



**M.O.G.C. pursuant to Legislative Decree 231/2001**

**Model of organization, management  
and control pursuant to Legislative Decree 231/2001 and  
subsequent amendments**

**ETHICAL CODE**

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**Approved by the Board of Directors on 08/25/2020**



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## **M.O.G.C. pursuant to Legislative Decree 231/2001**

### **1. SCOPE**

The purpose of this document is the definition of the Code of Ethics to be adopted within the company in order to provide a reference guideline for the correct application of the provisions of Legislative Decree 231/2001.

### **2. PREMISE**

This Code of Ethics (hereinafter also referred to as the "Code") constitutes the set of principles of conduct which the Company deems essential to comply with in carrying out the activities required for the pursuit of its institutional purposes, both internally within the corporate structure and in relationships with external parties.

The principles contained in this document are in line with the common values assumed internally by the organization.

The set of ethical principles and values expressed in the Code must inspire the activity of all those who work in the company, taking into account the importance of the roles, the complexity of the functions and the responsibilities entrusted to them for the pursuit of the Company's purposes. In particular, by way of example and not limited to:

- the members of the corporate bodies are inspired by the principles of the Code in setting the corporate objectives;
- individual managers give substance to the values and principles contained in the Code, taking on internal and external responsibilities and reinforcing trust, cohesion and team spirit;
- employees and external collaborators on an ongoing basis, with due respect for the law and regulations in force, adapt their actions and behavior to the principles, objectives and commitments set forth in the Code;
- the shareholders of the company.

The orientation towards ethics is an indispensable approach for the reliability of the company's behavior towards the stakeholders as well as, more generally, towards the entire civil and economic context in which the Company operates. The adoption of some specific principles of conduct, to be observed in relations with the Public Administration, with customers and with third parties, is a manifestation of the Company's commitment also in relation to the prevention of the crimes referred to in Legislative Decree 8 June 2001 n. 231 and subsequent amendments and additions.

The preparation of this Code of Ethics responds to these needs, which constitutes a code of conduct whose observance by all company representatives and external subjects is of fundamental importance for the proper functioning, reliability and reputation of the company.

In line with the purpose of preventing offenses that the Code proposes, the Supervisory Body (hereinafter also simply "O.d.V.") supervises compliance with the rules contained therein, supporting the company in preparing adequate training and information tools, ensuring constant effectiveness in controlling the methods of carrying out its activities and suggesting, when appropriate, the corrective actions deemed most appropriate.



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### **3. RECIPIENTS AND SCOPE OF APPLICATION**

Employees, managers, directors, shareholders and members of the Board of Statutory Auditors are the main recipients of this Code of Ethics. Therefore, they must strictly comply with the principles and standards of behavior set out therein, inspiring daily corporate behavior.

Under no circumstances can the pursuit of the corporate interest justify a conduct contrary to the laws in force and the rules of this Code. The Code of Ethics is in fact configured as an instrument of guarantee and reliability, to protect the Company's assets and reputation.

All those who, for various reasons (e.g. ATI partners, suppliers, customers, service providers, consultants, external collaborators, etc.), directly or indirectly, permanently or temporarily, work for the company are required to comply with the provisions of this Code of Ethics in their applicable parts.

### **4. REFERENCE ETHICAL PRINCIPLES**

#### **4.1. GENERAL PRINCIPLES**

The company adopts as an essential principle loyalty, respect for the person, transparency in operations, rejection of corruption and unfair competition and, in general, absolute compliance with the laws and regulations in force in the territory in which it operates. Consequently, each recipient of the Code must undertake to respect these elements.

#### **4.2. HONESTY AND FAIRNESS**

The pursuit of the company's interest can never justify conduct contrary to the principles of correctness, honesty, loyalty and mutual respect.

The directors, members of the Board of Statutory Auditors, employees, partners and collaborators of the company carry out their activities in compliance with the principles of conduct indicated above.

Therefore, they must not pay or accept sums of money, engage in other forms of corruption or give gifts or favors to third parties or accept gifts or favors from third parties in order to obtain direct or indirect advantages for the company.

The company bases relations with stakeholders (collaborators, users of the services provided, suppliers, business partners and, in a broader sense, the local communities in which the company operates or intends to operate) by respecting the rules of moral integrity and avoiding spreading misleading information such as to take unfair advantage of others' positions of weakness or lack of knowledge.

Relations with users of the services, with suppliers, with collaborators and with one's own employees/worker members and those among the latter are based on the utmost loyalty, keeping faith with the commitments undertaken, with a sense of responsibility in the enhancement and protection of the assets company and with an approach of complete good faith in every activity.

#### **4.3. TRANSPARENCY**

The Organization carries out its activity in the name of transparency, both in the internal management of the company activity and in the assignment of tasks and responsibilities, and in relations with



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customers, suppliers and external collaborators, in such a way that the interest of the company and that, consequently, collaborators and interlocutors are in a position to make informed decisions. Consequently, in compliance with the principle of transparency, the information transmitted inside and outside the Company must comply with the requirements of truthfulness, completeness and accuracy.

### **4.4. CONFIDENTIALITY**

The company guarantees the confidentiality of the information and personal data being processed and the protection of the information acquired in relation to the work performed, complying with the current regulatory requirements regarding the confidentiality of personal data. The recipients of this Code of Ethics are required to strictly comply with the obligation of confidentiality relating to information concerning the company's activity acquired in the performance of their duties or collaboration.

### **4.5. IMPARTIALITY'**

The Organization avoids any discrimination based on age, gender, state of health, ethnicity, language, sexual orientation, personal beliefs, nationality, political opinions and religious beliefs of its interlocutors, possible membership or non-membership of a trade union association or possible withdrawal from it, as well as any discrimination based on the condition of disabled people.

The company undertakes to develop the skills and competences of its personnel, pursuing a policy based on equal opportunities and merits, considering professionalism a guarantee for the entire community and a determining condition for achieving its objectives.

Therefore, search, selection, hiring and career development respond only to objective assessments of job quality, without any discrimination.

### **4.6. VALUE OF HUMAN RESOURCES**

Human resources are the great asset of the Company. The full involvement of human resources at all levels, in "teamwork" and in sharing objectives, and their protection and promotion allows the Company to place itself constantly at the disposal of customers, undertaking to ensure service efficiency and respect of the promised requirements.

To this end, the company undertakes to protect and enhance the skills of its employees, working partners and collaborators, guaranteeing working conditions and environments that favor their active participation, the assumption of responsibility and the ability to work as a team.

The company guarantees equal opportunities to all its employees, working partners and collaborators, recognizing career advancements and salaries based on the results achieved and the skills expressed by each.

### **4.7. FAIR COMPETITION**



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The company recognizes that competition is a fundamental element for the development and economic and social progress of the country. To this end, in carrying out its business, it ensures that the general conditions for the freedom of enterprise are respected, allowing economic operators to access the market and compete with equal opportunities, and protects its customers, promoting the containment of prices and improvements in the quality of services provided.

Therefore, the organization strongly condemns the organization and participation in any initiative contrary to current legislation on free competition, antitrust and monopoly.

It is absolutely forbidden to enter into agreements, even of an informal nature, or to take part in commercial practices which in any way have the purpose of altering the principle of free competition on the market and therefore are in violation of national and EU competition law. The Company does not deny, hide or delay any information requested by the antitrust authority and by the regulatory bodies in their inspection functions and actively collaborate during the investigative procedures.

Any agreement or behavior that could integrate a form of unfair competition is absolutely disapproved and therefore refrains from engaging in deceptive, collusive, predatory conduct or in any case characterized by the abuse of a dominant position.

### **4.8. CONFLICT OF INTEREST**

The members of the corporate bodies, the management, the employees, the working partners and all the collaborators of the company, within the scope of their respective activities, must avoid running into situations of conflict of interest, real or even just potential, with the corporate organisation.

A conflict of interest arises when personal interests or activities really condition the ability to operate in the total interest of the company. Therefore, any form of collaboration that conflicts with the responsibilities assumed towards the company must be avoided.

All of the above applies both in the case in which a collaborator pursues an interest other than that of the company or personally takes advantage of the company's business opportunities, and in the case in which the representatives of customers or suppliers or institutions public acts contrary to the fiduciary duties associated with their position, in their relations with the company.

### **4.9. LEGALITY**

The company is aware that the principle of legality is the instrument of guarantee and social cohesion, capable of reconciling, in a harmonious framework, the different and opposing interests in the field. In carrying out internal activities, the company is committed to guaranteeing compliance with the laws and regulations in force, with this document of the Code of Ethics and with all internal company regulations, so that the application may involve diligence, good faith, rectitude and fairness. In particular, the company operates in compliance with labor rights, trade union freedom, the protection of dignity, health and safety in the operating areas and repudiates all sorts of discrimination, forced labour, child labor and all forms of corruption.

The company and all its collaborators must never be implicated or involved in illegal activities and in activities for the purpose of terrorism and subversion of the democratic order, in operations that may involve the handling of stolen goods, laundering, self-laundering or the use of proceeds from criminal or illicit activities, in operations deriving from the use of privileged information also on financial



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instruments acquired in any way, in crimes of forgery of money, in public credit cards, in revenue stamps and in instruments or identification marks, in crimes and illicit data processing, in crimes against industry and commerce and in crimes relating to infringements of copyright.

### **4.10. FAIRNESS OF THE AUTHORITY**

In signing and managing relationships that involve the establishment of hierarchical relationships - especially with collaborators - the management of the organization undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse.

In particular, steps are taken to ensure that authority does not turn into an exercise of power harmful to the dignity and autonomy of the collaborator, and that the work organization choices safeguard the value of collaborators.

### **4.11. ENVIRONMENT, HEALTH AND SAFETY**

The company undertakes to comply with all the regulatory provisions that allow for the protection of workers' health in the workplace, through the ongoing activity of company functions specifically responsible for this.

Collaborators must scrupulously comply with the company provisions in force and, in any case, with the provisions of the law on personal safety and health protection.

The company complies with the provisions of the legislation on environmental protection.

Employees involved in operational processes that may have environmental repercussions must carry out their work conscientiously and in compliance with applicable laws and regulations.

## **5. RULES OF CONDUCT**

In accordance with the ethical principles and values set out above, the rules of conduct to be adopted in carrying out the company's activities are defined below.

### **5.1. RELATIONS WITH STAFF**

The company protects and promotes the value of human resources (an indispensable element for the existence and development of the company) in order to increase the wealth of skills of each employee and promotes respect for the physical, moral and cultural integrity of the person.

In particular, the organization undertakes to:



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adopt criteria of merit and competence, and in any case strictly professional, for any decision relating to a collaborator, starting from the selection phase, and to ensure a work environment in which individual characteristics cannot give rise to discrimination of any kind;

adopt a personal performance evaluation system based on objective evaluation criteria, communicated and discussed with each collaborator when defining the annual objectives, where these are applicable;

actively involve their collaborators in the company project, including decision-making in order to allow the complete expression of personal skills in professional fulfilment

prevent employees from undergoing unlawful conditioning and inconvenience in the context of their work, intervening to prevent abusive and defamatory attitudes;

protect the moral integrity of its personnel by guaranteeing the right to working conditions that respect the dignity and potential of the person. For this reason, the company undertakes to protect workers from acts of psychological violence or mobbing and opposes any attitude or behavior that is discriminatory or harmful to the person, their beliefs and inclinations.

guarantee working conditions that respect individual dignity and safe working environments, in full compliance with current legislation and regulations.

The management prohibits any form of psychological, physical, sexual harassment towards managers, employees, collaborators, suppliers, customers or visitors, where 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.

Any act of retaliation against an employee who refuses, complains or reports such unfortunate acts is prohibited.

### **5.2. RELATIONS WITH THE PUBLIC ADMINISTRATION**

By Public Administration we mean all those subjects, private and public law, which perform a "public function" or a "public service". By "public function" we mean the activities, governed by public law provisions, pertaining to legislative, administrative and judicial functions. By "public service" we mean the production of goods and services of general interest and subject to the supervision of a Public Authority, and those activities aimed at guaranteeing the person's rights to life, health, freedom of communication, under a concession and/or agreement, or in any case the activities regulated in the same forms as the public function even if without the typical powers of the latter.

Relations with the Public Administration (e.g. Supervisory Authorities, local or national entities) of an institutional or public nature must be inspired by the strictest observance of the applicable legal and regulatory provisions, as well as the general principles of fairness and loyalty and the company procedures.

In relations with the Public Administration, with public officials or with subjects in charge of a public service, with the judiciary, with the public supervisory authorities and with other independent authorities, as well as with private subjects who are concessionaires of a public service, the company adopts the absolute and strict compliance with current legislation and internal procedures, ensuring maximum transparency and fairness.





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The management of negotiations, the assumption of commitments and the execution of relations with the Public Administration and with Public Institutions are reserved exclusively to the corporate functions in charge and authorized for this.

In order to prevent crimes in relations with the Public Administration, it is strictly forbidden to accept, promise or offer, even indirectly, money, gifts, goods, services, benefits or other benefits of any nature to executives, officers or employees of the Public Administration or other Public Institutions to obtain more favorable treatments, undue services or for any other purpose related to such relationships.

The company is prohibited from hiring former employees of the Public Administration or their relatives, who have personally participated in commercial negotiations with the company or have approved and/or authorized requests to the Public Administration originating from the company itself.

Any employee, partner, collaborator, director who directly or indirectly receives requests or offers of money or favors of any kind (including, for example, freebies or gifts of no small value) from Public Officials, Public Service Officers or employees of the Public Administration or other Public Institutions is required to report immediately to the O.d.V.

In the management of tenders, the company operates in full compliance with current legislation and refrains from engaging in anti-competitive behavior, blaming any act aimed at improperly influencing the award of the tender.

In particular, it severely condemns any promises, offers of money, utilities, goods of value, or conditions of advantage, even indirect, in favor of Public Administration employees who in any capacity manage contracts or negotiations with public bodies, as well as promises, offers, donations addressed to competitors, in order to condition the outcome of the tender to their own advantage.

The personnel of the company in charge of preparing the necessary documentation for participation in public tenders must guarantee the transmission of truthful, complete and updated information.

When requesting and managing subsidies, contributions and loans of any kind obtained from the State, from other public bodies or from the European Union, the company will require its employees, partners, collaborators and directors to respect the principles of legality, transparency and correctness, condemning any behavior of a collusive nature. In particular:

the facts represented and the documentation provided to public officials or public service officers to obtain funding, grants, subsidies or subsidies from the Public Administration must be true, precise, accurate and complete in all their parts;

contributions, subsidies or loans obtained from the State or other public body must in no case be used for purposes other than those for which they were granted;

it is forbidden to alter in any way the functioning of IT or telematic systems and to intervene, without right and in any way, on the data, information or programs contained therein, in order to obtain financing or increase the amount of the financing obtained.

In the event of participation in judicial proceedings (administrative, civil or criminal), the company undertakes to proceed in compliance with the law and with the provisions of this code of ethics.

Within legal proceedings in which the company is a party, management, employees and any third parties acting on behalf and in the interest of the company are prohibited from:



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promise or offer, even indirectly, money or other benefits to a Public Official or a person in charge of a public service in order to obtain an advantage for the company in legal proceedings;  
alter the functioning of a computer or telematic system and intervene without right on the data, information and programs contained therein, in order to condition the outcome of the process in favor of the company.

Any employee, partner, collaborator, director who directly or indirectly receives news of conduct contrary to the principles set out above is required to immediately report to the O.d.V.

In the event of participation in judicial proceedings (administrative, civil or criminal), the company undertakes to proceed in compliance with the law and with the provisions of this code of ethics.  
Within legal proceedings in which the company is a party, management, employees and any third parties acting on behalf and in the interest of the company are prohibited from:

promise or offer, even indirectly, money or other benefits to a Public Official or a person in charge of a public service in order to obtain an advantage for the company in legal proceedings;  
alter the functioning of a computer or telematic system and intervene without right on the data, information and programs contained therein, in order to condition the outcome of the process in favor of the company.

Any employee, partner, collaborator, director who directly or indirectly receives news of conduct contrary to the principles set out above is required to immediately report to the O.d.V.

### **5.3. RELATIONS WITH SHAREHOLDERS**

The relationship with the shareholders is inspired by the criteria of correctness, transparency and attention to the appropriate use of the resources conferred by them. To this end, the company undertakes to provide suitable and timely reports on management progress, in line with the statutory obligations towards the corporate bodies through which the will of the shareholders is exercised, as already established in the statute.

### **5.4. RELATIONS WITH SUPPLIERS**

In choosing its suppliers, the company operates with the aim of achieving the maximum competitive advantage, assuming non-discriminatory behaviour, taking into account - in addition to the economic convenience - also the technical/economic capacity of its contractors and globally evaluating their reliability with reference to the specificity of the services to be rendered.

The company bases its conduct in relations with suppliers on principles of transparency, equality, loyalty and free competition. In particular, employees must:

observe and respect, in the supply relationships, the applicable legal provisions and the contractual conditions;

scrupulously comply with the internal procedures relating to the selection and management of relations with suppliers;



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obtain the collaboration of suppliers in ensuring the satisfaction of needs in terms of quality, safety and delivery times of goods or provision of services;  
observe the principles of transparency and completeness of information in correspondence with suppliers;  
avoid undergoing any form of conditioning by third parties unrelated to the company for the making of decisions and/or the execution of acts relating to one's work activity.

The organization sets up relations with its suppliers and subcontractors in compliance with current regulations and the principles of this Code.

Consequently, it expects its suppliers to behave correctly, diligently and in accordance with the provisions of the law, with particular attention to compliance with regulations and good practices regarding ethics, protection of health and safety in the workplace and respect for environment, the regulations relating to the operational safety of the traceability systems, the regular contributions of the personnel employed, as well as compliance with the laws in force on the subject of receiving stolen goods and recycling and the protection of intellectual property.

The company undertakes to maintain total confidentiality on information concerning its suppliers and to use the aforementioned information only for strictly professional reasons and in any case following written authorisation.

Furthermore, suppliers are also required to ensure the confidentiality of information, documents and personal data relating to the company and its collaborators.

It is expressly forbidden to receive/offer gifts and/or benefits (money, objects, services, favors or other benefits) from/to potential or actual suppliers, such as to determine an illicit conduct or, in any case, such as to be interpreted by an impartial observer as aimed at obtaining an advantage, even if not financial, except in cases in which gifts are traditionally offered to all those who maintain the same type of relationship with that customer or supplier.

The fee to be paid to suppliers must be exclusively commensurate with the service indicated in the contract and payments cannot be made to a person other than the contractual party or in a country other than that of the contractual parties.

Except for what has just been mentioned above, in the event that an employee receives money or a gift, he is obliged to promptly inform his hierarchical superior and the O.d.V.

### **5.5. RELATIONS WITH EXTERNAL COLLABORATORS AND CONSULTANTS**

Collaborators in any capacity and consultants of the company are required, in the execution of the contractual relationship established with the company or of the assignment received from the same, to behave with correctness, good faith and loyalty, respecting, as far as applicable to them, the provisions of the this Code, the company regulations and the instructions and prescriptions given by the company's personnel.

The company requires, in each individual agreement with collaborators and consultants, the observance, for the parts of competence, of the Code and also takes care of its dissemination among them.

Behaviors contrary to the principles expressed in the Code can be considered by the company as a serious breach of the duties of correctness and good faith in the execution of the contract, a reason



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for damage to the relationship of trust and just cause for the termination of the contractual relationships / partnership agreements. The contractual counterparties must sign declarations of knowledge of the principles of this Code, undertaking not to engage in any behavior that induces in any way the company or its managers, employees or collaborators to violate their principles, specified in the Code itself.

### **5.6. RELATIONS WITH CUSTOMERS AND USERS**

The company directs its activity towards the satisfaction and protection of its users, ensuring availability, confidentiality and courtesy, committing itself to the continuous pursuit of high quality standards of the services provided and providing accurate, timely and exhaustive information about the services themselves

The company undertakes to maintain total confidentiality on confidential information concerning its customers, both in reference to strategic information of the customer company and to personal data. Furthermore, it ensures that the aforementioned information is used only for strictly professional reasons and in any case following written authorisation. Customers are also required to ensure the confidentiality of information, documents, personal data relating to the company and its personnel.

Third parties or internal personnel who work on behalf of the company in the context of commercial negotiations with customers (especially public customers or customers who perform services of public utility) with whom, given serious reasons of convenience, there is a conflict of interests, even if only potential, must promptly inform their hierarchical superior and the O.d.V.

### **5.7. RELATIONS WITH OTHER INTERLOCUTORS**

The company does not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organizations, nor to their representatives or candidates, with the exception of contributions due on the basis of specific regulations.

The company refrains from any direct or indirect pressure on political or trade union representatives, through its employees or collaborators.

Directors and employees, in turn, cannot engage in political activity during working hours, or use company property or equipment for this purpose; they must also clarify that any political opinions expressed by them to third parties are strictly personal and therefore do not represent the opinion and orientation of the company itself.

In relations with other interest-bearing associations (e.g. trade associations, environmental organisations, etc.) no director, employee or collaborator must promise or pay sums, promise or grant goods in kind or other benefits on a personal basis to promote or favor interests of society.

## **6. METHODS OF IMPLEMENTATION AND CONTROL**

### **6.1. GENERALITY**



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All those who collaborate with the organization, without distinction or exception, are committed to ensuring compliance with the principles of this Code. In no way can acting in the interest or to the advantage of the company justify the adoption of behaviours, even achieved through omissive conduct and in possible competition with others, in contrast with the legislation and with these principles.

In particular, all collaborators are required to operate so that the rules of conduct referred to in this Code are adequately applied both within the company and, in general, by all its interlocutors. The corporate bodies and executives also have the duty to be the first to provide an example of consistency between the principles of the Code and daily conduct.

The body responsible for supervising the application of the Code is the O.d.V., set up in compliance with the Organisation, Management and Control Model for the prevention of crimes pursuant to Legislative Decree 231/2001 and related regulations, which coordinates appropriately with the competent bodies and functions for the correct implementation and adequate control of the principles of the Code of Ethics.

### **6.2. IMPLEMENTATION OF THE CODE**

The Code of Ethics was adopted by resolution of the Board of Directors on 08/25/2020 (attached to this document and an integral part of the same). Each update of the same will be adopted with a subsequent resolution, following possible organizational changes within the company, different external scenarios, as well as in relation to the experience acquired over time.

### **6.3. REPORTING TO THE O.D.V.**

All recipients of this Code are required to report any violation or suspected violation of the Code of Ethics to the O.d.V. of society.

All employees and collaborators of the company are required to collaborate with the O.d.V., possibly providing the company documentation necessary for carrying out the activities for which it is responsible.

It is absolutely forbidden for all internal personnel, senior management as well as third parties connected to the company for any reason, to submit to retaliatory or discriminatory acts, direct or indirect, the person who has proceeded to report to the O.d.V. the above. This is especially so when the discriminatory or retaliatory act was directly or indirectly determined by the report itself.

### **6.4. DISSEMINATION OF THE CODE OF ETHICS**

- The company disseminates the Code and its updates to the recipients, with the methods deemed most appropriate from time to time, such as, for example:
- 
- publication on its website;
- posting on the company bulletin board;
- informative/distributive note to collaborators and suppliers.



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### **7. RESPONSIBILITY**

The preparation and dissemination of this Code of Ethics are carried out under the responsibility of the executive body of the company.

### **8. ATTACHMENT - TEXT OF THE CODE OF ETHICS APPROVED ON 08/27/2020**