



YOUR GLOBAL
FORWARDING PARTNER



CODE OF ETHICS

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INTRODUCTION

D.B. Group S.p.A. (hereinafter also "Company") is a global operation that provides national and international shipping services, integrated logistics and customs consultancy.

The Company is the parent company of the D.B. Group, to which the companies directly or indirectly controlled by it belong. These companies operate in Italy and abroad (hereinafter, the "Subsidiaries"), and are subject to the management and coordination of the Company.

The corporate pay-off - Your Global Forwarding Partner - is an expression of the Company's distinctive traits at all levels: commitment to building solutions for any forwarding and logistics needs, without geographic limits, with a view of partnering with client companies, and through constant dialogue, both with the client and among the Company's members, to promote mutual growth worldwide, while respecting the environment.

This Code of Ethics regulates the behaviour and conduct that the Company maintains in carrying out its business, and in its relations with all internal and external parties (stakeholders).

This Code of Ethics, which constitutes an integral part of the Company's organisational model, was adopted by resolution of the Board of Directors on 8.1.2024.

The Company also undertakes to disseminate the Code to the competent bodies of its subsidiaries for the purposes of its implementation. The Company also undertakes to disseminate the values and principles of the Code within companies in which minority interests are held as well as joint ventures invested in.

1. SCOPE OF APPLICATION AND RECIPIENTS

1.1 Recipients of the document

Corporate bodies (directors and auditors), employees (persons linked by an employment relationship, including managers), collaborators (including interns) and all third parties who, although external to the Company, act, operate or collaborate with the Company, such as, but not limited to, external consultants, suppliers, and customers (hereinafter collectively referred to as the "Recipients").

It is the duty of all Recipients to know the content of the Code of Ethics, understand its meaning, and take action to request clarifications regarding the same, if needed. Under no circumstances can the pursuit of the Company's interests justify conduct contrary to applicable legislation and the rules of this Code.

Compliance with the indications formalised in this Code by all Recipients, each within the scope of their responsibilities and functions, contributes to the achievement of the Company's objectives, with the goal of sharing results and personal and professional development.

1.2 Dissemination and update of the Code of Ethics

This Code is brought to the attention of all Recipients through ordinary corporate communication tools. The Company will disseminate the Code of Ethics by making it available on the company Intranet and through its publication on the Company's website.

The Company shall take steps to inform and make all Recipients aware of the content of the Code and any future amendments to it, which will be made if changes in the context, current legislation, environment or the company organisation so require.

2. ETHICAL PRINCIPLES

2.1 Legality

The Company acts in full compliance with the law, which is considered an indispensable and unavoidable value in all company activities. All Recipients must be aware of applicable laws and regulations in all countries in which the Company operates, and are required to comply with them promptly. This commitment is also fundamental for consultants, suppliers, customers, and anyone who has relations with the Company. The Company shall not initiate or continue any relationship with anyone who does not intend to comply with this principle.

2.2 Transparency and integrity

The Company operates in compliance with the principles of transparency and integrity, and repudiates any corrupt, collusive or other practices that conflict with its values.

2.3 Social equity and the value of individuals

The Company respects the fundamental rights of individuals, and protects their identity and expression of gender, sexual orientation, marital status and family situation, age, ethnicity, nationality, religious belief, political opinion, socio-economic status and any other characteristic. The Company rejects and commits to avoid any form of discrimination in its conduct, and seeks to ensure a safe environment and working conditions that respect the dignity of individuals. The Company is committed to promoting the development of a culture based on the enhancement of everyone's abilities, encouraging the exchange of ideas, discussion and sharing.

2.4 Respect for individualities

For a company like the D.B. Group, which operates globally, it is essential to combine the international scope with territorial roots, putting people and local communities at the centre. The Company operates by applying these principles while simultaneously respecting the specific local values with which it comes in contact: the aim is not to impose itself, but act by enhancing local cultures.

2.5 Fairness in the exercise of authority

Authority shall be exercised with equity and fairness in the hierarchical relationships that may be established within the D.B. Group, avoiding any abuse. The Company ensures that the exercise of authority does not become detrimental to the dignity and autonomy of employees, and that work organisation choices safeguard the dignity and value of all human resources.

2.6 Diligence and professionalism

Members of the corporate bodies, employees and collaborators are required to carry out their tasks and activities with diligence and professionalism. This serves to provide services that meet the needs of the customer, with the awareness that behaviour that- even if abstractly aimed at favouring the Company- are in conflict with applicable regulations or with the provisions of this Code.

The involvement of collaborators of all ranks and levels, through their empowerment and enhancement of their skills, is a fundamental element to guarantee the achievement of excellent results and efficiency in the Company's activities.

2.7 Protection of confidentiality

The Company safeguards the confidentiality of the information and data in its possession, and guarantees full and punctual compliance with security and protection measures for the data entered in its IT systems and archives. The Company ensures the protection of personal data and the protection of privacy in compliance with applicable legislation in force.

2.8 Environmental Protection

The Company is committed to complying with environmental legislation and implementing preventive measures to avoid, or, where not possible, at least mitigate its environmental impact. The Company carries out its activities by trying to make an ever greater contribution in the fight against climate change, in offering solutions that reduce any type of emission as much as possible in line with available technologies. The Company undertakes to constantly monitor and monitor its environmental impact in order to find and implement innovative solutions that reduce the effects on the environment, while at the same time making its suppliers aware of the need to reduce environmental impacts associated with their activities.

The Company is aware of both the direct and indirect effects of its activities on economic and social development as well as the general well-being of the community. As such, it plans its activities by seeking a balance between economic initiatives and unavoidable environmental needs, not only in compliance with current regulations, but also in consideration of the rights of future generations.

2.9 Focus on the customer

The Company pursues the objective of fully satisfying the customer's expectations and needs at all levels, by building long-lasting and profitable relationships, and guaranteeing high standards of service, professionalism, availability and timeliness in communications.

3. PRINCIPLES OF CONDUCT IN BUSINESS MANAGEMENT

3.1 General principles

3.1.1 Compliance with current legislation

In the performance of its activities, the Company acts in accordance with current legislation in all the countries in which it is present, with constant updates regarding legislative and regulatory developments, including laws on tax and fiscal matters, the protection of intellectual and industrial property and copyright, and competition and antitrust regulations.

Every operation and transaction must be lawful, authorised, consistent and congruous, in compliance with both current regulations and the provisions of this Code, as well as company procedures.

3.1.2 Conflicts of interest

In conducting any activity, the Company believes it is necessary to avoid situations where the parties involved in the transactions are, or may even appear to be, in conflict of interest. Any situations of conflict of interest, even if only potential, must be promptly and fully communicated to the Company, and the person in conflict must abstain from carrying out or participating in the activities or acts. In order to comply with the principle of fairness and transparency, as well as ensure the trust of the community and the beneficiaries of its interventions, the Company ensures that all Recipients do not come into a condition of conflict of interest.

3.1.3 Caution in commercial transactions

In commercial transactions, the Company requires special care in the receipt and spending of coins, banknotes, securities and valuables, in order to avoid the danger of placing counterfeit or altered values on the market. The Company uses similar caution when using means of payment other than cash.

3.1.4 Confidentiality of company information and protection of privacy

All Recipients are required to maintain confidentiality and not externally disclose information concerning the company assets or inherent to the Company's business or of third parties who entertain relations with it, except in cases and with obligations established by law or other current regulatory provisions. All Recipients are required not to use confidential information of which they have become aware for purposes not related to the performance of their duties and responsibilities.

The Company processes the personal data of its employees, customers, suppliers and third parties that are provided or communicated to it as part of its activities (hereinafter, the "Personal Data"), in full compliance with applicable national and European legislation. The Company handles and processes personal data with care, maintaining the utmost diligence while being aware that it is to be used only for legitimate business purposes.

3.1.5 External communications

All forms of external communications and the dissemination of news, information and data related to the Company, must respect the right to information, laws, rules and practices of professional conduct. Information must be truthful, accurate, complete, clear, and respectful of the confidentiality of individuals and the obligations of confidentiality set forth in the Code.

External communications may only be disclosed by company departments expressly responsible or delegated for this purpose. Under no circumstances is it permitted to disseminate false or biased information or comments. Each communication activity is carried out with clarity, transparency, timeliness and accuracy such as to allow the recipients to make decisions in an informed manner. Any form of pressure is avoided, as is any conduct aimed at obtaining favourable attitudes towards the media.

3.1.6 Protection of industrial and intellectual property

The Company operates in full respect of industrial and intellectual property rights legitimately held by third parties, as well as of the laws, regulations and conventions, including those in the EU and/or international sphere, protecting such rights. In carrying out their activities, all Recipients must refrain from any conduct that may constitute usurpation of industrial property rights, alteration or counterfeiting of trademarks and/or distinctive signs of industrial products or of

patents, designs or industrial models, whether domestic or foreign, as well as refrain from importing, marketing or otherwise using or circulating industrial products with counterfeited or altered or mendacious trademarks and/or distinctive signs or made by usurping industrial property rights.

3.1.7 Compliance with anti-money laundering legislation

Recipients must not take part or be involved in any transaction that could imply even the slightest possibility of involvement in matters involving receiving stolen goods, money laundering, or using goods or money of illicit origin. In compliance with both national and international regulations regarding the fight against money laundering, the Company implements the controls necessary for the verification of information available on commercial counterparties before establishing business relationships with them, which also serves to verify their moral integrity and respect for the law in carrying out their business.

Recipients must respect the following principles to avoid giving or receiving undue or unjustified payments:

- all payments and other transfers made by or to the Company must be accurately and fully recorded in the required books and records;
- all payments must only be made to legitimate payees, for activities contractually formalised and/or deliberated by the Company and actually performed;
- no false, incomplete or misleading records shall be created, no hidden or unrecorded funds shall be established, nor may funds be deposited in personal accounts or those that do not belong to the Company;
- no unauthorised use of Company funds or resources shall be made.

3.1.8 Fight against smuggling

The Company condemns all forms of smuggling, and prohibits conducting business with parties who do not comply with relevant regulatory provisions. The Company requires that all contractual counterparties strictly apply customs legislation in import and export activities. Recipients are prohibited from engaging in conduct aimed at evading customs duties.

The Company bases its relations with the Customs and Monopolies Agency on the principles of correctness, maximum collaboration and transparency.

3.1.9 Fight against organised crime

The Company firmly condemns and fights against any form of organised crime, including mafia-type, with all of the tools at its disposition.

Recipients are called upon to prevent the risk of criminal infiltration through an attentive verification of the requirements of honour and reliability of business counterparts (such as suppliers, consultants, contractors, customers), resulting in the exclusion of any counterparty suspected of belonging to, being associated with, or facilitating criminal organisations.

3.1.10 Combatting terrorism

The Company repudiates all forms of terrorism, and within the scope of its activities, takes suitable measures to prevent any involvement in terrorist acts. To this end, the Company undertakes not to establish any working or commercial relationship with individuals involved in acts of terrorism, nor to finance or otherwise facilitate any of their activities.

3.2 Customer relations

The establishment of constructive relationships with customers is the basis on which the Company operates; it develops its business relationships with the desire to be a reliable and safe partner for customers and provide services of the highest standard.

The Company is committed to fulfilling requests impartially, in compliance with regulations, contracts and set quality standards, with high professionalism, courtesy and cooperation. The Company ensures appropriate quality and safety standards of its services, while periodically monitoring their perceived quality and full compliance.

In their relations with customers, directors, employees and collaborators are required to:

- develop and maintain favourable and long-lasting relationships based on maximum efficiency;
- respect commitments and obligations undertaken towards them;

- provide accurate, complete, truthful and timely information in order to allow the customer to make an informed decision;
- require customers to comply with the principles of this Code of Ethics;
- operate within the scope of current legislation and require its prompt compliance.

3.3 Relations with suppliers

The Company bases its relations with suppliers on respect and shared

- principles of correctness, transparency and good faith;
- the principles contained in this Code;
- the provisions of laws and regulations in force on workplace health and safety, with particular attention to the protection of child labour;
- the laws, regulations and environmental standards in force, and innovative solutions that eliminate, where possible, or at least reduce potential risks to the environment.

Suppliers play a fundamental role in the company strategy to obtain high performance and quality standards to offer to the customer. Therefore, the Company carries out rigorous checks on suppliers and their performance. The selection of suppliers and the purchase of goods and services are based on objective and transparent parameters, such as quality, service, price, reputation and professionalism. The supplier must comply with all regulations applicable to it for the correct performance of its activities.

All compensation and sums paid to the supplier must be adequately justified and documented, proportionate to the activity carried out, and in line with market conditions.

In business relationships with the supplier, it is strictly forbidden to give gifts, benefits or hospitality, unless they are of modest value or of such a nature that they cannot be interpreted as aimed at obtaining favourable behaviour.

3.4 Relations with external consultants, commercial partners and other collaborators

In relations with external consultants, commercial partners and other collaborators in various capacities, directors and employees are required to:

- adequately evaluate the requirements, including those moral, of external consultants, business partners and collaborators before their selection;
- select exclusively external consultants, business partners and collaborators with adequate professional qualifications and reputation;
- establish efficient, transparent and collaborative relationships, maintaining an open and transparent dialogue in line with best commercial practices;
- demand the application of contractually foreseen conditions;
- require external consultants, commercial partners and collaborators to comply with the principles of this Code of Ethics;
- always operate in full compliance with current regulations and company procedures.

The same general principles that regulate relationships with suppliers apply to relationships with external consultants, commercial partners and other collaborators, as well as the specifications above.

4. RELATIONS WITH THE PUBLIC ADMINISTRATION, GUARANTOR AND SUPERVISORY AUTHORITIES

The management of relations with the Public Administration is marked by strict compliance with current national, EU and international regulations. Recipients who, in the performance of their duties, dialogue or conduct negotiations with the Public Administration, whether Italian or foreign, are required to have a clear, correct and transparent attitude in every situation so as to guarantee and protect the image and reputation of the Company. Recipients must not in any way influence the decisions of public employees in an improper manner, nor engage in illicit behaviour such as to alter their impartiality and judgement.

The Company manages relations with the Public Administration through persons expressly delegated to do so. It is not permitted to offer money or gifts to managers, officials or employees of the Public Administration or their relatives,

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whether Italian or from other countries, unless they are gifts or benefits of modest value, given in full compliance with company procedures and laws. This should never be interpreted as seeking favours.

If the Company uses a consultant or "third party" to represent it in relations with the Public Administration, it must be ensured that the same directives for Company directors and employees remain valid.

In relations with the Public Administration, the Company must not be represented by a consultant or "third party" when conflicts of interest could arise.

Relationships with the Judicial Authorities and Judicial Police bodies, of every order and degree, must be based on maximum transparency, correctness and collaboration, without reticence, omissions or untruthful declarations.

Should they be personally involved in legal proceedings, Recipients are required to freely express their representations of facts, and to exercise the right not to respond that may be granted to them by law, at their discretion.

Recipients must also refrain from applying any pressure or threat, including through the use of physical violence, as well as any offer or promise of money or other benefits, in order to induce a person not to make statements or to make false statements before a Judicial Authority.

It is forbidden to destroy or alter records, minutes, accounting records and any type of document useful for investigations by the competent authorities.

5. RELATIONS WITH OTHER STAKEHOLDERS

5.1 *Relations with shareholders, the board of statutory auditors and the auditing firm*

The Company works to provide members with accurate, truthful and timely information in full compliance with current legislation and this Code of Ethics. The subjects involved are required to maintain maximum transparency, clarity and correctness in their relationships with shareholders, the board of auditors and the auditing firm, to ensure a relationship of maximum professionalism and collaboration. The Company provides information and establishes relationships subject to supervision and coordination by the corporate departments who oversee these matters.

5.2 *Relations with trade associations, trade unions and political parties*

Trade associations

The Company participates in trade associations and conducts its activities in full compliance with local and national institutions as well as all stakeholders, in contributing to the economic growth of the communities in which it operates.

The Company may cooperate with non-political associations for specific projects, based on the following criteria:

- cultural, social or beneficial value of the activity covered by the cooperation within the local communities in which the Company operates;
- clear and documentable use of resources;
- express authorisation by the departments responsible for managing such relationships within the Company.

Unions and Political Parties

Relations with trade unions are guided by the principles of correctness, impartiality and transparency, and are reserved to the Company departments delegated for this purpose.

The Company does not make direct or indirect contributions of any kind to parties, movements, committees or political organisations.

5.3 *Relations with competitors*

The Company recognises that fair competition constitutes a fundamental element for its development, and intends to protect this value by abstaining from collusive, predatory behaviour or abuse of a dominant position, in compliance with current legislation and the provisions of market regulatory authorities.

The Company refrains from using the trade secrets of others, and from the use of undue pressure, threats, violence or fraudulent means aimed at preventing or disturbing the performance of the commercial activity of others. The Company

also avoids engaging in any conduct that could lead to a disruption of competition in the acquisition of goods and services, such as through the corruption of private contractual counterparties.

6. PROVISION AND ACCEPTANCE OF GIFTS OR OTHER BENEFITS

In business dealings with third parties, the Company prohibits the offering of money, benefits (both direct and indirect), gifts, and hospitality, except for gifts or benefits of modest value given in full compliance with company procedures, which cannot be interpreted as aimed at obtaining favourable treatment or compromise the Company's image.

Directors and Employees are prohibited from accepting gifts or other benefits for themselves or others, even on festive occasions, with the exception of gifts of an appropriate nature and of modest value, such as to not conflict with current regulatory provisions. These must not compromise the integrity or reputation of either party, nor be interpreted by an impartial observer as aimed at acquiring undue and/or improper advantages.

7. ADMINISTRATIVE AND ACCOUNTS MANAGEMENT

Accounting transparency and keeping of accounting records are fundamental for efficient control, and are carried out in compliance with the principles of truth, completeness, clarity, precision, accuracy and compliance with applicable legislation.

Each Recipient, to the extent of his or her competence, is responsible for the truthful, complete, regular, clear and accurate keeping of accounting records in order to allow the reconstruction of transactions carried out at any time, through complete and properly filed supporting documentation.

For each record there must be adequate traceability in order to be able to carry out the controls that attest to the nature and reasons for the transaction, and identify who authorised, carried out, recorded and verified the transaction itself, at any time.

All employees involved in preparing financial statements or other similar documents must ensure maximum cooperation, completeness and clarity of the information provided, accuracy of the data and processing activities, and timely reporting of any conflicts of interest.

8. PROTECTION OF IT TOOLS

Directors and Employees must strictly comply with the rules adopted by the Company on IT security. They should therefore use the company's resources (hardware and software) with diligence and in accordance with the above rules, as regards personal computers, telephone equipment, and company programs made available for the performance of tasks and duties, avoiding any conduct that may impair the operation, reduce the efficiency or protection of the company's IT system. It is not permitted to alter the operation of a company telematic or IT system or the data and information contained therein.

9. RELATIONS WITH COMPANY PERSONNEL

The Company considers human resources (both employees and collaborators who work for the Company in contractual forms other than direct employment) as fundamental, and recognises them as one of the essential factors for the achievement of its corporate objectives. It therefore attributes great importance to the proper training, preparation and motivation of staff to maintain the quality standards of service provided to customers. The Company ensures respect for the individual in accordance with national laws and international principles on the protection of human rights. For this reason, all employees and collaborators of the Company must rigorously comply with these principles; any violation thereof will be firmly sanctioned.

9.1 Staff selection and management

The Company recruits personnel based on their experience, conduct and skills. Recruitment is carried out exclusively on the basis of the correspondence between expected and required profiles; professional growth and career advancement

are oriented to ensure maximum fairness and equal opportunities without discrimination on the basis of gender, nationality, age, sexual orientation, religious beliefs, political opinion, marital status and family situation and any other factor. The Company establishes appropriate procedures in order to optimize the process of selecting, inducting, training, informing and educating newly hired personnel, and the training and management activities of existing workers.

9.2 Management of the employment relationship

Staff is hired with a regular employment contract; any form of irregular work is not tolerated. Upon establishment of the employment relationship, the Company provides employment documents and any personal protective equipment supplied (if applicable for the job). Each employee/collaborator is provided with accurate information on the characteristics of the job function, tasks to be performed, on the regulatory matters and minimum salary levels, as governed by the national collective labour agreement. Each employee/collaborator is informed about the rules and procedures to be followed in order to avoid any health risks when carrying out work activities, as well as the contents of the Code of Ethics. This information is presented to the employee/collaborator so that acceptance of the assignment is based on understanding.

The use and exploitation of child labour is unacceptable.

The Company rejects all forms of exploitation of workers' state of need and illegal immigration, and refrains from any relationship with intermediaries for whom even the suspicion exists that they recruit labour by taking advantage of workers' state of need.

9.3 Protection of health and safety

The Company operates in full compliance with current legislation on the protection of health and safety in the workplace, as well as specific applicable prevention regulations.

The Company ensures conditions respectful of individual dignity and mental and physical integrity and safe and healthy work environments, in compliance with current regulations and workers' rights.

The following principles guide the Company's decisions regarding workplace health and safety:

- Eliminate risks and, where such is not possible, minimise them in relation to the knowledge acquired based on technological progress;
- evaluate all risks that cannot be eliminated;
- reduce risks at the source;
- respect ergonomic and health principles in the workplace, in the organisation of work, in the design of workplaces, the choice of work equipment, and in the definition of work and production methods, particularly in order to reduce the health effects of monotonous and repetitive work;
- replace what is dangerous with that which is not dangerous, or less dangerous;
- plan the measures deemed appropriate to ensure the improvement of safety levels over time;
- give collective protective measures priority over individual protective measures;
- give appropriate instructions to workers.

The Company involves and raises awareness amongst all company stakeholders, at all levels, in the management of issues related to occupational safety. It also ensures the understanding, application and maintenance of proper operating procedures, current safety regulations, and provisions issued, in the knowledge that proper worker training and information is a fundamental tool for improving company performance and workplace safety.

All Recipients are required to take the utmost care in order to prevent the risk of accidents at work or occupational diseases. Each Recipient is therefore required to take the utmost care in the performance of his or her activities, strictly observing all regulatory obligations incumbent on him or her, as well as all established safety and prevention measures, instructions and directives dictated by persons to whom the Company has delegated to fulfil workplace health and safety obligations.

Each worker must not expose others to risks and dangers that may cause damage to their health and physical safety, remembering that everyone is responsible and must act with the aim of ensuring the effective management of workplace safety and health.

9.4 Harassment

The Company deems any type of violence, harassment or unwanted behaviour that violates the dignity of the person to be unacceptable.

All employees and collaborators must personally contribute to building and maintaining a climate of mutual respect, showing attention to colleagues and to each other's sensitivities, in an environment of cooperation and help.

9.5 Diligence in the use of company assets

Each employee and collaborator is required to use company assets with diligence and responsible behaviour, in order to protect the assets themselves. Company assets must be used appropriately and in accordance with company interests, while avoiding any improper use of them by third parties.

It is forbidden to use company assets for purposes contrary to law, public order or morality, as well as commit or induce the commission of crimes as regards racism, the glorification of violence, discriminatory acts, or the violation of human rights.

10. METHODS OF IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

10.1 Supervision of the application of the Code of Ethics

The Company identifies the Supervisory Body, appointed pursuant to Legislative Decree 231/2001 and in accordance with the provisions of the Organisation, Management and Control Model adopted by the Company, as the body responsible for monitoring the application and compliance with this Code of Ethics.

The Supervisory Body is tasked with monitoring initiatives relating to knowledge and understanding of the Code;

- supervising the effective application of the Code;
- suggesting any changes, updates and additions to the Code;
- receiving and analysing reports of violations of the Code;
- reporting any violations of this Code to the competent bodies of the Company, verifying the effective application of any sanctions imposed.

Violations or suspected violations of this Code of Ethics must be reported in accordance with the procedures put in place by the Company.

Recipients may contact the Supervisory Body for any clarification relating to the interpretation or application of this document.

10.2 Violations of the Code of Ethics and related system of sanctions

The violation by Recipients of the principles contained in the Code will result in the application of sanctions provided for in the Disciplinary System established by the Company, to which reference is made, pursuant to Legislative Decree 231/2001, as part of its Organisation, Management and Control Mode.