



**CODE OF ETHICS OF  
CASILLO PARTECIPAZIONI SRL**

Adopted on 6 April 2013 and subsequently updated on 30 July 2018

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## INTRODUCTION

### ARTICLE 1 - PURPOSE AND CONTENTS OF THE CODE OF ETHICS

This document (hereinafter, the “Code of Ethics” or the “Code”) represents a tool of “corporate ethics”, and as such governs the general principles and rules of conduct that are recognized as having a positive ethical value, with the aim of orienting corporate action towards ethically correct behaviors.

This Code of Ethics constitutes a fundamental complement to the organization, management and control Model envisaged by article 6 of Italy’s Legislative Decree no. 231/01 (the “**231 Model**”), adopted by Casillo Partecipazioni Srl (hereinafter “**Casillo Partecipazioni**”, or the “**Company**”). Consequently, all Casillo Partecipazioni’s activities must align with the principles expressed in this document.

### ARTICLE 2 - RECIPIENTS AND DISSEMINATION OF THE CODE

The principles and provisions of the Code of Ethics are binding for the conduct of the Administrative Body, of the members of the control body, of the Supervisory Body pursuant to article 6, Legislative Decree no. 231/01 (the “**Supervisory Body**” or “**SB**”), of the shareholders, of the employees (executives and otherwise), of the consultants and of anyone who enters into contractual relationships for any reason, directly or indirectly, permanently or temporarily, in Italy or abroad, with the Company (hereinafter, collectively, the “**Recipients**”).

The Recipients of the provisions of the Code are obliged to adapt to the provisions contained herein, and to conform their behavior and actions to the principles set out below.

The Company undertakes to make use of the provisions contained in the Code in all economic relationships it establishes, and to disseminate the Code as widely as possible.

For the aforementioned reasons, the Code of Ethics is made available to any interlocutor of the Company and a copy of it is made available to all those who work for and/or within the Company. Finally, the Company recommends and also requires suppliers and partners to comply with the principles and requirements contained in this document.

### ARTICLE 3 - EFFECTIVENESS OF THE CODE

The conduct envisaged by this Code of Ethics describes and crystallizes, from an ethical point of view, the fulfillment of the obligations of loyalty and diligence which the Recipients must comply with.

Therefore, non-compliance with the conduct to which the Company explicitly attributes ethical value will be sanctioned in proportion to the characteristics of the conduct and the degree of responsibility of the transgressor.

Compliance with the rules and provisions contained in the Code of Ethics constitutes an integral and essential part of the contractual obligations deriving from subordinate employment relationships, as regards employees, and from contractual agreements, as regards freelance or independent collaborators. The violation of the aforementioned rules will constitute a breach of the obligations deriving from the employment or collaboration relationship, with all legal and/or contractual consequences.

**ARTICLE 4 - CODE IMPLEMENTATION AND UPDATES**

The Code is adopted and updated by the Company through resolutions of the Board of Directors, and may also be modified and integrated on the basis of indications and proposals formulated by the Supervisory Body and covered in Model 231.

Adopted with a resolution of the Administrative Body dated 3 June 2015, the present Code of Ethics was updated on 31 July 2018.

## **GENERAL ETHICAL PRINCIPLES**

The general ethical principles of the Company are transparency, fairness, efficiency, spirit of service, collaboration between colleagues, professional development and competition.

The general ethical principles must be brought to the attention of all Recipients of the Code.

### **ARTICLE 5 - TRANSPARENCY**

The principle of transparency is based on the authenticity, clarity and accessibility of information. The Company undertakes to observe this principle by providing all interested parties with the necessary information in a clear and unequivocal manner, and by adopting a communication, verbal or written, that is easy and immediate to understand.

In relations with counterparties, as well as in the stipulation of contracts, the Company discloses its information and communicates in a clear and understandable way, always ensuring that equal conditions are maintained.

### **ARTICLE 6 - FAIRNESS**

The principle of fairness is based, as a fundamental condition, on all those who work for or collaborate in any way with the Company respecting the rights of each person involved, beyond mere compliance with the law and/or any Employment Agreement.

Compliance with this principle is to be considered unconditional also from the point of view of privacy, in compliance also with the provisions of Regulation (EU) no. 2016/679 (GDPR). In this regard, the Company will refrain from any situation that could give rise to any kind of discrimination between those who work for or collaborate in any way with the Company.

### **ARTICLE 7 - EFFICIENCY**

The principle of efficiency requires that all work activities be carried out with professionalism and functionality, according to the most advanced standards of each sector.

In carrying out its work activity, the Company undertakes to offer an adequate service, always respecting the management of the company resources employed.

### **ARTICLE 8 - SPIRIT OF SERVICE**

The principle of spirit of service aims to provide a service characterized by efficiency, quality and high social value at the fairest economic and regulatory conditions, without any arbitrary discrimination.

## **ARTICLE 9 - PROFESSIONAL DEVELOPMENT AND COLLABORATION AMONG COLLEAGUES**

The Company protects human resources and promotes their professional growth, respecting equal opportunity principles and rules.

The Company recognizes the centrality of human resources, favoring collaboration among all those who work for or collaborate in any way with the Company.

### Article 9.1 - Integrity

The Company rejects any conduct that may favor or facilitate practices typical of any culture or religion that conflict with public order, or that affect the physical integrity of persons for purposes considered illegal by current laws.

Requests or threats aimed at inducing people to act against the law and the Code of Ethics or to adopt behaviors that are detrimental to individual moral preferences and personal beliefs are not tolerated.

## **ARTICLE 10 - COMPETITION**

The Company undertakes to promote fair competition on the market, operating according to principles of fairness, loyalty and transparency towards all competing operators, and in any case avoiding the risk of anticompetitive or fraudulent conduct towards competitors, by refraining from behaviors that are collusive and from any abuse of position.

### Article 10.1 - Antitrust and unfair competition

The Company, by virtue of the activity it carries out, recognizes the primary importance of the value of free and fair competition between the subjects operating on the market and, therefore, stigmatizes any behavior that could constitute an impediment or disturbance to the exercise of a business or trade.

The Company complies with antitrust and competition laws, promoting total and fair competition in all sectors in which it operates.

The Recipients undertake not to engage in any conduct that could disturb freedom in the industry and trade, not to use violence or threats in order to disturb or prevent the exercise of a competing activity, not to use fraudulent means aimed at conditioning the free market, and not to engage in any deceptive or disparaging conduct.

In relation to these principles, it is mandatory not to enter with competitors into written or oral contracts or other forms of agreement to fix prices or terms, limit production or split clients, suppliers or markets.

## **CRITERIA OF CONDUCT**

### **ARTICLE 11 - GENERAL PRINCIPLES**

The Company operates in compliance with current legislation for the achievement of corporate goals. All company activities are carried out in compliance with the principles and procedures set forth for this purpose.

The Company requires the Recipients:

- To comply with the laws in force, the principles set out in the Code, the Model, the regulations and the procedures established for the performance of company activities;
- To adopt irreproachable conduct, such as not to jeopardize the moral and professional reliability of the Company.  
Therefore, all the necessary measures are adopted to comply with current legislation, principles and internal regulations which the Company has adopted.

### **ARTICLE 12 - RELATIONS WITH STAKEHOLDERS**

#### 12.1 Equality and impartiality

The Company undertakes not to discriminate against its counterparties and to create with them a relationship characterized by high professionalism, oriented towards respect and courtesy, seeking and offering maximum collaboration, in compliance with current regulations and stipulated contracts.

#### 12.2 Interaction with Stakeholders

The Company undertakes to create a relationship of trust and collaboration with its Stakeholders. With this in mind, the Company pursues a company policy focused on responding to suggestions and complaints received by Stakeholders and by the associations protecting them, making use of suitable and timely communication systems, with particular regard also to people with disabilities. The Company undertakes to control the procedures that regulate its relationship with the Stakeholders and to communicate with them in a timely manner.

### **ARTICLE 13 - RELATIONS WITH CLIENTS**

The Company painstakingly analyzes the adequacy and feasibility of requested services, with particular regard to the regulatory, technical and economic conditions, so as not to take on contractual commitments that could put the Company in the condition of having to resort to savings that negatively affect the quality of the services themselves or job safety. The Company ensures fairness and clarity in commercial negotiations and in contractual obligations, as well as the faithful and diligent fulfillment of the latter.

#### Article 13.1 Relations with Consultants

The Company undertakes not to arbitrarily discriminate against its consultants.

For the purpose of this Code, consultancy is defined as any specialized intellectual service carried out by a professional individual or firm, which, having established experience and practice in a certain field, assists and advises the Company in carrying out its activities or provides information and opinions that can create added value and support decisions, promoting development through the activity itself. In this context, the relationship of trust between the Company and the consultant is essential. Such trust can be based on a consolidated relationship, on the reputation of the consultant, or on the academic and professional qualifications they possess.

The consultants' selection and subsequent contract definition take place on the basis of an assessment of their professionalism.

The Company's relationship with consultants is based on the regulatory principles of contractual good faith and correct execution of reciprocal obligations; moreover, the Company rejects any conduct consultants may adopt that is contrary to the law and/or to the principles of this Code.

External consultants' behavior must be based on openness and compliance with business needs, in the framework of a loyal, correct and highly professional collaborative relationship.

### **ARTICLE 14 - OBLIGATIONS IN PROCUREMENT**

#### 14.4 Obligations in procurement

##### 14.4.1 Impartiality

The Company, in order to comply with the principles of transparency and fairness, guarantees equal treatment to the companies with which it comes into contact.

For these reasons, the Company refrains from any arbitrary act that could have negative effects on said companies, as well as from any preferential treatment.

##### 14.4.2 Confidentiality and transparency

The Company, in order to protect the confidentiality of the information communicated by the counterparties with which it comes into contact, as well as in order to ensure transparency in its relations, refrains from disseminating and using, for personal purposes, the information it receives for work-related reasons, without prejudice to compliance with the rules and regulations set up to protect the right of information and access.

##### 14.4.3 Independence and duty to abstain

In order to comply with basic principles of fairness, as well as the ethical principles referred to in the Code, those who work for or collaborate in any way with the Company must not perform activities in contrast with the tasks entrusted to them, and avoid any involvement in situations that could harm the interested parties or the image of the Company. Furthermore, they are obliged to notify the Administrative Body of their participation in organizations, associations or bodies whose activities may in any way conflict with the performance of the Company's business.

##### 14.4.4 Gifts and other benefits

All those who work for or collaborate in any way with the Company, including the members of the Administrative Body, do not offer nor accept, for themselves or for others, gifts or other benefits that are not of absolutely modest value and such as not to affect the recipient's freedom of judgment.

14.4.5 Execution of the contract

The assessment of compliance with contractual conditions is carried out objectively by the Company and must result from written documentation.

The related accounting is completed within the established timeframe.

**ARTICLE 15 - HUMAN RESOURCE POLICIES**

15.1 Rules of conduct regarding the use of money, credit cards and tax stamps

All Recipients are strictly prohibited – in any activity that entails the use of money, credit cards or tax stamps – from any falsification of these goods and from using or holding such goods if they know they are false.

15.2 Rules of conduct regarding the use of money, goods or other benefits received from third parties

In the procurement phases, the Recipients are required to verify, as far as possible, that goods do not derive from crimes.

Furthermore, the aforementioned Recipients observe the internal provisions on the management of financial flows, as well as the legislation and specific procedures against money laundering.

15.3 Duties of the Administrative Body

The Administrative Body has the duty to comply with the regulations in force and to respect the principles of this Code.

The Administrative Body actively collaborates in any control ordered by the Company, the Supervisory Body, as well as by administrative or judicial Authorities. It is also obliged to constantly dialogue with the Supervisory Body and to inform it of any element useful for the SB to carry out the activities for which it is responsible.

15.4 Duties of the control body

The members of the control body have the duty to comply with the regulations in force and to respect the principles of the Code.

They actively collaborate with other corporate bodies and with the structures of the Company to ensure compliance with the principles set forth in this Code, bringing to the attention of the Supervisory Body any element useful for it to carry out the activities entrusted to it.

15.5 Duties of Executives

Executives have the duty to observe the regulations in force and to respect the principles of the Code.

They actively collaborate in any control required by the Company, by the Supervisory Body, as well as by administrative or judicial Authorities, and are obliged to constantly dialogue with the SB, and to inform it of any element useful for the SB to carry out its activities.

The same obligations apply to all those who have a special power of attorney within the Company.

#### 15.6 Selection and hiring of personnel

The Company evaluates the personnel to be hired according to criteria of fairness and transparency, and by analyzing candidates' profiles on the basis of company needs.

The Company, within the limits of the information available, avoids any form of favoritism in selecting the resources to be hired.

Personnel are hired under regular contracts. The Company refrains from creating any form of irregular work, as well as from using particular types of contracts in order to circumvent mandatory rules.

Upon starting an employment relationship, workers receive accurate information relating to:

- The characteristics of their role and the tasks to be performed;
- The regulatory and remuneration elements of the contract, with reference to the national collective labor agreement and any relevant company contracts;
- The rules and procedures to be adopted in order to avoid possible health risks associated with work activity.

Such information is presented to the employee in terms that ensure that acceptance is based on effective understanding.

#### 15.7 Personnel management

The Company does not tolerate any form of discrimination against its employees.

Corporate policy is aimed at assigning roles and responsibilities on the basis of the concrete skills possessed by its employees; moreover, compatibly with corporate organization, flexibility in working hours is favored when it facilitates the management of maternity and childcare in general.

The evaluation of the employees' activities is carried out by involving all the different company functions with which they interact.

#### 15.8 Staff development and training

The Company's collaborators and employees are considered an integral part and indispensable factor for growth and development. For this reason, the Company protects and promotes the value of human resources in order to improve and increase the intellectual assets and the competitiveness of the skills possessed by each person. The Administrative Body and executives use and fully leverage all the professional skills present in the company, to favor employees' and collaborators' professional development and growth.

The Company makes information and training tools available to all employees and collaborators, with the aim of enhancing their specific skills and professionalism.

Training can take place both on-site through specific courses, or remotely through special tools, including multimedia. Each employee's training progress is documented by the Company, which keeps track of it in specific archives.

New hires receive an introduction to the company activity. They are provided a copy of the Code, among other documents, so they can be aware of the ethical and responsibility principles that inspire the Company.

Each employee and/or collaborator is provided with specific means that enable them to collaborate efficiently and productively in the Company's activities.

#### 15.9 Health and safety in the workplace

The Company undertakes to disseminate and consolidate a culture of safety, developing risk awareness in personnel and promoting responsible behavior from all employees and collaborators. Furthermore, the Company works to ensure, above all through preventive actions, hygiene, health and safety for all workers.

The Company's main objective is to protect employees and collaborators, allowing them to work in a suitable and safe environment.

The Company, indeed, is particularly sensitive to the issue of safety in the workplace, and undertakes to operate every day in compliance with the regulations in force and in particular with the provisions of Legislative Decree no. 81/2008.

In this perspective, the Company is committed to implementing its health and safety policy in the workplace through:

- The introduction of an integrated risk and safety management system;
- A continuous analysis of risk, process criticalities and functions that need protection;
- The adoption of the best available technologies;
- The replacement of equipment and work tools considered at risk;
- The control and updating of working methods;
- The contribution of training and communication activities.

#### 15.10 People protection

The Company protects its employees and collaborators by guaranteeing working conditions that respect human dignity.

The Company condemns any act of sexual harassment, as well as any behavior that could upset the sensitivity and dignity of the person. To this end, it incorporates into the Code the text of the “Regulation for the protection of the dignity of women and men within the Company”, approved in agreement with the trade unions on 24 October 1997.

The Company does not tolerate any discrimination based on age, sex, race, state of health, nationality, political opinions and religious beliefs, and undertakes to protect workers from acts of psychological violence, counteracting any attitude or behavior that is discriminatory or harmful to the person, their beliefs or their preferences.

The Company periodically checks for the possible existence of discrimination of any kind in the workplace, making the related data available to the Supervisory Body.

#### 15.11 Information management

The Company complies with the provisions regarding the processing of data provided for by Regulation (EU) no. 2016/679 (GDPR).

In particular, the Company protects the privacy of all those who collaborate or operate with it – in compliance with the provisions of the law – and adopts behavioral standards that prohibit (subject to the exceptions provided for by law) the communication or dissemination of personal data held by the Company, without the prior consent of the interested party.

All employees and collaborators are made aware of the provisions set forth in the company policies regarding information security, to guarantee the integrity, confidentiality and availability of the data with which they come into contact, and are required to comply with them.

The Company does not investigate the ideas and, in general, the private life of its employees and collaborators for reasons not related to work (except in cases permitted by law).

#### 15.12 Conflict of interest

Employees, collaborators and anyone working on behalf of the Company must refrain from personally taking advantage of business opportunities that may arise as part of their activity for the Company itself.

In the event that a conflict of interest arises, even if only theoretically, for an employee, a collaborator or anyone working on behalf of the Company, the interested party must notify the Administrative Body of the Company, which, according to the established procedures, informs the

Supervisory Body. The Administrative Body and Supervisory Body assess, case by case, the actual existence of such conflict.

If the theoretical conflict of interest concerns the Administrative Body, the interested party informs the Shareholders and the Supervisory Body – which together assess, case by case, the actual existence of such conflict.

Each employee, collaborator and anyone working on behalf of the Company is required to provide information to the Administrative Body (or to the Shareholders, where the potential conflict concerns the Administrative Body) about the activities carried out outside working hours, if these appear to be in conflict with the interest of the Company.

#### 15.13 Use of company assets

Each employee, collaborator and anyone working on behalf of the Company is required to work diligently to protect the Company's assets, through responsible behavior in line with the operating procedures set up for their correct use, accurately documenting their utilization. Everyone is responsible for the protection of the resources entrusted to them, and has the duty to promptly inform the Administrative Body of any threats to the Company.

In particular, everyone must:

- Avoid private use of company assets, outside the permitted cases;
- Use the assets entrusted to them scrupulously and sparingly;
- Avoid improper use of company assets that could cause damage or reduction in efficiency or, in any case, conflict with the interests of the Company.

As regards IT applications, everyone is required to:

- Use them according to the instructions and for the purposes for which they are made available;
- Scrupulously adopt the provisions of corporate security policies, in order not to compromise the functionality and protection of the IT systems;
- Not send threatening or insulting e-mail messages, nor indulge in inappropriate language, nor make inappropriate comments that may offend people and/or damage the Company's image;
- Not browse on websites for personal purposes, and in any case not browse for any reason on sites with indecent and offensive content.

### **ARTICLE 16 - INSTITUTIONAL RELATIONS**

The Company, in its relations with the State Institutions, undertakes to:

- Establish, without any kind of discrimination, stable communication channels with all institutional interlocutors at any level;

- Represent the interests and positions of the Company in a transparent, rigorous and coherent manner, avoiding collusive attitudes.

In order to ensure maximum clarity and transparency, those who have received a direct mandate from the Administrative Body undertake to establish and maintain with the Institutions relations based on the observance of formal and respectful canons.

### **ARTICLE 17 - RELATIONS WITH SHAREHOLDERS**

The Company undertakes to provide Shareholders with accurate, truthful and timely information, also in order to facilitate their participation in corporate decisions.

It is the Company's commitment to protect corporate assets by ensuring high standards in its activity; the Company also undertakes to promptly communicate to Shareholders any information or news that may be considered relevant.

Absolute equality of treatment among all Shareholders is guaranteed, and preferential behavior is avoided.

#### 17.1 Accounting and corporate information

Accounting transparency is based on the truthfulness, accuracy and completeness of the basic information used for the related accounting records.

Everyone is required to collaborate in accounting's timely representation of useful information.

Adequate documentation to support the activity carried out is kept in the records for each operation, allowing for:

- Easy accounting entries;
- Identification of different levels of responsibility;
- The tracking of each transaction, also to reduce the risk of interpretation errors.

Each record must reflect exactly what is shown in the supporting documentation; it is the task of all those who manage it to ensure that the documentation is easily traceable and ordered according to logical criteria.

All those who become aware of omissions, falsifications or negligence in accounting or in the documentation on which the accounting records are based, are required to report the facts to the Administrative Body; in the event that the aforementioned Body becomes aware of it directly, it must report to the Supervisory Body and, at the earliest opportunity, to the Shareholders.

### **ARTICLE 18 - RELATIONS WITH THE PUBLIC ADMINISTRATION**

The Company maintains fair and transparent relations with the Public Administration.

For the purposes of this Code, the definition of "Public Administration" includes any public body or representative of a public body, independent administrative agency, and natural or legal person acting as a public official or as a person in charge of a public service.

The undertaking of any commitments towards the Public Administration and in any case towards Public Institutions is reserved exclusively to the appointed and authorized company roles, in compliance with the most rigorous observance of the applicable laws and regulations, and cannot in any way compromise the integrity and the reputation of the Company.

To this end, the Company correctly collects and archives the documentation relating to any contacts with the Public Administration.

Any activity, by those who work on behalf of the Company, aimed at influencing the independence of judgment of the public official or person in charge of a public service or in any case aimed at ensuring advantages of any kind for the Company is absolutely prohibited.

With regard to employees of the Public Administration or officials acting on behalf of the Public Administration, the Company:

- Does not admit any practice, of any nature and in any form, aimed at inducing, facilitating or remunerating a decision or the performance of an official act, or contrary to official duties, by the Public Administration;
- In particular, it does not allow payments or compensation, in any form, or acts of business courtesy (such as gifts or forms of hospitality), even simply offered, to executives, officers, employees and in any case to anyone acting on behalf of a Public Administration, their relatives or their agents, except in the case of objects of modest value that cannot be interpreted in any way as a tool to influence the actions of the Public Administration. Furthermore, the Company does not admit any promise of employment opportunities, advantages or other benefits to the aforementioned subjects;
- Anyone who works on behalf of the Company must refrain from trying to improperly influence the positions of those who negotiate or make decisions on behalf of the Public Administration;
- In the specific case of tenders with the Public Administration, the Company operates in compliance with the law and with correct commercial practices;
- In relations with the Public Administration, the Company is not represented by consultants or third parties, when this may lead to a conflict of interest.

Any violation of the above indications, even in the form of a mere attempt, by anyone who works – even indirectly – on behalf of the Company, must be promptly reported to the Administrative Body and the Supervisory Body, which jointly agree on the appropriate measures to take and adopt the disciplinary sanctions provided for by the Organizational Model.

#### **ARTICLE 19 - RELATIONS WITH POLITICAL PARTIES, ORGANIZATIONS AND POLITICAL OR TRADE UNION ASSOCIATIONS**

In making any contributions to political parties, movements, committees and political and trade union organizations, or to their representatives and candidates, the Company strictly adheres to the provisions set forth in the legislation in force.

The Company also refrains from any conduct aimed at exerting direct or indirect pressure on politicians or trade unions, and does not make contributions to organizations with which a conflict of interest may arise.

Any financial cooperation of the Company with non-political associations for specific projects is based on the following criteria:

- Clarification of the purpose of the intervention;
- Clear and documentable destination of resources;
- Express authorization from the departments responsible for managing these relationships within the Company.

### **ARTICLE 20 - CONTRIBUTIONS AND SPONSORSHIPS**

The Company can contribute to requests for contributions from bodies and associations that are explicitly non-profits and have a regular charter and articles of association, which are of high cultural, social or charitable value or, in any case, which involve a significant number of citizens. Sponsorship activities – which may regard culture, society, the environment, sport, entertainment and art – are intended for events that offer a guarantee of quality, or for which the Company can collaborate to planning, in order to guarantee their originality and effectiveness.

### **ARTICLE 21 - THE ENVIRONMENT**

The Company is primarily committed to safeguarding the environment.

All those who work on behalf of the Company, and in any case all Recipients, are required to contribute to the process of safeguarding and protecting the environment, in particular by paying the utmost attention to avoiding any illegal dumping and/or emission of harmful materials or waste.

The Company undertakes, in particular, to:

- Manage waste rationally, paying particular attention to the rules and procedures regarding waste disposal;
- Design and implement production processes and company activities with criteria aimed at preventing pollution, reducing environmental impacts, preventing possible accidents, safeguarding the health and safety of employees and the population, adopting for this purpose the best techniques available on the market;
- Define objectives and improvement programs aimed, in particular, at minimizing emissions, limiting waste in the electricity distribution network, and minimizing the visual and acoustic impact caused by corporate plants;
- Ensure all those who work on behalf of the Company comply with the environmental and safety legislation in force, ensuring personnel is constantly updated on the developments of the regulatory landscape in environmental matters and making them aware of the environmental protection objectives that the Company pursues;

- Establish and maintain a dialogue with local players, with representative territorial bodies and with any other interested party, through periodic, clear and transparent communication, on corporate strategies and on the results achieved in terms of safety, health and environmental protection.

## **METHOD OF IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS**

### **ARTICLE 22 - VIOLATION OF THE CODE OF ETHICS**

All interested parties, internal and external, are required to report in writing any non-compliance with the Code.

The reports must be submitted to the Supervisory Body, in accordance with the methods established by internal procedures and by using the communication channels made available by the Company also for the violations referred to in Model 231.

The SB will listen separately to the author of the report and to the person responsible for the alleged violation.

The Company undertakes to guarantee maximum confidentiality to the whistleblower, as well as to protect them from any possible retaliatory or discriminatory conduct, also through the tools offered by the legislation on whistleblowing.

### **ARTICLE 23 - SANCTIONING SYSTEM**

The violation of the principles contained in the Code is sanctioned by applying the sanctioning system dictated by Model 231 for its violations; such system must be considered referenced here in full, regardless of the possible establishment of a criminal judgment against the transgressor in cases in which the conduct also constitutes a crime.

The violation of the principles by an employee constitutes a disciplinary offense and gives rise to a disciplinary procedure, in compliance with current legislation and the applicable national collective labor agreement.

In case of violation of the Code by the Administrative Body, the Control Body, the Supervisory Body or by collaborators of the Company who are not subject to its hierarchical system, the most appropriate measures will be taken.

In the context of professional collaboration contracts and the supply of goods, services and work, express termination clauses in relation to conducts contrary to the principles of this Code of Ethics are inserted.

The sanctions and any request for compensation for damages are commensurate with the level of responsibility and autonomy of the offender, the possible existence of previous disciplinary measures against them, the intentionality of their behavior as well as its seriousness.

### **ARTICLE 24 - VIOLATIONS OF THE CODE OF ETHICS RELATED TO LEGISLATIVE DECREE NO. 231/01**

The adoption of ethical principles relevant to the prevention of crimes pursuant to Legislative Decree no. 231/01 constitutes an essential element of the preventive control system.

Therefore, the rules of conduct provided for in this Code constitute a basic reference that Recipients must comply with in their relations with all interlocutors, and in particular with the Public Administration and with public employees, as well as in all relations that may give rise to offenses envisaged and sanctioned by Legislative Decree no. 231/01.

The Administrative Body immediately reports any violations of the Code to the Supervisory Body.

This Code of Ethics, as a key complement to Model 231, was adopted on 6 April 2013, subsequently updated on 30 July 2018, and brought to the attention of the Recipients.