



## INTRODUCTION

The principles inside the current Code of Ethics (later also called “Code”) are applied to the components of social agencies, managers, employees and anyone that, permanently or temporarily, act on behalf of the Company or are tied to it by a collaborative relationship.

The Code of Ethics is an expression of a business context where the main goal is to fulfill, in the best of ways the expectations of the Company’s business partners, to *advocate* and promote a high standard of professionalism and prevent conducts which go against active legislation and the values that the company promotes.

This “Code” tries to set a minimum conduct standard, which involves the most common and sensitive areas of *the business*.

Other specific policies and procedures extend the concepts expressed in this “Code” and furtherly *cover* topics related to this business and the company’s organization.

## MISSION

The mission of the Company consists of producing and promulgate furnishing that allows the business of distribution to have efficient spaces that are also suitable for social evolutions of the behaviours and demand of customers.

For this purpose, the Company wants to ensure a solid commitment towards the employees easing their personal and professional growth.

Furthermore, it is considered of crucial importance the employees and partners’ professional performance development according to the principles of perseverance, ability, professionalism, efficiency, honesty, and loyalty.

The Company promotes the contact with the customer, shaping the relative links towards respect, kindness, fairness, and openness.

## 1. REGULATIONS AND GENERAL CONDUCT PRINCIPLES

### 1.1. Field of application

The Code is applied to the employees and everyone who cooperates with the execution of the Company’s activities and the pursuit of its goals.

Each employee has the responsibility to adopt these principles, policies, and procedures.

### 1.2. Observance of regulations and guidelines

The Company has an essential principle of observance of applicable regulations and guidelines.

Every Subject must be committed to observing applicable regulations and guidelines. The Company will not begin or carry on any bond with those who do not adjust to this principle.

The Subjects, therefore, must know the regulations that define their activities and the consequent behaviour: in case of doubt, or need for further explanation, regarding the complete observance and interpretation of



what is set forth by the Code of Ethics, they are invited to speak with the Supervisory Body, which is specifically established inside the Company.

### **1.3. Fairness and honesty**

The Company works in observation of professional ethics and inner regulations. The pursuing of the Company's interests can never justify behaviours that go against the principles of fairness and honesty.

Each work activity of those who work for the Company must be executed with professional commitment, moral values and fair management, also to defend the Company's Image.

Behaviours and relationships between all those who work for the interest of the Company, both inside and outside of it, must be inspired by openness, fairness and mutual respect.

All the Subjects must act loyally and in good faith while respecting the contractual obligations and ensuring the requested performances.

Particularly aimed to the managers, also, the Company demands that they actively try to suggest and achieve projects, investments and business actions that are useful to preserve and increase the economic, technological and professional capital of the Company.

The Company also guarantees on phenomena and business choices, the availability of an informative support such to allow to make the wide-ranging and most effective supervision possible by corporate bodies, audit bodies, and inner supervisions.

Without prejudice to the obligation of transparency provided for by law, CAEM staff inform their superior of situations of conflict, even potential, and refrain from making decisions on the matter. The conflict may concern interests of any kind, including non-patrimonial ones, such as those deriving from the intent of wanting to indulge political, trade union or hierarchical pressures.

### **1.4. Impartiality**

The Subjects must work with impartiality and must take decisions rigorously and openly in the execution of all business processes.

The Subjects must decline any unjustified pressure during the execution of their own activity. In case of any pressure, flatteries or requests to give favours regarding anybody's work activity or received proposals that go against the duty of neutrality must be notified to the Supervisory Body without any hesitation.

### **1.5. Private corruption**

The Company, in order to observe the principle of fairness and openness and to obtain the biggest profit possible from its activities, monitors to ensure that the Subjects are not subjected to private corruption or are authors of it.

Therefore, the Subjects must not violate the duties and obligations regarding their office to receive (or because they have already received) promises of money or various benefits.



The Company forbids obtaining benefits and advantages, or nonetheless accepting the promise of it, regardless if it violates their own duties or not.

During negotiations, the Subjects must not pursue only the Company's profit, ignoring their own personal interests, but must neither accept any kind of promise for personal benefit (money, goods, services, future employment, various benefits) made from any of the offerors and nonetheless let such promises influence their choice.

### **1.6. Conflict of interests**

To observe the principle of fairness and openness, as well as protecting the trust of own investors and customers, the Company monitors to make sure that the Subjects are not in situations of conflict of interest.

A conflict of interest is defined as any situation, occasion or relationship in which, even just potentially, there may be conflict of personal or other correlated people's (relatives, friends, acquaintances) interest or organizations of which any of the subjects is administrator or manager, that may go against the duties of neutrality.

Each Subject must avoid any situation that may cause conflict with the interests of the Company; particularly, any conflict of interest among personal and familiar economical activities and the tasks designated by the Company must be avoided.

Every choice and action undertaken by the Subjects must be prone to the best possible profit for the Company, which therefore sets the following rules:

- administrators and the general director who have conflicting interests, even just partially, with the Company, are not allowed to work or contribute to operations (or to participate to the related decisions) that affect the assets owned or managed by the Company
- the employees and partners of the Company cannot carry out any kind of deal or other professional activity that is conflicting, even just partially, with the interests of the Company;

Moreover, the Company provided the following obligations:

- to observe the Society's inner laws and obligations in all the personal and business relationships outside of itself;
- to avoid acts and bonds that could be or appear as going against the obligations deriving from each function of the Society or its interests;
- to evaluate the possible benefits and disadvantages that may arise to the company at the time of accepting any job in another company

The employees and collaborators of the Company cannot directly or indirectly participate or contribute in any way to any transaction, financial operation or investment done by the Company, from which they can obtain profit or other personal benefits not expected by contract, with the only exception of it being explicitly authorized by the Company itself.

Anyone who finds out about a conflict of interest, even just the possibility of it, must immediately notify their superior, the Supervisory Body and all the control bodies.

### **1.7. Environmental protection and work safety**



The Company is active in environmental protection as a primary asset. To do so, it drives its choices, in ways to grant the compatibility between economical initiative and environmental needs. All the Subjects have such responsibility.

The Company actively tries not to damage the environment and to participate and promote initiatives regarding the environment giving punctual and thorough notice. The Company must guarantee clear management from the administration, active participation by all the employees and the use of appropriate technologies.

In order to strengthen the duty of environmental protection, the Company invites the recipients of this Code to scrupulously comply with the provisions of the law, other directives on environmental protection and hygiene and company procedures, and always maintain correct and vigilant.

CAEM is committed to promoting, in the appropriate places, scientific and technological development aimed at protecting the environment and safeguarding its resources. In operational activities, it studies the adoption of advanced environmental protection systems. It promotes the process of protecting the environment by ensuring timely compliance with the regulations and company directives in this regard.

In order to protect and promote the development of the environment, it is expressly forbidden to:

- engage in behavior that is dangerous for the environment;
- fail to comply with existing operating instructions in the event of circumstances that make them necessary;
- conceal any cases of out-of-bounds or facts and events whose occurrence constituted a serious and immediate danger to the environment.

The Company guarantees work conditions that respect dignity of the individuals, and safe and healthy workplaces, according to the applicable health and safety regulation.

It promotes the dissemination of a culture of safety and awareness of the risks connected to the work activities carried out demanding from everyone, in all sort of levels, a behaviour that is responsible and respectful towards the security system used and the business procedures to contribute to the maintenance of their own and others' safety.

The goal of the Company is to safeguard human resources, having frequent conversations not only inside, but also with third parties involved with the Company's activities, according to the applicable regulations, also with a view to constantly improving the management of health and safety at work. To do so, the Company, through the applicable business functions, pays attention to the evolution of applicable regulations and the management structure, and proposes actions as a consequence of:

- a constant check of risks and critical issues of the processes and resources to be safeguarded;
- notifications of incidents and quasi-incidents;
- execution of training and communication actions.

## 2. PRINCIPLES OF RELATIONSHIPS WITH THIRD PARTIES

### 2.1. Relationship with the employees



Employees are the most valuable resource of the Company.

It's a Company policy to treat its employees equally and to choose them according to the qualifications required for the work to be done, regardless of race, colour, religion, nationality, sex, age or physical dysfunctions.

The Company has retribution programs based on high standards of performance, fair treatment and the opportunity of a competitive wage, proportional to the individual's performance.

The Company strives to ensure stable employment in conditions that allow the employees to develop personally and professionally, in a way that they can obtain satisfaction from the achievement of social goals, through a high performance, in an environment characterized by competitiveness, integrity, teamwork, and equality.

The Company provides a clean, healthy and safe environment with wide professional, economical and personal growth possibilities to the employees.

It pays constant and full attention to the enhancement of human resources. Therefore, meritocratic criteria of professional performance, honesty, and rightful behaviour are considered advisable bases for the adoption of decisions regarding the career and every other aspect about the employee.

The employees have to maintain a constant respectful behaviour towards the rights and the personality of their colleagues, collaborators and third parties, regardless of their position in the hierarchy of the Company.

### **2.2. Relationship with collaborators and advisors**

The Company proceeds with the individuation and selection of collaborators and advisors with absolute impartiality, autonomy, and independence of judgment.

Behaviour contrary to the principles expressed in the Code, may be considered by the Company to be a serious breach of the duties of correctness and good faith in the performance of the contract, a cause of injury to the fiduciary relationship and just cause for the termination of contractual relations.

### **2.3. Relationship with customers**

In carrying out its activities and in managing relations with customers, the Company strictly adheres to the law, to the principles of this Code and to the internal procedures, and so wants by its employees and collaborators, who are required to avoid any situation of conflict of interests with the Company.

### **2.4. Relationship with the suppliers**

The Company works according to the regulations and principles of the current Code in supplying goods and services relationships.

Employees involved in relations with suppliers and service providers must select them and manage the relationship with them according to impartiality and fairness, avoiding situations of potential conflict of interest with the same, reporting to the Company the existence or occurrence of such situations.



Furniture and services pricing must be negotiated on an equal and competitive basis, but also trying to obtain the maximum profit possible for each purchase.

It's essential that the relationship with the suppliers be conducted with integrity and trust that each party fulfills its obligations.

### **3. PRINCIPLES IN ACCOUNTING ACTIVITIES AND USE OF DATA**

#### **3.1. Accounting and financial relationships**

The company observes the rules of correct, complete and transparent accounting, according to the criteria indicated by the relevant legislative provisions, as well as by the current Accounting Principles defined by the specific Commissions.

All actions and operations must be properly registered and allow the decision-making, authorization and execution process to be verified.

Each operation must have adequate documentary support in order to be able to proceed at any time to carry out checks that certify the characteristics and motivations of the transaction and identify the parties who have authorized, carried out, recorded and verified the operation itself.

The accounting records must be kept in an accurate, complete and timely manner in compliance with company accounting procedures, in order to perform a fair representation of the balance sheet / financial position and management activity, in accordance with generally accepted accounting principles; appropriate periodic checks are established and strictly respected.

To this end, all employees and collaborators involved in accounting records must ensure maximum collaboration, completeness and clarity of the information provided, as well as the accuracy of data and processing.

For accounting records, we mean all the documents that numerically represent managerial facts, including internal expense reimbursement notes.

Any employee or collaborator of the Company who discovers rumours and situations of questionable origin or nature, omissions, falsifications, inaccuracies or unlawful acts must immediately report such violations to the respective Functional Manager.

#### **3.2. Compliance with tax obligations**

The Company undertakes to carry out with completeness and transparency all the tax obligations required by the current legislation and to collaborate, where required, with the tax authorities. Tax returns and the payment of taxes represent behaviors that are not only mandatory from a legal point of view but also unavoidable in the context of corporate social responsibility.

In particular, in order to prevent tax crimes, the recipients of this Code refrain from engaging in activities and conduct aimed at pursuing purposes of evasion of income or value added taxes, or other taxes in general, nor in the interest of or to the advantage of the Company or in the interest or advantage of any third party.

They do not introduce fictitious passive elements, making use of invoices or other documents for non-existent transactions, in the declarations relating to said taxes and in their preparation.



The staff responsible for administrative activity checks that the invoices and accounting documents received refer to services actually carried out by the person who issued them and actually received them by Caem before making payments.

They are not recorded in mandatory accounting records, nor are invoices or other documents held for non-existent transactions for evidence purposes.

The regular application of value added tax is regularly and periodically checked.

Lastly, Caem undertakes not to carry out objectively or subjectively simulated operations as well as by making use of false documents or other fraudulent means capable of hindering the assessment and misleading the Financial Administration; undertakes not to indicate, in returns relating to income or value added taxes, active elements for an amount lower than the actual amount or fictitious passive elements or fictitious credits and withholdings; not to submit invoices or other documents that refer to non-existent transactions in order to allow third parties to evade income or value added taxes; not to hide and / or destroy in whole or in part the accounting records, or the documents which must be kept, according to the times dictated by law, in order to conceal the reconstruction of income or turnover, for the sole purpose of to evade or to evict third parties; not to carry out simulated acts for the sole purpose of avoiding the payment of income or value added taxes or interest or administrative penalties relating to said taxes; not to indicate in the documentation submitted for the purposes of the tax offsetting procedure elements capable of obtaining an undue compensatory advantage.

### **3.3. Processing of data and confidential information**

The Company protects the confidentiality and confidentiality of information and data relating to employees, collaborators or third parties, collected on or during the course of their work, and each employee and collaborator is required to comply with these principles.

Partners who become aware of non-public information must use the utmost caution and care in using this information, avoiding disclosure to unauthorized persons, both inside and outside the company.

For confidential information we mean, by way of example: the technical information concerning procedures; purchase programs; cost, price, marketing or service strategies; revenue reports and other non-public financial reports; information on sales, mergers and acquisitions.

The IT processing of the information is subjected to the security checks necessary to safeguard the company from undue intrusion or illegal use.

## **4. ENTERPRISE RESOURCES**

### **4.1. Protection of company resources**

The Company shall use its best efforts to ensure that the use of available resources - carried out in compliance with current legislation and the contents of the bylaws, and in line with the values of this Code - is aimed at guaranteeing, increasing and strengthening corporate assets, to protect society itself, the shareholders, the creditors and the market.

All the Subjects are directly and personally responsible for the protection and legitimate use of the goods (tangible and intangible) and the resources entrusted to them for carrying out their functions.

### **4.2. Use of computer systems**



The use of IT systems and technological equipment must be carried out in compliance with the relevant company procedures.

With respect to the use of IT systems, each employee is responsible for the security of the systems used and is subject to the current regulatory provisions and the terms of the license agreements, as well as the principles expressed in this Code. It is therefore expressly forbidden for Company personnel to install and use software other than those installed by the Company.

Except as provided for by civil and criminal law, the use of network links for purposes other than those related to the employment relationship or to send offensive messages or that may cause damage to the image of the Company. Furthermore, it is expressly forbidden for all Company personnel to use the Company's IT systems to access websites for personal reasons, in particular sites for propaganda and trade in pornographic material.

Each user of IT tools is responsible for the security of the programs and for the correct use of all the data acquired in the exercise of their functions.

Each employee is also required to provide the necessary commitment in order to prevent the possible commission of crimes through the use of IT tools.

The Subjects cooperate with the Supervisory Body within the respective functions in order to ensure the effectiveness of the security systems.

The Company expressly forbids any conduct of alteration of computer or telecommunications systems and / or manipulation of the data contained therein.

### **5. CONFLICTS OF INTEREST**

All employees and collaborators must avoid situations that may create conflicts of interest, both real and potential, between personal and business activities; therefore transparency, trust and integrity are values that must be respected in any case.

Furthermore, no employee can obtain personal advantages in relation to the activity performed on behalf of the Company.

In particular, employees who have relationships with suppliers, contractors, customers and all the parties with whom they do or try to do business, must conduct the negotiation bearing in mind that the company's interest is paramount. They must absolutely avoid using, even if only implicitly, their position to influence decisions in their favour or in favour of relatives, friends and acquaintances for purely personal purposes of whatever nature they may be.

Where situations of potential conflict may arise, the communication between the collaborator and his / her superior is essential for the resolution of the matter.

### **6. PERSONNEL MANAGEMENT POLICIES**

For the development of the business and the continuous improvement of the processes supporting the business itself, the Company intends to give central importance to human resources and to the enhancement of key skills.



Communication, professional growth and attention to the work environment are the basis of our relationship with people and are reflected in the following company policies for their inclusion, development, training and rewarding.

The Company intends to give major importance to human resources and the valorisation of key skill *to better help* the growth and the continuous improvement of the support processes of the business.

Communication, professional growth and attention to the workplace environment are fundamentals of our relationship with people and are defined in the following business policies for their assimilation, growth, development and rewarding.

### **6.1. Selection and internal mobility**

The Company intends to attract from the market and permanently integrate into the company the best people and skills for the business and promote internal mobility in different roles, situations and functions to make the best use of available skills and speed up the growth of individual skills and potential.

### **6.2. Development and career**

The Company wants to follow the development of human resources and create a group of resources ready to cover key positions both managerially and professionally. The development and career paths are mainly based on the evaluation of behaviours, performances, skills, and potential.

### **6.3. Formation**

The Company promotes the growth of skills, giving formative possibilities according to the growth of the business and business culture.

To do so it created a policy of formation that plans the promotion of:

- a homogeneous spread of base knowledge functional to the activities done in the company (Base Training);
- base knowledge of the guidelines that regulate the workplace and the business lifestyle defined by the law (*Compulsory Training*)

### **6.4. Communication and listening**

We want people to feel part of a single company and to create a "two-track" communication channel between company and people, through which:

- to convey the messages and information necessary for people to understand and implement the company strategy;
- "listening to the voice" of people, to measure the internal climate and keep their level of satisfaction and motivation high.

### **6.5. Diversity and equal opportunities**

The Company rules out any kind of discrimination, particularly by sex, age, nationality, ethnicity, ideologies and religious beliefs working accordingly to the laws and contractual rules.



### **6.6. Industrial relations**

As part of Industrial Relations, the Company wants to encourage the involvement of workers and their representatives in the pursuit of corporate objectives and to promote the values that are at the foundation of the company and its competitiveness.

### **6.7. Competitive organization**

The Company pursues the innovation of organizational forms as a tool for building its competitive advantage and fosters the creation of a streamlined, client-oriented and value-generating organization.

## **7. RELATIONS WITH THE PUBLIC ADMINISTRATION**

### **7.1. Legality, rightfulness, and transparency in the relationship with the Public Administration**

The Company inspires and adapts its conduct to compliance with the principles of legality, correctness and transparency, in order not to induce the Public Administration to violate the principles of impartiality and good performance it is required to perform.

The contacts with the Public Administration are managed, in accordance with the appropriate company procedures, by those specifically and formally instructed by the Company to deal with or have contacts with public officials and / or Public Service officers belonging to said administrations.

All Subjects, in relations with the Public Administration, must comply with the obligations to inform the Supervisory Body of the Company provided for in the internal procedures and must make available and accessible, if required, any documentation and operation, even the non-economic ones, performed within the scope of the tasks and functions assigned to it.

In relationships of any kind with the Public Administration it is therefore expressly forbidden to put in place or instigate others to carry out corrective practices of any kind.

In the case of accesses, inspections and checks by public officials at the Company, the Supervisory Board must be notified immediately.

### **7.2. Gifts and other forms of benefits**

By virtue of the principle of integrity on which the Company bases its reputation, employees and collaborators must not accept, even during the festivities, money, rebates, contributions, gifts of excessive value and other benefits related to their professional activities, which may be considered illegal, unethical or compromising.

For no reason, gifts must be given to officials of companies with whom the company has business relationships, nor to persons identifiable as Public Officials or persons in charge of a public service.

No contributions should be made that could be considered illicit to political parties or to candidates for public office.

Company employees will not accept expensive gifts or gifts (except gifts of symbolic value) from suppliers, customers and other persons with whom the Company is in business dealings.



In any case, employees and collaborators refrain from practices that are not permitted by law, by commercial practices or by any ethical codes of companies or bodies with which they have relationships, and the company therefore opposes and condemns any form of corruption of subjects external to the company, including forms of advantage to the company deriving from illicit mediations with Public Officials and Public Service Officers.

### **7.3. Commercial relationship with the Public Administration**

In the context of any business negotiation, of a request or relationship with the Italian and / or foreign Public Administration, no conduct should be held for any reason to illegitimately influence the decisions of Public Officials or Public Service Officers, at the order to obtain the Company an undue or illicit profit or advantage.

### **7.4. Use of information systems of the Public Administration**

It is forbidden the alteration or intent to alter the functioning of a computer or telematic system of the Public Administration, as well altering or trying to alter the data therein contained, or rather the insertion of false data.

### **7.5. Funding, contributions, grants and public disbursements**

It is forbidden to address contributes, subsidies or loan to different ends than those for which they were eventually granted for by the Government or other public national and foreign body. The Company condemns the conduct aimed at obtaining, by the State or other national and foreign public Institution, any type of contribution, financing, subsidized loan or other disbursement of the same type, by means of declarations and / or documents for the purpose altered or falsified, or by means of information omitted or, more generally, by means of artifice or deception, including those made by means of an information or electronic system, aimed at misleading the provider.

## **8. RELATIONSHIPS WITH POLITICAL PARTIES, TRADE UNIONS, AND ASSOCIATIONS**

The Company undertakes to establish and maintain a constant collaboration with the trade associations and trade unions on the basis of principles of correctness and transparency, within the legislative provisions and provisions contained in the applicable collective bargaining.

The Company does not make any kind of contributions, directly or indirectly, to political parties, movements, committees and political and trade union organizations, associations of interests, or to their representatives or candidates, both in Italy and abroad, excluding contributions due on the basis of the legislation.

The Subjects cannot carry out political activities at the Company's headquarters or use their goods or equipment for this purpose. They must also clarify that any political opinion expressed by them to third parties is strictly personal and do not therefore represent the Company's position.

## **9. MONEY LAUNDERING PREVENTION**

The Company requires maximum transparency in commercial transactions and in relations with third parties, in full compliance with national and international regulations regarding the fight against the phenomenon of money recycling.



As a result, the Subjects may not establish business relationships on behalf of the Company with partners or suppliers or third parties who do not give guarantees of good repute and do not enjoy a good reputation or whose name is associated with events related to money laundering.

All financial transactions must be adequately justified in contractual relations and must be carried out by means of payment that guarantee their traceability.

The Company shall maintain business relationships exclusively with customers and suppliers of reputable reputation, who perform legitimate business activities and whose profits come from legitimate sources. Each business unit must have appropriate measures to ensure that forms of payment are not accepted when identified as an illegal money laundering tool. The Company is committed to the full compliance with all the anti-money laundering laws worldwide, including those that require the reporting of suspicious transactions in cash or otherwise. In particular, as governed by the Italian law, the Company is subject, among other laws and regulations, to the provisions of Law 197/1991 and Legislative Decree 231/2007 which incorporate the principles contained in the reference directives of the European Union on Anti-Money Laundering and Safeguarding the Integrity of the Financial System.

The integrity and reputation of the Company may be severely affected by the failure to identify transactions aimed at money laundering. Illegal money laundering is the process by which sums obtained through illicit means or intended for illegal purposes are converted in such a way as to be regularly acquired or not traceable for the purpose of identifying those who use them for illicit purposes. Money laundering is traditionally associated with criminal activities and remains an element of central investigation by law enforcement agencies. However, since 2001, the level of attention on money laundering practices used for the transfer of money destined for terrorist activities has been raised by the authorities; consequently, many legal systems, including that of the United States, have strengthened their anti-money laundering legislation. Recycling typically occurs by converting cash or cash equivalent values from one form to another, for example from personal checks to money order. Examples of payments or suspicious transactions attributable to money laundering include multiple money orders or travel checks issued by multiple parties, large cash payments or payments made by check on behalf of a customer by an unknown third party.

## **10. IMPLEMENTATION, CONTROL AND SANCTION METHODS**

### **10.1. Supervisory Body**

The Supervisory Body is the *body* in charge of supervising the observance of the current Code and reporting any need for revisions of it.

In the carrying out of its duties, the Supervisory Body has free access to useful business data and information and will coordinate with other bodies and business functions for the correct implementation and proper supervision of the principles of the Code.

The Subjects must be fully collaborative with the Supervisory Body to help the carrying out of its duties.

### **10.2. Knowledge and implementation**

This Code is brought to the attention of all the Subjects by the Supervisory Body.

Potential doubts related to the Code must be promptly analysed with the Supervisory Body.

All those who have dealings with the Company, without distinction or exception, in Italy or abroad, are committed to enforce the principles and rules of this Code. In no way, acting for the benefit of the Company can justify the adoption of behaviours that are in contrast with these principles and rules. In particular, all the Subjects are required to operate so that these principles and rules are properly applied.

### **10.3. Internal reporting**



The supervision of the implementation of the Code and of its application is responsibility of all the Subjects, who are indiscriminately and individually required to report any non-compliance or failure to apply to the Supervisory Body.

Anyone who becomes aware of violations of the principles of this Code and / or the operating procedures that make up the Model or generally the internal control system, must promptly report them to the Supervisory Body.

All the Subjects are required to report promptly and confidentially to their function manager and / or Supervisory Board, any information they have come to know in the performance of their work activities, about violations of legal regulations, of the Code or other company provisions that may, for any reason, involve the company. Functional managers must monitor the work of their employees and have to inform the Supervisory Body. To this end, the rules established in the general part of this Model are applied.

### **10.4. Code changes and revisions**

Any change and/or integration to this Code must be applied with the same procedures used for its initial approval.

### **10.5. Sanctions**

Compliance with the rules and principles of the Code must be considered an essential part of all relations maintained by the Company.

The violation of the principles established in the Code, in the Model and in the procedures established by internal protocols compromises the fiduciary relationship between the Company and its directors, employees, consultants, collaborators in various capacities, customers, suppliers, commercial and financial partners.

### **10.6. Whistleblowing Procedure**

Reports of possible violations, which have criminal relevance, can and must be made by all those interested by the organization, at any level (employees, managers, internal control bodies, customers and suppliers), who are required to report promptly and confidentially any information that they have come to know in the performance of their duties or activities, with reference to violations of the law or regulations, of the Code of Ethics, of the Model 231 (MOGC) or of other corporate provisions or to report any pressure to do so.

The managers of the reporting procedure are required to direct their collaborators to comply with the Code, to report any violations, to repress retaliation or pressure attempts, promptly reporting such events to the higher or control bodies, through the reported communication channels organization.

In order to guarantee the effectiveness of Model 231, in compliance with the confidentiality and individual personality of the parties concerned, the Company prepares information channels through which those who, for whatever reason, are involved in the business or are involved in it, can report freely, directly and confidentially to the Supervisory Body and Top Management: [odv@caem.it](mailto:odv@caem.it); [whistleblowing@caem.it](mailto:whistleblowing@caem.it);

### **10.7. Method of dissemination of the Code**

A copy of this Code is given to all the employees of the Company through the methods specified by the Model.

All the employees are informed and trained about the contents of the Code through an adequate formation.