

Code of Ethics

by

Roncadelle Operations S.r.l.

Version of 07/12/2022

Approved by the Board of Directors

on February 3, 2022.

FOREWORD

The '**Code of Ethics**' regulates the set of rights and responsibilities that the company expressly assumes towards its stakeholders in the performance of its activities.

The organisation intends to contribute with its actions, with a sense of responsibility and moral integrity, to the research and development, production and marketing of innovative products and services with high technological value and, in particular, the conception, development, production and marketing - including direct marketing - of products, medical devices and pharmaceuticals.

The company believes in the value of work and considers legality, fairness and transparency of action to be essential prerequisites for achieving its economic, production and social objectives.

The principles that inspire the work of this Company are formally collected in a Code of Ethics in the conviction that the reliability of the Company is measured by its respect for the rules and by the appreciation of the people who work in it.

The objective of Roncadelle Operations S.r.l. is to pursue excellence in the market in which it operates, through sustainable development, ensuring the protection of the environment and the safety of the people involved, while respecting social ethical values.

This Code of Ethics therefore represents a distinctive and identifying element towards the market and third parties, the knowledge and sharing of which is required of all those who work in the Company or collaborate with it.

RECIPIENTS

This Code is binding for the directors and employees of Roncadelle Operations S.r.l., as well as for all those who work and collaborate, permanently or on a temporary basis, with the Company, as well as for individuals with representative, administrative or management functions, auditors, partners and external consultants (hereinafter, the 'Recipients').

The Code of Ethics is brought to the attention of all Recipients, who are required to respect and observe its principles and to adapt their conduct to its provisions in both internal and external relations. Knowledge of and compliance with the provisions of the Code of Ethics is an essential requirement for the establishment and maintenance of contractual, employment and collaboration relations with the Company.

PRINCIPLES

The principles listed below are considered fundamental, so our organisation is committed to respecting them towards everyone.

The core values on which the company's activities are based are as follows.

1. Legality and ethics in the conduct of business activities

Roncadelle Operations S.r.l. operates in absolute compliance with the law and this Code.

In observance of the principle of legality, the Company rejects any conduct aimed at circumventing current and applicable laws, including those of corruption or extortion, illegitimate favours, illicit payments and any other conduct aimed at illicitly obtaining personal advantages, both in dealings with domestic and foreign authorities.

Compliance with applicable laws and observance of ethical standards are also important because of the need for close cooperation between the medical technology sector and healthcare professionals. The activities carried out by the Company are therefore guided by the advancement of medical science, the improvement of patient care and the protection of healthcare professionals themselves. The activities carried out by the Company are therefore inspired by the utmost transparency, correctness and ethicality.

Under no circumstances may the pursuit of the interests of the Company legitimise unlawful and dishonest conduct.

2. Transparency and clarity of information

Information disclosed both within and outside the Company must be characterised by truthfulness, accuracy and completeness.

The company is committed to implementing the principles of transparency and clarity of information in the performance of all its activities, starting from the drafting and negotiation of contracts, the management of economic and financial resources and accounting reporting activities, up to and including the management of internal and external personnel who collaborate with the company in various capacities. Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorised, consistent, congruous, documented, recorded and verifiable.

The company's communication takes the form, above all, of scientific information, which must be accurate, balanced, correct, objective, unambiguous or misleading, and documented. The information must be produced and communicated in compliance with the provisions governing the subject.

The Company does not tolerate misleading information activities and repudiates any behaviour aimed at taking unfair advantage of others' positions of weakness or lack of knowledge.

3. Labour ethics, protection and enhancement of human resources

The company's internal and external collaborators are the fundamental resource for the development and growth of the company.

The company acts with respect for the fundamental rights of the individual and protects his or her moral and ethical integrity. The company is committed to maintaining a serene working environment, in which personnel can grow professionally. In managing human resources, the company is inspired by the value of healthy cooperation between colleagues, teamwork and the creation of a stimulating environment for individual growth and progress. Professional development in particular is based on the principle of equal opportunities, through the recognition of the results achieved, professional potential, skills, merits, seriousness and professionalism of each worker, and on this basis it determines career and salary advancements.

On the basis of these values, therefore, the company rejects any form of discrimination, isolation, exploitation or harassment by anyone, be it for personal or professional reasons. Any discrimination based on a person's racial or ethnic origin, political opinion, religious or philosophical conviction, trade union membership, state of health, sexual life or sexual orientation, marital status, physical appearance, economic or social condition and similar is therefore prohibited.

4. Workplace and worker safety

The Company is committed to ensuring health and safety workplaces. The Company undertakes to identify and prevent risks related to the performance of its business activities, setting itself the objective of combating risks at source by adopting all organisational, technical and procedural measures to guarantee the protection of workers' health and safety.

5. Protection of the individual personality

The Company recognises the value and importance of the protection of individual freedom in all its forms and repudiates any manifestation of violence, especially if aimed at restricting personal freedom. The Company undertakes to promote respect for this fundamental principle within its own activity and among its employees, collaborators, suppliers and partners.

6. Absence of conflict of interest

In order to ensure compliance with the principle of fairness, Recipients shall ensure that every business decision is taken in the interest of the company and must avoid any situation of conflict of interest between personal or family economic activities and the duties held, such as to compromise their independence of judgement and choice.

The Recipients are therefore required to prevent situations, even if only apparent, of conflict of interest, in which personal interests or those of persons connected to them may be involved.

The Recipients are required to abstain in the event of serious reasons of convenience and opportunity, as well as in any other case in which the performance of an action or conduct may jeopardise compliance with the principles of impartiality and independence.

7. Environmental Protection

The company recognises the fundamental importance of safeguarding the environment and undertakes to refuse and recuse any conduct aimed at obtaining advantages possibly related to the violation of environmental regulations or to economic savings in environmental policy.

8. Protection of industrial and intellectual property rights

The Company operates in full compliance with current legislation on the protection of trademarks, patents and other distinctive signs as well as copyright.

9. Protection of Confidentiality

The company ensures the confidentiality of any information in its possession and refrains from investigating and researching information except where such activities comply with applicable regulations.

10. Protection of personal data

The Company processes personal data in compliance with the principles of fairness, lawfulness and transparency, in accordance with the regulatory provisions dictated on the subject of privacy by EU Regulation 2016/679 and Legislative Decree No. 196/2003, as amended by Legislative Decree 101/2018, as well as any further regulations dictated at national or supranational level on the protection of personal data (the "Personal Data"), in particular with reference to the provisions issued by the Italian Data Protection Authority ("Applicable Privacy Regulations").

RULES OF CONDUCT

The rules contained in this section are intended to indicate to the Recipients the attitudes and behaviour to be observed when carrying out the various company activities in accordance with the values that inspire this document.

All Recipients of this Code of Ethics must observe correct and transparent conduct in the performance of their duties, thereby contributing to the effectiveness of the internal control system for the protection of corporate value.

1. Protection of share capital and creditors

The corporate bodies of Roncadelle Operations S.r.l. are required to maintain a correct, transparent and collaborative conduct, in compliance with the law and internal company procedures, in all activities aimed at preparing the financial statements and other corporate communications required by law, so as to provide true and correct information on the Company's economic, equity and financial situation. The Company's corporate bodies are required to comply with the legal provisions protecting the integrity and effectiveness of the share capital and to always act in compliance with the internal company procedures, which are based on such provisions, in order not to harm the guarantees of creditors and third parties in general.

No concealment of information or partial or misleading representation of economic, asset and financial data by management and persons subject to their direction and control is allowed. For each operation, adequate supporting documentation of the activity carried out must be formed and kept in order to allow the easy and accurate reconstruction of the Company's economic events.

Any negligence, omission or falsification of which the corporate bodies become aware must be promptly reported to the Organismo di Vigilanza.

2. Relations with supervisory bodies

The Company, in its relations with the supervisory or inspection bodies, supports their activities on an organisational and documentary level, enabling inspections to be carried out correctly.

3. Relations with Suppliers

Suppliers, business partners, external collaborators and, in general, all persons collaborating with the company to achieve its purpose and in the performance of its activities are required to comply with the ethical and behavioural principles contained in this Code of Ethics.

The Company undertakes not to discriminate its suppliers. Personnel must base their relations with suppliers and consultants on the utmost fairness and transparency in compliance with the laws and regulations in force, as well as with this Code of Ethics, and with the internal procedures relating to the processes of purchasing and selecting suppliers. The supplier selection process is based on uniformity and fairness of treatment, guaranteeing maximum transparency and efficiency through an objective assessment of quality, price and ability to supply and guarantee continuous goods and services of an adequate level.

4. Customer relations

When initiating business relations with new customers and in managing existing ones, addressees must avoid relations with persons involved in unlawful activities, in particular related to money laundering, terrorism, corruption, violation of human rights, or in any case lacking the necessary requirements of ethicality and commercial reliability.

5. Relations with Public Administrations in the fight against corruption

Roncadelle Operations S.r.l., through its directors, employees, collaborators or representatives, as well as through intermediaries, must not receive, promise or offer to public officials, persons in charge of a public service, employees in general of the Public Administration or other Public Institutions in particular, money, goods or other utilities of various kinds in order to promote and favour its own interests or the interests of the company.

The Recipients must therefore refrain from promising or paying sums or promising goods or other forms of benefit; any sponsorships, appointments, consultancies, advertising, acts of commercial courtesy, such as gifts or forms of hospitality or any other form of benefit or act of liberality must always be authorised and adequately documented and are only permitted if of modest value and such as not to compromise the integrity and reputation of the parties and cannot be interpreted, by a third and impartial observer, as acts intended to obtain advantages and favours in an improper manner.

Any activity, direct or even through an intermediary, aimed at influencing the independence of judgement or securing any advantage for the Company is prohibited.

Any Recipient who receives, directly or indirectly, proposals for benefits from public officials, persons in charge of a public service, employees in general of the Public Administration or other Public Institutions must immediately report them to the Supervisory Board or to his or her company contact person, if a third party.

Recipients involved in tender procedures must act in compliance with the principles of fairness and transparency, assessing the appropriateness and feasibility of the services required by the tender and providing all the information requested by the officials in charge of awarding the tender, with whom they will entertain relations and conduct suitable for not compromising their freedom of judgement.

In the event of an award, the Recipients shall ensure that the contractual obligations are fulfilled and that the negotiation and business relations are conducted in a clear and correct manner.

6. Relationships between private individuals in the fight against corruption

It is forbidden for Recipients to solicit, accept the promise or receive, directly or through an intermediary, undue money or other benefits, of any kind whatsoever, from a private individual (e.g. health professionals,

suppliers, customers, agencies, business partners, consultants, but also Directors or other employees of the Company, such as their hierarchical superiors, etc.) to perform or omit an act of their office, in violation of their professional and loyalty obligations.

The prohibition must be considered absolute and concerns advantages of any kind, whether for the Company and/or for oneself and/or for third parties. It is also prohibited whether the act in breach of one's official duties is actually omitted or performed.

Similarly, it is forbidden for Addressees, directly or through intermediaries, to offer, promise or pay money or other undue benefits, whether financial or of any other nature, to private persons (e.g. health professionals, suppliers, customers, agencies, business partners, consultants, but also other employees of the Company, such as their hierarchical subordinates, etc.) in order to influence the performance or omission of an act of their office. The prohibition is absolute and concerns advantages of any kind, whether for the Company and/or for oneself and/or for third parties.

7. Duties of transparency of information

Communications, both internal and external, must be truthful, clear, correct and transparent. All information activities must comply with the ethical duties and professional conduct practices in force in the field of scientific information.

When carrying out the activity of scientific information and presentation of medical devices to doctors, healthcare personnel and/or pharmacists, it is forbidden to grant, offer or promise rewards, pecuniary advantages or advantages in kind. It follows that the promotional material must be of negligible value, must not be fungible or linkable to the activity carried out by healthcare professionals and must not bear the company trademark or the sponsored product. Free samples are to be delivered only to healthcare professionals, exclusively through the sales representatives, upon written request by the latter.

8. Relations with the press and other media

The Company's relations with the media are reserved exclusively to the corporate functions in charge, or to The Recipients expressly authorised by them, and are carried out according with the corporate communication strategies and, in any case, according to conduct criteria marked by principles of transparency, correctness and timeliness.

Recipients not in charge of communication are prohibited from releasing to representatives of the press and other means of communication and/or third parties, including social networks, information of any nature concerning the Company or in any case from leaking news concerning the business or organisation of Roncadelle Operations S.r.l., unless specifically authorised.

9. Fighting organised crime, money laundering, self laundering and handling stolen goods

Recipients are required to comply with current and applicable regulations.

The Company repudiates any form of criminal organisation, whether of a national or transnational nature, and to this end undertakes not to establish any relationship of a working, collaborative or commercial nature with persons - whether natural or legal persons - involved even only indirectly in criminal organisations or, in any case, linked by kinship and/or affinity ties with exponents of known criminal organisations. It does not finance or facilitate activities referable even only indirectly to such organisations.

Similarly, the Addressees must not be implicated or involved in operations that may lead to the laundering of criminal or illegal proceeds in the interest or to the advantage of the Company and, to this end, pursues the objective of maximum transparency in commercial transactions and prepares all appropriate instruments to counter the phenomena of money laundering and receiving stolen goods.

All employees and collaborators are required to diligently comply with internal regulations and must undertake to act loyally in order to comply with the obligations assumed under the employment contract and the provisions of the Organisational Model and this Code of Ethics, ensuring due performance and compliance with the commitments made to the Company.

In detail, the personnel shall not:

- receive any form of corrisponding from anyone for the performance of an act of their office or contrary to their official duties;
- be subjected to any form of conditioning by third parties outside the company for the purpose of taking decisions and/or performing acts relating to their work.

Any employee or collaborator who receives gifts, or any other form of benefit, not directly attributable to normal courteous relations shall take all appropriate steps to refuse such gifts, or any other form of benefit, and shall inform his/her superior and the Supervisory Board thereof.

10. Relations with employees and collaborators

The evaluation and selection of personnel and external collaborators are carried out in a fair and transparent manner, respecting equal opportunities in order to match the Company's needs with the candidates' professional profiles, ambitions and expectations.

In fact, the Company offers equal employment opportunities to every employee, on the basis of professional qualifications and skills, selecting, hiring, and remunerating on the basis of merit and competence criteria, in compliance with all laws, the provisions of the applied collective bargaining agreements, regulations and directives in force.

Recipients are required to adopt all useful measures to avoid any form of favouritism in the personnel selection process, using objective and meritocratic criteria, respecting the dignity of candidates and in the interest of the company's good performance.

At the beginning of the collaboration, the employee/collaborator receives comprehensive information regarding the characteristics of the tasks and function he/she will perform, regulatory and salary elements, and regulations and conduct regarding personal health risks.

All staff are employed on regular contracts, as required by law.

All decisions taken in the area of human resources management and development, even for access to different roles or positions, are based on considerations of merit and/or correspondence between expected profiles and the profiles possessed by the resources.

Any form of discrimination against persons is prohibited. The Company therefore prohibits seeking information or making enquiries about the opinions, personal tastes and, in general, private aspects of employees or collaborators.

Human resources are fully valorised by activating available resources to foster their development and growth, including through staff participation in training initiatives.

In the management of hierarchical relations, authority shall be exercised with fairness, avoiding any abuse thereof. It constitutes abuse of the position of authority to request, as a due act to the hierarchical superior, services, personal favours and any behaviour that constitutes a violation of this Code of Ethics. The Company firmly prohibits and undertakes to oppose episodes of mobbing, stalking, psychological violence and any discriminatory behaviour or behaviour detrimental to personal dignity inside and outside company premises.

11. Conflicts of interest

Recipients must avoid, in the performance of their activities, situations that may generate conflict, even if only potential, of interest with the Company or that may interfere with their ability to make impartial decisions. Any situation potentially liable to generate a conflict of interest obliges the employee to refrain from carrying out any operation and to inform his/her hierarchical superior, detailing the nature, terms and origin of the advantage.

12. Working Environment

Roncadelle Operations S.r.l. is committed to offering its staff a healthy, safe working environment that respects the dignity of workers. Likewise, employees must actively contribute to building mutual respect, showing sensitivity and attention towards their colleagues.

To this end, but not limited to, the following are prohibited:

- abusive and violent behaviour towards colleagues and/or subordinates;
- intimidating and harassing behaviour, including through the abuse of hierarchical position, which tends to create a hostile working environment towards colleagues, including *mobbing* practices;
- unjustified attitudes that may in any way negatively interfere with the work performance of colleagues.

13. Safety at work

The Company is committed to ensuring a working environment that complies with current health and safety regulations by promoting responsible behaviour and preserving the health and safety of all employees and collaborators by monitoring, managing and preventing risks related to the performance of professional activities.

The company, in compliance with the provisions of the law, or at the indication of any other source, adopts all the measures necessary to ensure and improve the conditions of the working environment, also and above all with reference to hygiene and safety, as well as the procedures aimed at constantly improving the corporate climate.

Workers must adopt safe behaviour at work, i.e. operate in compliance with company regulations, procedures, operating instructions, prevention rules in general and this Code of Ethics.

Workers must avoid dangerous behaviour and contribute to the fulfilment of the obligations laid down to protect health and safety in the workplace, in compliance with the provisions and instructions issued by the Company. Safety in the workplace is ensured both by strictly implementing the provisions of the law in force, and by actively promoting the culture of safety through specific training programmes in which Personnel are called upon to participate.

14. Use of company assets and IT services

In carrying out their professional activities, personnel have an obligation to conserve, preserve and protect the Company's tangible assets, intellectual property and financial assets.

In particular, computer or telematic tools and services must be used in full compliance with the relevant regulations in force, in particular with regard to computer crimes, computer security, privacy and copyright, as well as internal procedures.

Employees are prohibited from loading borrowed or unauthorised software onto company systems. In addition, it is forbidden to make unauthorised copies of licensed programmes for personal, corporate or

third-party use. Computers and IT tools made available by the Company must be used solely for business purposes.

Employees are also forbidden to send threatening and insulting e-mail messages, as well as to resort to linguistic expressions that do not conform to the Company's style, or in any case to inappropriate language.

15. Protection of industrial and intellectual property rights

Employees must respect the legitimate industrial and intellectual property rights of third parties and refrain from the unauthorised use of such rights, in the knowledge that violation thereof may have negative consequences for the Company. In particular, personnel, in the performance of their activities, must abstain from any conduct that may lead to the usurpation of industrial property rights, the alteration or counterfeiting of distinctive signs of industrial products, or of patents, designs or industrial models, both domestic and foreign, as well as abstain from importing, marketing or otherwise using or putting into circulation industrial products with distinctive signs that are counterfeited or altered or made by usurping industrial property rights. All employees must refrain from using in an unlawful and/or improper manner, in their own interest, in the interest of the company or of third parties, intellectual works (or parts thereof) protected under copyright law.

16. Confidentiality and data protection obligations

Recipients are required to process only the data and information connected with their functions and their existing relationship with the company, not to disclose information or news learned in the performance of their functions, except for purposes connected with the exercise of their professional activity and in compliance with the principle of transparency.

Addressees are also bound not to use or disseminate inside information, manipulate or disseminate false information.

Recipients are required to perform the personal data processing activities of which they become aware by reason of their functions in compliance with the applicable data protection regulations and the instructions issued by the Company. In particular, employees are required to comply with personal data management procedures, rules of conduct and technical and organisational security measures adopted by the Company to ensure an adequate level of data security.

17. Environmental Protection

All production activities are managed in compliance with current environmental regulations.

18. Transparency obligations under the Confindustria Medical Devices Code of Ethics

The Company must document and make public every year, through an appropriate Transparency Model and in strict adherence to the relevant company procedures, transfers of value performed directly or indirectly against Health Care Professionals, Health Care Organisations and Third Parties.

Both transfers made directly by the Company and those made indirectly on behalf of Roncadelle Operations S.r.l. through a third party must be documented and publicised.

The data must be published on the corporate website, in compliance with Regulation EU on data protection. The Company is obliged to keep, alternatively also in electronic format, for a period of at least three years appropriate documentation showing that the Health Professional's consent to the publication of the data concerning him/her has been requested.

Value transfers related to promotional material, meals and drinks and product samples are excluded from the publication requirement.

With regard to the methods of publication of data related to transfers of value and their periodicity, please refer to the provisions of the Code of Ethics of Confindustria Dispositivi Medici.

Publication of data on interaction with the individual Health Professional

The Company shall disclose, on an individual basis for each recipient, the amount of transfers of value made during the previous year with reference to

- a. costs of participation in training, educational and promotional activities on farm products (excluding meals and drinks);
- b. fees for consultancy and professional services, including voice-over activities, resulting from a specific contract between the Company and the individual Professional indicating the type of service provided, including the related travel and hospitality expenses (excluding meals and drinks).

If the Healthcare Professional does not give his consent to the processing of personal data, the Company shall in any case publish the data on an aggregate basis, in accordance with the procedures laid down in the Code of Ethics of Confindustria Dispositivi Medici.

Publication of data on interaction with the Health Organisation and other Third Parties

The Company shall disclose the amount of transfers of value made to each Health Organisation or other Third Party during the preceding year in respect of

- a. contributions for the financing of events (e.g. sponsorship of conferences, congresses and scientific meetings, etc.) aimed at meeting educational/training needs of a scientific or other nature, as described in the Code of Ethics of Confindustria Dispositivi Medici;
- b. fees for consultancy activities and professional services, including speaker activities, defined by a specific contract between the Company and the Health Organisation, indicating the type of service provided, including the relevant travel and hospitality expenses;
- c. donations both in cash and in other goods given to the Health Organisation.

Publication of other data in aggregated form

The Company is also required to publish the following transfers in aggregate form, in accordance with the procedures set out in the Code of Ethics of Confindustria Dispositivi Medici:

- a. all donations both in cash and in other goods to Third Parties other than the Organisation Sanitary;
- b. funding for research and development activities;
- c. scholarships.

IMPLEMENTATION OF THE CODE

1. Dissemination and training on the Code of Ethics

The Company undertakes to ensure maximum and punctual dissemination of this Code of Ethics both inside and outside the Company. With particular reference to the Corporate Bodies and Personnel, it guarantees:

- the distribution of the Code of Ethics to all members of the Corporate Bodies and all employees;
- the posting of the same in a place in the company premises accessible to all, in order to allow the verification of any report of violation of the Code, as well as the assessment of facts and the application of appropriate sanctions in the event of violation;
- assistance in the interpretation and clarification of the provisions contained in the Code;
- the design of systems for verifying effective compliance with the Code of Ethics.

The Organismo di Vigilanza pursuant to Legislative Decree 231/01 (hereinafter referred to as the 'SB'), which is responsible for controlling the effective implementation of the Model, promotes and monitors training initiatives on the principles of the Code of Ethics. The training will be characterised by a higher degree of depth for persons qualified as so-called 'apical' by the decree, as well as for those who work in the areas most at risk of commission of offences as indicated in the Organisational and Management Model.

With particular reference to Third Party Recipients and any other interlocutor, the Company shall also

- informing them of the commitments and obligations imposed by the Code of Ethics, by handing over a copy of it;
- disseminate the Code through the company's information systems;
- require them to comply with the Code of Ethics;
- sign clauses and/or in any case declarations contained in and/or in any case attached to the relevant contracts aimed, on the one hand, at formalising the commitment to comply with Legislative Decree No. 231/2001, the Model and the Code of Ethics and, on the other hand, at regulating the contractual sanctions that will be applied as a result of the breach of this commitment.

Any doubts concerning the application of this Code shall be discussed with the Organismo di Vigilanza in good time.

2. Tasks of the Organismo di Vigilanza

As already mentioned in the previous paragraph, control over the implementation of and compliance with the Code of Ethics is entrusted to the Organismo di Vigilanza, which must, insofar as it is of interest here:

- monitor compliance with the Code of Ethics, with a view to reducing the danger of the offences provided for in the Decree being committed;
- comment on ethical issues that may arise in the context of company decisions, and on alleged violations of the Code of Ethics of which it becomes aware;
- make available all possible means of knowledge and clarification concerning the correct interpretation and implementation of the provisions contained in the Code of Ethics;
- monitor the updating of the Code of Ethics, formulating its own proposals for adaptation and updating;
- promote and monitor the Company's implementation of communication and training activities on the Code of Ethics;
- report any violations of the Code of Ethics to the competent corporate bodies, verifying the effective application of any measures imposed.

3. Violations of the Code of Ethics and Sanctions

Observance of the rules of the Code of Ethics must be considered an essential part of the duties incumbent on the Company Bodies and Personnel, as well as an essential part of the contractual obligations undertaken by Third Party Recipients.

Violation of the rules of the Code of Ethics will entail the application of the sanctions provided for in the Disciplinary System (to which reference is made) and/or, as regards Third Party Recipients, in the clauses included in contractual relationships.

With regard to Senior Persons, various types of sanctions are envisaged, ranging from a written warning, a warning, the curtailment of emoluments to the revocation of the office.

Different types of sanctions may be applied to Employees, ranging from verbal warning, written warning, fine and suspension within the limits provided for by collective bargaining and dismissal, in accordance with the applicable CCNL.

With regard to Third Party Recipients, the sanctions provided for are of a contractual nature of graduated intensity on the basis of a specific clause inserted in the agreement or in the letter of appointment.

4. Reporting violations of the Code of Ethics

Should a person required to comply with this Code of Ethics become aware of a fact or circumstance likely to constitute a danger of violation thereof, he/she shall promptly report it to the Supervisory Board.

The body ensures the confidentiality of the reporting person, operating in such a way as to guarantee full

respect for the reporting person's personal data.

The Company strictly forbids any retaliatory, discriminatory or penalising behaviour towards anyone who, in good faith, reports a violation of this Code, a violation of the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 and/or an offence relevant under the aforementioned Decree, or reports a potentially unlawful conduct.