



Code of Ethics

Legislative Decree No. 231 of
8 June 2001

Review	Description updates	Approval	Validity
1 of 01/06/2015	First Issue		
2 of 01.03.2021	MOG 231		

SUMMARY

Code of	Ethics1
Legislative Decree	No. 2311 of 8
.....	June 2001
FOREWORD	3
1. <i>Mission and structure of the Code of Ethics</i>	3
2. <i>Addressees of the Code of Ethics</i>	3
GENERAL PRINCIPLES	4
1. <i>Legality and Transparency</i>	4
2. <i>Confidentiality</i>	5
3. <i>Respect for human dignity and work capacity</i>	6
4. <i>Safety at work and environmental protection</i>	7
CRITERIA OF CONDUCT	8
1. <i>Transparency of accounting records and anti-money laundering</i>	8
2. <i>Relations with employees and collaborators</i>	9
Consultancy and professional services	9
Protection of privacy and management of confidential information	9
Personnel recruitment and selection	10
Use of computers, media and company assets	10
Prohibition of alcoholic, psychotropic and narcotic substances	11
Conflict of interest.....	11
3. <i>Relations with the Public Administration</i>	12
Gifts and entertainment expenses.....	12
Relations with the Public Administration and Judicial Authorities	12
4. <i>Relations with suppliers and consultants</i>	13
3. ARRANGEMENTS FOR IMPLEMENTING THE CODE OF ETHICS	13
1. <i>The effectiveness of the Code towards third parties</i>	13
2. <i>The contractual value and enforceability principles of the Code of Ethics</i>	14

FOREWORD

1. MISSION AND STRUCTURE OF THE CODE OF ETHICS

This Code of Ethics (hereinafter, also the "Code") is an expression of ethical principles and values assumed SCAGLIA INDEVA S.p.A. in the conduct of its business activities, particularly in terms of health and safety at work, environmental protection, management of financial flows and direct and indirect taxation.

The complexity of the technical, administrative situations and operational processes in which SCAGLIA INDEVA S.p.A. is involved, together with the need to prevent the offences underlying the administrative liability for crime of legal persons governed by Legislative Decree no. 8 June 2001, No. 231 require a clear definition of fair business values and responsibilities that SCAGLIA INDEVA S.p.A. recognizes and to which it orients its activities.

SCAGLIA INDEVA S.p.A. is committed to promoting awareness of the Code by employees and collaborators and all stakeholders by requesting their constructive contribution to the application and continuous improvement of the Code.

SCAGLIA INDEVA S.p.A. continuously monitors through the Board of Directors and the Supervisory Board on compliance with the Code, providing adequate tools and procedures for information, prevention and control and ensuring the transparency of operations and behaviors implemented, intervening, if necessary, with corrective actions.

The Code of Ethics adopted by SCAGLIA INDEVA S.p.A. is composed as follows:

- General Principles: constitute the fundamental values, recognised by SCAGLIA INDEVA S.p.A. as constituents of the business activity and with which the various *stakeholders* involved are required to comply, in order to promote the good economic performance, reliability and reputation of the entity;
- Criteria for conduct: these provide the guidelines and rules to which the company's collaborators are required to adhere in order to comply with the general principles and to prevent the risk of unethical conduct, to be supplemented by specific protocols, practices and operating instructions for the prevention of offences;
- Methods of implementation and control: describe the system of control for compliance with the Code of Ethics.

2. ADDRESSEES OF THE CODE OF ETHICS

The Recipients of this Code and stakeholders are:

- The company's shareholders;
- the Board of Directors of SCAGLIA INDEVA S.p.A.;

- employees with an open-ended or fixed-term employment contract;
- external collaborators;
- the members of the Board of Auditors;
- professionals and all collaborators, consultants, self-employed workers who perform their activities, including training, internships, apprenticeships within or on behalf of the structure of SCAGLIA INDEVA S.p.A.;
- other third parties with whom the company has contractual relations for the achievement of the company's objectives, involving the provision of services, including temporary ones, or the performance of activities in the name of and on behalf of the organisation, such as to establish a relationship of trust with the latter.

SCAGLIA INDEVA S.p.A. undertakes in respect of such persons:

- implement adequate training and awareness programmes on the contents of the Code of Ethics;
- to ensure the timely dissemination of the Code to all personnel, so that proof of knowledge is provided, with a commitment to comply with it, possibly also by publishing it on the company website, as well as on a special notice board freely accessible by personnel;
- periodically check that the Code is respected and complied with;
- to ensure its periodic review and update in order to adapt the Code to any changes in the organisational or management structure of the Institute and to regulatory developments;
- to adopt adequate prevention tools and appropriate sanctioning measures in case of proven violation of the provisions of the Code.

The Addressees of this Code undertake to act and behave in line with what is indicated therein, to report any violations of which they become aware, to cooperate in compliance with internal procedures for the concrete implementation of the Code.

GENERAL PRINCIPLES

1. LEGALITY AND TRANSPARENCY

SCAGLIA INDEVA S.p.A. acts in compliance with the laws and regulations in force in the territories in which it operates, the Organisation, Management and Control Model, the Code of Ethics and the internal rules.

The pursuit of the statutory interest and objectives can never justify a behaviour unlawful or contrary to the duties set out in this document.

SCAGLIA INDEVA S.p.A. establishes relations with its private, public and institutional stakeholders in compliance with the rules of fairness, loyalty, collaboration and mutual respect.

The actions, operations, negotiations and activities carried out and, in general, the conduct of the Addressees of the Code in the performance of their working activities or collaboration relationship shall be based on the principles of honesty, fairness, integrity, transparency and mutual respect.

The Addressees shall act with commitment and professional rigour, so as to protect the prestige and reputation of SCAGLIA INDEVA S.p.A..

Corrupt practices, illegitimate favours, collusive behaviour, direct or indirect solicitation of personal and career advantages for oneself or others, are strictly prohibited and prosecuted.

It is also strictly forbidden to offer or promise, directly or indirectly, payments, benefits and other advantages of any kind to third parties, representatives and public officials, public or private employees, in order to influence, compensate or omit an act of their office.

Acts of commercial courtesy, such as gifts and gratuities, are allowed only if of modest value and in any case such as to exclude their destination to acquire undue advantage or in the form of unfair competition. These expenses and forms of hospitality must in any case be authorized in advance by the Administrative Body of SCAGLIA INDEVA S.p.A. or its delegate.

Anyone who receives proposals for gifts, gratuities or favorable treatment not configurable as acts of commercial courtesy of modest value or not part of specific business projects authorized by the management of SCAGLIA INDEVA S.p.A., shall promptly refuse them and inform the Administrative Body of SCAGLIA INDEVA S.p.A..

SCAGLIA INDEVA S.p.A. maintains a relationship of trust and loyalty with its employees, who are prohibited from taking up employment with third parties, consultancy or other assignments without first informing the company. Employees may not carry out activities or behave in a manner contrary to the interests of the company.

2. CONFIDENTIALITY

The Addressees undertake to treat all information acquired in the performance of their working activity or professional collaboration relationship as confidential and, therefore, not to disclose it, except within the limits of and in function of the performance of the activity or function for which they are responsible.

The information legitimately acquired may not be used for its own interests in order to gain undue advantage in an illegal manner or in such a way as to cause damage to the rights, assets and objectives of SCAGLIA INDEVA S.p.A..

The Recipients in the performance of their duties will produce or come into contact with information of a confidential nature that if improperly disclosed could seriously damage the interests of SCAGLIA INDEVA S.p.A. This information (drawings, designs, prototypes, plants, machines, devices, technical expertise, processes, lay-outs, data, proposals, offers,), defined as a whole confidential information, may be stored in various forms: paper, computer,

It is prohibited for all Recipients to process, use and access without authorization confidential information relating to data or knowledge belonging to SCAGLIA INDEVA S.p.A. for purposes other than strictly professional.

All Addressees are required to safeguard the confidential nature of the information to which they have had access in the course of their work, even if such information is not specifically classified as confidential and does not specifically concern the company, but customers, competitors, suppliers, markets and public bodies, connected with the company's activities.

It is forbidden for all Recipients to extract copies, communicate and disclose to third parties confidential information and make any statement involving SCAGLIA INDEVA S.p.A., unless strictly necessary for the performance of their duties and without having taken the necessary precautions to prevent misuse by third parties.

The Recipients also undertake to return to SCAGLIA INDEVA S.p.A. at the time of termination of relations with it, all paper, computer, and other material containing confidential information that they have come into possession in the performance of their duties during the relationship with SCAGLIA INDEVA S.p.A.

SCAGLIA INDEVA S.p.A., through its internal control function, retains the power to monitor information flows, archives and any other company documentation in order to verify compliance with the provisions of this code and with current legislation on the protection of privacy rights.

Failure to comply with the above obligation of confidentiality will constitute a serious breach of contract,

SCAGLIA INDEVA S.p.A. adopts specific policies on confidentiality and protection of information, including the signing of confidentiality agreements (*Non Disclosure Agreements*) and the provision of specific information on how to process personal data, in accordance with current legislation.

3. RESPECT FOR HUMAN DIGNITY AND WORKING CAPACITY

SCAGLIA INDEVA S.p.A. promotes the protection of human rights and fundamental freedoms, inalienable and inalienable, in particular civil and political rights, social, economic and cultural rights and the so-called third generation rights (the right to self-determination, peace, development and environmental protection).

Discrimination of any kind on grounds of race, gender, religious belief, age, health, political opinion, trade union membership, nationality, sexual orientation and generally any intimate characteristic of the human person is repudiated.

Indeed, diversity represents an opportunity for innovation and development, encouraging dialogue and the exchange of ideas, opinions and experiences.

Corruption, forced or child labour are also combated.

The company also ensures working conditions that respect personal dignity and works to ensure that there is no intimidation, *bullying* or *stalking* in the working environment.

Work must be based on relationships of trust and cooperation, in compliance with company directives and relations between colleagues and in formal compliance with the roles laid down in the company organisation chart.

Teamwork should be promoted and stimulated. Personal interests must not be put before social goals.

SCAGLIA INDEVA S.p.A. is committed to developing the working skills and competences of its employees and collaborators and to protecting the working conditions both in the protection of the psycho-physical integrity of the worker.

SCAGLIA INDEVA S.p.A. is committed to offering to all workers and employees the same opportunities for work, collaboration and training, ensuring a fair treatment and compensation based solely on criteria of merit and competence, without discrimination. The Administrative Body and the functions responsible for this purpose must:

- adopt in any case criteria of merit and competence (and in any case strictly professional) for any decision concerning human resources;
- in all cases, select, recruit, train, remunerate and manage human resources without any discrimination;
- create a working environment in which personal characteristics or orientations cannot give rise to discrimination of any kind.

4. PROTECTION OF SAFETY AT WORK AND PROTECTION OF THE ENVIRONMENT

SCAGLIA INDEVA S.p.A. is committed to acting in compliance with current regulations on the protection of health and safety in the workplace, as well as to promote the effective application within its structure and operational processes.

SCAGLIA INDEVA S.p.A. also promotes the internal dissemination of a culture of safety and risk awareness, encouraging the adoption of responsible conduct by all stakeholders.

SCAGLIA INDEVA S.p.A. shall ensure continuous monitoring of the premises and related facilities at its disposal for any reason, in order to guarantee the highest levels of worker health and safety in accordance with the regulations in force.

If the Addressees of the Code notice any anomalies or irregularities, they shall immediately inform the supervisors, the employer or his delegate.

Workers and, in general, all stakeholders who visit the company premises undertake to comply with the relevant regulations and directives, and to take care of their own health and safety and that of the other people present in the workplace, who are affected by the effects of the

their actions or omissions, in accordance with their training, instructions and role.

SCAGLIA INDEVA S.p.A. adopts responsible policies to protect and safeguard the environment, through the analysis of risk factors for the ecosystem, implementation and continuous improvement of industrial processes in the direction of reducing and optimising environmental impact.

The company promotes the responsible use of natural resources in order to reduce the consumption of fossil fuels and ensures the reduction of greenhouse gas emissions, paying particular attention to renewable energy sources and the efficient use of energy and natural resources.

The company implements policies to contain the generation of waste by promoting, where possible, the recycling and reuse of materials and in any case ensures that waste disposal takes place in a responsible manner in full compliance with current regulations, including through constant technological updating of plants in order to ensure the reduction of polluting factors.

CRITERIA OF CONDUCT

1. TRANSPARENCY OF ACCOUNTING RECORDS AND ANTI-MONEY LAUNDERING

The Addressees of the Code are required to cooperate, within the scope of their competences, in order to ensure that management events are correctly and promptly recorded in the accounting records.

Every operation or transaction must be authorised, verifiable, legitimate, congruous, consistent and correctly and promptly recorded and registered in the company's accounting system in accordance with the criteria indicated by law and on the basis of the applicable accounting principles.

It is forbidden to behave in such a way as to jeopardise the transparency and traceability of financial statement information. Adequate supporting documentation of the activity carried out is kept on file for each operation, so as to allow easy and accurate accounting records, the timely determination of the characteristics and reasons behind the operation, and the identification of the various levels of responsibility.

Recipients who become aware of omissions, falsifications or negligence in the management of the accounts are required to communicate the facts to the superior body, or to the body to which they belong.

No employee or collaborator may make payments in the interest and on behalf of SCAGLIA INDEVA S.p.A., in the absence of adequate supporting documentation and formal authorization, delegation or power of attorney.

Financial records must be retained and destroyed in accordance with the retention policy set out in the relevant legislation.

Each level of the organisational structure has the task of contributing to the creation of an effective and efficient internal control system, as described in the Organisational Model.

In order to implement this task, SCAGLIA INDEVA S.p.A. guarantees the corporate bodies with control powers, as well as the Supervisory Board established under Article. 6 D. Decree 231/2001. D. 231/2001, free access to data, documentation and any information useful to carry out its activities.

Recipients are required to cooperate fully with the holders of control powers. Activities hindering the control function, carried out by institutional control bodies, are therefore prohibited.

SCAGLIA INDEVA S.p.A. also monitors that its activities do not become a tool to facilitate, even potentially, illegal activities and criminal and terrorist organizations. To this end, it always applies the national and international anti-money laundering regulations.

SCAGLIA INDEVA S.p.A. verifies with the utmost diligence the information available on business counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them.

SCAGLIA INDEVA S.p.A. shall ensure that the transactions to which it is a party do not present, even potentially, the risk of favouring the receipt, replacement or use of money or goods resulting from criminal activities.

2. RELATIONS WITH EMPLOYEES AND COLLABORATORS

Consulting and professional services

Consultants and self-employed workers, as well as more generally suppliers of services and intellectual work, are obliged to observe the same *standards of conduct* as employees when conducting business with or on behalf of the company, being also interested parties in the application of the Organizational Model and the Code of Ethics of SCAGLIA INDEVA S.p.A..

Those acting in the name and/or on behalf of the company are required to maintain and protect the company's image of seriousness, respectability and fairness.

Protecting privacy and managing confidential information

SCAGLIA INDEVA S.p.A. adopts appropriate precautions and security measures regarding the processing of personal and/or sensitive data collected from time to time by the Recipients.

In accordance with applicable law, any investigation into the opinions, preferences, personal tastes and, in general, the private life of the Recipients is prohibited.

It is also forbidden, except in the cases provided for by law, to communicate or disseminate personal data without the prior consent of the person concerned or in violation of the internal Privacy Policy or other regulations.

Recipients shall also safeguard confidential information of which they become aware. knowledge, in accordance with any Non-Disclosure Agreement entered into with SCAGLIA INDEVA S.p.A. and use them only within and in the exclusive interest of the entity.

The term 'confidential information' means information relating to the company's current or planned activities which, if used or disclosed without prior authorisation, could be financially advantageous to third parties and/or harmful to the company.

Confidential information may include, by way of example, trade secrets and know-how, inventions, marketing and sales programmes and strategies, information on customers and suppliers, financial data, production processes and techniques, computer software, data, formulas, technical drawings and drawings, metric calculations, tender specifications, even if originating from third parties but entrusted to the company.

In particular, the Addressees who are in possession of or have access to confidential information shall avoid disclosing such information outside the company, refrain from using such data for their own benefit or for the benefit of extraneous persons, unless this is indispensable for the pursuit of the tasks entrusted to them or in any case of institutional purposes.

The obligation to keep confidential information confidential does not cease with the termination of the professional relationship with the company. The termination of the relationship also entails the obligation to hand over to one's direct superior all documents and other materials containing confidential information, in accordance with the specific provisions contained in the Non-Disclosure Agreement entered into.

Personnel research and selection

The search and selection of staff to be recruited is the responsibility of the Personnel Department and is carried out with respect for the privacy of the candidates, ensuring equal opportunities and avoiding any favouritism, in accordance with the procedures determined by public law.

Staff are employed under a regular employment or self-employment contract in accordance with the legislation applicable in the place of recruitment; all forms of illegal employment are expressly prohibited and not tolerated.

At the time of recruitment or establishment of the collaboration relationship, and during the first period of induction in the company, each Collaborator shall receive accurate information with particular reference to the rules governing his/her employment relationship, to the prevention rules and procedures relating to health and safety in the workplace, to the company policies, to the Organisational, Management and Control Model adopted pursuant to Legislative Decree no. 231/2001 and to the rules of this Code in order to ensure immediate knowledge and promote a more rapid integration in the life and culture of the company.

Use of computers, media and company assets

Each Recipient is required to take the necessary measures to ensure computer security in accordance with the procedures, instructions and operating practices adopted by SCAGLIA INDEVA S.p.A..

The company's resources must not be used for illegal purposes, to cause nuisance, or be used in a way that is offensive to others.

The use of computers, software programs, cloud resources, systems and media owned by the company to send e-mail or access the Internet engages the company's image. The use of such resources must be consistent with institutional *policies* and company standards, privacy, copyright, trademark, trade secret and other intellectual property considerations.

Technological resources shall be used in accordance with the procedural and operational rules established by the relevant departments in each company. The credentials for accessing the company's information systems may only be known by their owners and assignees and may not be disclosed to third parties.

Each employee also has the duty to act diligently to protect the company's assets, through responsible behaviour in line with the operating procedures laid down to regulate their use, accurately documenting their use.

Prohibition of alcoholic, psychotropic and narcotic substances

Recipients shall personally contribute to promoting and maintaining a climate of mutual respect in the work environment. It shall be considered a conscious assumption of the risk of impairing such environmental characteristics to be found or to be under the effect of alcohol, drugs or substances with similar effect during work performance and in the workplace.

It is prohibited to:

- holding, consuming, offering or transferring for any reason drugs or substances with similar effects, during work and in the workplace;
- smoking inside the premises and workplaces.

Conflict of interest

The persons covered by the Code must act in the interest of the company. They must, therefore, avoid situations of conflict of interest that could affect their independence of judgement and choice.

If one of the Addressees finds him/herself in a situation that, even potentially, may constitute or determine a conflict of interest, he/she shall promptly report it to his/her superior.

Furthermore, no employee shall take advantage of opportunities that may arise through the availability of assets, information or his/her position in the company, and shall not engage in activities in competition with it.

3. RELATIONS WITH THE PUBLIC ADMINISTRATION

Gifts and entertainment expenses

In accordance with the principles set out in this Code of Ethics and the Organizational Model of SCAGLIA INDEVA S.p.A., as well as in compliance with the legislation on anti-corruption, it is prohibited any form of gift that could even just be interpreted as exceeding normal business practices or courtesy or otherwise aimed at acquiring favorable treatment in the conduct of any activity related to SCAGLIA INDEVA S.p.A.

In any case, SCAGLIA INDEVA S.p.A. refrains from practices that are not permitted by law, business practices or codes of ethics of companies or entities with which it has relationships.

The gifts offered - except those of modest value - must be managed and authorised according to the institutional processes by the Administrative Body or by the expressly delegated function and must be adequately documented.

Expenses incurred such as meals, travel expenses and entertainment offered to third parties will be made in accordance with applicable laws and *policies* adopted by SCAGLIA INDEVA S.p.A..

Relations with the Public Administration and Judicial Authorities

Relations between the company and the Public Administration shall be based on strict compliance with applicable laws and regulations, as well as with specific company *policies* and procedures, and shall in no way compromise the integrity and image of the company.

The assumption of commitments and the management of relations, of any kind, with the Public Administration, public officials or persons in charge of a public service are reserved exclusively to the Administrative Body or to the functions and persons appointed and provided with delegated or special power of attorney.

Any giving or promising of money or other benefits for illegal purposes or to obtain undue advantages is expressly prohibited.

It is also prohibited, in particular, the corporate bodies, employees and collaborators, attorneys and attorneys with authority to represent the company in court, to promise or give money or other benefits to magistrates, judges, clerks and witnesses in order to influence the outcome of the process in favor of SCAGLIA INDEVA SpA.

4. RELATIONS WITH SUPPLIERS AND CONSULTANTS

SCAGLIA INDEVA S.p.A. is committed to seeking in suppliers and external collaborators a suitable professionalism and a commitment to sharing the principles and contents of the Code of Ethics and promotes the construction of lasting relationships for the progressive improvement of *performance* in the protection and promotion of the principles and contents of the Code.

In relations of procurement, supply of goods and services and external collaboration (including consultants, agents, etc.), Recipients are required to

- Comply with current legislation and specific procedures on the selection of contractors and the awarding of contracts, works and services;
- in any case, observe the internal procedures for the selection and management of relations with suppliers and external collaborators and not to preclude any person meeting the requirements from competing for a supply contract with the company;
- adopt, in the selection, only objective evaluation criteria in a declared and transparent manner, in line with usual business practice;
- observe and demand compliance with the contractual conditions;
- promptly report potential breaches of the Code to the Supervisory Board.

3. PROCEDURES FOR IMPLEMENTING THE CODE OF ETHICS

1. THE EFFECTIVENESS OF THE CODE TOWARDS THIRD PARTIES

SCAGLIA INDEVA S.p.A. requires the commitment of the Stakeholders to whom this Code is addressed

Ethics to act with integrity and to manage its activities in line with the highest ethical standards.

Everyone shall endeavour to interact in a fair manner with suppliers, competitors and co-workers. There should be no attempt to gain a position of superiority in business relationships through manipulation, concealment or abuse of privileged information, or otherwise misrepresentation of material facts. Everyone's attitude shall be fair to everyone.

Whoever, also acting in the name and/or on behalf of the company, comes into contact with third parties with whom the company intends to enter into legal, institutional or other relationships, is obliged to:

- a) informing them of the commitments and obligations imposed by the Code;
- b) require compliance with the obligations concerning their activity;
- c) adopt internal initiatives to ensure compliance with the Code, in the event of refusal by third parties to comply with the Code or in the event of failure or partial performance of the commitment undertaken to comply with its provisions.

2. THE CONTRACTUAL VALUE AND COERCIVE PRINCIPLES OF THE CODE OF ETHICS

The Code of Ethics, considered as a whole and together with all the specific procedures contained in the Organisation, Management and Control Model adopted by the Institute pursuant to Legislative Decree 231/2001, must be considered an integral part of the employment contract, pursuant to Article 2104 of the Italian Civil Code, where applicable, or of the contract of collaboration or intellectual work or supply of goods or services.

The violation of these provisions therefore constitutes an offence of a disciplinary nature and, as such, may be pursued and sanctioned by the company pursuant to and for the purposes of art. 7 of Law 300/1970, in accordance with and with the imposition of the penalties provided for in the Disciplinary System integral part of the Organizational Model of SCAGLIA INDEVA S.p.A..

This does not affect the right of SCAGLIA INDEVA S.p.A. to compensation for material and immaterial damages suffered as a result of the violation.

As for collaborators, consultants, contractors and other third party recipients of this Code of Ethics, signing or, in any case, adhering to the provisions and principles laid down therein is an essential and necessary condition for the stipulation and execution of contracts of any kind between the company and such persons; therefore, the provisions approved, disclosed and accepted are an integral part of the contracts themselves.

In this perspective, SCAGLIA INDEVA S.p.A. shall, therefore, proceed to:

- a) establish, in agreement with the Supervisory Board, criteria and procedures aimed at ensuring compliance with the Code of Ethics;
- b) prepare communication and training programmes for the various Stakeholders aimed at disseminating knowledge and understanding of the Code of Ethics;
- c) verify the effective implementation of the Code;
- d) consider reports of possible violations of the Code;
- e) notify the Supervisory Board of the results of any investigations carried out in relation to breaches of the Code, and the adoption of sanctions in accordance with the Disciplinary System;
- f) activating and maintaining an adequate flow of information between the various stakeholders involved
title to compliance with the Organisational Model.

Each Key-Officer or Function Manager is obliged to:

- ensure compliance with the Code of Ethics by their subordinates;
- ensure that employees understand that compliance with the provisions of the Code is an integral and substantial part of their work performance;
- encourage the selection of employees and collaborators who guarantee compliance with the principles set out in the Code;

- promptly report to the Supervisory Board and the Administrative Body of SCAGLIA INDEVA S.p.A. any reports of violations or requests for clarification made by employees;
- prevent any form of retaliation within its Functions against workers or collaborators who have collaborated in the observance or concrete implementation of the Code.

Each employee and collaborator of SCAGLIA INDEVA S.p.A. is required to be familiar with the provisions contained in the Code and the reference law that governs the activity carried out within their function.

Employees and collaborators are obliged to:

- a) comply with the Code and refrain from conduct contrary to these provisions and rules;
- b) in case of doubts, to contact one's direct superiors, the Administrative Body or the Supervisory Board, for the necessary clarifications on how to apply the Code or the reference regulations;
- c) promptly report to their direct superiors, to the Administrative Body and to the Supervisory Board any news concerning possible violations of the Code, unless the irregularities detected involve the office holder himself; in this case, the news must be reported to persons above the "direct superior" involved, to the Administrative Body and to the Supervisory Board;
- d) collaborate with the management of SCAGLIA INDEVA S.p.A. within investigations aimed at verify, and possibly sanction, possible violations.

All recipients of this Code of Ethics may report in writing, through protected information channels, any violation or suspected violation of the Code of Ethics by e-mail communication to the dedicated address by registered letter to the attention of the Supervisory Board at the headquarters of SCAGLIA INDEVA S.p.A.