

## Code of Ethics

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## Introduction

This document, called "Code of Ethics" (hereinafter, also "Code") is an official document that expresses the commitments and ethical responsibilities in business conduct and company activities, assumed by the companies of Newster System S.r.l. (Hereinafter Company). Furthermore, it regulates the set of rights, duties and responsibilities that the Company expressly assumes towards those who interact in carrying out its business.

**The Code must be considered an integral part of the employment contracts in place and to be stipulated.**

**The violation of its provisions will therefore constitute an offense of a disciplinary nature and, as such, will be prosecuted and sanctioned by the Company and may result in compensation for the damage caused to them.**

With regard to the signing of this Code or the adherence to the provisions and principles contained therein by collaborators, consultants, self-employed workers and other third parties, who provide their activities in favor of the Company, it represents a condition for the stipulation of contracts of any nature between the Company and these subjects. The provisions thus signed or approved, even for conclusive facts, are an integral part of the contracts themselves.

Based on the foregoing, any violations by third parties of specific provisions of the Code may legitimize the Company's withdrawal from contractual relations with this parties. They can also be identified ex ante as causes for automatic termination of the contract.

## Mission

The mission of Newster System is to turn every healthcare facility into a model of sustainable waste management, solving problems caused by medical waste by means of environmentally safe alternatives to incineration, protecting People and the Planet from the risks of infection and pollution.

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For this purpose, we provide the best technological and ecological solutions to ensure that healthcare waste is managed in total safety in every country around the world, according to existing laws and the highest environmental standards, to improve people's quality of life.

In the 1990s, the world became aware of the negative impact of medical waste incineration, which produces large quantities of POPs (Persistent Organic Pollutants) such as dioxins and furans.

The history of Newster begins in 1996 when a patent was acquired for an innovative technology for the ecological treatment of solid infectious medical waste, long before the 2004 Stockholm Convention which called on governments to reduce or eliminate POPs.

Since then, Newster System has never stopped designing new solutions for the disposal of different types of infectious waste and for air sanitization.

Social Responsibility has been one of the founding principles of the Company, together with the respect for socio-economic development, the environment, the creation of local well-being and for different cultures, has led Newster System to be at the forefront to guarantee a healthy and safe environment.

Newster System is a European leader in sterilization technologies and the only company in the world offering a complete and ecological solution for most types of hazardous waste produced in healthcare facilities. We design and manufacture state-of-the-art equipment for the treatment of solid healthcare waste, sewage wastewater and medical laboratory fluid waste in a cost-effective and environmentally friendly way.

The technologies patented and certified by Newster System are the result of ongoing investments in research and development. We work in close collaboration with international organizations, NGOs, universities and healthcare facilities

Our aim is to prevent the spread of infections and ensure healthy working and living conditions.

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## Strengths

A mix of important elements has allowed Newster System to become a leader in the sustainable management of hospital waste, in particular for:

- **Teamwork** - The careful choice of high-level professional staff and their continuous training, addressing new markets with an approach on legislative, economic and cultural aspects.
- **Communication** - Close relationship with distributors and exchange of information on a weekly/monthly basis. On the one hand, the technical, scientific, commercial and structural training of the constantly evolving distributor, and on the other the inputs on the needs of the local market that allow us to meet local needs.
- **Environmental culture** - Dissemination of awareness on environmental policies, according to European and international standards for waste management in health facilities. A detailed treatment of the scientific aspects is regularly carried out, followed by our biologists.
- **Internationalization** - Worldwide monitoring of issues and developments relating to the management of hospital waste. We are active members of international organizations (such as ISWA - International Solid Waste Association) working in legislative and scientific environmental research. Collaboration with waste management consultants is carried out regularly.
- **Wide range of products** - Designed to meet different requirements related to waste management in healthcare facilities. Newster products comply with European Directives and are certified by the local government authorities of each country where the systems are distributed and installed.
- **Particular attention to training / post-sales / assistance** - Technicians receive extensive "practical training" directly at our production plant in Italy, or at the offices of distributors when required. Timely supply of spare parts, diagnosis and targeted repairs in an accurate and timely manner. The assistance is carried out on site by our authorized technicians.

## Legality Rating

The legality rating is a synthetic indicator certified by the *Competition and Market Authority (AGCOM)* which requires compliance with high standards of legality and, more generally, the degree

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of attention paid to the correct management of one's business in line with as defined with resolution **no. 28361 of 28 July 2020** and of the new Implementing Regulation on Legality Rating from 20 October 2020.

This recognition takes the form of a score between a minimum of one star and a maximum of three stars.

Newster System obtained this recognition with one of the best Legality Rating scores set at **\*\* +**.

## United Nations Global Compact

**Newster System is registered in the United Nations Global Compact**, whose Vision is to promote the creation of a more inclusive and sustainable global economy.

*"Our challenge today is to design a pact [...] on a global scale to support the new global economy"*

**(Kofi Annan - Secretary General, United Nations**

**"World Economic Forum", January 31, 1999, Davos)**

With this in mind, the initiative pursues two complementary purposes:

- make the Global Compact and its Ten Principles an integral part of the strategy and daily operations of the companies that adhere to it;

- encourage and facilitate dialogue and cooperation of all relevant stakeholders in support of the Ten Principles promoted by the initiative and the United Nations Sustainable Development Goals (SDGs) for 2030.

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The United Nations Global Compact encourages companies around the world to create an economic, social and environmental framework to promote a healthy and sustainable world economy that guarantees everyone the opportunity to share its benefits.

To this end, the UN Global Compact requires companies and organizations that adhere to it to share, support and apply in their sphere of influence a set of fundamental principles relating to human rights, labor standards, environmental protection and struggle to corruption.

These are universally shared principles as they are derived from the [Universal Declaration of Human Rights](#), the [ILO Declaration](#), the [Rio Declaration](#) and the [United Nations Convention against Corruption](#).

**Businesses are required to respect:**

**Human rights**

● **Principle I**

Promote and respect universally recognized human rights within their respective spheres of influence;

● **Principle II**

Make sure you are not, even indirectly, complicit in human rights abuses.

**Work**

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• **Principle III**

Support the freedom of association of workers and recognize the right to collective bargaining;

• **Principle IV**

Eliminate all forms of forced and compulsory labor;

• **Principle V**

The effective elimination of child labor;

• **Principle VI**

The elimination of all forms of discrimination regarding employment and profession.

**Environment**

• **Principle VII**

Support a preventive approach to environmental challenges;

• **Principle VIII**

Undertake initiatives that promote greater environmental responsibility;

• **Principle IX**

Encourage the development and dissemination of technologies that respect the environment.

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## Fight against corruption

- **Principle X**

Businesses are committed to tackling corruption in all its forms, including extortion and kickbacks.

## Development Cooperation through AICS

In Italy, the possibility of involving private sector companies among the actors of cooperation was formally introduced by law no. 125/2014 - "General Discipline on International Development Cooperation".

In particular, art. 23 of Law 125 provides for the participation of "profit-making entities" in the Italian Cooperation system and allows public support for private sector initiatives that are consistent with the planning, in compliance with the ultimate aims of the cooperation, including the fight against poverty, the reduction of inequalities and the promotion of human rights.

In fact, the involvement of the private profit sector represents the most recent step in the strategy of strengthening the Italian system for development cooperation, which sees the public actor working together with other institutions, with non-profit actors (civil society organizations, foundations, onlus, ethical finance, associations of diasporas ...) and those of the private profit sector.

In fact, Newster System has participated in and won two Development Cooperation Projects for the sterilization of potentially infected hospital waste in the hospitals of Niger & Mozambique.

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## Adoption of the ethics code and its recipients

**The Code of Ethics is aimed at the corporate bodies and their members, employees, workers, even temporary workers, consultants and collaborators in any capacity, attorneys and any other person who may act in the name and on behalf of the Company.** (Hereinafter, also "Recipients of this Code").

Recipients are required to learn the contents and to respect the precepts of this Code, which will be made available to them, as specified here.

In particular, the management bodies of the Company, in setting the corporate objectives, undertake to be inspired by the principles contained in the Code.

**The top management of Newster System are responsible for the effective implementation of the Code and its dissemination inside and outside the Company.**

**The employees of Newster System, in addition to the respect per se due to the regulations in force and the provisions of collective bargaining, undertake to adapt the methods of performance of the working activity to the purposes and provisions set out in this Code in relations with external parties to the Company itself and, in particular, with the Public Administrations and other Public Authorities.**

An essential requirement of any fruitful collaboration relationship for Newster System is represented by the respect, by collaborators and other third parties, of the principles and provisions contained in this Code.

In this sense, when signing contracts or agreements with collaborators or other third parties, Newster System provides their interlocutors with a significant extract of the Code.

## Values

Newster System inspires its activity on the following values:

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## **Integrity**

Newster System acts with honesty in an ethical way respecting everything it does. Honors its principles and takes responsibility for its actions.

## **People**

Newster System puts people in the foreground and works by creating an environment where change and competition are encouraged and where dynamism and teamwork are recognized.

Newster System is committed to ensuring that its collaborators work together with colleagues, suppliers and customers also belonging to different cultures, in an environment of mutual trust and respect.

Newster System works with passion in every activity and directs this passion to achieve its mission.

## **Performance**

Newster System believes that results are achieved by keeping the promises given: the promises to customers in terms of product performance, employee results and company success.

## **Flexibility**

For Newster System, flexibility means speed, proactivity, immediacy and adaptability, respecting the numerous cultures with which the Company works.

## **Improvement**

Newster System believes that every opportunity for change is an opportunity for improvement and continuously seeks to improve products, services, the company and its way of working.

To this end, Newster System being P.M.I. innovative focuses on innovation and initiatives.

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## Rules of conduct

The rules of conduct contained in this section are intended to indicate the conduct to be observed in carrying out the various company activities in accordance with the values which inspire this Code.

### Collaborators

Collaborators, understood as directors, employees and those who, regardless of the legal qualification of the relationship, operate under the direction or supervision of Newster System, must observe correct and transparent conduct in carrying out their duties.

### Obligations of Collaborators

Each Collaborator is required to be aware of the provisions contained in the Code or referred to by it, as well as the relevant legal regulations that regulate the activity carried out within the scope of his / her function and which form an integral part of each person's work performance.

The Collaborator who has news of alleged illegal conduct is required to communicate the aforementioned information to the Sole Director of the Company and, where necessary, to their superiors. The Sole Director, with the support of superiors informed about the alleged illegal conduct, will notify the Supervisory Body in charge.

### Collaborators also have the obligation to:

- a) refrain from conduct contrary to these provisions and rules;
- b) contact their superiors and / or Sole Director, for the necessary clarifications on the application methods of the Code or of the reference regulations;
- c) promptly report to their superiors and, where necessary, to the Sole Director of the Company any information regarding possible violations of the Code;
- d) collaborate with the Company in the event of any investigations aimed at verifying and possibly sanctioning possible violations.

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**Each company department manager is obliged to:**

- a) ensure compliance with the Code by their direct subordinates;
- b) represent an example for their employees with their behavior;
- c) make every effort to ensure that employees understand that the provisions contained in the Code are an integral part of their work performance;
- d) select employees and collaborators who undertake to respect the principles contained in the Code;
- e) promptly report to the Sole Director any reports or needs from their subordinates.

**Each Collaborator who, acting in the name or on behalf of Newster System, comes into contact with third parties with whom the Company intends to undertake commercial relations or is obliged to have relations of an institutional, social, political or any nature whatsoever nature, has the obligation to:**

- a) inform these subjects of the commitments and obligations imposed by the Code;
- b) demand compliance with the obligations of the Code in carrying out their activities;
- c) take the necessary internal initiatives in the event of a refusal by third parties to comply with the Code or in the event of failure or partial execution of the commitment undertaken in observing the provisions contained in the Code itself.

**● Each Collaborator is required to work diligently to protect company assets from improper or incorrect use.**

In particular, with regard to IT applications, each employee is required to scrupulously adopt the provisions of the company security policies in order not to compromise the functionality and protection of the IT systems.

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- **Each collaborator is required to respect the principles of correctness, integrity, appropriateness and confidentiality in the use of IT applications: therefore all behaviors that may, in any way, even if only potentially, integrate violations of the provisions of internal procedures must be avoided adopted by the Company and by the applicable legislation.**
- **All Collaborators are required to avoid any activity or situation of personal interest that constitutes or could constitute, even if only potentially, a conflict between individual interests and those of Newster System.**
- **Each Collaborator is prohibited from taking part, directly or indirectly, for any reason whatsoever, in commercial initiatives that place themselves, even if only potentially, in a situation of competition with Newster System.**

In the event that situations of conflict of interest, even potential, both internal and external to the company activity, are identified, each person involved is required to refrain from adopting the conflicting conduct, promptly notifying the Supervisory Body in charge, to the which is responsible for assessing the existence, case by case, of any incompatibilities or situations of prejudice.

## Selection and hiring

**Newster System recognizes the centrality of human resources in the belief that the main success factor of every company is the professional contribution of the people who work there, in a framework of loyalty and mutual trust.** Therefore, in the phase of selection, hiring and career advancement of personnel, Newster System carries out assessments exclusively on the basis of the correspondence between expected profiles and proposed profiles and on transparent and verifiable considerations of merit, in line with the policies and procedures defined. The management of employment relationships is aimed at guaranteeing equal opportunities and encouraging the professional growth of employees.

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Newster System in the context of personnel selection processes does not make any discrimination, direct or indirect, based on trade union, political, religious, racial, language or sex reasons.

## Safety, health and work environment

**Newster System pays particular attention to the creation and management of suitable environments and workplaces from the point of view of the safety and health of collaborators in compliance with the national and international directives on the subject.**

Newster System also promotes the physical and moral integrity of collaborators through, respectively, safe and healthy work environments, as well as working conditions that respect individual dignity.

In order to guarantee safety in the workplace, Newster System inspires its conduct in the conduct of the activity on principles and criteria considered necessary and priority with respect to organizational and production needs. In particular, they constantly strive to:

- avoid risks;
- adequately assess the risks that cannot be avoided;
- combat risks at source;
- adapt work to man, in particular as regards the design of workplaces, the choice of equipment and methods of work and production, mitigate monotonous and repetitive work in order to reduce the effects of these jobs on health;
- take into account the degree of technical evolution;
- replace what is dangerous with what is less or not dangerous;
- planning prevention, aiming at a coherent complex that integrates the technique, organization and working conditions, social relations and the influence of factors in the working environment;
- give priority to collective protection measures over individual protection measures;
- give adequate instructions to workers.

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These principles are used to take the necessary measures to protect the safety and health of workers, including the prevention of occupational risks, information and training, as well as the preparation of an organization and the necessary means.

Newster System, both at the top and operational levels, adheres to these principles, in particular when decisions or choices must be made and, subsequently, when these must be implemented.

## Fair competition

**For Newster System it is of primary importance that the market is based on correct and fair competition**, and to this end it undertakes to scrupulously observe the relevant laws and to collaborate with the market regulatory authorities.

## Gifts and benefits

**No form of gift is allowed that can even be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring favorable treatment in the conduct of any activity connected to Newster System.** This rule - which does not allow for exceptions even in those countries where offering gifts of value to business partners is customary - concerns both gifts promised or offered and those received, meaning any kind of benefit by gift. Newster System refrains from practices not permitted by law, by commercial use or by ethical codes, if known, of the companies or entities with which they have relationships.

## Transparency in every operation and activity

**Each operation and / or activity must be lawful, authorized, consistent, documented, verifiable and in compliance with the principle of traceability and company procedures, according to criteria of prudence and protection of the interests of Newster System:**

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- company procedures must allow for carrying out controls on operations, authorization processes and their execution;
- every collaborator who carries out transactions involving sums of money, goods or other economically evaluable benefits belonging to Newster System, must reasonably provide the appropriate evidence to allow the verification of the aforementioned transactions.

## Anti-money laundering

**Newster System undertakes to prevent, by all means, the use of its economic instruments and its financial system for the purposes of money laundering, self-laundering or financing of any criminal activity of any kind.**

The Company also prevents all operations that hinder the correct identification of the origin of money and other assets.

## Transparency of accounting

**The Newster System accounting responds to the generally accepted principles of truth, accuracy, completeness and transparency of the recorded data.**

The recipients of this Code undertake to refrain from any conduct, active or omissive, which directly or indirectly violates the regulatory principles and / or internal procedures concerning the formation of accounting documents and their external representation.

In particular, the Recipients of this Code undertake to collaborate so that every operation and transaction is promptly and correctly recorded in the respective company accounting system according to the criteria indicated by the law and by the applicable accounting principles, and duly authorized and verified.

The recipients of this Code are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to allow:

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- a) accurate accounting registration;
- b) the immediate identification of the characteristics and underlying reasons;
- c) easy formal and chronological reconstruction;
- d) the verification of the decision-making, authorization and implementation process, in terms of legitimacy, coherence and congruity, as well as the identification of the various levels of responsibility.

Recipients of this Code who become aware of cases of omission, falsification or neglect in accounting records or supporting documentation are required to promptly report them to the Manager / Sole Director and, where necessary, to their superior. The Sole Director informed of such cases will notify the Supervisory Body in charge.

Newster System promotes the launch of training and refresher programs in order to make the Recipients aware of this Code regarding the rules (laws or regulations, internal prescriptions, provisions of the trade associations) that govern training and management of accounting documentation.

## Internal controls

**Newster System promotes at every level the assumption of a mentality oriented to the exercise of control. A positive and regular attitude towards controls contributes significantly to the improvement of company efficiency.**

By internal controls we mean all the tools adopted by Newster System for the purpose of directing, managing and verifying the activities of the company with the aim of ensuring compliance with the laws and company procedures, protecting the assets, efficiently managing the activities and providing accurate and complete accounting and financial data.

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Each level of the organizational structure has the task of contributing to the creation of an effective and efficient internal control system. For this reason, consequently, all Newster System employees, in the context of the functions performed and their respective duties, are responsible for the correct functioning of the control system.

The Company ensures access to data, documentation and any information useful for the performance of its own to the shareholders, to the auditing company possibly appointed and to the other corporate bodies with control powers, as well as to the Supervisory Body in charge. activities.

## Confidentiality

**Collaborators are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, etc. of which they are aware due to the work carried out.**

The Company implements measures to protect the information managed and prevent it from being accessible to unauthorized personnel.

All information, in particular that learned in the context of the activities carried out for customers, must be considered confidential and cannot be disclosed to third parties, nor used to obtain personal, direct or indirect advantages.

## Relations with Members

The Company aims to enhance the share capital, committing itself to remunerate the risk adequately, in order to increase their solidity with a view to medium-long term sustainability according to market rules and in compliance with the principles of correctness and transparency. .

The Company ensures the full transparency of the choices made and assumes as its objective that of maintaining and developing a constructive dialogue with the shareholders.

The Company assures shareholders the exercise of access rights to corporate documentation and provides shareholders with any clarifications relating to the Newster System activity that they may request.

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## Relations with financial institutions

**Newster System maintains relationships with financial institutions based on fairness and transparency, with a view to creating value for the Company, for their shareholders and for all relevant interlocutors.** For this reason, financial institutions are chosen in relation to their reputation, also for adherence to values comparable to those expressed in this Code.

## Relations with Distributors

Relations with distributors are based on maximum collaboration and transparency, with a view to the benefit of all parties.

The Company defines contractual relationships according to fairness and good faith, in compliance with common values, which inspire this Code.

## Providers of goods and services

The Company defines collaborative relationships with its suppliers, in compliance with the regulations in force and the principles of this Code, paying attention to the best professional standards, best practices in the field of ethics, health and safety protection and compliance with environment.

The selection procedures of Newster System suppliers - based on objective and verifiable reference elements - will take into consideration, among others, the economic convenience, the technical capacity, the reliability, the quality of the materials, the supplier's compliance with the procedures of quality adopted by them, as well as the credentials of their contractors; the Purchasing Department is responsible for requesting their offers from multiple suppliers and evaluating them fairly.

## Partner

Newster System, in order to face the growing complexity of the business, promotes initiatives, such as joint ventures or shareholdings in companies, together with business partners, which are chosen

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in relation to reputation and reliability, as well as adherence to values comparable to those expressed in this Code.

**Relations with partners are based on transparent agreements and constructive dialogue, aimed at achieving common objectives**, in line with the regulations and principles of this Code.

## Public administration

### Fairness and honesty

**In its relationship with the Public Administration, Newster System inspires and adapts its conduct to the principles of fairness and honesty.**

The persons appointed by the Company to follow any negotiation, request or institutional relationship with the Public Administration, Italian or foreign, must not for any reason try to improperly influence their decisions, nor engage in illegal behavior, such as the offer of money or other utility, which may alter the impartiality of judgment of the representative of the Public Administration.

Without prejudice to the foregoing, any variation of the content of commercial offers addressed to Public Administrations is also prohibited, if they are not previously authorized by the head of the function involved, subject to a positive opinion drawn up in writing by the Supervisory Body in charge.

### Grants and funding

**Newster System undertakes to provide complete, correct and truthful information in order to access contributions, grants or loans obtained from the European Union, the State or another public body, even if of modest value and / or amount.** Such contributions, grants or loans must be used for the purposes for which they were requested and granted.

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Similarly, in the event of participation in public tender procedures, the Recipients of this Code are required to operate in compliance with the law and correct commercial practice, in particular avoiding inducing Public Administrations to unduly operate in favor of the Company they belong to and other Group companies.

### **Accreditation to the "White List"**

In order to guarantee relations with the Public Administration, **Newster System has also been accredited in the list of suppliers, service providers and executors of works not subject to attempted mafia infiltration, called "white list"** and referred to the sectors most exposed to risk as identified by art. 1, paragraph 53, of the law 6 November 2012, n. 190.

### **Registration in the Electronic Market of the Public Administration (MePA)**

Newster System has also been accredited with a certified supplier on the Public Administration Electronic Market (MePA) platform, an instrument of the Ministry of Economy and Finance launched and managed by Consip since 2003, which makes a list available to Italian public administrations certified suppliers on which the Public Administration can make purchases of goods and services.

### **Public supervisory authorities**

The recipients of this Code undertake to scrupulously observe the provisions issued by the competent institutions or public supervisory authorities for compliance with current legislation in the sectors connected to their respective areas of activity.

The Recipients of this Code undertake to comply with every request from the institutions or public supervisory authorities within their respective supervisory functions, providing - where required - full cooperation and avoiding obstructive behavior.

## **Relations with representatives of political forces and associations**

**Newster System deals transparently with all political forces, in order to duly represent its positions on topics and issues of interest.**

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The Company maintains relations with trade associations, trade unions, environmental organizations and similar associations, with the aim of developing their activities, establishing forms of cooperation of mutual benefit and presenting its positions.

## Contributions and sponsorships

The Company is available to provide contributions and sponsorships, in compliance with the procedures defined, giving adequate publicity, to support initiatives proposed by public and private bodies and by non-profit associations, duly constituted in accordance with the law and which promote the values to which inspires this Code

## Relations with the Mass-Media

Relations with the mass media are based on respect for the right to information.

**The external communication of data or information must be truthful, accurate, clear, transparent, respectful of the honor and confidentiality of people, coordinated and consistent with the policies of Newster System.** The information relating to the Company and directed to the mass media may be disclosed only by the corporate functions delegated to do so, or with the authorization of these, in compliance with the defined procedures.

## Respect for the environment

**Newster System respects the environment as a resource to be protected, for the benefit of the community and future generations.** In compliance with current regulations, Newster System adopts the most suitable measures to preserve the environment, promoting and planning the development of activities in line with this objective and promoting awareness-raising initiatives.

## Methods of implementation and supervision program

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## Communication and training

This Code is brought to the attention of all internal and external subjects interested in the corporate mission through specific communication and training activities.

## Supervisory body

The Supervisory Body is responsible for monitoring the functioning, application of the Organizational Model and its periodic updating. It also monitors compliance with the Code of Ethics by the recipients of the same.

The Supervisory Body maintains the requisites of autonomy and independence, assumes powers of investigation and control as well as powers of initiative for the performance of the assigned functions.

## System of proxies

Newster System makes use of a system of proxies and powers of attorney on the basis of which certain activities can be carried out only by persons expressly authorized to do so.

## Sanctions

In the event of violations of the Code of Ethics, the Company adopts disciplinary measures against those responsible for the violations, where deemed necessary for the protection of corporate interests, and compatibly with the provisions of the current regulatory framework and employment contracts, reach up to the removal from the company of those responsible, in addition to compensation for any damage resulting from the violations themselves.

Non-compliance with the rules of the Code of Ethics by members of the corporate bodies may result in the adoption, by the competent corporate bodies, of the most suitable measures envisaged and permitted by law.

Violations of the rules of the Code by employees constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to the relevance of the same as a disciplinary offense.

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Violations committed by suppliers and external collaborators will be punishable in accordance with the provisions of the related contractual assignments, except for more significant violations of the law.

## Final provisions

### Conflict with the Code

In the event that even one of the provisions of this Code should conflict with provisions set out in internal regulations or procedures, the Code will prevail over any of these provisions.

### Amendments to the Code

Any changes and / or additions to this Code must be made in the same way as for its initial approval.

This Code is - at least annually - subject to verification and possible update by the Board of Directors.

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