



OBJECT

**ORGANISATION, MANAGEMENT AND CONTROL
MODEL**

in accordance with the Legislative Decree 231/01 (*)

DOCUMENT TITLE

CODE OF ETHICS

231.PG All.03



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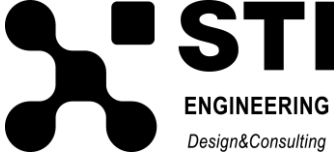
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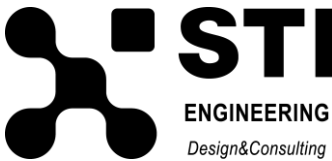
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Rev.	Document Date	Description of modifications and updates
00	10/10/2019	First issue
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(*) This document has been developed in accordance with Legislative Decree No. 231 dd. June 8, 2001 "Discipline of Administrative Liability of Legal Persons, Organizations and Associations, including those without legal personality, pursuant to Article 11 of Law No. 300 dd. September 29, 2000".

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1. Introduction

STI ENGINEERING S.R.L. is a Company founded in Italy in 1990 and grown worldwide, offering design and consulting services in the civil construction and industrial plant sectors, which, although they are profoundly different sectors in terms of culture and objectives, can be addressed through the Company's cross-cutting technical skills. In the Civil & Infrastructure area STI ENGINEERING S.R.L. has developed solutions for the residential, healthcare, hospitality, commercial, transportation, business, public, and sports centre sectors, and in the Industrial area it has developed projects for the food & beverage, chemical, Oil & Gas, manufacturing, shipbuilding, metal-mechanics engineering, logistics, and paper-making sectors.

The target market is worldwide. Over the years, several local units have been opened abroad and in Italy in order to ensure effective service, the necessary presence at the customer's premises and in production districts of interest to the Company and the market.

The opening of the local unit in Trieste for instance, follows precisely the desire to satisfy that market share demanding specific solutions for the naval sector to the Company.

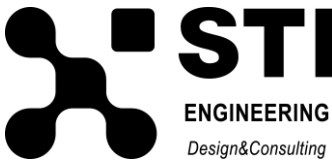
In addition to having several local units around the world, the Company collaborates with partner companies in Oman, Russia, Mexico, Paraguay, and China.

The Company is UNI EN ISO 9001:2015 certified for provision of design, instrumental verification, construction management and technical consulting services in the field of building works, technological systems, and Oil & Gas. Within the scope of its activities and in the conduct of its business, the Company assumes, as its guiding principles, compliance with the law and regulations of the territory in which it operates, as well as internal regulations, within a framework of legality, fairness, transparency, confidentiality, and respect for the dignity of the person.

To do this, the Company has decided to adopt an Organization and Management Model aligned with the requirements established by Legislative Decree 231/2001, with the aim of preventing the risks of offenses that apical personnel or personnel subject to the direction of others, including all external parties with which the Company has relations, may commit and that the same regulatory framework expressly recalls. In any case, the model is constructed to act as a supporting structure with respect to the principle of legality to which the work of the Company as a whole, must be inspired in the conduct of business.

The adoption of this Code of Ethics represents an important key towards the definition and implementation of the highest standards of compliance with the law and ensures a clear definition of the principles on which the actions of each person of or working on behalf of S.T.I. ENGINEERING S.R.L. are based and will constitute the basic

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element of the corporate culture, as well as the standard of behaviour of all recipients in the conduct of Company activities and business, integrating the various regulations that the Company has been adopting and the Organization, Management and Control Model developed pursuant to Legislative Decree 231/2001, of which this Code is part.

The principles expressed in this Code represent a guide that the Company wished to develop in order to consistently and effectively meet future challenges. Indeed, the Company believes that, in conducting its business activities, the assumption of ethical behaviour represents a fundamental element for its growth and affirmation, also and above all in the long term.

The Company recognizes that unethical behaviour undermines the relationship of trust between the Company and its stakeholders and fosters the assumption of prejudiced attitudes and the establishment of a hostile climate toward the Company that is harmful to the Company's interests.

The Company's reputation and credibility are key corporate assets, and their preservation is one of the objectives of adopting this Code of Ethics.

In no way may the belief that one is acting for the benefit or in the interest of S.T.I. ENGINEERING S.R.L. justify, not even in part, the adoption of conduct contrary to the principles and contents of the Code.

2. Definitions

Recurring expressions are used in this document and its annexes, which are defined within document 231.PG-AII.02 "Glossary".

3. Ethical Principles

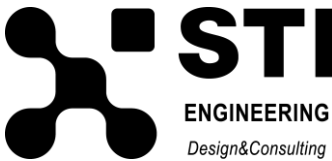
S.T.I. ENGINEERING S.R.L. intends to set up its operations based on the following principles, set forth and articulated below.

3.1. Legality and Honesty

Recipients are required to comply with the laws and, in general, the regulations in force in the countries in which they operate, also in view of the fact that the Company also has local units and partners abroad. Compliance with Company regulations must also be guaranteed, as implementation of regulatory obligations, for the parts within their competence.

To consistently implement the aforementioned regulations and laws, recipients must know and understand them. Also, in view of this, it is important to ensure the necessary training and updating activities on the subject. If any doubts exist on how to proceed, the Recipient should contact the Company's Supervisory Board, which will provide the necessary information.

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With the aim of making its Collaborators aware of issues pertaining to legality and the Code of Ethics, S.T.I. ENGINEERING S.R.L. ensures training programs and continuous awareness actions. The Company has also adapted its Organization Model to the parameters and requirements set forth in Articles 6 and 7 of Legislative Decree 231/2001, with a view to being able to ensure compliance with the principle of legality.

3.2. Impartiality and non-discrimination

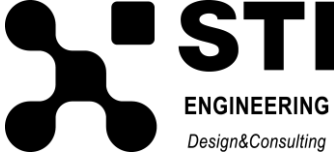
In the pursuit of its activities and in its relations with stakeholders, S.T.I. ENGINEERING S.R.L. operates according to criteria of impartiality, objectivity and transparency. In particular, it does not allow any kind of discrimination on the basis of age, gender, sexual orientation, health status, race, nationality, religion, political opinion or any other aspect of the personal life of each employee. It also expects this form of respect from function managers toward all employees.

3.3. Transparency and fairness in business conduct

Collaborators are required to comply with transparency, understood as clarity, completeness and relevance of information, avoiding misleading situations in transactions carried out on behalf of the Company. Employees and Collaborators are required to comply with the ethical, expert and professional rules applicable to the transactions carried out on behalf of the Company. Likewise, these individuals are required to comply with the Company's regulations as the implementation of ethical, expertise or professional obligations and as a formalization of the conduct expected from the Company. Those who hold positions of responsibility are also required to conduct themselves in an exemplary manner and promote a culture of ethical behaviour that complies with rules and laws.

Compliance with this principle implies a commitment to provide due information, both outside and inside the Company, in a clear and complete manner. To this end, S.T.I. ENGINEERING S.R.L. is committed to ensuring that its representatives and collaborators convey the Company's image with clarity, fairness and diligence in all relationships, both internal and external. To this end, the Company undertakes to:

- Provide accurate, clear, factual, and fair information, communications, and instructions, both financially, legally, ethically, and socially.
- Ensure the traceability of each operation by arranging support in the form of documented information suitable for enabling, at any time, the performance of verifications monitoring the characteristics and motivations of the operation and identify who has authorized, carried out, recorded and verified the corporate operation itself through the adoption of procedures and/or practices that ensure the proper recording, detection and preservation of the relevant documentation.

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- Check that all contracts with parties, both internal and external, always include understandable, clear and correct clauses.

3.4. Confidentiality

Employees and Collaborators shall ensure the confidentiality of technical, technological, commercial, financial, patrimonial and banking information, which may have been learned, even if occasionally, during the execution of operations carried out on behalf of the Company.

Recipients are obliged to handle Company data and information exclusively within the scope and purposes of their work activities and, in any case, not to disclose (communicate, spread or publish in any way) sensitive information without the explicit consent of those concerned and confidential information without the authorization of the Company. This principle of confidentiality is absolute in nature and does not require the information to have been formally qualified as confidential in advance.

3.5. Respect for safety, the environment and future generations

In carrying out its activities and relations with customers, suppliers, partners and collaborators, the Company is concerned that they are undertaken taking into account environmental and social costs and impacts, in order to minimize the negative effects that could fall on the community and future generations. Furthermore, in its labour relations, the Company expects and is committed to maximum compliance with the pro tempore health and safety regulations in force and to the continuous improvement of safety levels in the Company for all the activities it carries out. Compliance with these procedures and principles extends not only to department heads or members of the Prevention and Protection Service but is also required of all individuals working on behalf of the Company.

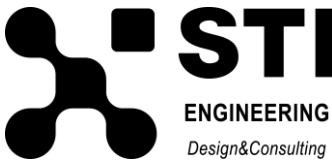
4. General Provisions

4.1. Scope of application

This Code contains the set of rights, duties and responsibilities of the Company towards Stakeholders (employees, suppliers, customers, partners, Public Administration, etc.). Compliance with the Code of Ethics is also required to:

- The Corporate Bodies, which must bring all decisions and actions into compliance with the Code, spread knowledge of it and encourage its sharing by staff and third parties who operate in the interest and advantage of the Company; they must also constitute, through their behaviour, a reference model for all Collaborators.
- Employees, who are required to act in compliance with the Code and to report any infringements to the Supervisory Body;

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- Suppliers of goods and services, who must be appropriately informed of the rules of conduct contained in the Code and standardize their behaviour for the entire duration of the contractual relationship with the Company.

The subjects required to comply with the Code are defined, in the context of this Code of Ethics, collectively as "RECIPIENTS".

4.2. Legal Effectiveness of the Code

The ethical principles set forth in this Code of Ethics are relevant to the prevention of crimes under ex Legislative Decree 231/2001 and constitute an essential element of the preventive control system.

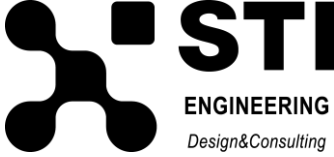
The rules of the Code of Ethics constitute an essential part of the contractual obligations of the employees of S.T.I. ENGINEERING S.R.L. pursuant to and for the purposes of Article 2104 of the Civil Code (Diligence of the employee), Article 2105 of the Civil Code (Duty of loyalty) and Article 2106 of the Civil Code (Disciplinary sanctions). This Code of Ethics also constitutes a set of disciplinary rules pursuant to and for the purposes of Article 7 of Law No. 300 of May 20, 1970 (Workers' Statute). It is therefore in addition to the disciplinary provisions contained in the current National Collective Labor Agreements that may be applied.

This Code of Ethics also constitutes a set of rules of contractual nature that supplement the content of the relationship that binds the Company to the members of the corporate bodies, as outlined in the current civil laws. From this perspective, the Code of Ethics also represents the system of rules to guarantee the reliability and transparency of the company in all locations and circumstances necessary for the operation of the company such as for example for the sustainability of business continuity and for participation to public tenders.

Compliance with the Code of Ethics by suppliers and intermediaries in any form integrates the obligations to fulfil the duties of diligence and good faith in negotiations and execution of contracts in place with the Company. Violation of the rules of the Code of Ethics and Protocols referred to in the contract may constitute, depending on the seriousness, just cause for revocation or termination of contracts with all legal consequences, including compensation for damages.

4.3. Diffusion of the Code of Ethics

In the belief that the Code of Ethics is a fundamental tool for the proper functioning of the Company and that only through its consistent application by all levels of the Company it is possible to ensure its effectiveness, the Company promotes the maximum circulation and knowledge of the Code. In particular, this Code of

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Ethics is made available to internal personnel through direct delivery and publication on the Company intranet and its contents disclosed in specific meetings. As for newly hired personnel, the Code of Ethics is delivered and illustrated upon hiring.

External stakeholders (suppliers, customers, intermediaries, ...) are informed of the adoption of the Code by publication on the Company website.

Any amendments to the Code, introduced by an act of the Administrative Body of the Company, shall be subject to the same forms of publicity as provided in this article of the Code of Ethics.

4.4. Reporting of Violations and reference to the Procedure

The Company encourages Recipients to report any attitude or action that they consider to be in violation, even if only potential, of the law or the Code, or other company rules. Reports can be carried out personally or anonymously, in writing or verbally, according to the internal reporting procedure referred to in Annex 07 of this General Part. They are treated with the utmost confidentiality, in compliance with the provisions of the law and the implementing provisions envisaged within the Management Model, of which this Code of Ethics is an integral part.

The Company will not tolerate any form of retaliation against anyone who makes a report in good faith.

4.5. Revisions and updates to the Code

The revision of the Code is approved by the Administrative Body, after hearing the opinion of the Supervisory Board. The proposal is formulated taking into account the evaluation of Stakeholders with reference to the principles and contents of the Code, including promoting their active contribution and reporting of any deficiencies.

5. Rules of Conduct

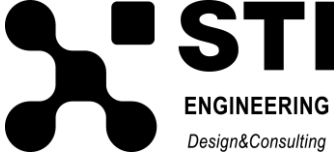
5.1. Company Governance

5.1.1. Appointment and behaviour of the Company Bodies

Appointment of members of Company Bodies must be made through transparent procedures.

Company Bodies act and deliberate knowledgeably and autonomously, pursuing the goal of creating value for the Company in compliance with the principles of legality and fairness. Likewise, the decisions of members of the Company Bodies must be autonomous, that is, based on free appreciation and pursuing the Company's interest in full compliance with the law. Independence of judgment is a requirement of the decisions of the Company Bodies and, therefore, the members must

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ensure maximum transparency in the management of operations in which they have special interests. In such circumstances, the relevant laws and corporate regulations must be complied with. In particular, the members of the Administrative Body are individually expected to perform their duties with seriousness, professionalism and presence, thus enabling the Company to benefit from their expertise.

5.1.2. Company Management

In managing its business, the Company intends to comply with the obligation to prepare an organisational, administrative and accounting structure pursuant to art. 2086, second paragraph, of the Civil Code, such as to safeguard corporate continuity and guarantee the sustainability of its debt and the conduct of top management, subordinates and all collaborators and partners of the company must aim for this purpose.

The directors must act promptly to address the signs of the pre-crisis and take action in order not to jeopardize the interests of the company and the creditors with speciously dilatory and ineffective actions with respect to the resolution of the crisis.

All corporate entities and company professionals must behave in a transparent and loyal manner in the procedures activated for the negotiated settlement of the crisis.

5.1.3. Relations with the Shareholders

The Company promotes transparency and periodic information of the Shareholders, in compliance with applicable laws and regulations. The Shareholders themselves will be adequately and punctually informed about any action or choice that may have effects or consequences towards their investments. Their conscious and informed participation in corporate decisions will be promoted by the Company with constant and targeted actions. The interests of all members are promoted and protected by rejecting any special or partisan interests.

The Society encourages:

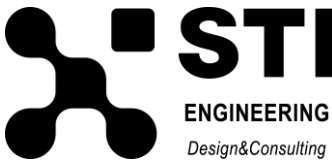
- The regular attendance of Board Members at meetings if the governing body is a Board of Directors
- The smooth operation of the meetings while respecting the right of each shareholder to obtain clarification, express their opinion and make proposals.

The utmost confidentiality of information pertaining to extraordinary transactions will also be promoted. The Recipients involved shall keep such information confidential and not misuse it.

5.1.4. Transparency of Business Accounting

The Company promotes the utmost transparency, reliability, and integrity of information inherent in

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the Company's accounts. Every operation and transaction must be verifiable, legitimate, consistent, and congruous and also properly recorded and authorized.

All actions and operations of the Company must be properly recorded, and the process of decision-making, authorization and performance must be verifiable. For each transaction there must be adequate documentary support in order to be able to perform, at any time, checks that attest to the characteristics and reasons for the transaction and identify who authorized, carried out, recorded and verified the transaction.

Recipients who become aware of omissions, falsifications or negligence are required to report the facts to the Supervisory Board.

The Company is committed to circulating and promoting internal control procedures and holding personnel accountable for compliance with them, in relation to the functions performed and tasks assigned.

In dealing with external consulting parties, each responsible function refrains from any conduct that could hinder the business or pander to the transmission of untrue information and is committed to ensuring a fair and transparent relationship with these functions. The same transparency and fairness are required from those who have consulting relationships with the Company.

The financial statements and related reports are prepared in accordance with the principle of clarity, truth, and fairness, in accordance with the provisions of the Civil Code and relevant laws, as well as in full compliance with both consulting and Intercompany contracts.

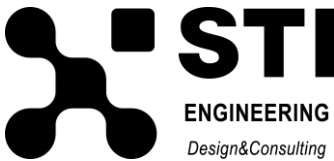
In the preparation of financial statements or other similar documents, top management and all recipients anyway involved must:

- Represent the economic, financial or asset situation with truth, clarity and completeness
- Facilitate in every way the performance of control activities
- Present complete and responsive deeds and documents to the assembly in accordance with the accounting records
- Provide the Supervisory Board with correct and complete information on the economic, financial or asset situation.

5.2. Relations with the Personnel

People are an indispensable element of the Company's existence: the dedication and professionalism of employees are determining values and conditions for achieving the Company's goals. For this reason, the Company is committed to developing the abilities and skills of management and employees, so that, in the context of work performance, the energy and creativity of individuals find full expression for the realization of their potential, and to safeguard working conditions both in the protection of the psycho-physical integrity

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of the worker and in respect for his dignity.

5.2.1. Free Choice of Work

The Company emphatically rejects forced, bonded, or involuntarily performed labor by inmates and does not impose any constraints that bind employees to the Company itself, such as depositing sums of money or identity documents: following proper notice each employee is free to terminate employment with the Company.

5.2.2. Selection and Recruitment

Recipients shall promote respect for the principles of equality and equal opportunity in personnel selection and recruitment activities, rejecting any form of favouritism, nepotism or patronage.

Employment relationships are formalized with regular contracts, rejecting any form of irregular employment. The Company is committed to offering, in full compliance with the relevant legal and contractual regulations, all workers the same employment opportunities, making sure that everyone can enjoy fair normative and retributive treatment based exclusively on criteria of merit and competence, without any discrimination.

Recipients shall foster maximum cooperation and transparency with the newly hired employee so that the latter is clearly aware of the assignment given to him or her.

5.2.3. Personnel Management and Evaluation

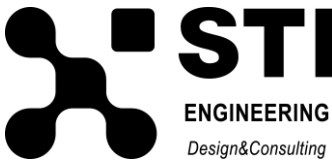
S.T.I. ENGINEERING S.R.L. rejects any form of discrimination against its employees and collaborators, favouring decision-making and evaluation processes based on commonly shared objective criteria.

The Company wishes that the Recipients, at every level, will strive to maintain a climate of mutual respect for the dignity, honour and reputation of each person in the Company. The Company will intervene to prevent insulting, discriminatory or defamatory interpersonal attitudes.

5.2.4. Contracts and Wages

As far as possible, work guaranteed by S.T.I. ENGINEERING S.R.L. will be performed in accordance with recognized labour relations established within the framework of national law and custom.

In this sense, obligations to employees under labour or social welfare laws and rules emanating from the employment relationship of a regular nature will not be fulfilled through the use of subcontracts or home-work agreements or through apprenticeship programs where there is no intention to impart any specialization or provide regular employment, nor will such obligations be fulfilled through the excessive use of temporary employment contracts.

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All employees will be provided with understandable written information on working conditions related to wages before they are hired and on the details of their pay for the period in question whenever they are paid. Deductions from payroll as a disciplinary measure will not be allowed without the express consent of the employee concerned. All disciplinary measures will be recorded.

5.2.5. Professional Growth

Any Collaborator has an equal right to professional growth based on the enhancement of his or her professional skills, personal abilities, and contribution, and to appropriate professional and cultural training. Therefore, the Company promotes the professional and cultural growth of Recipients through appropriate training tools and plans and identifies the best paths for growth within the Company.

5.2.6. Privacy Protection

Any Collaborator has the right to confidentiality of information about him/her that is not strictly for professional purposes. If sensitive information is provided to the Company, the Collaborator has the right to know who is responsible for processing such data and how it is processed in order to maintain its confidentiality.

5.3. Rules of Conduct towards Third Parties

5.3.1. Final Clients

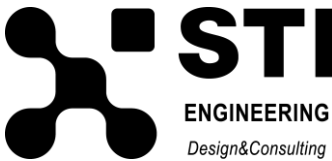
The Company considers the direct relationship with customers as the key to improve day by day the efficiency of its services and find the most suitable solutions for any kind of problem that may arise. For this reason, the Company requires its Employees and External Collaborators to comply with the following provisions:

- Maintaining relationships based on honesty and transparency. In this sense, Recipients shall provide Clients with transparent and truthful products, services, messages, communications, and contracts, avoiding formulas that are difficult to understand, untrue, and unlawful or unfair business initiatives.
- Promotion of utmost courtesy and helpfulness in managing relations with End Clients. Recipients promote continuous improvement in the quality of products and services offered to End Clients.

5.3.2. Suppliers

The Company. is committed to seeking in suppliers and external collaborators suitable

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professionalism and commitment to sharing the principles and contents of the Code and promotes the building of lasting relationships for the progressive improvement of performance in the protection and promotion of the principles and contents of the Code itself. The processes of selecting and choosing suppliers is therefore marked by the principles of legality, fairness and transparency.

In addition, Recipients undertake to include in contracts the confirmation that they have familiarized themselves with the Code and the express obligation to abide by the principles contained therein, thereby verifying compliance with the conditions contractually stipulated.

The choice of the supplier is based on objective and impartial criteria in terms of quality, innovative level, cost, additional services compared to the services and products offered. To avoid possible situations of conflict of interest, Recipients must not accept free gifts, presents and the like, unless directly attributable to normal courteous relations and of modest value.

Should Recipients receive proposals of benefits from a supplier to favour its business, they must immediately suspend the relationship and report the fact to the Supervisory Board.

Violation of the principles of legality, fairness, transparency, confidentiality and respect for personal dignity is just cause for termination of relations with suppliers.

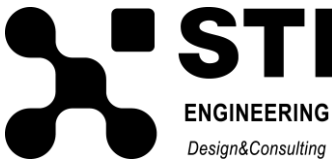
5.3.3. Public Administration and Public Institutions

In the relations with the Public Administration and Public Institutions, Recipients must promote lawful and correct relations marked by maximum transparency and traceability and refuse any form of promise or offer of payments or goods to promote or favour any interest or advantage. Such relationships are reserved exclusively for the competent functions and positions, in compliance with approved programs and Company procedures. The Company must not be represented in relations with the Public Administration by a consultant or "third party" when conflicts of interest may arise.

It is not permitted for Recipients or Intermediaries to offer money or gifts to managers, officials or employees of the Public Administration and Public Institutions, or their relatives, unless they are gifts or utilities of modest value. If Recipients receive requests or proposals for benefits from public officials, they must immediately suspend the relationship and report the fact to the Supervisory Board.

When any business negotiation, request or relationship with the Public Administration and Public Institutions is underway, Recipients should not seek to improperly influence the decisions of the other party, including those of officials dealing or making decisions, on behalf of the Public Administration and Public Institutions. The following actions must also not be taken (directly or indirectly):

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- Investigate or propose employment and/or business opportunities that would benefit Public Administration Employees in a personal capacity.
- Offer or in any way provide free gifts.
- Soliciting or obtaining confidential information that could compromise the integrity or reputation of either party.

In the specific case of conducting a tender, one must operate in accordance with applicable laws and sound business practice.

5.3.4. Political Parties and Labour Organizations

The Company is completely foreign to any political party and trade union organisation. In this sense, the Company does not financially subsidize these organizational or associative forms in any way and does not support events, demonstrations, conferences with political or trade union propaganda purposes.

5.3.5. Contributions and Sponsorships

The Company can accept requests for contributions limited to proposals coming from non-profit associations or those of cultural or charitable value. Sponsorship activities can concern social, environmental, amateur sport, entertainment and art themes.

5.3.6. Industrial Property Rights

Recipients whose activity, assignment or function involves, in any way, the processing of data, information or documents regarding intellectual and/or industrial property rights of the Company have the duty to safeguard them with the utmost diligence, accuracy and confidentiality.

The intellectual and/or industrial property rights on products, works and/or knowledge developed in the workplace belong to the Company which holds the right to exploit such knowledge, according to methods and times deemed most suitable, in compliance with the laws of the time. applicable time.

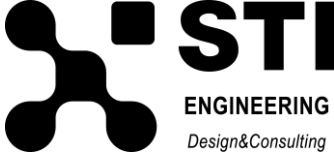
Likewise, the Company respects and protects the intellectual and industrial property rights of others, ensuring that only original products and works are used in company activities, regularly licensed by the legitimate owners and employed in accordance with the authorizations received.

5.4. Rules of Conduct in Business

5.4.1. Conflict of Interests

The Recipients, in carrying out their activities, will carefully avoid being involved in transactions or business dealings that could result in a conflict of interest. Each Collaborator must, in fact, carry out

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their work exclusively and in the best interest of the Company, avoiding any situation of conflict between personal economic activities (their own, those of relatives up to the fourth degree, or cohabitants) and Company interests that could harm the Company's activities or provide illicit advantages for themselves, relatives, or cohabitants.

In the event of a conflict situation, each Collaborator is required to immediately inform the Company.

5.4.2. Relations with Competitors

Relations with competitors must be guided by criteria of prudence and confidentiality in order to best preserve the elements of competitive advantage of the Company.

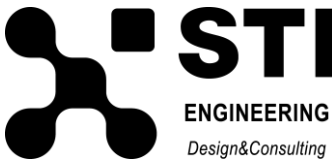
For this reason, no employee of the Company, except for individuals expressly and formally delegated, may engage in business relations with representatives of the competition.

5.5. Safety and Safeguard of Health and Working Conditions

The Company promotes working conditions that protect the psycho-physical integrity of individuals, providing workplaces that comply with current health and safety regulations. The Recipients, within the scope of their duties, actively participate in the process of risk prevention, safeguarding the environment and public safety, and protecting their own health and safety, as well as that of colleagues and third parties. Adequate measures are taken to prevent accidents and health damage that arise from, are connected to, or occur during work, reducing, as reasonably possible, the causes of risks inherent in the work environment.

In order for the principles, criteria, and methods by which the Recipients, at every level, make any decision regarding health and safety at work, to be explicit and transparent, the Company has identified some guidelines that can be summarized as follows. In every work activity, it is necessary to:

- a) Avoid risks.
- b) Evaluate risks that cannot be avoided.
- c) Cut risks at the source.
- d) Adapt work to the individual, particularly with regard to the design of workstations and the choice of equipment and work and production methods, especially to mitigate monotonous and repetitive work and to reduce the effects of these tasks on health.
- e) Take into account the level of technological advancement.
- f) Replace what is dangerous with what is not dangerous or less dangerous.
- g) Plan prevention, aiming for a coherent complex that integrates technology, work organization, working conditions, social relations, and the influence of factors in the work environment.
- h) Appoint a health and safety officer who is part of the Company's management, in accordance with

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applicable laws.

- i) Give priority to collective protection measures over individual protection measures.
- j) Provide adequate instructions to workers, including periodic and documented training on health and safety in the workplace, repeating such training for new hires and when employees change departments.

The above expressed principles are used by the Company and those who manage hygiene and safety in the workplace - to take the necessary measures to protect the safety and health of workers, including activities for the prevention of occupational risks, information, and training, as well as the preparation of an organization and the necessary means.

All recipients must adhere to these principles, especially when decisions need to be made or choices need to be made, and subsequently when they need to be implemented.

5.6. Environmental Protection

The Company directs its choices in such a way as to guarantee compatibility between the pursuit of its institutional goals and environmental needs. committing itself to operate in every situation in full compliance with environmental regulations and to limit the environmental impact of its activities, also taking into account the development of scientific research on the subject.

When promoting, planning or entrusting the planning of building interventions, the Organization carries out or ensures that, among other things, all the necessary investigations are carried out to verify the possible environmental risks deriving from the intervention and prevent damage.

The Organization also undertakes to spread and consolidate a culture of environmental protection and pollution prevention among all its collaborators and suppliers, developing awareness of risks and promoting responsible behaviour on the part of all collaborators.

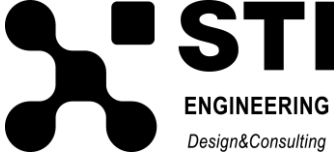
6. Compliance with the Ethical Principles and Sanctioning and Disciplinary System

6.1. Company Bodies and Components of the Supervisory Board

Compliance with the Code of Ethics by members of the Social Bodies and the Supervisory Body integrates and specifies the obligations of diligence in carrying out the assigned tasks.

Violation of the rules of the Code of Ethics and the operational protocols of the Organizational Model referred to in Legislative Decree 231/2001 constitutes a failure to fulfil the obligations arising from the relationship of organic representation, with the consequent application of sanctions provided by law and/or the Sanctioning and Disciplinary System.

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6.2. Employees

Compliance with the Code of Ethics by employees integrates and specifies the obligations of loyalty, fairness, and correctness in carrying out the employment contract in good faith, as required by the Company under Article 2104 of the Civil Code.

In the event of a violation of the rules of the Code and the operational protocols of the Organizational, Management, and Control Model referred to in Legislative Decree 231/2001, the sanctions provided by the specifically approved Sanctioning and Disciplinary System will be applied.

The rules of the Code of Ethics and the Organizational Model constitute essential parts of the contractual obligations of workers under Article 2104 of the Civil Code.

6.3. Third Parties

Compliance with the Code of Ethics and the operational protocols of the Organizational Model referred to in Legislative Decree 231/2001 by suppliers and Recipient Intermediaries integrates the obligations to fulfil the duties of diligence and good faith in negotiations and the execution of contracts with the Company.

Violation of the rules of the Code of Ethics and the protocols referenced in the contract may, depending on the severity, constitute just cause for revocation or termination of contracts with all legal consequences, including compensation for damages.