

WHISTLEBLOWING PROCEDURE MANAGEMENT OF THE VIOLATION REPORTING SYSTEM PURSUANT TO LEGISLATIVE DECREE 231/2001

REV.	DATE	APPROVED	NOTE
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DEFINITIONS

For the purposes of this procedure, unless otherwise specified, the terms listed below have the meaning attributed to each of them below:

- **Internal Signaling Channels**: specific channels dedicated to the transmission of Specific channels dedicated to the transmission of Reports pursuant to Art. 4, paragraph 1 of Legislative Decree 24/2023;
- **Work Context**: the work or professional activities, present or past, carried out within the relationships maintained with the Company through which, independently from the nature of such activities, a person acquires **Information about Violations** and in which he or she may risk suffering **Retaliation** in the event of a **Report**;
- **Facilitator**: a natural person who assists a **Reporter** in the reporting process, operating within the same **Work Context**, and whose assistance must be kept confidential;
- **GDPR**: Regulation (EU) 679/2016 of the European Parliament and of the Council of 27 April 2016 relating to the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data and which repeals Directive 95/46/CE;
- **Reports Manager**: the person appointed to receive and manage Reports for the purposes of this procedure, appointed in accordance with Art. 4 paragraph 2 of Legislative Decree 24/2023; the **Company** has identified engineer Luca Fattore as **Reporting Manager**;
- **Information**: privacy information provided pursuant to Art. 13 of the GDPR to the interested parties or to the Person involved and to the Reporter;
- **Information on Violations**: information, written/oral, including well-founded suspicions, regarding **Violations** committed or which, based on concrete elements, could be committed as well as circumstantial elements of conduct aimed at concealing such **Violations**¹;
- **Report Register**: register in which the **Report Manager** notes, upon receipt of the **Report**, the preliminary information relating to it, assigning each **Report** a progressive number;
- **Retaliation**: any behavior, act, or omission, even if only attempted or threatened, carried out due to the **Report** and which causes or may cause **Reporting Person**, directly or indirectly, unjust damage;
- **Person involved**: the natural or legal person mentioned in the **Report** as the person to whom the **Violation** is attributed or as the person in any case implicated in the **Violation** reported;
- **Reporting party**: subjects indicated in the following § 4;
- **Reporting (“wrongdoing”)**: communication of **Information on Violations**;
- **Disciplinary System**: a set of sanctioning measures against those who do not observe the provisions of this procedure, as better specified in the following §6;

¹ Irregularities or anomalies that the Reporter believes could give rise to one of the Violations are also included, provided that they are not mere irregularities but rather symptomatic indicators such as to make the Reporter reasonably believe that one of the Violations could be committed.

- **Third Parties:** all subjects "external" to the Company having negotiating relationships with it (by way of example, consultants, suppliers, customers, and partners);
- **Evaluation (Triage):** assessment of the **Report** for classification purposes and the adoption of investigative measures, priorities, and related management.
- **Violation:** all behaviors, acts, and omissions identified in the following §4.1.

Terms defined in the singular are also understood in the plural where the context requires it and vice versa. Similarly, terms defined in the masculine are also understood as feminine where the context requires it and vice versa.

1. PURPOSE

For the purposes of applying Legislative Decree 24/2023, this procedure defines, within the scope of the activity carried out by **Sapre Srl** (hereinafter also just «**Sapre**» or «**Company**»), the general principles established, in particular, to safeguard the Whistleblowers, the operating methods to be observed in the management of **Whistleblowing Reports**, the protection measures as well as the **Disciplinary System**.

2. TERMS OF VALIDITY

This procedure becomes valid from its issue date indicated on the cover.

Any subsequent update cancels and replaces, from the date of its issue, all versions issued previously.

3. LEGISLATIVE AND REGULATORY REFERENCES

- Legislative Decree 24/2023 *"Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, concerning the protection of persons who report violations of Union law and containing provisions concerning the protection of people who report violations of national regulatory provisions."*
- Legislative Decree 231/2001 *"Discipline of the administrative liability of legal persons, companies and associations even without legal personality, pursuant to article 11 of law 29 September 2000, n. 300"*
- *"Guidelines on the protection of persons reporting breaches of Union law and the protection of persons reporting breaches of national legislative provisions. Procedure for the presentation and management of external reports."* of the National Anti-Corruption Authority (ANAC) approved with Resolution no. 311 of 12 July 2023
- EU Regulation no. 679/2016 of the European Parliament and of the Council of 27 April 2016;
- UNI ISO 45001:2018 *"Management systems for health and safety at work – Requirements and user guide"*
- ISO 37002:2021 *"Whistleblowing management systems - Guidelines"*.

4. OPERATIONAL METHODS

The following subjects can make **Reports** :

- the Company's subordinate workers, including workers whose employment relationship is governed by Legislative Decree 15 June 2015, n. 812, or by article 54-bis of the legislative decree of 24 April 2017, n. 50, converted, with amendments, by law 21 June 2017, n. 96³;
- self-employed workers, including those indicated in Chapter I of Law 22 May 2017, n. 814, as well as the holders of a collaboration relationship, referred to in Article 409 of the civil procedure code and Article 2 of legislative decree no. 81 of 2015, who carry out their work at the Company;
- workers or collaborators who carry out their work for public sector or private sector entities that provide goods or services that carry out works for third parties;
- freelancers and consultants who work for the Company;
- volunteers and interns, paid and unpaid, who work for the Company;
- shareholders and people with administrative, management, control, supervisory, or representation functions, even if these functions are exercised on a purely de facto basis at the Company.

4.1 PURPOSE OF THE REPORT

Given the general prohibition on making **Reports that** are manifestly unfounded and/or made maliciously (e.g., for defamatory purposes) or with gross negligence, the **Violations** that may be the subject of a **Report** concern:

- relevant illicit conduct pursuant to Legislative Decree 8 June 2001, n. 231 or the violations of the internal regulations governing Sapre's activity, exposing it to the risk of incurring administrative liability pursuant to Legislative Decree 231/2001 of which one became aware within one's Work Context;
- violations of the Code of Ethics of which you become aware within your Context Working;
- offenses falling within the scope of European Union or national acts relating to the following sectors: public procurement; financial services, products, and markets and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation protection and nuclear safety; food and feed safety and human health and well-being

2 ie "Collaborative relationships which take the form of exclusively personal, continuous work services and whose methods of execution are organized by the client also with reference to the times and place of work; part-time work; intermittent work; fixed-term work; administration; apprenticeship; accessory work".

3 ie "For each provider, with reference to all users, to compensation of a total amount not exceeding 5,000 euros; for each user, with reference to all providers, to compensation of a total amount not exceeding 10,000 euros; for the overall services rendered by each provider in favor of the same user, for compensation of an amount not exceeding 2,500 euros; for each provider, for the activities referred to in the decree of the Minister of the Interior of 8 August 2007, published in the Official Journal no. 195 of 23 August 2007, carried out towards each user referred to in law 23 March 1981, n. 91, to compensation of a total amount not exceeding 5,000 euros."

4 i.e. Work contract (ex articles 2222 cc et seq.) and Contract for the provision of intellectual work (ex articles 2229 cc et seq.), excluding small entrepreneurs (ex art. 2083 cc).

animals; public health; consumer protection; protection of private life and protection of personal data (to be understood as a violation of privacy legislation) and security of networks and information systems;

- acts or omissions detrimental to the financial interests of the European Union (referred to in Article 325 of the Treaty on the Functioning of the European Union);
- acts or omissions concerning the internal market (pursuant to Article 26, paragraph 2, of the Treaty on the Functioning of the European Union), including violations of European Union competition rules and State aid, as well as violations concerning the internal market related to acts that breach corporate tax rules or mechanisms aimed at obtaining a tax advantage that defeats the object or purpose of the applicable corporate tax legislation;
- acts or behaviors that undermine the object or purpose of the provisions set forth in the Union acts in the aforementioned sectors.

4.2 CONTENUTO DELLA SEGNALAZIONE

The **Reporter** is required to provide all the useful elements to allow the **Reporting Manager** to carry out the necessary and appropriate checks to confirm the validity of the facts which are the subject of the **Report**. To this end, **the Report** should contain concrete, documented and/or documentable circumstances and information such as to reasonably lead to the belief that the reported acts/facts or omissions constitute a **Violation**.

Preferably it should state the following:

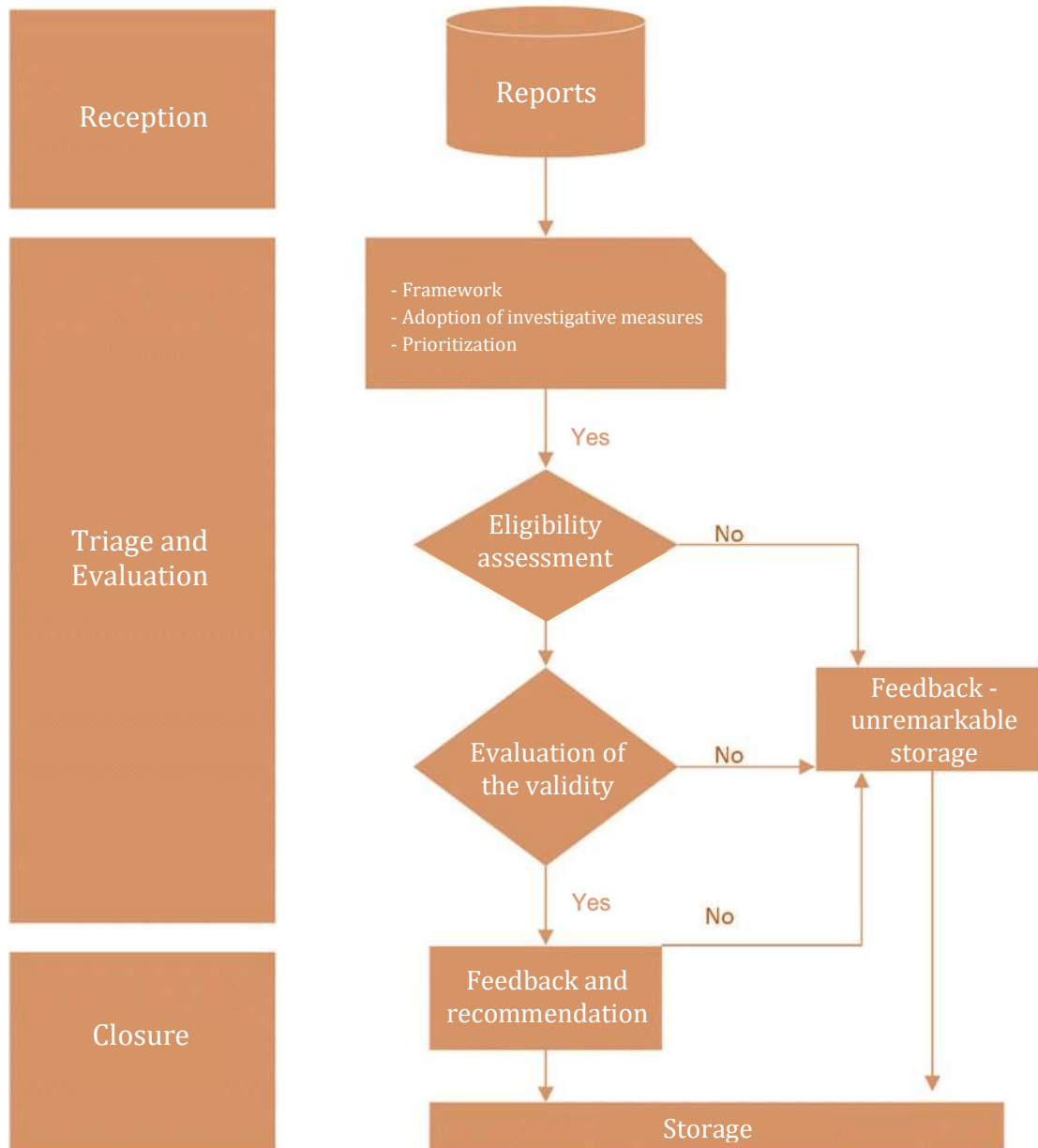
- the personal details of the person making the **Report** with the indication of the position or function carried out within the **Company**;
- the clear and complete description of the facts covered by **the Report**;
- if known, the circumstances of time and place in which the facts were committed;
- if known,
- the personal details or other elements (such as the qualification and the service in which the activity is carried out) that allow the identification of the person who carried out the facts that are the subject of the **Report**;
- the indication of any other subjects who can report on the facts covered by **the Report**;
- the indication of any documents that can confirm the validity of such facts;
- any other information that can provide useful feedback regarding the existence of the facts reported.
- **Reports** that do not fall within the scope and object of this procedure will not be taken into consideration in any way.⁵

⁵ We refer in particular to the Reports concerning (§ par. 2.1.1 ANAC Guidelines):

disputes, claims, or requests linked to a personal interest of the reporting person or of the person who has filed a complaint with the judicial authority which relates exclusively to their individual work or public employment relationships or inherent to their employment or of public employment with hierarchically superordinate figures;

reports of violations where already regulated on a mandatory basis by the European Union or national acts indicated in part II of the annex to the decree or by the national ones that constitute.

4.3 REPORTING MANAGEMENT PHASES



Management of **Reports** occurs in accordance with the phases described below:

- a) Reception and **Triage** (§4.5);
- b) Evaluation (§4.6 and 4.7);

implementation of the European Union acts indicated in part II of the annex to Directive (EU) 2019/1937, although not indicated in part II of the annex to the decree.
reports of violations relating to national security, as well as procurement relating to aspects of defense or national security, unless such aspects fall under relevant secondary legislation of the European Union.





c) Closure (§4.8).

In each phase of management of **the Report**, the **Reports Manager**:

- where necessary, informs the **Reporter** of the status of **the Report** and any subsequent steps inherent and/or consequent to it;
- guarantees the confidentiality of the identity of the **Reporter** and the information contained in the **Reports** (Protection) to the extent that anonymity and confidentiality are enforceable according to the law and to the people competent to receive them or follow up on expressly authorized Reports;
- operates in compliance with the duties of independence and professionalism (Impartiality);
- guarantees the accurate and efficient management of all **Reports**.

4.4 INTERNAL SIGNALING CHANNELS (RECEPTION)

The **Report** must be addressed to the **Reports Manager** using the following **Internal reporting channels**:

<p>In written shape</p>	<p>Via postal mail</p> <p> <i>To the care of the Sapre Reporting Manager</i> <i>Luca Fattore</i> <i>Sapre S.r.l., Via Ambrogio Colombo, 2155 Gorla Minore (VA), Italy</i></p> <p> The report must be inserted in two closed envelopes: the first with the reporter's identification data together with a photocopy of the identification document and the second with the Report. Both must then be inserted into a third sealed envelope bearing the words "confidential" to the Reporting Manager on the outside.</p>
<p>In oral form</p>	<p> By means of a request to arrange a direct meeting with the Whistleblowing Manager sent via e-mail to the e-mail address luca.fattore@bruschitech.com or by any means suitable to ensure their receipt.</p> <p> The e-mail must have the subject «Request for a direct meeting with the Sapre Whistleblowing Manager» without indicating the reasons or other references inherent to the subject of the Whistleblowing Report. The meeting must be organized within a reasonable time.</p>

In particular, without prejudice to the provisions of the following § 4.6, 4.7, and 4.8, the **Manager Reports** is the only person responsible for accessing the **internal Reporting Channels** and viewing the content of the Reports, subject to written authorization from the Company pursuant to art. 29 of the GDPR. The **Manager Reports** must adopt suitable methods to prevent the loss, destruction, and unauthorized access to the **Reports**.

The **Report** submitted to a person other than the **Reports Manager** is transmitted, within seven days of its receipt, to the **Reports Manager**.

Once the Report has been received, the Reports Manager:

- promptly registers the same in the relevant Register
- Reports through the attribution of a progressive identification number that allows for

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within seven days from the date of receipt, issue the **Reporting Person** an acknowledgment of receipt of the **Report**.

The Report Register contains the following fields:

- progressive identification number;
- date of receipt of the **Report**;
- **Signaling Channel** used;
- a brief summary of the subject of the **Report**, a copy of **the Report**, and any attached documents.

4.5 RECEPTION AND TRIAGE

All **Reports** are subject to analysis by the **Reports Manager**, who, in order to evaluate their completeness and validity, verifies the presence of useful data and information, assigning a higher level of priority to **Reports** concerning the hypothetical commission of crimes as they are more at risk for the Company.

All Reports are subject to a preliminary analysis by the **Reports Manager**, who evaluates the subject matter and proceeds and, therefore, assuming the role of **Whistleblowing Manager**, carries out the completeness and validity verification activity, assigning a higher degree of priority to the **Reports** concerning the hypothetical commission of offenses as they are at greater risk for the **Company**, and proceeds with the **assessment** of the admissibility of the **Report** (§4.6);

In order to ensure impartiality in the evaluation, if the **Report** concerns the **Report Manager**, the **Report Manager** will promptly forward the **Report** to the Sole Administrator for appropriate evaluation.

4.6 ASSESSMENT OF THE ADMISSIBILITY OF THE REPORT

The **Whistleblowing Manager** carries out an initial examination of the **Report** in order to evaluate immediately whether the **Report** is:

- clearly inadmissible;
- not related to **Violations**.

In such cases, the **Whistleblowing Manager** proceeds to communicate the circumstance to the **Reporter** within three months from the date of the acknowledgment of receipt or, in the absence of such notice, within three months from the expiry of the seven-day period from the submission of the **Report** and to archive the **Report**.

4.7 ASSESSMENT OF THE FOUNDATION OF THE REPORT

If, from an initial examination, the **Report** does not appear to be clearly unfounded, the **Whistleblowing Manager** will proceed with the investigation and assessment activities. In order to carry out all the necessary checks on **the Report** received, the **Whistleblowing Manager** can:

1. acquire further information and/or documentation from the **Reporter** in support of the facts reported (also through a paper procedure through the acquisition of written observations and documents);

- II. proceed with the hearing of the **Person involved** or, at his request, hear him through a paper procedure through the acquisition of written observations and documents;
- III. consider suggesting to the Board of Directors the adoption of **preliminary measures** suitable to contain any risks (e.g., suspension of the **Person involved**, measures to avoid evidence tampering);
- IV. make use of the support of the Managers of specific company functions or - if deemed appropriate - also of external consultants whose involvement is functional to the verification and assessment activity, without prejudice to compliance with the provisions regarding the processing of personal data.

In any case:

- if the **Reporter** comes into possession of further information or documents in support of facts subject to **the Report**, he can communicate them via the **internal Reporting Channels** indicated in the previous § 4.4;
- the **Reports Manager** will respond to the **Report** within three months from the date of the acknowledgment of receipt or, in the absence of such notice, within three months from the expiry of the seven-day deadline from the submission of the **Report**.

4.8 CLOSURE OF THE REPORT

The investigation and assessment activities must be concluded within an appropriate deadline, depending on the scope and complexity of the activities to be carried out.

If, at the end of the analysis phase, the following emerges:

- the absence of sufficiently detailed facts or the unfoundedness of the **Report**, the **Report Manager** will archive the **Report**, informing the **Reporter** (archiving without findings);
- the definitive validity of **the Report**, the **Report Manager**, in relation to the nature of the **Report**, will provide (in compliance with the provisions regarding the processing of personal data and after verifying the provision of consent by the Reporting Party) to:
 - inform the hierarchical manager of the person who committed the Violation and the Board of Directors, recommending the adoption of corrective actions;
 - propose disciplinary measures via written communication in accordance with the provisions of the **Disciplinary System** (§6).

If, following the investigation of **the Report**, a procedure is initiated against a specific reported subject, an ad hoc notice must be provided to that subject.

If the **Violation** is particularly serious or concerns one or more members of the Board of Directors, the **Whistleblowing Manager** informs the other members and, if necessary, informs the **Company's shareholders**.

4.9 MONITORING AND CORRECTIVE ACTIONS

It is the responsibility of the hierarchical superior of the **Person involved** (if present, otherwise the Board of Directors) to supervise the implementation of the corrective action recommendations issued.

The **Reports Manager** monitors the implementation of corrective action recommendations by informing the Board of Directors of relevant developments.

The **Reports Manager**, in compliance with the provisions regarding the processing of personal data, annually reports to the management body information relating to the management of **Whistleblowing Reports** and the general functioning of this procedure so as to allow it to evaluate the effectiveness of the whistleblowing management system.

4.10 TRATTAMENTO E GESTIONE DEI DATI PERSONALI

The personal data - including special categories of data and judicial data - communicated as part of the **Report** will be processed in compliance with the provisions of the **GDPR** as better described in the **Combined Notice for Reporting Person and Involved Party** (Annex "1") referred to via link and yield available on the site in the dedicated area at the address [<https://www.bruschitech.com/privacy-policy/>].

Reports cannot be used beyond what is necessary to adequately follow up on them.

The identity of the **Reporter** and any other information from which such identity can be deduced, directly or indirectly, cannot be revealed without the express consent of the Reporter himself:

- a) to people other than the **Report Manager** and other people specifically authorized by the Data Controller (this consent must be requested before proceeding with the communication to each person other than the people authorized to manage the reports);
- b) In the context of **disciplinary proceedings**, where the dispute is based, in whole or in part, on the Report, knowledge of the Reporter's identity is indispensable for the defense of the accused.

In particular, the **Reporting Manager** must deliver to the **Reporter** or verify that **the Information** has been delivered on behalf of the data controller and acquire consent in the case of an oral **Report** through a meeting.

In this case, the **Reporting Manager** must acquire the following consents:

- a) to the disclosure of the identity of the **Reporter** and any other information from which such identity can be deduced directly or indirectly to persons other than those competent to receive or follow up on the **Reports**;
- b) to the revelation of the identity of the **Reporter** in the disciplinary proceedings where the dispute is based, in whole or in part, on **the Report**, and knowledge of the identity of the **Reporter** is indispensable for the defense of the accused;
- c) the documentation of the Report.

If the **Reporting Manager** has received consent to the documentation of the Report referred to in the letter. c) above, must document the **Report** in the following ways.

If the **Report** was made orally during a meeting with the **Report Manager**, the **Report** is documented either by recording on a device suitable for storage and listening or through minutes. The **Reporting Person** will be able to verify, correct, and confirm the meeting minutes by signing them.

The protection of the identity of the **Reporter** and the **Persons Involved** is guaranteed until the conclusion of the proceedings initiated in relation to the **Report**.

Personal data that is clearly not useful for the processing of a specific **Report**, where possible, is not collected or, if collected accidentally, is deleted immediately.

The **Person Involved** cannot exercise the rights referred to in articles 15-22 of the GDPR if the exercise of the same could result in an effective and concrete prejudice to the confidentiality of the identity of the **Reporting Party**.

4.11 STORAGE AND PRESERVATION OF DOCUMENTATION

The objective of preserving and archiving the documentation is to allow the correct traceability of the entire process and to facilitate any subsequent checks.

The **Reporting Manager** is required to keep all documentation supporting the **Reporting** for the time necessary to carry out the evaluation activities in an IT archive using methods suitable to prevent its loss, destruction, and unauthorized access.

The **Reports** and related documentation are kept for the time necessary to process them and, in any case, no later than five years from the date of communication of the final outcome of the **Report procedure**, in compliance with the confidentiality obligations referred to in Article 12 of Legislative Decree 24/2023 and the principle of limitation of conservation referred to in privacy legislation.

5. PROTECTIVE MEASURES

5.1 CONDITIONS FOR THE PROTECTION OF THE REPORTER (PROTECTION)

The protection measures apply in the following cases:

- a) if at the time of the **Report**, the **Reporter** had reasonable grounds to believe that the **Information on the Violations** was true and fell within the objective scope (§ 4.1);
- b) if the **Report** was made according to the methods indicated herein procedure;
- c) in cases of anonymous **reporting**, if the **reporting party** was subsequently identified and/or suffered **retaliation**.

MEASURES	REGULATORY REFERENCE AND DESCRIPTION
Prohibition of retaliatory acts	The ban is provided for by Art. 17 of Legislative Decree 24/2023, which is intended to be fully referred to here. ⁶ Acts undertaken in violation of this prohibition are void.

The Art. 17 co. 1 “*The entities or persons referred to in Article 3 cannot suffer any retaliation*” refers to:

- a) the **Reporters**;
- b) the **Facilitators**;
- c) people from the same **working context** as the **Reporting Party** who are linked to them by a stable emotional or kinship bond within the fourth degree;
- d) the **Reporter's** work colleagues who work in the same **work context** as the Reporter and who have a regular and current relationship with said person;
- e) the entities owned by the **Reporting Party** or for which the same people work, as well as the entities that operate in the same **working context** as the aforementioned people.

MEASURE	REGULATORY REFERENCE AND DESCRIPTION
<p>Protection of Retaliation</p>	<p>Having said this, those who believe they have suffered retaliation for having made a Report must inform the Reports Manager, who, having assessed the existence of the elements, reports the hypothesis of discrimination to the Board of Directors.</p> <p>The Board of Directors promptly evaluates the opportunity/need to adopt acts or measures to restore the situation and/or to remedy the negative effects of the Retaliation and the existence of the conditions for initiating disciplinary proceedings against the person responsible for the Retaliation.</p> <p>The Board of Directors, with the possible assistance of external consultants, assesses the existence of the conditions to initiate disciplinary proceedings against the person who carried out the retaliation and promptly informs the Whistleblowing Manager. If the (alleged or ascertained) Retaliation is reported to one or more members of the Board of Directors, the Reports Manager informs the entire Board of Directors.</p> <p>In any case, individuals who have suffered retaliation have the right to report it to the National Anti-Corruption Authority.</p>
<p>Confidentiality obligations</p>	<p>The obligation of confidentiality is provided for by Art. 12 of Legislative Decree 24/2023, which is intended to be fully referred to here.</p>

5.2 PROTECTION OF THE PERSON INVOLVED

The **Persons involved** are protected concerning the confidentiality of the **Reports** that concern them and any investigations carried out and to protect them from any retaliatory and/or defamatory **reports** (Protection).

For this purpose, as indicated in the subsequent §6, defamatory or slanderous Reports that could give rise to civil and/or criminal liability **for the Reporting Person are strictly prohibited**.

6. DISCIPLINARY SYSTEM

The establishment of disciplinary proceedings against the person responsible is envisaged in case of violation of this procedure and, pursuant to art. 21 of Legislative Decree 24/2023, when the Company ascertains that:

- a Violation has been committed;
- Retaliation has been committed;
- the Report was obstructed or an attempt was made to obstruct it;
- the confidentiality obligation pursuant to art. 12 of Legislative Decree 24/2023;
- the Reporter has submitted a Report with intent or gross negligence;
- the verification and analysis of the Reports received was not carried out.

The criminal and civil liability of the **Reporting Person** who makes unfounded Reports with intent or gross negligence remains unaffected.

In particular, when the criminal liability of the **Reporting Person** for the crimes of defamation or slander, or their civil liability for the same reason, in cases of intent or gross negligence, is established, even with a first-degree sentence, protection measures are not guaranteed.

The Reporting Person will be subject to a disciplinary sanction for the protection of the **Company** and the **Involved Party**, as well as compensatory actions.

The **Reporter** who reveals or disseminates **Information on Violations** covered by the obligation of secrecy relating to the protection of copyright or the protection of personal data or who reveals or disseminates **Information** is not punishable - and is not considered liable either civilly or administratively - **on Violations** that offend the reputation of the **Person involved**, when, at the time of disclosure or dissemination, there were reasonable grounds to believe that the disclosure or dissemination of the same information was necessary to reveal the **Violation**; all limited to the behaviors, acts or omissions strictly necessary to reveal the **Violation**.

As part of the disciplinary proceedings, the identity of the **Reporter** cannot be revealed, where the dispute of the disciplinary charge is based on separate investigations further than the **Report**, even if consequent thereto. If the dispute is based, in whole or in part, on the Report and knowledge of the identity of the **Reporter** is indispensable for the defense of the accused, the **Report** will be usable for the purposes of disciplinary proceedings only in the presence of the express consent of the **Reporting Party** upon revealing their identity. The **Reporting Manager** will be required to:

- verify the presence of consent / to the acquisition of the written consent of the **Reporting Party** using the form attached to the **Reporting Information** (Annex 2);
- communicate in writing to the **Reporter** the reasons for revealing the confidential data.

The **Company**, through the bodies and functions specifically appointed for this purpose, takes steps to impose, with coherence, impartiality, and uniformity, sanctions proportionate to the respective violations of this procedure.

6.1.1 EMPLOYEES AND DIRECTORS

Failure to comply with and/or violate the rules of conduct indicated by this procedure by the Company's employees/ administrators constitutes failure to fulfill the obligations deriving from the employment relationship and gives rise to the application of disciplinary sanctions.

The sanctions will be applied in compliance with the provisions of the law and collective bargaining and will be proportionate to the gravity and nature of the facts.

The assessment of the aforementioned violations, the management of disciplinary proceedings, and the imposition of sanctions remain the responsibility of the designated and delegated company functions.

Violations of this procedure by members of the Company's corporate bodies

must be communicated to the Reporting Manager, who will take the appropriate initiatives in accordance with the law.

6.1.2 THIRD PARTIES

Any behavior carried out by Third Parties in violation of the provisions of this procedure may also lead to the termination of the contractual relationship without prejudice to the Company's request for compensation if such behavior causes damage to it.