarified that this Ethical Code and Model 231/01 also apply to third party recipients, intending to refer to external parties who operate, directly or indirectly for the Company (by way of example: collaborators, consultants and suppliers, commercial partners, investee companies, etc.).

Third Party Recipients are therefore obliged to comply with the provisions contained in Model 231/01 and in this Ethical Code within the limits of their competences and responsibilities.

Ethical principles

- **Compliance with the law**
- **Respect and appreciation of the person**
- **Fairness and honesty**
- **Environmental protection**
- **Safety**
- **Transparency of accounting records and tax obligations**
- **Transparency, correctness and accessibility of information**
- **Confidentiality of information**
- **Value of corporate reputation and credibility**
- **Antitrust and competition**
- **Anti-money laundering**
- **Smuggling**

Respect for the law

Esart undertakes to conduct its business in compliance with international, community, national, regional, provincial and municipal regulations.

The Company deems unacceptable any form of corruption and considers it an obstacle to fair competition. Therefore, it prohibits any form of corruption of both public officials and private third parties and pays particular attention to the management of processes deemed sensitive or instrumental to the commission of the aforementioned crimes.

The company also rejects any kind of fraud, the incorrect use of public resources, the false communication of company data and in general any illegal practice and makes the utmost effort, as far as it is concerned, to implement the initiatives aimed at the fight to crime and terrorism

The recipients of the Ethical Code are therefore required to comply with current legislation and in no case is it allowed to pursue or realize the interest of the company in violation of the law.

To this end, the company requires its directors, partners, collaborators and employees in general, and anyone who carries out representative functions in any capacity, including de facto, the compliance with the legislation and all current regulations and ethically correct behaviour, such as not to jeopardize their moral and professional reliability.

Respect and appreciation of the person

Esart promotes respect for the physical and cultural integrity of the person and respect for the dimension of relationships with others.

It guarantees working conditions that respect individual dignity and safe working environments and applies the legislation and employment contracts in force to its employees. The company enhances the skills of its resources by using training tools and professional refresher courses.

The company is committed to adopting the ethical principles in the field of corporate social responsibility in particular, with regard to ethically correct behaviour towards workers, in the following main areas:

- 1) child labour: ban on the employment of people under the age of 15, guarantee for minors under 18 qualified training;
- 2) foreign workers: absolute prohibition of any form of irregular work;
- 3) forced labour: prohibition of the employment of people who are not free to terminate the employment contract, as per legislation;
- 4) health and safety: guarantee of a safe and healthy working environment;
- 5) freedom of association and right to collective bargaining: prohibition not to authorize, hinder or penalize trade union activity;

6) discrimination: selection of collaborators on the basis of skills and abilities, equal treatment of all workers, offering them equal opportunities and conditions, regardless of race, religion, sex, age, social conditions, etc.;

7) disciplinary practices: respect for workers in actions and words;

8) remuneration: guarantee to its workers of economic conditions suitable for a dignified life.

Fairness and honesty

Esart operates in compliance with applicable laws, professional ethics, the statute and internal regulations. The pursuit of corporate purposes can never justify conduct contrary to the principles of correctness and honesty.

The Company is committed to promoting and encouraging honesty in conduct, as a fundamental principle in its management.

The conduct of the recipients of the Ethical Code must also be inspired by correctness, collaboration, loyalty and mutual respect.

Environmental protection

The protection and safeguarding of the environment have been and are a priority for Esart.

As part of its activities, the company is committed to contributing to the development and well-being of the communities in which it operates by pursuing the objective of guaranteeing the health of employees, external collaborators, customers and communities affected by the activities themselves and to environmental impact.

Each recipient always undertakes to respect this principle, even in the future, and to work to achieve this policy in carrying out their business.

Safety

Esart is committed to protecting safety, the health and moral and physical integrity of the staff. To this end, it promotes responsible and safe behaviour and adopts all the safety measures required to guarantee a safe and healthy working environment, in full compliance with current legislation on prevention and protection.

Employees, in terms of health and safety at work, are required to:

- take care of their own health and safety and that of other people present in the workplace, who are affected by the effects of their actions or omissions, in accordance with the training, instructions and means provided by the employer;
- contribute, together with the employer, managers and supervisors, to the fulfilment of the obligations required to protect health and safety in the workplace;

- observe the provisions and instructions given by the employer, the managers and the persons in charge, for the purposes of collective and individual protection;
- correctly use the work equipment and safety devices;
- immediately report to the employer, manager or person in charge of the deficiencies of the aforementioned means and devices, as well as any dangerous situation of which they become aware, working, in case of urgency and in relation to their skills to eliminate or reduce the situations of serious or imminent danger, informing the workers' safety representative;
- do not remove safety, signalling and control devices without authorization;
- not to carry out operations or manoeuvres on their own initiative that are not within their competence or that could compromise their own safety or that of other workers;
- participate in the education and training programs organized by the employer;
- undergo the health checks required by current legislation or otherwise ordered by the competent doctor.

Transparency of accounting records and tax obligations

The accounting records must be based on the principles of truthfulness, transparency, accuracy, completeness, clarity and precision in accordance with current legislation.

For each transaction and accounting operation, adequate supporting documentation of the activity carried out is kept in order to allow:

- the timely and timely accounting entry;
- the identification of the different levels of responsibility;
- the reconstruction of the transaction, also in order to reduce the probability of error;
- the immediate determination of the characteristics and reasons behind the operations;
- the easy formal reconstruction of the operation also from a chronological point of view;
- verification of the decision-making, authorization and implementation process, as well as the identification of the various levels of responsibility and control.

The Company, in the management of accounting and tax obligations, undertakes to guarantee the transparency and correctness of the information that flows into the fiscally relevant declarations, endeavouring to guarantee the objective and subjective truthfulness of the operations carried out and transfused in the same declarations and the completeness and correctness of tax documents.

Transparency, correctness and accessibility of information

Esart recognizes the fundamental value of correct information to the shareholders, the competent bodies and functions, regarding the relevant facts concerning the corporate and accounting

management and in no way justifies actions by its collaborators that prevent control by the bodies in charge.

The company favours a continuous, timely and complete flow of information between the corporate bodies, the various company areas, the Management, the various senior figures, the Supervisory Body, and, where necessary, to the Public Authorities.

The information transmitted externally and within the organization itself must comply with the requirements of truthfulness, completeness and accuracy.

Every action and operation of the company must be properly recorded, authorized and a trace must be kept in order to ensure the identification of the different levels of responsibility and accurate reconstruction. The company also provides for the adoption of an adequate and rigorous document archiving system that meets the requirements of truthfulness, accessibility and completeness.

Confidentiality of information

Esart ensures the confidentiality of the information in its possession, compliance with the legislation on the management of personal data and refrains from seeking confidential data through illegal means.

All information available to the company is treated in compliance with the confidentiality and privacy of the parties concerned.

Personnel who in any way come into possession of confidential or sensitive information must in no way feel authorized to disseminate it or use it outside of operational purposes authorized by the company management.

Value of corporate reputation and credibility

For Esart, the reputation and credibility acquired are precious intangible assets to be preserved and protected.

The company believes that good reputation and credibility foster internal and external relations, in particular those with shareholders, customers and public institutions; they also stimulate and encourage the fruitful development of human resources and facilitate the fairness and reliability of suppliers.

The recipients of the Code of Ethics must therefore refrain from engaging in any conduct that could harm the reputation and credibility of the company, and, on the contrary, undertake to improve and protect them.

Antitrust and competition

Each recipient is required to strictly comply with the legislation on unfair competition (antitrust) and fulfils all disclosure obligations towards the Supervisory Authorities ("Authorities") guaranteeing the truthfulness and completeness of the documentation and communications transmitted.

In particular, Esart pursues any illegal behaviour by employees and collaborators towards members of the Authority aimed at obtaining other advantages, acts or undue measures of the authority in favour.

All employees and external collaborators are obliged to report to the Supervisory Body any behaviour that they have come to know directly or indirectly, aimed at preventing or modifying the mechanisms that regulate competition and markets, whatever the means used. to achieve the company's goals.

Anti-money laundering

Employees and collaborators of the company must not, in any way and under any circumstances, receive or accept the promise of cash payments or run the risk of being involved in events relating to money laundering from illegal or criminal activities.

Before establishing relationships or entering into contracts with non-occasional suppliers and other partners in long-term business relationships, the moral integrity, reputation and good name of the counterpart must be verified.

The company undertakes to comply with all laws and provisions, both national and international, on the subject of anti-money laundering.

The company also ensures the correct management of financial resources and the traceability of the transactions related to them, in particular in the context of business processes relating to collections and payments, in order to always make it possible to identify the origin of the money.

Smuggling

All employees and collaborators of the Company who, directly or indirectly, acts in the import processes must guarantee the regular introduction into the territory of the State of goods subject to border rights, paying particular attention to compliance with the provisions on customs matters.

The Company undertakes to ensure the preventive verification of the forwarding agents it uses and to guarantee the traceability of customs operations.

Code of conduct

Code of conduct for shareholders and corporate bodies

Esart creates the conditions for shareholder participation to be widespread and aware.

The company asks the shareholders, in the figures they represent, to respect the principles of correctness, collaboration, honesty, respect for the law.

The Organizational Model adopted pursuant to Legislative Decree 231 by the company towards shareholders and other corporate bodies, is mainly aimed at:

- act with the utmost fairness and transparency towards the shareholders,
- avoid any type of conduct aimed at influencing the decisions of the Shareholders' Meeting;
- satisfy its members in an impartial and non-discriminatory manner and in strict compliance with the obligations undertaken;
- guarantee a continuous and correct flow of information to the Board of Directors, the Shareholders' Meeting and the Watch Structure, as well as between these same bodies, favouring in particular correct and timely information regarding the preparation of the financial statements, the financial statements, reports, prospectuses, corporate communications in general and anything else required for its operation, in compliance with the provisions of the law;
- favour the planned controls by the competent bodies and functions, in particular the board of statutory auditors, auditors and the Watch Structure;
- avoid any type of transaction to the creditors' prejudice.

Shareholders, directors and statutory auditors are required:

- to behave based on integrity, loyalty and a sense of responsibility towards the company;
- to behave in a manner inspired by autonomy, independence and fairness with public institutions, private entities (including social creditors), economic associations, political forces and any other bearer of interest;
- to guarantee regular participation and information to the meetings and activities of the corporate bodies;
- to ensure the sharing of the company's ethical vision and mission;
- to assess situations of conflict of interest or incompatibility of functions, assignments outside or within the company, refraining from carrying out operations in conflict of interest in the context of their business;
- not to hinder the control and / or auditing activities carried out by the shareholders, by the other corporate bodies, including the Supervisory Body or the auditing company;
- to make confidential use of the information they become aware of, avoiding using their position to obtain both direct and indirect personal advantages.

Code of conduct for staff

Esart recognizes the centrality of staff and the importance of establishing and maintaining relationships based on loyalty and mutual trust, enhancing the skills of the individual. Personnel include both employees, collaborators, and directors who work for the company.

All relations with personnel are characterized by transparency and fairness, as it is also expressly forbidden, except as provided by law and collective agreement, any discrimination (by race, sexuality or sex, nationality, religion, language, trade union or political affiliation).

All decisions made in the context of personnel management are based on merit assessments and / or correspondence between expected profiles and profiles owned by collaborators.

In the management of hierarchical relationships, authority is exercised with equity and correctness, avoiding any abuse.

Human resources are fully exploited by activating the levers available to encourage their development and growth.

Esart guarantees all staff a healthy and safe working environment, in which they feel free to express their ideas and beliefs in order to “enrich” the company and improve its performance.

Anyone who believes that they have suffered offenses against their person or discrimination can report the incident to the Management or to the competent functions, which, if deemed necessary, will transfer the information to the Watch Structure, to ascertain the facts and any application of the consequent measures. Differences in treatment motivated by objective criteria, which are not in conflict with the law or the collective agreement, do not fall within the concept of discrimination.

Requests or threats aimed at inducing people to act against the law and the Ethical Code, or to adopt behaviours detrimental to the moral and personal beliefs of each are not tolerated, and will therefore be sanctioned. The right / duty to make statements to the judicial authorities is strictly protected and guaranteed, therefore all actions or threats that may lead to refusal to make statements or to make false statements are prohibited.

It also requires that there is no harassment of any kind towards employees, suppliers, customers or visitors in internal and external business relationships. Harassment means:

- any form of intimidation or threat that is an obstacle to the peaceful performance of one's duties or the abuse by the hierarchical superior of the position of authority;
- the obstacle to the individual job prospects of others for mere reasons of personal competitiveness.

Esart also does not allow harassment of a sexual nature, meaning as such:

- the subordination to the acceptance of sexual favours of determinations relevant to the working life of the recipient;

- proposals for private interpersonal relationships, conducted despite an expressed and evident dislike, which have the ability, in relation to the specificity of the situation, to disturb the recipient's serenity with objective implications on his working expression.

Staff are required to:

- avoid engaging in, collaborating with and causing the carrying out of conduct suitable for the carrying out of crimes referred to in Legislative Decree 231/01;
- collaborate with the Watch Structure during the verification and supervision activities, providing the requested data and information;
- report any malfunctions or violations of Model 231/01 and / or the Ethical Code to the Watch Structure

The staff can, at any time, contact the Watch Structure both verbally and in writing regarding:

- interpretation of the Ethical Code and / or the Protocols of Model 231/01;
- legitimacy of a specific behaviour, as well as its suitability or compliance with Model 231/01 and / or the Ethical Code.

The previous provisions are extended to all possible collaborators, even occasional ones, consultants, agents of the Company, who are therefore obliged to comply with the provisions contained in Model 231/01 and in this Ethical Code and in particular, within the limits of their competences and responsibilities, the ethical principles of reference and the rules of conduct of the staff.

Conflict of interest

Every employee, collaborator and director of Esart is required to avoid all situations and all activities in which a conflict with the interests of the Company may concretely manifest itself or which may affect with their ability to make decisions in the best possible way for the interest of the company and in full compliance with the rules of the Ethical Code.

He must also refrain from taking personal advantage from acts of disposing of corporate assets or from business opportunities of which he became aware in the course of carrying out his duties.

Esart recognizes and respects the right of its employees, collaborators and directors to participate in investments, business or other activities other than those carried out in the interest of the company, provided that these are activities permitted by law and contractual regulations and compatible with the obligations assumed as employees, collaborators or directors.

All Esart's employees, collaborators, directors and shareholders are required to avoid conflicts of interest between personal and family economic activities and the duties they hold within the structure to which they belong.

Directors, collaborators, employees with top positions, called to make decisions in business when there is a clear conflict between personal interests and those of the company must:

- communicate the existence and characteristics of this conflict to the Watch Structure or to their company contact;
- refrain from exercising their decision-making role and delegate this role to other persons in charge of the company organization;
- if the aforementioned abstention / delegation is not possible, in any case involve other subjects in the decision-making process in order to give greater transparency to the process itself.

Relations with customers

Esart undertakes to satisfy its customers in strict compliance with the obligations undertaken by signing the contract. Establishes a relationship with customers characterized by high professionalism and based on availability, respect, courtesy, research and the offer of maximum collaboration.

Contracts and communications must be clear and formulated in accessible and understandable language, in compliance with current regulations.

The company undertakes to:

- promptly and in the most appropriate way communicate any information relating to any changes to the contract or any changes in the economic conditions and / or distribution of the products;
- always respond to customer suggestions and complaints.

Esart is committed to ensuring the required standards and periodically monitoring its processes and products, to ensure maximum quality and compliance with industry regulations.

Relations with suppliers

The correct and transparent relationship with suppliers is an important aspect for the company's business.

The selection of suppliers takes place in compliance with the law: in particular, the company uses only qualified and reliable suppliers.

In any case, the selection of suppliers and the determination of the purchase conditions take place according to objective parameters, such as quality, convenience, price, capacity, efficiency, ethics, compliance with the law.

More generally, when selecting suppliers, consider reference requirements:

- the professionalism of the interlocutor;
- the availability, appropriately documented, of organized structures, planning skills and resources, know-how;

- the existence and effective implementation of quality, safety and environmental management systems;
- the conduct that does not adversely affect the image and good name of the company.

In relations for the supply of goods and services, the company:

- maintains an honest and open dialogue with suppliers, in line with good commercial practices;
- observes and demands compliance with all the obligations imposed by current legislation, relating to safety, tenders, contributions and tax payments, in the context of procurement, supply, and procurement relationships.

Relations with the Public Administration

Esart bases its relations with public administrations on maximum transparency and fairness, in strict compliance with the laws and regulations in force, the principles set out in the Ethical Code and the 231/01 Model in order to ensure the absolute legitimacy of its work.

To this end, the undertaking of commitments with the Public Administrations and Public Institutions is reserved exclusively for the designated and authorized functions that will carry them out in due compliance with the laws, the principles of this Ethical Code and the 231/01 Model, as well as in spirit of maximum collaboration.

To this end, the staff must undertake to:

- operate, without any kind of discrimination, through the communication channels in charge of this with the interlocutors of the Public Administration at national and international, community and territorial level;
- represent the interests and positions of the company in a transparent, rigorous and coherent manner, avoiding attitudes of a collusive nature;
- avoid and condemn behaviours aimed at obtaining an undue advantage or any other benefit for the company by means of altered or falsified statements, documents, reports for the purpose, or by means of omitted information, or, more generally, by means of artifices or deceptions, including those carried out by means of computer or telematic systems.

Esart prohibits its staff from accepting, promising or offering, even indirectly, money, gifts, goods, services, services or favours that are not due (including in terms of employment opportunities) to public officials, public service officers or employees, in general, of the Public Administration or other Public Institutions, to influence their decisions, in view of more favourable treatments or undue services or for any other purpose.

Personnel who directly or indirectly receive requests or offers of money or favours of any kind (including, for example, gifts or presents of no small value) improperly formulated to those, or by those who work on behalf of the company in the context of relations with public officials, persons in charge of public service or employees in general of the Public Administration or other Public Institutions, must immediately report to the Watch Structure for the adoption of consequent

measures. Failure to report will be considered a serious breach of the obligations of loyalty and correctness.

Corporate assets

Company's staff is required to operate with due care and diligence to protect the proprietary assets owned by them. The staff is responsible for the protection and use of the assets and resources entrusted to them and has the duty to promptly inform the structures in charge of threats or harmful events.

In particular, the staff is required to:

- avoid improper use of company assets that may cause undue costs, damage or reduction in efficiency or otherwise in contrast with the interest of the company;
- scrupulously adopt the provisions of internal policies and procedures, even if not formalized, in order not to compromise the functionality, protection and safety of IT systems, equipment and plants;
- always operate in compliance with the safety regulations required by law and internal procedures, in order to prevent possible damage to property, people or the environment;
- use company assets, of any type and value, in compliance with the law, internal regulations, and the principles of this Ethical Code;
- use the assets exclusively for the exercise of work; in any case, the use or transfer of the goods by third parties or third parties, even temporarily, is prohibited, except when specifically provided and authorized;
- operate, as far as possible, in order to reduce the risk of theft or damage to the assets and resources assigned or present, promptly informing top management and / or the Watch Structure in the event of abnormal situations.

The recipients of this Ethical Code are not allowed to hold sums of company money in cash, unless this is necessary for the physiological functioning of the company. In this case, the liquid amount must be closely monitored.

Use of computer systems

The Staff makes use of the computer systems within the limits and in the sole interest of the company, each employee is responsible for the safety of the systems used and is subject to the regulations in force and the conditions of the license agreements.

Except as provided for by civil and criminal laws, the use of network connections for purposes other than those inherent to the employment relationship or to send offensive messages or messages that may damage the image falls within the improper use of company assets and resources. of society.

The staff is also required not to communicate their passwords to access the computer system, to pay maximum attention and the utmost commitment in order to prevent the possible commission of crimes through the use of IT tools.

Anyone who in any way becomes aware of the alteration of the computer system or the data managed by it, must immediately notify the top management and the Watch Structure.

Protection of Confidentiality

The privacy of employees, collaborators, administrators and the confidentiality of information is protected in compliance with the relevant legislation.

It is including any investigation into people's ideas, private life and state of health.

Employees, collaborators and administrators are required to know and implement the provisions of the company's policies on information security, to ensure its integrity, confidentiality and availability.

It is the obligation of every employee, collaborator and director to ensure the confidentiality required by the circumstances for each piece of information learned on the basis of their job function.

Implementation and distribution of the Ethical Code

Distribution, information and training

The Ethical Code is brought to the attention of all interested parties inside and outside the Company through specific information and training activities.

The company prepares and implements a periodic plan for dissemination, information and training activities aimed at disseminating knowledge of the ethical principles and name of conduct envisaged by the Ethical Code.

Watch Structure

The control over the implementation and compliance with this Ethical Code and the Organization, Management and Control Model is entrusted to the Watch Structure (ODV), which, pursuant to Legislative Decree 231/2001, has the task of collect reports of possible violations of the Code and the Model, to promote the most appropriate checks on the nature and seriousness of the violation and to communicate the outcome to the competent bodies.

Reports

Any violations of the Ethical Code must be reported to the Watch Structure with a communication sent by e-mail to the specifically dedicated e-mail address or through the additional reporting channels established.

The report must be drawn up in writing and documented in a clear and detailed manner.

The Watch Structure will analyse the report, possibly listening to the author of the same and the person responsible for the alleged violation, guaranteeing the whistle blower against any type of retaliation, understood as any act that could give rise to even the only suspicion of being a form of discrimination or penalization. The ODV ensures the confidentiality of the whistle blower's identity, without prejudice to legal obligations.

Violations of the Ethical Code

The violation of the Ethical Code and the Model compromises the relationship of trust between the Company and the person who commits the violation (shareholders, directors, employees, collaborators, customers and suppliers). If ascertained, the violations will be promptly prosecuted through the adoption of disciplinary measures provided for by the Disciplinary System, which is an integral part of the Model, in accordance with the provisions of the relevant National Collective Agreement and the Civil Code.

Compliance with the Ethical Code is an integral part of the contractual obligations of employees, also pursuant to and for the purposes of art. 2104 of the Civil Code (due diligence obligation).

The violation of this obligation constitutes a breach of contract and, therefore, may be a cause for termination of the contract, without prejudice to any compensation for damages resulting to the Company from such violation.

Third party recipients (suppliers, consultants, partners, etc.) are required to comply with the provisions of this Code and compliance with the same constitutes a prerequisite for the continuation of the professional or collaborative relationship existing with the Company. To this end, the obligation to comply with the requirements contained in the Ethical Code is included in the letters of appointment and in the contracts, under penalty of termination or forfeiture of the contract and / or relationship.