

# BENACCHIO S.R.L.

## The Code of Ethics

Approved by the Board of Directors on 17/05/2023

Rev.5 according SAQ 5.0



# BENACCHIO





*" It takes time to build a corporate masterpiece. It takes time to build a life. And it takes time to develop and grow. So, dedicate to yourself, to your business and to your family, the time they deserve and the time they need"*



**BENACCHIO**




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Our Organization intends to offer services with high added value, meet the needs of Customers and enhance the fundamental assets: this is the mission that Benacchio S.r.l. wants to pursue. The fundamental tools to achieve these objectives are the use of advanced technologies and the widespread network system that allow to offer a wide and integrated range of services adapted to the needs of the different customer segments present in the territory. For the size and the large number of people with whom it interfaces every day (employees, customers, suppliers), Benacchio S.r.l. represents an important subject in the economic scenario to which it belongs; for this reason, it has defined, in addition to this Code of Ethics, a Charter of Values as an expression of all the ideals to which the people who work within our Company must be inspired to carry out their activities.

The Code of Ethics identifies, on the basis of what are the founding values of the corporate culture, a standard of conduct for all those involved in the Company's activities.

It constitutes a precautionary safeguard against the commission of crimes pursuant to Legislative Decree 231/01 and operates in synergy with Model 231, strengthening the Company protocols in place. Being addressed to all corporate stakeholders, these subjects are identified as the "Recipients" of this document.



**Correctness  
Moral Integrity  
Objectivity  
Transparency  
Honest**

**Are the fundamental  
principles who Drive,  
constantly acting  
corporate**

### Why we adopted a Code:

- Benacchio intends to disseminate guidelines that guide its activity in compliance with Legislative Decree no. 231 of 2001. The Code is shared with the aim of reaching all its Recipients, whether they are employees, of each operational headquarters, managerial, administrative figures, or external partners.
- The desire to improve and learn from experience has led us to:
  - The disclosure of the Company protocols established to guarantee the complete transparency of the activities we carry out, strengthening the prevention measures, as well as the control by the top figures.
  - Constant monitoring of the degree of diffusion and effective application of the values contained in this Code.
  - The integration of the principles of the Company Management System with those set out in the Code.
  - To make all Company figures responsible for the principles set out in the Code of Ethics, with attention to reports of violations of the same that may involve the adoption of disciplinary measures.
- **The relationship between the Code and other rules:**

The Code is not antagonistic to the laws in force or to the National Collective Labour Agreement applied, but it is an instrument capable of strengthening them. Benacchio is committed to full compliance with the laws and regulations in force in Italy and in all the countries in which it operates.





Through the Code, Benacchio S.r.l defines its ethics and creates a structure to make it penetrate all areas of the Company, strong in the assumption that the deontological values, the foundation of the corporate culture, cannot be in contrast with the interest of the Company, nor even less, constitute an obstacle to its realization.

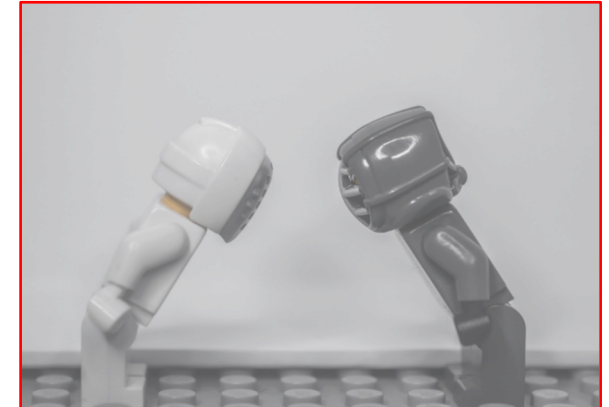
We involve the Management, equipping it with appropriate tools to achieve a **sustainable development goal, lasting and respectful of the plurality of interests and subjects involved**. Managers, by promoting projects, actions, and investments useful for increasing the assets, management, and technological values of our Company in the long term, contribute to ensuring that the principles set out here become typical of the method of each work team. With this in mind, we have developed the **Managerial Model** as a tool for defining the inspiring principles of the Managers who lead the Company and who have the task of strengthening trust both internally and externally, cohesion and the team spirit of workers. Managers work to ensure that employees understand that compliance with the rules of the Code is an essential part of the quality of work performance. In addition, Managers have the task of facilitating the dissemination, among all levels, of a corporate culture, characterized by the enhancement of control actions. In fact, the attitude to internal and external checks must be positive, conceived as an opportunity to improve efficiency. The persons in charge of carrying out internal audits and the audit firms in charge have free access to the data, documentation and information useful for carrying out the audit activity.

The Code of Ethics has **contractual value**. Therefore, compliance with the rules contained herein is to be considered an essential part of the contractual obligations of the Workers of Benacchio S.r.l, as well as provided by art. 2104 of the Italian Civil Code.

Violation of the rules of the Code could constitute a breach of the primary obligations of the employment relationship or disciplinary offense, with any consequence of the law, including about the preservation of the employment relationship and may result in compensation for damages deriving from the same.







### Transparency

Our conduct is based on the truthfulness, as well as accuracy and completeness of the information produced. Transparency is a modus operandi that the Company adopts both in internally disclosing information and in relations with the outside world.

### Integrity

Benacchio S.r.l is a Company in which correctness, honesty and impartiality of behaviour, internal and/or external, constitute a common way of feeling and acting.

### Respect

Personnel is the key resource of Benacchio S.r.l. Respect, opportunities for professional growth and development and recognition of personal merit are our guidelines.

The expression of the ideals to which all the people who work in Benacchio S.r.l, they must be inspired to carry out their activities is contained in the **Charter of Values**, reference point for the birth of a corporate culture consistent with the Company's tradition.



Benacchio S.r.l believes in fair competition and pursues it, adopting principles such as fairness and transparency towards all operators on the market. In this regard, it is emphasized that the Company undertakes, to the utmost respect for the **intellectual property** rights of others, maintaining the utmost confidentiality with respect to any strategic, confidential, or industrial secret, information of its Customers, from whom the Company expects a conduct of mutual respect. As mentioned, in fact, the values of transparency and honesty guide every business activity, including those of an accounting, administrative-financial and communicative nature.

In the tax field, the **principles** of **segregation** and **traceability** are applied; all operations and transitions must be oriented to the utmost **correctness**, always allowing to analyze the phases of management, the responsibilities of the various figures involved and keeping open the possibility of reconstructing the methods of carrying out of its work.

- Maximum **transparency** is applied to each accounting activity in compliance with current regulations and best business practices. In fact, Benacchio S.r.l pursues the application of high standards of financial planning, aligning its Tax System with the applicable accounting principles.
- Priority is given **to the accuracy** of the information exchanged, formal and substantive legitimacy and clarity and truthfulness in accounting findings.
- All the documentation necessary for the correct accounting **registration** is regularly recorded and kept. For each accounting operation, documentation is kept in the records that allows the identification of the different levels of responsibility. Company employees who become aware of omissions, falsifications, negligence in the accounting or documentation on which the accounting records are based, are required to report the made to one's superior or, alternatively, to the SB.

In terms of communication, our Company undertakes to promptly provide both Commercial Partners and external Parties entitled to make a request, complete and truthful information. In this sense, the Code of Ethics is a means to inspire behaviour and orient the culture and business decisions to the application of the principle of transparency.

The integrity of our business is based on the desire to pursue corporate objectives in compliance with the provisions on Antitrust and promoting fair competition between the parties. To do this, we conduct our activities in a framework of **fair competition**, with honesty and respect for our Counterparties and openly opposing any corrupt practice aimed at obtaining undue advantages. This applies both in relations with Public Administrations (also as a Supervisory Authority) and in relations with Private subjects. Benacchio S.r.l. undertakes to take an intransigent line towards all conduct aimed at misappropriation and at bringing about an unlawfully obtained advantage. In no case, in fact, can the pursuit of the corporate interest justify dishonest conduct. In addition, the Company categorically prohibits the **counterfeiting** of products, or a part of them, and **the alteration** of trademarks or distinctive signs, domestic or foreign, of industrial products made by third parties. The use of counterfeit or altered trademarks or signs is expressly prohibited, in compliance not only with the law, but also with our customers and our competitors.

Our Company is aware of the importance of actively participating in the life of the community within which it is inserted, supporting activities in line with our Mission and with the principles of the Code of Ethics. However, we believe it is essential to regulate every donation, sponsorship, and partnership, with a view to constantly responding to the principle of traceability and transparency in decisions. For this reason, the choice of beneficiaries and the whole process that culminates in the receipt of our contribution by third parties, is monitored **to avoid the creation of conflicts of interest**, as well as the risk that what is donated for the support of a cause, is used for corrupt purposes. Any situation potentially subject to conflict of interest, must be promptly communicated to your superior, here are some examples:

- Economic and financial interests of the employee and/or his family in the activities of Suppliers, Customers and competitors; using your position in the Company or the information acquired to gain a personal advantage. This also applies in relation to the purchase or sale of shares in Group of external companies when, in relation to the functions performed, you are aware of relevant information not in the Public Domain.
- Carrying out work activities, of any kind, at Customers, Suppliers, competitors.
- Acceptance of money, favours or benefits from persons or companies that are or intend to enter the business relationships with Benacchio S.r.l.







As a Company, we try to reflect the principle of **inclusiveness**, acting responsibly and respectfully, and encouraging our Staff to do the same. Confrontation, as a means of accelerating the sense of belonging and the sharing of a common vision, assumes great importance. Therefore, we try to face the Company's choices by sharing the themes and enhancing the contribution of our resources. The characteristics of the individuals who make up our Company, are respected and cared for precisely because we believe that a careful look at the staff, can generate a strong incentive for the individual to act with a view to professionalism, integrity, and responsibility. Adopting an approach of continuous improvement, we ask the Managers to enhance the professionalism of the individual work teams, activating **staff training** courses that promote professional and personal development and growth.

For us, employees have equal dignity, and regardless of the corporate role they play, we are committed to offering them **equal opportunities**. It goes without saying that discrimination based on race, skin colour, sex, country of origin, age, religious belief, marital status, sexual orientation, sexual identity, individual expression, military or veteran status, disability condition, is repudiated and punished.

The above principles are also applied to all processes in Benacchio S.r.l concerning: **selection, ethical recruitment policy**, training, career advancement and dismissal. In this regard, decisions in the field of Human Resource Management are made on the correspondence between expected and offered profiles and the related evaluations are carried out based on merit criteria and repudiating favouritism, nepotism, and forms of clientelism. It should also be noted that disparities that can be justified based on objective criteria are the result of the different qualities of individuals and do not constitute a discriminating factor for the Company.

The Workers will be briefed thoroughly on corporate profile, job functions and contract details, as part of the employment process through a brochure presentation of the Company.

- Orientation, medical check-up, training, grievance process, wages and payment processes, including reimbursement of the recruitment fee for respective nationalities.
- Signing of contract in source country in native language only after they are briefed on the details of the job and contract.

The Company expects to receive full cooperation from employees, at every level, for the maintenance of a working climate of **mutual respect for the dignity, honour and reputation of each one**. We demand that forms of interpersonal harassment be excluded in external and internal relations, understood as: the creation of a work environment intimidating, hostile or isolation towards the individuals who compose it, or the unjustified interference with the performance of the work of others, including the creation of obstacles to the individual job prospects of others for mere reasons of personal competitiveness.

Benacchio S.r.l does not admit the occurrence of sexual harassment such as: the subordination of determinations of relevance for the working life of the recipient to the acceptance of sexual favours, the proposals of private interpersonal relationships conducted, despite an express or reasonably evident disapproval, which have the ability, in relation to the specificity of the situation, to disturb the serenity of the recipient with objective implications on his working expression.

In addition, with a view to maintaining a working environment that respects the sensitivity of others, the performance of work under the effects of alcohol or drug abuse will be considered as a factor affecting the quality of the environment in which it operates, considering the expected contractual reflexes. In the same way, without prejudice to the general prohibitions on smoking in the workplace, where this generates danger and in any case in the workplace characterized by special indications, Benacchio S.r.l in situation of work coexistence, will take into consideration the condition of those who feel physical discomfort in the presence of smoke and ask to be preserved from contact with “passive smoking” in their place of work.



The Company's assets, and in particular the communication tools, as well as the means of transport, are assigned to our staff due to the work carried out and all the staff is called to be the custodian of these goods. Therefore, the use of **computer systems** and related programs and applications must be limited to professional needs. With this in mind, we ask staff to properly store the computer equipment provided and to comply with **copyright** regulations, as well as, to observe the prohibition on storing files or documents of an illicit, outrageous or discriminatory nature and the prohibition of altering data, information and programs in any way.

The **protection of the privacy** of our employees is perceived as an aspect of great importance and is managed through the application of high security standards to regulate the type of information to be requested and the methods of treatment and storage of the data. Benacchio S.r.l undertakes to protect the information relating to its employees and third parties, generated, or acquired within and in business relationships, and to avoid any misuse of this information. The information, knowledge and data acquired or processed by employees during their work or through their duties belong to Benacchio S.r.l and may not be used, communicated, or disclosed without specific authorization of the superior, without prejudice to the prohibition to disclose information relating to the organization and production methods of the Company or to make use of it in such a way as to be detrimental to it, every employee of Benacchio S.r.l Must:

- Acquire and process, according to the procedures defined by the specific procedure, only the data necessary and appropriate for the purposes of its Unit of belonging and in direct connection with its functions.
- Keep the data itself in such a way that it is prevented from others who do not want to become aware of it.
- Communicate the data themselves in the context of pre-established procedures and/or with the explicit authorization of the higher positions and in any case, after having ensured about the dissemination in the case data specific.
- Ensure that there are no absolute or relative constraints on the dissemination of information concerning third parties connected to Benacchio S.r.l by a relationship of any kind and, where appropriate, obtain their consent; associate the data in such way that any person authorized to have access to it can easily draw a picture as much as possible precise, comprehensive and truthful.



Benacchio S.r.l also opposes the **exploitation of minors**, the use of child labour and any form of **modern slavery** and undertakes to regulate all employment relationships by means of a contract that guarantees the protection of the Worker. Benacchio S.r.l **respect and protect the rights of minorities and indigenous people**. Moreover, by aberrant of the use of forced labour, Benacchio S.r.l refuses to use workers who work against their will or who are not free to interrupt the employment contract. At the same time, it is forbidden to ask staff for “deposits” or to hand over personal documents for the purpose of undertaking work activity. It goes without saying that the Company asks its Business Partners to share the same commitment to respect Human Rights and every Worker.

Benacchio S.r.l seeks to promote “the fair treatment and full participation of all people”, particularly groups “who have historically been underrepresented or subject to discrimination” on the basis of identity or disability. Benacchio S.r.l promote a welcoming, diverse and discrimination/harassment- free workplace with regards to Diversity, Equity and Inclusion (DEI).

Openly fighting any inhumane treatment, Benacchio S.r.l has regulated working hours in accordance with the provisions of the National Collective Agreement, defining a **weekly schedule** with a maximum of 40 hours and pre-selling at least one day of rest per week. The Company has also defined, as an annual maximum ceiling, 250 hours of overtime that must be appropriately remunerated with an appropriate increase. In any case, to ensure respect for the dignity of workers, the **remuneration** is set about the minimum legal standards and is adequate to provide an income such as to guarantee the satisfaction of the basic needs of the Workers.

About the possible employment of young Workers in internships or traineeships, the Company undertakes to avoid exposing these subjects to situations inside or outside the workplace that constitute a danger or that are not healthy.





We think that investments in the field of **Health and Safety at work** are to be directed both towards the correct training of personnel, in compliance with the requirements of the legislation, and towards organizational tools of a technological nature or of a technical/instrumental nature. We attach primary importance to safeguarding the Safety and Health of Workers, with the objective not only compliance with the requirements of the rules, but a continuous improvement of working conditions. With this in mind, we believe that knowledge of the risks present in the workplace is the best form of prevention. Therefore, we are committed to providing all our employees with timely **information/training**, that considers the possible verifiable risks. We also believe that the experience of the Staff who have accumulated greater seniority within our Company, can largely contribute to a realistic assessment of the risks present and can help to increase the level of awareness with respect to Health and Safety issues at work.

Benacchio S.r.l hopes that, at every hierarchical level, during the performance of its role and in line with the training received, everyone will work to identify the possible sources of danger to undertake and implement the measures aimed at removal of the risks or, if this is not possible, at their maximum minimization.



In the realization of the Company mission the behaviour of all the recipients of this Code must be inspired by the ethics of responsibility and this consideration inevitably leads us to turn a look at both society and the environment. We pay great attention to **environmental issues** and, whenever possible, we opt for the adoption of business strategies and techniques that reduce the environmental impact generated by our business. To do this, we are committed to staying constantly updated on the innovations derived from the development of scientific and the availability of better techniques and technologies that can be applied to our reality. In addition, Benacchio S.r.l operates in compliance with current legislation and in line with the following principles:

- Use of renewable sources to protect land, forest and waters
- Progressive integration of the care of the environmental aspects of the activities carried out with the Company strategies.
- Sustainable management of the environment resource, also through policies to enhance the use of natural resources.
- Implementation of all the actions necessary to ensure compliance and adaptation to current regulations.
- Constant updating of staff on the evolution of legislation and legislation on environmental matters.
- Awareness and involvement of staff on environmental issues, to achieve high standards of professionalism.



Benacchio S.r.l believes it is essential to create a solid sharing of the founding principles expressed in the Code of Ethics not only with internal staff, but also by exercising an influential role with regard to external parties such as: Suppliers, project collaborators, consultants, business partners, etc. All those who operate outside our Company and whose activity contributes to the achievement of our corporate objectives, represent subjects whose work must necessarily be bound to respect the principles of: legality, independence, fairness, price equity, diligence, confidentiality, professionalism and good faith. In addition to this document, the Company has adopted a **Code of Conduct for Suppliers and Partners** to define the ethical and social guidelines that our Partners are required to comply with. This document is an integral part of the Contracts and Agreements stipulated with our business network. We believe that sharing these principles allows us to establish lasting relationships characterised by trust in our collaborators.

The supplier selection process, as well as the purchase of goods/services from Third Parties, are interpreted in terms of transparency and congruity between what is requested and what is provided. This is a process governed by specific internal procedures that the Company has adopted to guarantee impartiality and to regulate the periodic monitoring of the possession of the requisites necessary to meet Company needs.

Personnel involved in purchasing decisions must:

- Adequately inform Third Parties about the commitments and obligations imposed by the Code, requiring compliance with the ethical principles set out herein, within the scope of the activities that such parties carry out on behalf of Benacchio S.r.l;
- Remain free from personal obligations towards suppliers, reporting any previous relations;
- Immediately report to the Supervisory Body any attempt or case of alteration of normal business relations;
- Refrain from offering goods or services to personnel of other companies/entities in order to obtain confidential information or direct or indirect benefits relevant to oneself or to the Company. Neither must they accept goods or services from external or internal Parties by engaging in behaviour aimed at favouring such Parties.





With the aim of measuring the degree of compliance with current legislation, with reference to the standard on health and safety at work and environmental protection, Benacchio S.r.l has the right to carry out audits at its suppliers, according to the agreed methods. All the contracts stipulated with Third Parties are defined in compliance with current legislation and contain the indication of the **termination clauses**, to allow Benacchio S.r.l to resolve relations with subjects lacking in compliance with the legislation.

Benacchio S.r.l undertakes to inform Third Parties with whom it is linked by a contractual relationship on the contents of the same (understood as a definition of the characteristics of the activity, methods of providing the requested service and the payment times), as well as the consequences of the any causes of termination of the relationship.

To this end, we adopt a correct and complete line of information on the content of the contract, towards suppliers and thanks to the information relating to the Code of Ethics we communicate the expected behaviours to those with whom we have signed agreements or contracts.

Relations with Third Parties supplying goods/services are also conducted in the total **absence of corruption**. Benacchio S.r.l is not interested in any preferential treatment that does not derive directly from the excellence it represents. Therefore, Company personnel must refrain from offering, promising, or giving, directly or indirectly, values of any kind, such as gifts, commercial agreements, etc, that may influence a decision inherent in the business activity or allow to obtain an undue commercial advantage.

In addition, it is specified that in the management of commercial relations with foreign countries the Company, **before carrying out the export activities, carries out the appropriate checks against possible restrictive economic sanctions imposed by the European Union**, in the context of the fight against terrorism, to the recipient country.



Benacchio S.r.l establishes with Customers a relationship characterized by high professionalism and based on availability, respect, courtesy, research and the offer of maximum collaboration. All the relationships undertaken by the Company are conducted with a view to maximizing **quality**. In addition, the Company aims to achieve Customer satisfaction by rejecting any form of arbitrary discrimination against Customers that could compromise the principle of equality.

The adoption of high-quality standards, however, is not the only goal to be achieved, in fact, it is accompanied by the **protection of customers**. Litigation with our Customers is perceived as a failure, which is why we try to avoid it by quickly resolving the complaints made by our Customers.

The activities of Benacchio S.r.l constantly require the acquisition, storage, processing, communication and dissemination of news, documents and other data relating to negotiations, administrative procedures, financial operations, know-how (contracts, acts, reports, notes, studies, drawings, photographs, software). The databases of Benacchio S.r.l may contain, among other things, personal data protected by legislation to protect privacy, data that for negotiation agreements cannot be disclosed externally and data whose inappropriate or untimely disclosure could produce damage to business interests. The adequate protection of confidential customer information and data is our primary objective, so it is the obligation of every employee to ensure the confidentiality required by the circumstances for each news learned due to their job function.

The contracts and communications with our Customers, built in compliance with the Company procedures adopted, are:

- Clear, simple, and formulated with the language as close as possible to that usually used by the interlocutors.
- Compliant with current regulations and the indications of the Authorities, without resorting to elusive or otherwise incorrect practices (such as the insertion of practices or vexatious clauses against customers).
- Complete, thanks to a comprehensive and accurate information on the products and services provided, so as not to neglect any element relevant to the Customer's decision.
- Adequate to protect confidential Customer information.



The employees and collaborators of our Organization who are called to illustrate or provide external information regarding the objectives, activities, results and points of view of Benacchio S.r.l through, by example: participation in conferences, congresses and seminars; the drafting of articles, essays and publications in general; participation in public interventions; are required to obtain the authorization of the top management of the structure organizational membership about texts, the reports and the lines of action that you intend to follow.



In relations with the **mass media**, information must be truthful and transparent. The Company takes care to present itself accurately and homogeneously in communication with the outside. These reports are reserved exclusively for the corporate functions and responsibilities delegated to this. It is forbidden for employees of Companies to provide information to representatives of the mass media or to undertake to provide it without the authorization of the competent functions. In no way, moreover, the employees of Benacchio S.r.l may offer payments, gifts, or other advantages aimed at influencing the professional activity of functions of the mass media, or that can reasonably be interpreted as such.



As a Company with operations in various jurisdictions, Benacchio S.r.l is subject to various international economic sanctions and export control regulations. Being a global player, Benacchio S.r.l observes good business conduct and is committed to adhere to relevant economic sanctions and export control regulations wherever it operates, guided by this document. The Benacchio S.r.l Economic Sanctions and Export Control Policy and Guidelines aims at putting forth:

- Benacchio's position in adhering to the applicable economic sanctions and export control regulations, which is consistent with international norms and standards;
- Principles and measures that Benacchio S.r.l adopts vis-à-vis economic sanctions and export control that include how Benacchio S.r.l identify, mitigate and manage economic sanctions risk in the jurisdiction where it operates;
- The guidance on the application of economic sanctions and export control as reflected in the Guidelines;
- The consequences of failing to comply with the Policy and the economic sanctions and export control regulations as a whole.

Benacchio S.r.l requires all our employees and Third Parties performing work for, or on behalf of Benacchio S.r.l to strictly adhere to the Policy and Guidelines at all times.



Relations with public institutions, as well as those with the Supervisory Authorities, are conducted in a **collaborative perspective** by providing the information requested and related to the Company's activity. Relations with the Public Administration are conducted in such a way as not to induce partial, distorted, ambiguous or misleading interpretations. In a word, the criterion of transparency and **maximum correctness** and clarity must also oversee relations with the PA. The representatives of the PA who are in charge of carrying out verification actions at the Company must receive full cooperation from our staff, allowing free access to data, information and documentation useful for the performance of the activity.

Gifts and acts of courtesy and hospitality towards representatives of governments, public officials and public employees are allowed only when they are of modest value, devoid of any prerequisite for obtaining an undue advantage and in any such case as not to compromise the integrity of the relationship or the reputation of one of the Parties.

Benacchio S.r.l has defined strict rules on the use of contributions and funding received from a Public Body or from the European Union, such as prohibiting the use of these resources for purpose other than those pre-established.

Relations with Public Institutions are aimed at safeguarding the overall interest of the Company and are reserved exclusively for **persons identified** internally as managers delegated to this function. The responsible subjects provide for a prior assessment of the actions to be taken that may involve a relationship with the PA, sharing its objectives with the Management and, subsequently, monitoring the implementation of the same.

Benacchio S.r.l undertakes not to make contributions, direct or indirect or in any form, to parties, movements, committees, associations, or other bodies of a political or trade union nature, nor to their representatives. The Recipients are free to provide political funding, on a personal level, to candidates, parties, or committees of their choice, within the limits established by law. Under no circumstances will the Recipients be reimbursed or compensated for any personal political financing.

The effective application of the Adopted Code of Ethics passes in the first place through the **dissemination and sharing** of the same with its recipients, whether they are internal or external to the Company. The implemented strategy is based on:

- External sharing with all stakeholders through publication of the Company website [www.benacchiosrl.it](http://www.benacchiosrl.it)

Internal sharing on the Company intranet and posting of a hard copy in a company location accessible to all employees. In addition, knowledge of the Code of Ethics is promoted internally through information meetings with staff. Training is also encouraged by the Supervisory Body, which contributes to the evaluation of the training plan and the initiatives organized according to the role and responsibilities of the various Company figures. Also, regarding the training of new hires, a training activity is planned for them to illustrate the contents of the Code and Rule of Conduct whose observance is required.

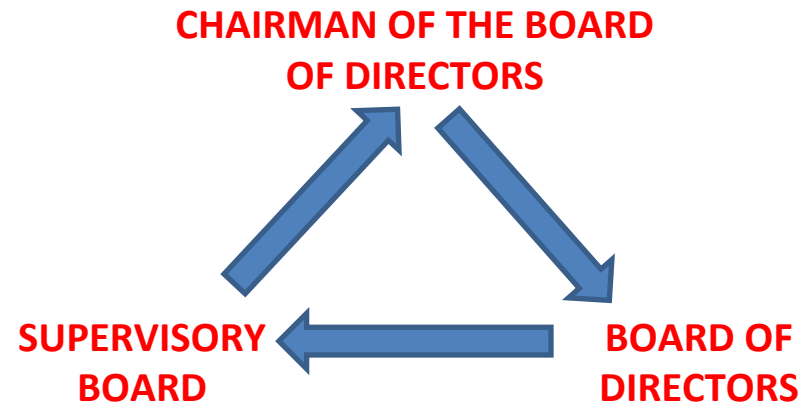
In fact, Company staff are required to know and understand the principles of the Code, as well as the reference procedures that regulate the functions and responsibilities held. Each Worker is obliged to:

- Refrain from conduct contrary to the ethical principles and procedures adopted.
- Collaborate with the Authorities (Environment or Safety Public Authorities) actively when there are inspections or visits in the plant.
- Contact superiors in the SB in case of need for clarification on how to apply the rules of the Code.
- Carefully select its collaborators, in compliance with the specific procedures adopted and directing them to the observance of ethical principles, by requesting confirmation of acknowledgment of the Code of Ethics.
- Collaborate with internal functions, as well as the SB, in verifying possible violations.
- Promptly report to their superiors' surveys or news provided by stakeholders about possible cases of violation of the Code of Ethics. Reports of possible violations are sent, in compliance with the operating procedures established by the specific procedures, to the Supervisory Body.





The task of verifying the implementation and application of the Code of Ethics falls on:



Benacchio S.r.l has set up a [Supervisory Board](#) composed by the external member Roberto Grisenti (Società Lab 231 S.r.l), as President, by the external member Law. [Massimiliano Redaelli](#) and two internal members: [Laura Forner \(HR\)](#) and [Egidio Corradin \(PMO\)](#).

- Verify the application and compliance with the Code of Ethics through monitoring activities and promote, if necessary, proposals for its updating in accordance with the evolution of civil sensitivity and legislation.
- Express binding opinions on the revision of Company procedures, to ensure consistency with the Code of Ethics and vice versa.
- Promote maximum dissemination and knowledge of the Code among employees and partners.
- The provision of every possible cognitive and clarification tool about the interpretation and implementation of the rules contained in the Code.
- The carrying out of checks on any news of violation of the reference rules of the Code of Ethics, to evaluate the facts and to allow the Board of Directors to implement sanctioning measures if the violation is ascertained.
- Discourage any form of retaliation of any kind on those who have provided news of possible violations of the Code or of the reference norms.

The provisions of this Code are an integral part of the contractual obligations assumed by the staff, as well as by the subjects having relations with the Company.

A violation of the principles and behaviours indicated in the Code of Ethics compromises the fiduciary relationship between Benacchio S.r.l and the person responsible for the violation and a **disciplinary measure** follows. The possible measures that follow, differ depending on the person responsible for the violation:

- Employees are punishable in accordance with the employment contract applied, regardless of the possible criminal relevance of the behaviours carried out. Disciplinary measures range from recall or warning to suspension without pay and, in the most serious cases, dismissal. Before taking a disciplinary measure, the person concerned is given the opportunity to justify his conduct in accordance with the Workers' Statute.
- For consultants, collaborators, customers and suppliers, specific methods of termination of the contractual relationship are activated, reported in the individual contracts.
- In the case of subjects in top position, Directors or Legal Representatives, the SB formalizes a communication to the Shareholders' Meeting, which will be convened in ordinary or extraordinary session at the explicit request of the SB itself. The Company can also claim any compensation for the damage suffered.

It follows an involvement of all workers, as well as subjects outside the Company, in relation to violations that require to be brought to the attention of the Management through the report. In this regard, the Supervisory Body present is one of the possible recipients of the facts to be reported. In fact, it is considered natural that, in the presence of irregularities with respect to what is prescribed by current legislation, by the Code of Ethics or by a Company procedure, the employee with knowledge of the facts, turns to his superior or to the SB.



All reports must be received in writing, possibly anonymously, according to the forms and channels prepared.

<p><b>The subjects inside the Company</b> Can forward their report to the email <a href="mailto:segnalazioni@benacchiosrl.it">segnalazioni@benacchiosrl.it</a></p>	<p><b>Staff outside the Company</b> Can send their report to the email <a href="mailto:odv@benacchiosrl.it">odv@benacchiosrl.it</a></p>
<p>Once the report has been received, the Supervisory Body carries out the investigations into the content of the same, investigating possible violations of the Code of Ethics. To do so, it can avail itself of both the collaboration of the author of the report and of the person responsible for the alleged infringement.</p> <p>If the investigation leads to the ascertainment of a violation of the Code, or of the law, the SB reports to the Management the behaviours that may require the adoption of a disciplinary sanction or the activation of contractual termination mechanisms.</p> <p>The prerogative of the Supervisory Body, as part of the management of the report, is to ensure the <b>protection of the whistle-blower</b>.</p> <p>The Company does not tolerate prejudicial action taken against anyone who provides truthful information relating to a violation of the law, the Code or other policy or internal procedure. Retaliation against those who report any wrongdoing will not be tolerated and anyone caught undertaking it may be subjected to disciplinary action. Victims of retaliation must also immediately report the case to their Manager, Human Resources and/or compliance function.</p>	

