

# COMPLIANCE PROGRAM

(implementing Italian Legislative Decree 231/2001 as amended)

## Annex 4

### Sanctions System

# salvagnini

**SALVAGNINI ITALIA S.P.A.**

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## 1 INTRODUCTION

One of the essential elements for the formation, implementation and maintenance of an effective Compliance Program under Article 6 Italian Legislative Decree 231/01, is the existence of an adequate sanctions system suitable for sanctioning noncompliance with the measures indicated in the Program itself (protocols/internal procedures provided for in the Program, Code of Conduct, circulars and service orders, etc.).

Therefore, the definition of an adequate Sanctions System is an essential prerequisite of the exempting value of the Compliance Program *under* Italian Legislative Decree 231/2001 with respect to the administrative liability of entities.

Given the seriousness of the consequences for the Company in the event of misconduct by employees in general, managers, directors and auditors, any failure to comply with the Compliance Program constitutes a violation of the duties of diligence and loyalty and, in the most serious cases, damages the relationship of trust established with the Company.

Violations of the Compliance Program and Code of Conduct entail the application of the disciplinary sanctions set forth below, regardless of any criminal liability and the outcome of the relevant trial; the rules set forth in this System do not replace but rather supplement the provisions of the law and the clauses of collective bargaining on the subject of disciplinary sanctions.

The existence of a disciplinary system for subordinate workers - who qualify as "persons subject to the management or supervision" of one or more Senior Management according to the definition contained in Article 5(1)(b) Italian Legislative Decree 231/01 - is inherent to the employment relationship, as provided for by civil law<sup>1</sup>. In particular, the legislator has explicitly placed on the employee a duty of diligence and loyalty in the performance of his or her duties, as well as the possibility for the employer to resort to the application of disciplinary sanctions in the face of behavior inconsistent with these obligations. The sanctioning response must be commensurate with the seriousness of the infraction committed and must comply with the provisions contained in the Workers' Statute<sup>2</sup>, the current (i) National Collective Bargaining Agreement for the Metalworking Industry and, in general, the applicable Italian Laws.

In accordance with the laws in force, the disciplinary sanctions applicable to the Company's employees shall be brought to the attention of all Addressees of the application of the provisions contained therein, and this shall also be done through publication on the company bulletin board or other means deemed appropriate.

Pursuant to the regulations under consideration, therefore, the Company's Staff and non-employees are subject to this Sanctions System.

## 2 ADDRESSEES OF THE SANCTIONS SYSTEM

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<sup>1</sup> articles 2086, 2094, 2106 Italian Civil Code

<sup>2</sup> article 7 Italian Law 300/70

The provisions of this document, as well as those of the Code of Conduct and Compliance Program in general, apply to the following persons (hereinafter, "**Addressees**"), to the extent applicable, respectively:

- *Internal Parties* (hereinafter also referred to as "*Staff*"): those who have an ongoing, fixed-term or open-ended relationship with the Company; by way of example, members of the Corporate Bodies, employees, collaborators (including para-employees), interns and trainees;
- *Third Parties* (hereinafter also referred to as "*Third Parties*"): external professionals, partners, suppliers and consultants, supply companies and, in general, those who, having relations with the Company, in carrying out activities in the name of and/or on behalf of SALVAGNINI ITALIA S.P.A. or in any case, in carrying out their activities for the Company, are exposed to the risk of committing offenses under Italian Legislative Decree 231/2001 in the interest or benefit of the Company.

The Company: (a) brings the Compliance Program to the attention of employees, through the most appropriate means, and (b) properly informs and trains employees on its contents.

### **3 CONDUCT THAT CONSTITUTES A VIOLATION OF THE COMPLIANCE PROGRAM**

In order to make the prohibited behaviors immediately intelligible, the main punishable offenses are specified below:

- a) violation of the prohibitions and obligations specifically set forth in the Code of Conduct;
- b) failure to cooperate with the Supervisory Body or its operational staff by engaging in conduct that is omissive or reticent or otherwise likely to impede or even hinder its control, assessment and verification functions;
- c) violation or circumvention of the procedures and operational protocols adopted by the Company;
- d) failure or inadequate supervision by hierarchical superiors of compliance with the requirements and procedures set forth in the Code of Conduct and/or the Compliance Program by Staff;
- e) commission, even in attempted form, of acts provided for by Italian Law as offenses that may result in the Company's liability under the Decree;
- f) commission of actions or conduct that do not comply with the requirements of the Compliance Program, or omission of actions or conduct prescribed by the Program, in the performance of sensitive or instrumental activities that:
  - 1. expose the Company to an objective situation of risk of committing one of the offenses covered by Italian Legislative Decree 231/2001, as amended; and/or
  - 2. are uniquely directed to the commission of one or more of the offenses covered by Italian Legislative Decree 231/2001, as amended; and/or

3. are such as to result in the application against the company of sanctions provided for in Italian Legislative Decree 231/2001, as amended.
- g) violation of the measures to protect the author of whistleblowing reports of illegal conduct relevant under Italian Legislative Decree 231/2001 or violations of Compliance Program;
  - h) malicious or grossly negligent reporting of unfounded misconduct relevant under Italian Legislative Decree 231/2001 or violations of Compliance Program;
  - i) in the event that a sanction or precautionary prohibitory measure has been applied to the Company, violation of the obligations or prohibitions inherent in such sanctions or measures;
  - j) failure to participate in training programs, without adequate justification, put in place by the Company in relation to the subject matter.
- (m) with particular reference to Occupational Health and Safety and Environmental Offenses:
- omissions in the observance, implementation and control or violation of occupational health and safety protection regulations (Italian Legislative Decree 81/08 as amended);
  - omissions in the observance, implementation and control or violation of environmental protection regulations (Italian Legislative Decree 152/2006, Italian Criminal Code and other special regulations).

It should be noted that the aforementioned conducts are relevant as infractions punishable under this document even if they are committed through omissive conducts and/or in possible concurrence with other persons.

In addition, any conduct that constitutes a violation of the provisions contained in the Whistleblowing Procedure to which express reference is made may be sanctioned on a disciplinary level, without prejudice to any civil or criminal liability arising from such violations.

## **4 APPLICATION PROCEDURES**

### **4.1 Procedures with respect to employees**

Notice of a potential Compliance Program violation is matched by the initiation of a fact-finding procedure and possibly the disciplinary procedure established by Italian Law and the applicable Collective Bargaining Agreement. Therefore:

- i) any report of a violation of the Compliance Program is given impetus to the investigation procedure; in particular, the Head of the department to which the employee in question belongs and/or the Head of Human Resources, shall proceed with all the necessary investigations, with all the widest powers to acquire any useful element, also making use of the technical support of the competent corporate

structures; if the violation has been reported, the person who received it must protect the confidentiality of the reporter;

- ii) in the event that, as a result of the procedure, a violation of the Compliance Program has actually been detected, a charge must be made and, taking into account any justifications that the worker deems to have submitted within the time limits provided for by the regulations in force, a disciplinary sanction will be imposed, if necessary.

In particular:

- upon any report of a potential violation by the individuals who have a coordinating and/or supervisory role, and having consulted the hierarchical superior of the author of the detected conduct, the Company formally makes the charge and – having analyzed the employee's justifications, if any – imposes any applicable disciplinary sanction;
- the Supervisory Body is notified of the imposition of the disciplinary sanction;
- the adoption of discriminatory measures against whistleblowers may be reported to the National Labor Inspectorate, for measures within its competence, not only by the reporting person, but also by the labor organization indicated by the reporting person;
- retaliatory or discriminatory dismissal of the whistleblower is null and void, and changes of duties in violation of Article 2103 of the Italian Civil Code are also null and void. It is the employer's responsibility, in the event of disputes related to the imposition of disciplinary sanctions, or to demotions, dismissals, transfers, or subjecting the reporter to other organizational measures having direct or indirect adverse effects on working conditions, subsequent to the submission of the report, to prove that such measures are based on reasons unrelated to the report itself.

The Company monitors the application of disciplinary sanctions and verifies compliance with all legal and contractual requirements related to the imposition of the disciplinary sanction.

#### **4.2 Procedures with respect to Directors and members of the Board of Statutory Auditors and General Managers appointed by the Shareholders' Meeting (if appointed)**

This Compliance Program is delivered to each member of the Board of Directors and Board of Statutory Auditors, as well as to the General Managers appointed by the Shareholders' Meeting, where present and appointed.

When the violation of the provisions and rules of conduct of the Program and the Code of Conduct is made by members of the Board of Directors, the Board of Statutory Auditors, or a General Manager, the Supervisory Body or other person who has become aware of it according to the powers held and company procedures must promptly inform the entire Board of Directors and the entire Board of Statutory Auditors, as well as the Supervisory Body, if the information does not come from the latter.

The Board of Directors and the Board of Statutory Auditors, each within the scope of its powers or functions or prerogatives, may take appropriate action, as provided by Italian Law or the Bylaws, including the immediate or timely convening of the Shareholders' Meeting.

The Shareholders' Meeting shall examine the facts of the noncompliance stated in the agenda, formulate the facts with an indication of the circumstances of time and place inherent in the noncompliance itself and which gave cause for the call of the meeting, and

also set the date of its own reconvening for the examination of the offender's oral and/or written defenses and then to take decisions.

The Chairman of the Board of Statutory Auditors may be delegated to notify the offender, as formalized, if it is a challenge to a Board member, or a Board member may be delegated to notify the offender, if it is a challenge to a member of the Board of Statutory Auditors or a General Manager, who will provide the notice by registered letter with return receipt indicating the date of the next Meeting for the above tasks.

A period of not less than twenty-five days and not more than forty days shall elapse between the date of receipt of the complaint and the predetermined date of the Meeting.

At the time of formalization of the complaint, if it deems there to be particularly serious violations, the Shareholders' Meeting may order, until the conclusion of the proceedings, the immediate provisional suspension of the offender, which will be communicated together with the notice.

In the event that the offender is linked to the company by an employment relationship, all the sanctions provided for in Sections **7.1** and **7.2** may also be taken against the offender.

The outcome of the investigations carried out and any disciplinary sanction applied must be reported by the Chairman of the Board of Directors to the Supervisory Body and to the person/company in charge of the statutory audit if well-founded indications of a business crisis that may undermine the company's ability to continue as a going concern are identified.

If the violation has been reported, the person who received it must ensure the confidentiality of the reporter's identity.

#### **4.3 Procedures towards the person/company in charge of the statutory audit**

The contract with the person/company in charge of the statutory audit must include a special clause providing for compliance with the Code of Conduct insofar as applicable to the relationship established and related sanctions in case of violation.

When violations are detected by the subject/company in charge of the statutory audit, upon report of the SB or other party or on its own initiative, the Board of Directors shall consider the application of the sanctions referred to in **points a. and b.** of paragraph **7.4** or urgently convene the Shareholders' Meeting in accordance with the Bylaws and in compliance with the Italian Civil Code for the possible sanction referred to in **point c.-** of paragraph **7.4**

The Board of Directors or the Shareholders' Meeting, according to their respective competencies, shall examine the facts of the noncompliance stated in the agenda, formulate the facts with an indication of the circumstances of time and place inherent in the noncompliance and which gave cause for the convocation, and also set the date of its own reconvening for the examination of the oral and/or written defenses of the offender and then to act on them.

Decisions made should be reported to the Supervisory Body.

A Board Member may be delegated to notify the offender of the objection, as formalized, who will provide the notice by registered letter with return receipt or PEC indicating the date of the next meeting for the above tasks.



A period of not less than twenty-five days and not more than forty days shall elapse between the date of receipt of the complaint and the preset date of the meeting.

If the violation has been reported, the person who received it must protect the confidentiality of the reporter.

#### **4.3 Procedures towards third parties (e.g., business partners, consultants and external collaborators)**

At the time of entering into contracts for – merely by way of example - supply, contracting out of goods and/or services, consultancy, agency, distribution or commercial representation assignments, special clauses will be prepared, whereby the Third Parties - in their relations with the Company - undertake to comply with the principles and operating practices defined in the Compliance Program - if and insofar as applicable in light of the relationship established – and/or in the Code of Conduct as well as in the performance of the activities envisaged in the contract, from engaging in commissive or omissive conduct in violation of the aforementioned 231 Code of Conduct and/or from engaging in commissive or omissive conduct, even in the form of a mere attempt, that integrates the elements of any of the offenses that constitute the prerequisite for liability under Italian Legislative Decree 231/01. Failure to comply with these obligations, constituting a serious and essential violation, will give the Company the right to proceed with the following sanctions, which must be expressly provided for in the contract:

- reminder and notice to comply;
- suspension of the execution of the contract and the concomitant notice of a peremptory deadline within which the effects of the contested violation must be fully eliminated, under penalty of ipso jure termination of the contract;
- payment of a penalty in the amount that will be deemed appropriate and effective for the different types of relationships established with Third Parties;
- immediate termination of the contract pursuant to Article 1456 of the Civil Code without prejudice to the third party's duty to compensate for damages.

If a violation occurs by collaborators, consultants or other Third Parties connected to the company by a contractual relationship other than employment, the SB or other person who has become aware of it according to the powers held and company procedures shall report this circumstance to the CEO of the Area to which the contractual relationship pertains.

The aforementioned Director will make all the necessary investigations, with all the broadest powers to acquire all useful elements – also making use of the support of the relevant corporate structures – and will take the appropriate initiatives, pursuing the applicable contractual remedies, subsequently informing the Board of Directors.

The offense must be formally protested in writing by registered mail with return receipt to the offending party specifying the facts that gave rise to it with an indication of the circumstances of time and place.

No sanction may be imposed unless the infringement has first been contested in writing, specifying the fact that gave rise to it, and in any case unless fifteen days have elapsed since the contestation itself, during which time the Third Parties shall be heard, if they so request, and shall have the right to present their defense, including in writing.

The imposition of the penalty described above must be justified and communicated in writing to the domicile of the Third Parties offender by registered mail with return receipt.

The outcome of the investigations carried out and any initiatives taken towards Third Parties must be communicated by the Executive Directors to the Supervisory Body and to the

person/company in charge of the statutory audit of accounts if well-founded indications of a corporate crisis that may undermine the company's ability to continue as a going concern are identified.

If the violation has been reported, the person who received it must protect the confidentiality of the reporter.

## **5 CRITERIA FOR EVALUATING THE CONDUCT ALLEGED AGAINST EMPLOYEES**

The type and extent of each of the following sanctions, also in application of the principle of proportionality in Article 2106 of the Civil Code, vary in relation:

- to the intentionality of the behavior or the degree of negligence, recklessness or inexperience, with regard also to the foreseeability of the event;
- to the overall conduct of the employee with particular regard to whether or not the employee has a disciplinary record, to the extent permitted by Italian Law;
- to the worker's duties;
- to the functional position of the persons involved in the facts constituting the failure;
- to any special circumstances, aggravating or mitigating, accompanying the disciplinary offense;
- to the possible sharing of responsibility with other employees who participated in bringing about the failure;
- to the company's exposure to the risk of offenses being committed and the possible application of the sanctions provided for in Italian Legislative Decree 231/01.

The Company's right to claim damages arising from an employee's violation of the Compliance Program is in any case unaffected.

With regard to the investigation of infractions, disciplinary proceedings and the imposition of sanctions, the powers already granted, within the limits of their respective delegated powers and competencies, to the Company's management remain valid.

## **6 ROLE OF THE SUPERVISORY BODY**

Supervision of compliance with the Compliance Program is entrusted to the Supervisory Body, which, in the exercise of its functions, is also called upon to detect any violations.

Reports regarding any potential cases of liability under Italian Legislative Decree 231/01 and/or violations of the 231 Compliance Program should be addressed to the Supervisory Body; these reports should be transmitted and handled in the manner and through the channels provided in the "**Whistleblowing Procedure**", which also allows the sending of anonymous reports.

## **7 SANCTIONS**

### **7.1 Sanctions against non-management employees**

The company's disciplinary system is based on the relevant provisions of the Italian Civil Code, the Workers' Statute, the Collective Bargaining Agreement for the category and in any case the applicable regulations on the subject.

The applicable sanctions against non-management employees are those provided for by Italian Law and the regulations set forth in the applicable collective bargaining agreements, namely:

- a. written warning;
- b. fine not exceeding the amount of three hours' pay;
- c. suspension from work and pay for a period not exceeding 10 days of actual work;
- d. Individual dismissal.

The system, as also provided for in the relevant collective bargaining agreements, exemplifies the disciplinary behaviors according to the significance of each case, listing the applicable sanctions based on their severity.

Without prejudice to the need to assess the type and extent of sanctions in application of the criteria listed in paragraph 5, as a supplement to the exemplification provided by the relevant Collective Bargaining Agreement and as an exemplification of the general rule (article 2104 Civil Code) according to which the employee has the obligation to observe in the most scrupulous manner the duties of office, it is specified that an employee incurs a disciplinary offense who, even in possible concurrence with others:

- violates by commissive or omissive behavior the internal procedures set forth in this Compliance Program,
- tolerates, even when commanded by a hierarchical superior, the violation, by other parties, of the internal procedures in the following program; gives dispositions and/or induces colleagues of equal or superior rank and/or subordinates to the violation of the internal procedures in this program and/or tolerance with respect to the violation of these procedures
- adopts, in the performance of activities in the areas at risk, a behavior, active and/or omissive, that does not comply with the requirements of this Compliance Program, whether or not it is such as to determine the concrete application against the company of measures provided for in the Decree
- engages in conduct, active and/or omissive, directed at the commission of an offense provided for by Italian Legislative Decree 231/2001; engages in conduct, active and/or omissive, that constitutes an offense provided for by Italian Legislative Decree 231/2001; violates the measures for the protection of the author of reports of unlawful conduct relevant under Italian Legislative Decree 231/2001 or violations of the Compliance Program;
- reports with malicious or gross negligence unlawful conduct relevant under Italian Legislative Decree 231/2001 or violations of Compliance Program that have proven to be unfounded.

The identification of the sanction to be applied concretely in relation to the commission of one or more of the conducts exemplified above will be carried out in application of the principle of proportionality referred to in Article 2106 of the Civil Code, as well as the criteria indicated in paragraph 5 above.

## **7.2 Sanctions against managers**

When the violation of the internal procedures set forth in the Compliance Program and/or Code of Conduct is carried out by executives, the sanction deemed most appropriate will be

applied against those responsible in accordance with the provisions of the Italian Law, the regulations set forth in the collective bargaining agreement for the category or any individual agreements, up to and including termination of employment.

In such cases, removal of powers, if any,

conferred on the manager and, where possible, assignment to a different position.

Penalties of a disciplinary nature, as well as any claim for damages, will be commensurate with the level of responsibility, role and intensity of the fiduciary bond related to the assignment given.

In the event of a violation by managers, the Supervisory Body or other person who has become aware of it in accordance with the company's powers and procedures will report this circumstance, as provided for in Paragraph 6 above, to the Head of Human Resources and, for information or in the case where the alleged perpetrator is the Head of Human Resources, to the Board of Directors. If the violation has been reported, the person who received it must protect the confidentiality of the reporter. The aforementioned Human Resources Manager (or other delegated person, if any) shall make all necessary investigations, with the broadest powers to acquire any useful element, and shall take appropriate action.

The outcome of the investigations conducted and any disciplinary sanction applied must be reported to the Supervisory Body.

### **7.3 Penalties against directors and auditors and against general managers appointed by the shareholders**

If a member of the BOD is involved, the following sanctions may be imposed (as detailed in the Table in Section 9):

- a formal written warning censuring the violation of the Compliance Program and/or Code of Conduct and an notice to comply with the provisions of the Compliance Program and/or Code of Conduct,
- suspension from office and compensation for a period including between one and six months,
- removal from office of any delegation of authority in the exercise of which the violation was committed and, in the most serious cases, removal from office of the office for just cause,

The penalties if a member of the Board of Statutory Auditors (if any), on the other hand, are:

- a formal written warning censuring the violation of the Compliance Program and/or Code of Conduct and an notice to comply with the provisions of the Compliance Program and/or Code of Conduct,
- suspension from office and compensation for a period including between one and six months,
- removal from office, subject to approval by court decree pursuant to Article 2400, Paragraph 2 of the Civil Code.

Penalties as well as any claim for damages, if any, will be commensurate with the level of responsibility, role and intensity of the fiduciary bond related to the assignment given.

In the event that the Director is linked to the company by an employment relationship, all the sanctions provided for in paragraphs 7.1 and 7.2 above may also be taken against him/her.

The provisions of this Section 7.3. for sanctions against Directors and Statutory Auditors apply to the General Manager appointed by the Shareholders' Meeting, if any.

The outcome of the investigations conducted and any disciplinary sanction applied must be reported to the Supervisory Body by the Chairman of the Board of Directors.

If the violation has been reported, the person who received it must protect the confidentiality of the reporter.

#### **7.4 Penalties against the person/company in charge of the statutory audit**

The sanctions are:

- a. formal written warning censuring the violation of the Compliance Program and/or Code of Conduct and notice to comply;
- b. payment of a penalty stipulated in the appropriate contractual clause;
- c. removal from office for just cause, after consultation with the Board of Statutory Auditors (if any), without prejudice to the communications referred to in Article 13(7) Italian Legislative Decree 39/2010.

Penalties may be imposed in case of obstruction of the Supervisory Body's supervisory activities, in case of violation of the preventive protocols and the provisions of the Program and/or the Code of Conduct applicable, to the extent of its competence, to the subject/company in charge of the statutory audit.

Penalties under a. and b. will be imposed by the Board of Directors.

The penalty under c. will be imposed by the Shareholders Meeting.

In any case, the Shareholders' Meeting must comply with the regulations set forth in the Special Italian Law.

#### **7.5 Measures towards Third Parties (e.g., business partners, consultants and external collaborators)**

In the event that an offenses provided for in the Decree or in any case a violation of the Program and/or Code of Conduct is committed by Third Parties (e.g., business partners, consultants and external collaborators of the Company itself, however named, or by other parties having contractual relations with the Company) this will be sanctioned in accordance with the provisions of the specific contractual clauses included in the relevant contracts.

#### **7.6 Sanctions archive**

The Company has an updated sanctions file maintained by the Human Resources Manager. Penalties imposed on members of the Board of Directors or Third Parties in relationship with the company will be kept in a file kept at the Supervisory Body.

### **8 CHANGES TO THE SANCTIONS SYSTEM**

All amendments to this Sanctions System must be adopted by the Board of Directors, after obtaining the non-binding opinion of the Supervisory Body, unless they are non-substantial changes, i.e., without potential impact on the Program's suitability and preventive effectiveness (e.g., changing references to contractual rules on disciplinary matters).

Amendments shall be brought to the attention of all Addressees of the application of the provisions contained therein, including by posting on the company bulletin board or by other means deemed appropriate.

## **9 REPREHENSIBLE CONDUCT OF SENIOR MANAGEMENT AND SANCTIONS**

In deference to the principle of taxability and with the aim of making the prohibited behaviors immediately intelligible, the main disciplinary offenses for Senior Management, as defined by Article 5(1)(a) of Italian Legislative Decree 231/2001, are specified below.<sup>3</sup>:

<b>Types of Senior Management Conduct</b>	<b>Sanctions</b>
- Failure to comply with the protocols and procedures for planning the formation of decisions of the Governing Body (CEOs and members of the Board of Directors) in the activities of the function	- Warning and notice to comply - Suspension if infractions are serious and repeated - Removal from office if recurrence after suspension
- Failure to comply with procedures and/or processes for implementing decisions of the Management Body in organizational activities	- Warning and notice to comply - Suspension if infractions are serious and repeated - Removal from office if recurrence after suspension - Termination of employment if recurrence after removal from office
- Failure to comply with the methods and procedures formulated for the acquisition and management of financial resources prepared for the prevention of predicate offenses	- Warning and notice to comply - Suspension if infractions are serious and repeated - Removal from office if recurrence after suspension - Termination of employment if recurrence after removal from office
- Failure to comply with the obligation to document the steps required by procedures and protocols in functions and processes at risk of predicate offenses	- Warning and notice to comply - Suspension if infractions are serious and repeated
- Behaviors of obstructing or circumventing the Supervisory Body's controls, unjustified obstruction of access to	- Warning and notice to comply - Suspension if infractions are serious and repeated

<sup>3</sup> Italian Legislative Decree 231/2001, Article 5 - Liability of the Entity: "1. *The entity is liable for the offenses committed in its interest or to its advantage: a) by individuals who hold the position of representatives, directors or managers of the entity or of one of its organizational units that enjoys financial and functional independence, in addition to individuals who are responsible, even de facto, for the management or control of the entity; [...]*"

information and documentation against the persons in charge of controls	- Removal from office if recurrence after suspension
- Failure to observe, implement and control or violation of occupational health and safety protection regulations Italian Legislative Decree 81/08, as amended, which may be the source of the specific negligent predicate offenses Articles 589 and 590 paragraphs 2 and 3 of the Criminal Code.	- Warning and notice to comply - Suspension - Removal from office in the most serious cases, assuming realization of the predicate offenses - Termination of employment if recurrence after removal from office
- Failure to comply with, implement and control or violation of environmental protection regulations (Italian Legislative Decree 152/2006, Italian Criminal Code and other special regulations) that may constitute a source of predicate offenses under Article 25 undecies of Italian Legislative Decree 231/2001.	- Warning and notice to comply - Suspension - Removal from office in the most serious cases, assuming realization of the predicate offenses - Termination of employment if recurrence after removal from office
- Violations of the specific duty to supervise subordinates	- Warning and notice to comply - Suspension - Removal from office in the most serious cases, assuming realization of the predicate offenses
- Unjustified and repeated multiple violations of Compliance Program protocols and its implementation for continuous compliance	- Suspension - Removal from office if recurrence continues after suspension - Termination of employment if recurrence after removal from office
- Failure to report noncompliance and irregularities also committed by Senior Management	- Warning and notice to comply - Suspension if infractions are repeated
- Failure to assess and take timely action on whistleblowing reports and warnings for actions highlighted by the Supervisory Body in activities under the purview of Senior Management	- Warning and notice to comply - Suspension if infractions are serious and repeated - Removal from office if recurrence continues after Suspension