

Organisation, Management and Control Model

pursuant to Legislative Decree no. **231** of 8 June 2001 as
amended

CODE OF ETHICS



REVISION LIST

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0 GENERAL INTRODUCTION

0.1 INTRODUCTION

This document, called the Code of Ethics, regulates the set of rights and responsibilities that DURANTE ADESIVI SPA – A SOCIO UNICO (hereinafter DURANTE ADESIVI) expressly assumes towards those with whom it interacts in the performance of its business.

Fully in tune with the positions expressed and protected by the accreditation system to which it adheres, the organization is aware that it contributes with its work, with a sense of responsibility and moral integrity, to the process of development of the Italian economy, territory and civil growth of the country.

DURANTE ADESIVI believes in the value of work and considers the legality, correctness and transparency of action as essential prerequisites for the achievement of its economic, productive and social objectives.

DURANTE ADESIVI affirms the appropriateness of its Code of Ethics in the pursuit of its social *mission*.

The Code of Ethics also aims to introduce and make binding on DURANTE ADESIVI the principles and rules of conduct relevant to the reasonable prevention of the offences indicated in Legislative Decree 231/2001 and subsequent amendments.

The Code of Ethics, considered as a whole and together with all the specific implementation procedures approved by the company, is considered an integral part of the employment contracts in place and to be stipulated, pursuant to Art. 2104 of the Civil Code. (Diligence of the employer).

Violation of its provisions will therefore constitute an offence of a disciplinary nature and, as such, will be prosecuted and sanctioned by the company pursuant to and for the purposes of Art. 7 (Disciplinary sanctions) of Law No. 300/1970 (Workers' Statute - Rules on the protection of freedom and dignity of workers, freedom of association and trade union activity in the workplace and rules on placement) and may result in compensation for damages caused to the organisation.

As for collaborators, consultants and self-employed workers (as specified below among the recipients) who carry out their activities in favour of DURANTE ADESIVI and other third parties, the signing of this Code of Ethics or an extract thereof or, in any case, the adherence to the provisions and principles provided for therein represent a *conditio sine qua non* for the conclusion of contracts of any kind between the company and such parties.

The provisions thus signed or, in any case, approved, even for conclusive facts, constitute an integral part of the contracts themselves.

Due to what has been described so far, any violations by the parties referred to in the previous paragraph of specific provisions of the Code of Ethics, based on their seriousness, may legitimise the withdrawal by the company from the contractual relationships in place with said parties and may also be identified *ex ante* as grounds for automatic termination of the contract pursuant to Article 1456 of the Italian Civil Code (express termination clause).

0.2 RECIPIENTS OF THE CODE OF ETHICS OF DURANTE ADESIVI

Through the adoption of the Code of Ethics, DURANTE ADESIVI aimed to define moral values, clear rules and procedures to be complied with.

The Code of Ethics is addressed to:

- **Members of the collegiate bodies**
- **Employees (both fixed-term and permanent)**
- **Project Collaborators**
- **Consultants**
- **Suppliers of Goods and Services**
- **Any other person who may act in the name and on behalf of the company either directly or indirectly, permanently or temporarily or those who establish connections or relationships with the company and work to pursue its objectives**

Recipients of this Code of Ethics are required to learn its contents and comply with its provisions.

The Code of Ethics will be made available to them, as specified below.

The Management, or a delegate, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the organisation.

The employees of DURANTE ADESIVI, in addition to compliance with current regulations and the provisions of collective bargaining – where applicable –, undertake to adapt the methods of performance of the work activity to the purposes and provisions of this Code of Ethics.

This both in intra-company relations and in relations with subjects external to the company and, in particular, with Public Administrations and with other public authorities.

The essential requirement of any relationship of profitable collaboration with DURANTE ADESIVI is represented by the compliance, by the other recipients, with the principles and provisions contained in this Code of Ethics.

In this sense, at the time of entering into contracts or agreements with other recipients, DURANTE ADESIVI provides its contacts with a copy of this document.

1 PRINCIPLES OF CONDUCT FOR THE ORGANISATION

1.0 INTRODUCTION

The principles listed below are considered fundamental, so DURANTE ADESIVI undertakes to respect them towards anyone.

It is also essential that these values do not remain merely stated but become translated into conduct and behaviour inherent to the company.

As an organization and as individuals, all recipients, in the work environment, are required to apply them correctly in both internal and external operations and relationships.

The fundamental values on which the activity of DURANTE ADESIVI is based are:

- 1.1 Integrity of conduct and compliance with Laws and Regulations**
- 1.2 Rejection of all discrimination**
- 1.3 Centrality, development and enhancement of human resources and fairness of the authority**
- 1.4 Territorial roots**
- 1.5 Business transparency and ethics**
- 1.6 Quality**
- 1.7 Diversity**
- 1.8 Legality and combating terrorism and crime**

DURANTE ADESIVI expects these values to define its identity, unite employees and collaborators to the global organization.

1.1 INTEGRITY OF CONDUCT AND COMPLIANCE WITH LAWS AND REGULATIONS

DURANTE ADESIVI undertakes to create and provide quality services and to compete on the market according to principles of fair and free competition and transparency, maintaining correct relations with all public, governmental, administrative, customs institutions, with citizens and with third-party companies.

Everyone is required to operate, in any situation, with integrity, transparency, consistency and fairness, conducting each business relationship honestly.

DURANTE ADESIVI operates in strict compliance with the Law and ensures that all personnel act accordingly: people must behave in accordance with the Law, whatever the context and the activities carried out and the places in which they operate.

This commitment must also apply to consultants, suppliers, customers and anyone who has relations with our organization.

DURANTE ADESIVI will not start or continue any relationship with those who do not intend to align themselves with this principle.

1.2 REJECTION OF ALL DISCRIMINATION

In decisions that affect relations with stakeholders (personnel management and work organisation, selection and management of suppliers, relationship with the surrounding community and with the institutions that represent it), our organisation avoids any discrimination based on the age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors.

1.3 CENTRALITY, DEVELOPMENT AND ENHANCEMENT OF HUMAN RESOURCES AND FAIRNESS OF THE AUTHORITY

DURANTE ADESIVI recognizes the centrality of human resources and believes that an essential factor of success and development is the professional contribution of the people who work there.

The company has always placed the professionalism and individual contribution of people at the centre of its work, giving continuity to a relationship style that aims to recognise the work of each person as a fundamental element of business and personal development.

At the same time, DURANTE ADESIVI places dialogue, the exchange of information – at any level –, the enhancement and professional updating of its employees and the establishment of a corporate identity and the related sense of belonging at the centre of its daily work.

This value translates into:

- **The creation of a work environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of staff**
- **The creation of a relationship system that favours teamwork over hierarchical relationships**
- **The daily effort aimed at sharing skills and knowledge also through the use of innovative systems**

DURANTE ADESIVI attributes the utmost importance to those who provide their work within their organization, contributing to its development as it is precisely through the human resources that the company is able to provide, develop, improve and ensure optimal management of its services.

Without prejudice to legal and contractual provisions regarding workers' duties, employees are required to have professionalism, dedication to work, loyalty, a spirit of collaboration, mutual respect, a sense of belonging and morality.

In the management of contractual relationships that imply the establishment of hierarchical relationships, our company undertakes to ensure that authority is exercised with equity and fairness and that any form of abuse is avoided: in particular, the company guarantees that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the person.

These values must in any case be safeguarded when making choices regarding the organization of work.

1.4 TERRITORIAL ROOTS

DURANTE ADESIVI aims to carry out projects focused on the direct involvement of citizens, public and private institutions, entrepreneurship and associations on everything related to health education, prevention and taking charge of their well-being. The company is active and will continue to be active so that the companies collaborating with it comply with the same behavioural regulations and orient their activities to the same principles and values.

DURANTE ADESIVI also promotes local development through a strong connection with the different players of the territorial community of reference. It therefore operates in the local community on the development of a rich and generative society, capable of recognising and enhancing the resources that compose it, the skills and potential present, the differences of gender, culture and ethnicity, by promoting well-being, integration and social development and enhancing the recognition of the same by users and those who materially offer the service/product.

1.5 BUSINESS TRANSPARENCY AND ETHICS

The history, identity and values of the organisation cover a business ethic based on:

- **Reliability**
understood as a guarantee of absolute seriousness in the projects launched, in the transactions and in the commitments made
- **Solidity**
relating to an entity that supports the capital bases defined, as evidenced by its long activity
- **Transparency**
as a result of the concept of the social role that requires not only respect for principles and ethical work but also the implementation of methods that allow the communities of reference and social players to have the information to be able to reconstruct their work
- **Correctness in the contractual field**
avoiding that, in existing relationships, anyone working in the name and on behalf of the company tries to take advantage of contractual gaps or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the contact person has come to find himself
- **Protection of competition**
refraining from collusive, predatory and position-abusing behaviour

1.6 QUALITY

Quality is a distinctive element of DURANTE ADESIVI.

The organization is committed and responsible for ensuring quality in every activity, in line with its long-term strategy.

The activities are carried out by the company through a set of processes inspired by a quality management system that offers uniformity, transparency and service improvement externally.

1.7 DIVERSITY

DURANTE ADESIVI requires its directors, employees and collaborators, behaviours that guarantee absolute respect for the dignity of people, therefore the organization:

- Guarantees the most scrupulous observance of the rules for the protection of child labour, of workers' freedoms and rights
- Guarantees the conditions of free membership in trade unions
- Does not tolerate violations of human rights
- Promotes, in the whole social fabric, integration as a form of collective enrichment

In particular, the company condemns all forms of discrimination on the basis of gender, ethnic, political and religious affiliation.

1.8 LEGALITY AND COMBATING TERRORISM AND CRIME

DURANTE ADESIVI believes deeply in democratic values and condemns any activity that could be directed at terrorism or subversion of the democratic order.

The organisation also condemns any activity that involves:

- Forgery, counterfeiting, altering and/or spending coins, public credit cards and revenue stamps
- Forgery, counterfeiting, or possession, transfer of non-cash payment instruments
- Acceptance and processing of proceeds from criminal activities (money laundering)
- Abusive access to external computer systems
- Abusive possession of access codes
- Damage to equipment and data
- Fraud in the management of electronic signature certification
- Interceptions, impediments and interruptions of computer communications
- Dissemination of ideas of tolerance and silence related to the use of narcotic substances or that create any addiction
- Incitement to carry out unlawful acts or even acts contrary to the moral sense
- Negligence in combating violence, damage to public property and compliance with internal regulations

2.0 THE SOCIAL PLAYERS

2.1 CUSTOMERS

The company's primary objective is the complete satisfaction of the needs of its customers and institutions.

In this context, DURANTE ADESIVI ensures its customers the best execution of the tasks entrusted and is constantly oriented on promoting increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency and cost-effectiveness.

DURANTE ADESIVI provides accurate, complete and truthful information in order to allow customers and institutions to use the services and product of DURANTE ADESIVI through rational and conscious decisions.

DURANTE ADESIVI protects the privacy of its customers in accordance with current regulations on the subject, undertaking not to communicate or disseminate the related personal data without prejudice to legal obligations.

DURANTE ADESIVI also adopts a communication style based on efficiency, collaboration and courtesy.

2.2 FINANCIAL INSTITUTIONS

DURANTE ADESIVI maintains relationships with financial institutions based on fairness and transparency, with a view to creating value for the company itself.

For this reason, financial institutions are chosen in relation to their reputation, also for adherence to values comparable to those expressed in this Code of Ethics.

2.3 SUPPLIERS

DURANTE ADESIVI defines collaborative relationships with its suppliers, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection and respect for the environment.

Precisely for these reasons, DURANTE ADESIVI – in the selection of suppliers - verifies the related professional and reputational requirements, also through research on open sources, regarding their possible involvement in illegal activities.

INTERNAL AND EXTERNAL CONSULTANTS

The consultants are chosen in relation to their professionalism and reputation in addition to reliability and adherence to values comparable to those expressed in this document.

Relations with the consultants are based on transparent agreements and a constructive dialogue aimed at achieving the common objectives, in accordance with the regulations and principles of this Code of Ethics.

2.4 PUBLIC ADMINISTRATION

The term Public Administration means any person, subject, interlocutor qualifying as a Public Official or Public Service Officer operating on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions, including also the Customs Authorities, as well as of private partners concessionaires of a Public Service.

DURANTE ADESIVI inspires and adapts its conduct, in relations with the Public Administration, to the principles of fairness and honesty. On this basis, the persons appointed by the company to follow any negotiation, request or institutional relationship with the Public Administration, Italian or foreign, must not under any circumstances seek to improperly influence its decisions or engage in illegal behaviour, such as the offer of money or other benefits, which may alter the impartiality of the judgement of the representative of the Public Administration.

The persons appointed by the company to manage relations with any Public Administration authority must verify that the information provided in any way and for any reason is true, accurate and correct. The persons allowed to have direct contacts with the Public Administration on behalf of the company are the only persons expressly indicated by the company itself for this purpose.

No other employee may enter into any kind of relationship with the Public Administration for activities related to the company's corporate purpose.

When carrying out tenders, the subjects appointed by the company must comply with the law and its regulations.

EMPLOYMENT RELATIONSHIPS WITH FORMER EMPLOYEES OF THE PUBLIC ADMINISTRATION

The hiring of former employees of the Public Administration who in the exercise of their functions have had relations with the company or their relatives or similar, takes place in strict compliance with the standard procedures defined by the organization for the selection of personnel.

The definition of other work and/or consulting relationship with former employees of the Public Administration or with their relatives or similar also takes place in strict compliance with the standard procedures.

GRANTS AND FINANCING

Contributions, grants or financing obtained from the European Union, the State or other public body, even if of modest value and/or amount, must be used for the purposes for which they were requested and granted.

DURANTE ADESIVI prohibits the recipients of this Code of Ethics from using the funds received by Public Administrations and/or inter-professional funds for purposes other than those for which they were disbursed.

Similarly, in the event of participation in public evidence procedures, the recipients of this Code of Ethics are required to operate in compliance with the law and correct commercial practice, avoiding in particular inducing Public Administrations to operate unduly in favour of the company.

DURANTE ADESIVI undertakes to prevent acts that suggest the recipients of this Code of Ethics carry out actions aimed at obtaining illegal advantages.

The use of altered or falsified declarations or documents or the omission of information or, in general, the performance of artifices or deceptions, aimed at obtaining concessions, authorizations, financing, contributions from the European Union, the State or other Public Entity, also constitutes illegal conduct.

2.5 PUBLIC SUPERVISORY AUTHORITIES

Recipients of this Code of Ethics undertake:

- To scrupulously observe the provisions issued by the competent institutions or Public Supervisory Authorities for compliance with the legislation in force in the sectors related to the respective areas of activity
- In the context of the current investigations with Institutions and/or Public Supervisory Authorities, there are no petitions or requests containing untrue declarations in order to obtain public disbursements, subsidized contributions or financing or to unduly obtain concessions, authorizations, licenses or other administrative acts
- To comply with any request from the aforementioned institutions or Authorities within the scope of their respective supervisory functions, providing – where required – full cooperation and avoiding obstructionist behaviour

2.6 POLITICAL FORCES, ASSOCIATIONS AND INSTITUTIONS WITH VESTED INTEREST

DURANTE ADESIVI deals transparently with all political forces, associations present in the territory and public institutions (territorial and national) in order to duly represent its positions on topics and issues of interest.

3.0 PRINCIPLES OF CONDUCT FOR STAFF

3.1 PROFESSIONALISM

Each person carries out their work and services with diligence, efficiency and fairness, making the best use of the tools and time at their disposal and assuming the responsibilities related to the obligations.

3.2 LOYALTY

People are required to be loyal to DURANTE ADESIVI and to third parties.

3.3 HONESTY

As part of their work, the people of DURANTE ADESIVI are required to know and diligently comply with Model 231 and the laws in force.

Honesty is the fundamental principle for all the company's activities, for its initiatives and constitutes an essential value of organizational management. Relations with stakeholders, at all levels, must be based on criteria and behaviours of fairness, collaboration, loyalty and mutual respect. Under no circumstances can the pursuit of business interest justify dishonest conduct.

3.4 LEGALITY

DURANTE ADESIVI undertakes to comply with all national and international rules, laws, directives and regulations and all generally recognized practices. In addition, it inspires its decisions and behaviours to take care of the public interest entrusted to it.

3.5 CORRECTNESS AND TRANSPARENCY

People do not use for personal purposes information, goods and equipment that they have in the performance of the position or assignment assigned to them.

Each person does not accept or carry out for himself or for other pressures, recommendations or reports that may harm the company or undue advantages for himself, for the company or for third parties.

Each person rejects and makes no promises of improper offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favouring any interest group or individual.

3.6 CONFIDENTIALITY

People ensure the utmost confidentiality regarding news and information constituting the company's assets or inherent to the company's activity, in compliance with the provisions of the law, current regulations and internet procedures. In addition, the persons of the company are required not to use the confidential information for purposes not connected with the exercise of their business.

3.7 RESPONSIBILITY TOWARDS THE COMMUNITY

DURANTE ADESIVI aware of its social role in the reference territory, on economic and social development and on the general well-being of the community, intends to operate in respect of

national and local communities, supporting initiatives of cultural and social value in order to improve its reputation and legitimacy to operate.

3.8 RESOLUTION OF CONFLICTS OF INTEREST

In the performance of work activities, people pursue the company's general objectives and interests. They inform their superiors or contact persons without delay of situations or activities in which there could be an interest in conflict with that of the company, by the people themselves or their close relatives and in any other case where there are relevant reasons of convenience. People respect the decisions that have been taken by the company in this regard.

3.9 SENSE OF BELONGING

In the performance of work activities, people pursue everything that does not hinder or in any way prejudice the creation of a sense of belonging of people to their organization, work group or to third parties.

3.10 MUTUAL RESPECT

People engaged in any capacity in collaboration with DURANTE ADESIVI demand and actively show respect for the tasks, skills, methods of carrying out the tasks also through the omission of their own personal considerations to third parties.

3.11 SPECIFIC OBLIGATIONS

Employees of DURANTE ADESIVI must follow the instructions shown:

a) TRANSPARENCY

It is a good rule that any information relating to the activities carried out within the company is available to everyone.

Each employee has the task of interacting with their manager and colleagues in relation to the work they carry out.

In case of misunderstandings or problems, it is everyone's duty to interact first with their manager or contact person.

Conduct themselves in a scrupulously manner independent from conditions of any kind that may influence their work both towards their Client and towards external Organisations related to them.

Not to maintain improper economic relationships or accept gifts of value or favours of any kind from Organisations, suppliers of their Client.

Report, at the time of acceptance of the professional assignment or during its performance, any relationship or interest in common with external Organizations that have relations with their Client, which may cause conflicts of interest.

b) CONSISTENCY

Once a commitment is made, it is completed.

Never leave a job unfinished and never take on commitments that you already know you cannot handle.

c) COURTESY AND KINDNESS

Courtesy and kindness are and must be the basis of every daily activity, they must also be a constant in interpersonal relationships both inside and outside the company.

d) PUNCTUALITY

If you are late for an appointment, it is a good rule to warn before the agreed time expires, doing so later is a rude gesture.

Punctuality is a form of respect towards those who are waiting.

e) CONFIDENTIALITY

All information and data managed in the workplace are corporate property and confidential, so they must be treated as such. In particular, you should never talk about problems or work situations in public places where you can be heard, or in the presence of people who have no right to be involved in the information in question.

f) PROFESSIONALISM

Being professional means knowing all appropriate behaviours, everything you need to do your job in the best possible way, considering the needs of the customers and the company.

Whatever activity is carried out, it is always necessary to be professional.

g) WORK ENVIRONMENT

Everyone should have the ability to understand the phenomena that underlie interpersonal relationships and adopt a behaviour consistent with the context of reference, always trying to maintain a courteous, friendly and collaborative climate with their colleagues.

h) CORPORATE LOYALTY AND RESPECT

It is everyone's duty to share company policies and work to ensure that they are respected.

During the daily activity, every employee should always preserve the interests and image of the company, as well as having the utmost respect for company property.

During the performance of their activity, they should always evaluate the economic implications of their choices, avoiding waste.

i) RESPECT FOR THE CLIENT

DURANTE ADESIVI, like all free-market companies, survives thanks to its customers.

Respect, kindness and courtesy should be a constant in the relationships of those who make contact with the organization.

l) WORKSTATION

Each employee is responsible for their own workstation. Everyone is responsible for the care and cleaning of the tools at their disposal.

m) PERSONAL COMPUTER

The personal computers supplied must be kept in the best possible condition and no other programs can be installed except those anticipated by the company configuration.

The hardware equipment made available by the company are in all respects work tools and may not be used for personal purposes.

In particular, the files contained therein constitute company assets and may not be arbitrarily damaged and/or destroyed.

It is absolutely forbidden to use hardware equipment for copying and/or storing files and data, such as USB mass memories, laptops, optical discs, burners and any other electronic storage medium, unless expressly authorised by the company.

n) INTERNET

The Internet connection is a work tool and must be used as such.

THE USE OF THE INTERNET FOR PRIVATE PURPOSES IS ALLOWED ONLY OUTSIDE WORKING HOURS.

Internet browsing:

- It is not allowed for those sites that do not directly relate to the performance of the assigned tasks, especially those that can detect the political, religious or trade union opinions of the employee
- It is not allowed to carry out all kinds of financial transactions, including remote banking operations, online purchases and the like, except in cases directly authorised by the company and in compliance with normal purchasing procedures
- It is not allowed to download and install free software (freeware), shareware, P2P and/or FTP, taken from websites, unless expressly authorised by the company
- It is forbidden to register on sites whose contents are not related to work if and in any case without express authorisation of the company
- It is not allowed to participate, for non-professional reasons and in any case without express authorisation of the company, in forums, or the use of chat lines

- The storage of electronic documents of an offensive and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation, etc., is not allowed

It is also forbidden to alter the functioning of a computer or telematic system, or to intervene without right in any way on data, information contained therein, producing a transfer of money, monetary value, or virtual currency.

o) EMAIL

Email is a corporate tool and should not be considered private correspondence and therefore:

- It is not allowed to use email (internal and external) for reasons not related to the performance of the assigned tasks
- It is not allowed to send or store messages (internal or external) of an offensive and/or discriminatory nature based on sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation, etc.
- It is not allowed to set up and use email accounts outside the company

p) MOBILE PHONES

The use of mobile phones has rules of good behaviour that should always be respected.

Given that it is a work tool, the mobile phone should always be kept silent during meetings and appointments with customers, especially when you are at their premises.

The use of mobile phones for personal purposes must be limited to only emergencies.

q) COMPANY CARS

The company car is under the total responsibility of the person to whom it has been assigned just as all company assets should be used and maintained with the utmost care.

It must be driven in full compliance with the requirements of the highway code.

Any fines resulting from violations of the highway code remain the responsibility of the driver.

r) PRIVATE CARS

Use of a private car for work purposes is anticipated and, as in the case of corporate cars/vehicles, the driver must operate in full compliance with the requirements of the highway code.

Any fines resulting from violations of the highway code remain the responsibility of the driver.

3.12 HUMAN RESOURCES

Human resources are an indispensable element for the existence of DURANTE ADESIVI.

The dedication and professionalism of employees are decisive values and conditions for achieving the objectives of DURANTE ADESIVI.

It is committed to developing the skills and expertise of each employee so that the energy and creativity of individuals finds full expression for the realization of their potential.

It offers all workers the same job opportunities, so that everyone can enjoy fair treatment based on merit, without any discrimination.

The competent functions must:

- Adopt merit, competence and in any case strictly professional criteria for any decision relating to an employee;
- Select, hire, train, remunerate and manage employees without any discrimination;
- Create a work environment in which personal characteristics cannot give rise to discrimination.

Interprets its entrepreneurial role both in the protection of working conditions and in the protection of the psycho-physical integrity of the worker, in respect of their moral personality, avoiding that they suffer unlawful conditioning or undue hardship.

For this reason, DURANTE ADESIVI protects workers from acts of psychological violence or mobbing and counters any discriminatory or harmful attitude or behaviour towards the person, their beliefs and inclinations.

To this effect, non-work behaviours that are particularly offensive to civil sensitivity, which make interpersonal contacts in the work environment problematic, are also considered relevant for DURANTE ADESIVI.

It conforms to the principle that everyone, on the basis of their level of placement in the company organization chart, is evaluated with mainly meritocratic criteria and is competent and responsible for their actions or omissions.

The person who has management and representation functions in the company, also at the level of position, exercises the direction, coordination and control over the activities of the subjects subject to it and/or coordinated by it.

In any case, it guarantees that the authority does not turn into the exercise of power detrimental to the dignity of the employee or collaborator and that the choices of work organization safeguard the value of the individual contributions.

All forms of discrimination must be avoided and in particular any discrimination based on race, nationality, sex, age, physical disabilities, sexual orientation, political or union opinions, philosophical guidelines or religious beliefs.

The staff must be hired with a regular employment contract in accordance with the provisions of the legal obligations, in full compliance with the current regulations on the employment of workers, remuneration, contribution, tax and insurance obligations.

It does not make use of the work services of minors and in any case refuses forms of work collaboration with minors in contrast with the law; in particular, it does not participate in activities that provide for the direct or indirect use of child labour provided by third party companies.

It does not hire the subjects (including external consultants) indicated in the Reference Lists, issued by the Public Authority on the fight against organised crime, or belonging to organisations indicated in those same Lists.

It is expected that employees, at all levels, collaborate to maintain a climate of mutual respect for the dignity, honour and reputation of each one.

It undertakes to intervene to prevent injurious or defamatory interpersonal attitudes.

4.0 CRITERIA OF CONDUCT

4.1 INTRODUCTION

The rules contained in this section are intended to indicate to the recipients of this Code of Ethics the attitudes and behaviours to be observed during the performance of the various company activities in accordance with the values on which this document is based.

All recipients of this Code of Ethics (identified in Chapter 0 of this document) must observe correct and transparent conduct in the performance of their role, thus contributing to the effectiveness of the internal control system to protect the value of DURANTE ADESIVI.

In compliance with the law, all recipients must maintain an attitude based on the availability of corporate bodies and supervisory authorities.

4.2 RELATIONS WITH STAFF

For any further information, please also refer to the relevant procedures of the 231 Management System.

In general:

- **Selection of staff**

The evaluation of the staff to be hired, or in collaboration, is carried out based on the correspondence of the profiles of the candidates, with respect to those expected and internal needs, in compliance with equal opportunities for all interested parties. The information requested is strictly linked to the verification of the aspects provided for by the professional and psycho-attitudinal profile, in compliance with the private sphere and the candidate's opinions. Management adopts, in the selection activity, appropriate measures in order to avoid favouritism and facilitation of all kinds.

- **Establishment of the employment relationship**

The staff is hired with a regular employment, professional service or internship contract: no form of irregular work is tolerated.

- **Integrity and protection of the person**

In the context of the management and staff development processes, as well as during the selection phase, the decisions taken are based on the correspondence between expected profiles and those held by persons and/or on considerations of merit.

Access to roles and assignments takes place on the basis of skills and abilities. In addition, compatible with the general efficiency of work, forms of flexibility in the organization of work are favoured that accommodate people on maternity leave as well as those who have to take care of children.

- **Enhancement and training of resources**

DURANTE ADESIVI provides people with information and training tools with the aim of enhancing the specific skills and preserving the professional value of the staff.

Institutional training is anticipated, provided at certain times of professional life, internal to the person (example: for new hires there is an introduction to the business) and recurrent training aimed at operational staff (example: training on safety in the workplace, on management 231 and code of ethics).

4.2.1 SAFETY AND HEALTH

DURANTE ADESIVI undertakes to offer a working environment capable of protecting the health and safety of its personnel, disseminating and consolidating a safety culture, developing risk awareness and promoting responsible behaviour by all personnel. DURANTE ADESIVI intends to disclose and disseminate the culture of safety and health to all those who are part of the Entity, or who, in any case, carry out their activities for and with DURANTE ADESIVI.

The Entity also operates in order to preserve, especially with preventive actions, the health and safety of workers.

Among the main objectives is to protect human resources by constantly seeking the necessary synergies not only internally, but also with suppliers, external consultants and customers involved in the company's activities.

All employees are required to comply with internal rules and procedures on risk prevention and health and safety protection and to promptly report any deficiencies or non-compliance with applicable regulations.

The company adopts the general measures for the protection of health and safety at work prescribed by law with particular reference to the provisions of Legislative Decree 81/08 and subsequent amendments.

DURANTE ADESIVI undertakes to comply with all regulations regarding health and safety at work for employees, collaborators and users.

In particular:

- It defines the operating procedures to be followed and coordinates activities in the field of health and safety at work
- It ensures the application of current regulations also through the creation of risk assessment documents and the definition of processing procedures in line with current safety standards
- It constantly monitors legislative innovations and strives for their implementation

DURANTE ADESIVI also undertakes to ensure:

- The assessment of all health and safety risks
- The planning of prevention, aimed at a complex that integrates in a coherent way into prevention the operating conditions, as well as the influence of environmental factors and the organization of work
- The elimination of risks and, where this is not possible, their minimisation in relation to the knowledge acquired on the basis of technical progress

- The respect for the ergonomic principles of work organization, in the design of the workstations, in the choice of equipment and in the definition of work and service delivery methods, in particular in order to reduce the effects on health of monotonous and repetitive work
- Reduction of the risks at the source
- The replacement of what is dangerous with what is not or is less dangerous
- The limitation to a minimum of the number of workers who are or may be exposed to the risk
- The limited use of chemical, physical, and biological agents in the workplace
- The priority of collective protection measures over individual protection measures
- The health control of workers
- The removal of the worker from exposure to the risk for health reasons inherent to his person and shift where possible to another task
- Adequate information and training for workers, managers, proposals, the RLS and all personnel
- Adequate instructions to workers
- The participation and consultation of workers and the RLS
- The planning of the measures deemed appropriate in order to ensure the improvement over time of safety levels also through the adoption of codes of conduct and good practices
- The emergency measures to be implemented in the event of first aid, firefighting, evacuation of workers and serious and immediate danger
- The use of warning and safety signs
- The regular maintenance of environments, equipment, systems with particular regard to any safety devices in accordance with the indication of the respective manufacturers
- Adequate instructions to employees, collaborators and users and their training in accordance with the provisions of the law and the CCNL applied to personnel

4.2.2 PRIVACY PROTECTION

In the processing of the data of its personnel, the company complies with the provisions contained in Legislative Decree 196/2003 and subsequent amendments and additions containing the code on the protection of personal data, as well as the recently transposed European standards.

Individuals are given a privacy policy that identifies:

- Purposes and methods of processing
- Any subjects to whom the data are communicated
- Information necessary for the exercise of the right of access pursuant to Art. 13 of Legislative Decree 196/2003 and subsequent amendments, as well as the transposed European regulation 2016/679 GDPR and national laws.

In cases where the legislation requires it, individuals are asked for specific consent to the processing of their personal data.

Any investigation into the ideas, preferences, personal tastes and in general the private lives of employees and collaborators is excluded.

The same procedure is also applied for the electronic management of information and personal data.

4.2.3 ENVIRONMENTAL PROTECTION

The organization undertakes to pursue the protection of the environment through compliance with national and Community legislation and regulations.

It undertakes to carry out pollution prevention and to disseminate awareness of environmental issues among employees, collaborators and suppliers.

DURANTE ADESIVI intends to disclose and disseminate the culture of the protection of the environment to all those who are part of the Entity, or who, in any case, carry out their activities for and with DURANTE ADESIVI.

4.2.4 WORKPLACE HARASSMENT

DURANTE ADESIVI demands that internal and external working relationships do not give rise to harassment, meaning as such:

- The creation of an intimidating, hostile or isolating work environment towards individual groups of workers;
- The unjustified interference with the performance of the work of others;
- The obstacle to the individual job prospects of others merely for reasons of personal competitiveness.

It does not allow sexual harassment, meaning as such:

- The subordination of decisions of relevance to the recipient's working life to the acceptance of sexual favours;
- The proposals of private interpersonal relationships, which despite an express or reasonably obvious dislike, have the ability, in relation to the specificity of the situation, to disturb the serenity of the recipient with objective implications for their work expression.

4.2.5 ALCOHOL AND DRUG ABUSE

DURANTE ADESIVI requires each employee to personally contribute to maintaining the work environment respectful of the sensitivity of others.

It is therefore considered conscious assumption of the risk of prejudice of these environmental characteristics, during the course of work and in the workplace:

- Work under the effects of abuse of alcoholic substances, narcotic substances or substances of similar effect;
- Consume or transfer narcotic substances for any reason during the course of the work.

States of chronic dependence on substances of this nature, when impacting the work environment, are – due to contractual repercussions – equated to the previous cases.

It undertakes to promote the social actions provided for in collective bargaining.

4.2.6 SMOKING

DURANTE ADESIVI requires each employee to contribute to the safety and hygiene of the workplace, paying particular attention not only to the diligent performance of their work functions, but also to peaceful coexistence with other workers, respecting each other's needs.

In particular, DURANTE ADESIVI, while recognizing the widespread habit of smoking, must emphasize that, in light of the activities carried out within the company premises, mostly involving the processing of highly flammable materials, this practice is particularly dangerous and risky to the collective health.

However, DURANTE ADESIVI, with a view to maximizing human resources, considers it essential that adequate attention be paid to the condition of those who may experience physical discomfort in the presence of smoke and ask to be protected from contact with the so-called "passive smoke".

Therefore, here, in addition to specifically recalling the provisions of current legislation regarding the general prohibitions on smoking in closed premises, pursuant to Law no. 3 of 16 January 2003, Art. 51, the Company **expressly prohibits** all employees from smoking traditional and electronic cigarettes inside the premises where the work is carried out.

In any case, since DURANTE ADESIVI rejects any form of discrimination, even indirect, and considers it essential to meet the needs of all company personnel, a specific smoking area has been prepared, marked with the relative signs, where workers can go to smoke, within the organizational and temporal limits imposed by the sector regulations and by the principle of normal reasonableness.

It should be noted that the violation of the aforementioned prohibitions may be subject to disciplinary action, which does not preclude the imposition of any sanctions contemplated by law.

4.3 DUTIES OF THE STAFF

For any further information, please also refer to the relevant procedures of the 231 Management System.

People must act loyally in order to comply with the obligations signed in the employment contract and the provisions of the Code of Ethics ensuring the required services.

4.3.1 DELEGATIONS OF POWER AND RESPONSIBILITY

The duties, responsibilities and powers of the directors, employees and collaborators are defined through specific resolutions and/or appropriate procedures.

These duties, responsibilities and powers must be known, accepted and respected.

4.3.2 OBLIGATIONS FOR DEPARTMENT MANAGERS REGARDING THE CODE OF ETHICS

Each department manager, identified as such in the organization chart, in the job description and/or in the delegation system, has the obligation to:

- Take care of the compliance with the Code of Ethics by those directly or indirectly subject to his responsibility
- Represent an example for your employees / collaborators with your own behaviour
- Ensure that employees understand that the provisions contained in this Code of Ethics are an integral part of their work performance
- Promptly report to Management or any delegate or to the SB any reports or special needs from their subjects

Failure by the department managers to comply with the obligations referred to in this chapter may result in the application of disciplinary sanctions, as provided for by the penalty system.

4.3.3 OBLIGATIONS FOR ALL EMPLOYEES REGARDING THE CODE OF ETHICS AND THE DOCUMENTATION PRODUCED BY THE COMPANY

Each employee is required to know the provisions contained in the Code of Ethics or referred to by it, as well as the relevant legal provisions governing the activity carried out within the scope of the relative function, which are an integral part of the work performance of each one.

The employee who has knowledge of alleged illegal conduct or who in any way violates this Code of Ethics or the provisions of the Organizational Management Model is required to communicate the information in his possession about such conduct, only in the ways established by company procedures, to the following subjects;

- a) Management or Function appointed by it;
- b) To Management alone, in the event that the report refers to the conduct carried out by the aforementioned Function, in the performance of company functions/duties;
- c) To the Supervisory Body.

Management adopts monitoring systems on the effective reading and understanding of mandatory legal documents by employees, collaborators, etc., by means of anonymous tests, activating the most appropriate actions to constantly increase the level of dissemination and understanding of their contents.

Employees are also required to:

- Refrain from conduct contrary to these provisions and rules
- Contact your superiors or the SB and/or delegate as responsible for the management of the prevention model for the necessary clarifications on the application methods of the Code of Ethics or the regulations of reference
- Promptly report to at least one of the subjects indicated above any news regarding possible violations of the Code of Ethics
- Collaborate with the organization in the event of any investigations aimed at verifying and possibly sanctioning possible violations

These behavioural requirements are also required of external consultants and collaborators of all kinds.

4.3.4 PROTECTION OF COMPANY ASSETS

Every recipient is required to work diligently to protect the company's assets from improper or incorrect use.

People must know and implement the provisions of internal policies on information security in order to ensure integrity, confidentiality and availability.

Information and know-how must be protected with the utmost confidentiality. The most significant data that the company acquires or creates in the course of its activity must be considered confidential information and subject to appropriate attention: this also includes information acquired from and regarding third parties (customers, contacts, partners, employees, etc.).

Persons who in the performance of their duties come into possession of confidential information, materials or documents must inform their superiors.

Both during and after the termination of the employment relationship with the company, individuals may use confidential data exclusively in the corporate interest and never for their own and/or third parties' benefit.

4.3.5 CONFIDENTIAL INFORMATION ON THIRD PARTIES

The staff of DURANTE ADESIVI must refrain from using illicit means in order to acquire confidential information about other organizations and third parties.

Those who, within the framework of a contractual relationship, become aware of confidential information about other subjects, will be required to use it exclusively as provided for in the contract in question.

Without proper authorization, persons may not request, receive or use confidential information regarding third parties. Should you learn confidential information about another person's account that is not already subject to a non-disclosure agreement or other form of protection, you will need to contact your manager for assistance in processing that information.

4.3.6 USE OF COMPANY ASSETS

Every person is required to work diligently in order to protect the company's assets through responsible behaviour and in line with the operating procedures prepared to regulate their use, accurately documenting their use.

In particular, the staff must:

- Use the assets entrusted to them scrupulously and sparingly
- Avoid improper use of company assets that may cause damage or reduced efficiency or are in any way contrary to the company's interest

- Properly safeguard the resources entrusted to them and promptly inform the units in charge of any threats or events harmful to the company

As for computer applications, each one is expressly required to:

- Carefully adopt the provisions of company security policies in order not to compromise the functionality and protection of computer systems
- Refrain from sending threatening or abusive emails or from using low-level language or from expressing inappropriate comments that may offend people and/or damage the image of the company
- Refrain from browsing websites with indecent and offensive content and in any case not related to professional activities

Finally, with regard to credit and payment cards, or other non-cash payment instruments, provided by the company, it is expressly forbidden to:

- Use them without express written authorisation from Management;
- falsify or alter them in any way.

4.4 RELATIONS WITH CUSTOMERS

For any further information, please also refer to the operating procedures of the Management System.

4.4.1 IMPARTIALITY

DURANTE ADESIVI undertakes to offer its services and products without any discrimination between private customers or potential dowry holders with particular attention to the latter.

4.4.2 CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

Contracts and communications to customers by the Entity must always be:

- Clear and simple, formulated with the language closest possible to that normally used by the contact persons
- Compliant with current regulations and such as not to constitute evasive or otherwise incorrect practices
- Complete so as not to neglect any relevant element, for the purposes of the customer's decision

4.4.3 STYLE OF STAFF BEHAVIOUR TOWARDS CUSTOMERS

The style of behaviour of the company's people towards customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship.

4.4.4 DATA PROCESSING

- In the processing of the personal data of the customers, the organisation complies with the provisions contained in Legislative Decree 196/2003 and subsequent amendments and additions

containing the Code on the Protection of Personal Data, as well as the transposed European regulation 2016/679 GDPR and national laws.

A privacy policy is completed that identifies:

- Purposes and methods of processing
- Any subjects to whom the data are communicated
- Information necessary for the exercise of the right of access.

In cases where the legislation requires it, individuals are asked for specific consent to the processing of their personal data. Any inquiry on the ideas, preferences, personal taste and in general the private life of the customs is excluded.

The staff is obliged to process the data with the maximum discretion and confidentiality in particularly internally. The same procedure is also applied for the electronic management of information and personal data.

4.4.5 MANAGEMENT OF ADMINISTRATIVE-ACCOUNTING ACTIVITIES

In relations with customers, the persons appointed by the company are required to comply with the prohibition to issue invoices or other accounting documents for non-existent transactions, or in any case false, fictitious, artifact.

The personnel must carefully keep the accounting records and the documentation whose filing is mandatory, as the concealment and destruction, even partial, of the same is prohibited.

In any case, it is forbidden to engage in fraudulent conduct suitable for hindering the assessment activity of the financial administration, or such as to mislead it.

All company personnel must behave correctly, transparently and collaboratively, in compliance with the law and internal company procedures, in all administrative-accounting activities.

4.4.6 CUSTOMS OBLIGATIONS MANAGEMENT

In relations with customers, the staff is required to avoid giving rise to the implementation of conduct that may integrate, directly or indirectly, the cases of crime provided for in the field of smuggling (Article 25-sexiesdecies, Legislative Decree No. 231/2001)

To this end, it is essential that the personnel in charge verify the correspondence between the relevant documentation in customs matters and the type/quantity of goods sold and purchased; as well as to verify the correctness of the calculation of customs charges and the actual payment of the same.

The Entity provides specific training for the functions involved in the management of customs obligations.

4.5 RELATIONS WITH SUPPLIERS

For any further information, please also refer to the relevant procedures of the Management System.

4.5.1 SELECTION OF THE SUPPLIER

Purchasing processes are based on:

- The search for the maximum competitive advantage for the company;
- The granting of equal opportunities to suppliers;
- Loyalty;
- Impartiality.

The selection of suppliers and the determination of the conditions of purchase are based on an objective assessment of the quality, price of the asset or service of its actual availability as well as the guarantee of assistance and timeliness.

Another selection criterion is the exclusion of suppliers who have ongoing criminal proceedings for contracts or other mafia-related matters.

It is specified that the assessment regarding the existence of professional and reputational requirements must also be extended to the *outsourcers* that the entity may use in the execution of the import — or export — of goods from — or to — non-EU countries.

These are, in particular:

- customs shippers who, on behalf of their customers, take care of the management of customs obligations;
- companies that provide goods transport services;
- companies authorised to manage the customs warehouses where the goods converge pending payment of customs charges.

4.5.2 INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS

Relations with suppliers, including those concerning financial and consulting contracts, are constantly monitored by the company.

The conclusion of a contract with a supplier must always be based on relationships of extreme clarity avoiding, where possible, forms of dependence.

Documents exchanged with suppliers must be properly archived: in particular, those of an accounting nature must be kept for the periods established by current legislation.

4.5.3 MANAGEMENT OF ADMINISTRATIVE-ACCOUNTING ACTIVITIES

The personnel of the entity, regarding relations with the suppliers, must carefully keep the accounting records and the documentation whose filing is mandatory, as the concealment and destruction, even partial, of the same is prohibited.

In any case, it is forbidden to engage in fraudulent conduct suitable for hindering the assessment activity of the financial administration, or such as to mislead it.

All company personnel must behave correctly, transparently and collaboratively, in compliance with the law and internal company procedures, in all administrative-accounting activities.

4.5.4 CUSTOMS OBLIGATIONS MANAGEMENT

In relations with the suppliers, the staff is required to avoid giving rise to the implementation of conduct that may integrate, directly or indirectly, the cases of crime provided for in the field of smuggling (Article 25-sexiesdecies, Legislative Decree No. 231/2001)

To this end, it is essential that the personnel in charge verify the correspondence between the relevant documentation in customs matters and the type/quantity of goods sold and purchased; as well as to verify the correctness of the calculation of customs charges and the actual payment of the same.

The Entity provides specific training for the functions involved in the management of customs obligations.

4.6 RELATIONS WITH PUBLIC ADMINISTRATIONS

In this section, the relations between DURANTE ADESIVI and public administrations are discussed.

4.6.1 CORRECTNESS AND LOYALTY

DURANTE ADESIVI intends to conduct relations with the Public Administration with the utmost transparency and ethical conduct. These relationships, which must take place in compliance with current legislation, comply with the general principles of fairness and loyalty so as not to compromise the integrity of both parties.

4.6.2 GIFTS, DONATIONS AND BENEFITS

No person of DURANTE ADESIVI may give money or offer economic advantages or other types of benefits to subjects of the Public Administration or private individuals for the purpose of obtaining positions or other personal advantages or for the company itself.

No form of gift is allowed that can be interpreted as exceeding normal commercial or courtesy practices or in any case aimed at acquiring favourable treatment in the conduct of any activity related to the company.

In this sense, a "normal commercial or courtesy practice" worth less than € 100.00 is considered a gift.

In particular, any form of gift to Italian and external public officials or their family members that may influence their independence of judgement in order to obtain more favourable treatment or undue benefits or advantages of various kinds is prohibited.

A gift is any type of benefit: not only material goods but also, for example, free participation in conferences, training courses, promise of a job offer etc.

The above cannot be circumvented by resorting to third parties: in this regard, not only illegal payments made directly to entities or their employees but also illegal payments made to persons acting on behalf of such entities are considered acts of corruption.

On the occasion of occasions, anniversaries and/or holidays, the donation of goods is allowed as long as it is small as dictated by the tax laws in force.

If a person of DURANTE ADESIVI, on the other hand, receives explicit or implicit requests for benefits from a member of the Public Administration or private individuals, he/she shall immediately inform the BoD or the person to whom he/she is required to report for the adoption of appropriate checks and initiatives.

4.6.3 RELATIONS WITH THE CUSTOMS AUTHORITIES

Specifically, in relations with the customs authorities, DURANTE ADESIVI, in addition to compliance with the aforementioned criteria of conduct, guarantees

- the segregation of functions involved in the relative processes;
- maximum collaboration and transparency;
- the sharing of evidence of any checks or inspections in order to define the actions to be taken to deal with any critical issues detected by the competent authorities in customs matters.

4.7 EXTERNAL RELATIONS

In this section, the details regarding the external relations of DURANTE ADESIVI are discussed.

4.7.1 EXTERNAL EFFECTIVENESS OF THE CODE OF ETHICS

Anyone acting in the name and on behalf of DURANTE ADESIVI who comes into contact with third parties with whom the organization intends to undertake commercial relations or is required to have relationships of an institutional, social, political or any other nature, has the obligation to:

- Inform these subjects of the commitments and obligations imposed by the Code of Ethics
- Require compliance with the obligations of the Code of Ethics in the performance of their activities
- Take the necessary initiatives in case of refusal by third parties to comply with the Code of Ethics or in failure or partial execution of the commitment made to comply with the provisions contained in the Code of Ethics itself, informing Management or the delegates and the SB.

4.7.2 CONFLICT OF INTEREST

All recipients must ensure that every decision taken within the scope of their activities is made in the interest of DURANTE ADESIVI.

All recipients are required to avoid any activity or situation of personal interest that constitutes or may constitute, even if only potentially, a conflict between their own interests and those of the organization

and, in any case, they must comply with the specific procedures adopted by the company in this regard.

All recipients of the Code of Ethics must refrain from taking advantage of their relationship with the company in order to favour themselves or third parties to the detriment or disadvantage of the organisation itself.

Every employee is prohibited from taking part, directly or indirectly, in any capacity, in commercial initiatives that put themselves in a situation of direct competition with the company unless such participation has been previously communicated to the competent Board of Directors and approved by the same, having heard the opinion of the SB.

In the event that situations of conflict of interest are identified, even potential, both internal and external to the company's activity, each person involved is required to refrain from putting in place the conduct of conflict by giving timely notice to the SB which is responsible for the evaluation regarding the existence, on a case-by-case basis, of any incompatibility or situations of prejudice.

4.7.3 COMPETITIVE PRACTICES

For DURANTE ADESIVI, it is of primary importance that the market be based on fair and fair competition.

The Entity is committed to scrupulously observing the relevant laws and to collaborating with the regulatory authorities of the market. In particular:

- It undertakes to carry out the activities in compliance with the rationale of the law for the assignments of supply of goods and services that are entrusted through express agreements with public bodies, including economic ones and public equity companies
- Competes fairly on the market respecting the rules of competition
- It undertakes to provide correct information about its business both internally and externally or in the face of legitimate requests
- Ensures the veracity and correctness of social data relating to financial statements, reports and other official documents

4.7.4 GIFTS AND BENEFITS

See previous chapter 4.5.2

4.8 SPONSORSHIP/ORGANISATION OF PROMOTIONAL EVENTS

It undertakes to sponsor or organize both national and local events.

It does not sponsor/organise promotional or training events for people/countries included in the Black List Reference Lists, issued by the Public Authority on the fight against organised crime, terrorism and money laundering.

4.9 RELATIONS WITH POLITICAL PARTIES, TRADE UNIONS AND ASSOCIATIONS

It refrains from any form of undue pressure, direct or indirect, on political or trade union leaders, including through its managers, employees or collaborators.

It is possible to adhere to requests for contributions limited to proposals from non-profit organizations or associations, or that are of considerable cultural or charitable value.

4.10 RELATIONS WITH MASS MEDIA

The information to the outside must be truthful and transparent.

It must be presented in an accurate and homogeneous manner in the communication with the mass media.

Relations with the mass media are reserved exclusively for the corporate functions and responsibilities delegated to this.

Employees may not provide information to representatives of the mass media or undertake to provide it without the authorization of the competent functions.

In no way or form may employees offer payments, gifts, or other benefits aimed at influencing the professional activity of mass media functions, or that can reasonably be interpreted as such.

4.11 ILLUSTRATION OF OBJECTIVES AND RESULTS

Employees called upon to illustrate or provide externally news regarding the company's objectives, activities, results and points of view through, but not limited to:

- Participation in conferences, congresses and seminars
- The writing of articles, essays and publications in general
- Participation in public interventions

They are required to obtain the authorisation of the organisational structure to which they belong regarding the texts, the reports prepared and the lines of action that they intend to follow and to agree on the contents with Management.

5.0 APPLICATION MECHANISMS OF THE CODE OF ETHICS

5.1 ORGANISATIONAL PRINCIPLES

DURANTE ADESIVI ensures that the organisational system is based on the criterion of separation between those who decide, those who execute and those who check. In particular, the organisation makes all transactions verifiable because they are recorded.

The Entity binds those who perform the audit function to the veracity and correctness of the data and the information.

Each operation and/or activity must be lawful, authorized, consistent, documented, verifiable, in accordance with the principle of traceability and internal procedures according to the criteria of prudence and to protect the interests of the company.

The internal procedures must allow controls to be carried out on operations, authorisation processes and the execution of the same.

Every employee who carries out operations involving sums of money, goods or other economically assessable utilities as belonging to DURANTE ADESIVI must reasonably provide the appropriate evidence in order to allow the verification of the aforementioned transactions.

5.2 ACCOUNTING TRANSPARENCY

The Entity's accounting complies with the generally accepted principles of truth, accuracy, completeness and transparency of the recorded data.

Recipients of this Code of Ethics undertake to refrain from any behaviour, active or omissive, that directly or indirectly violates regulatory principles and/or internal procedures that concern the creation and storage of accounting documents, as well as their external representation.

The recipients of this Code of Ethics are also required to keep and make available, for each operation or transaction carried out, adequate supporting documentation in order to allow:

- Accurate accounting registration
- The immediate identification of the underlying characteristics and motivations
- The easy formal and chronological reconstruction
- The verification of the decision, authorization and implementation process, in terms of legitimacy, consistency and congruity as well as the identification of the various levels of responsibility

The recipients of this Code of Ethics who become aware of cases of omission, falsification or neglect in accounting records or supporting documentation are required to promptly report it to the Function in charge or to the SB and/or Management.

DURANTE ADESIVI promotes training and updating in order to make the recipients of this Code of Ethics aware of the rules (laws or regulations, internal requirements, provision of trade associations) that govern the training and management of accounting documentation.

5.3 CHECKS AND INSPECTIONS

DURANTE ADESIVI guarantees the willingness, through the competent persons, to provide all the information and the view of the documents, and necessary requests to the audit and control bodies.

It guarantees accessibility to all information and documents to those entitled and provides, through the willingness of its directors and employees, responsible for their function, all the information that support the exercise of supervisory functions.

DURANTE ADESIVI prohibits its directors and employees and/or collaborators from making false statements rather than presenting false documents or certifying untrue situations, including through computer systems, with the aim of improperly receiving public funds and/or obtaining and maintaining any facilitations.

5.3.1 SUPERVISION OF THE IMPLEMENTATION OF THE CODE OF ETHICS

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

- Board of Directors
- Management
- Coordinators and Supervisors
- Supervisory Body: this body, in particular, in addition to monitoring compliance with the Code of Ethics, having access to all the company's information sources, suggests the appropriate updates to the Code, also on the basis of reports received from the staff

The following tasks are performed by the SB:

- Notify Management, in order to take the appropriate measures, of the reports received regarding violations of the Code of Ethics
- Express binding opinions on the revision of the most relevant policies and procedures in order to ensure coherence with the Code of Ethics
- Contribute to the periodic review of the Code of Ethics: to this end, the SB makes the appropriate proposals to the Board of Directors which assesses them and, if necessary, approves and formalises them

The SB maintains the requirements of autonomy and independence, assumes powers of investigation and control as well as powers of initiative for the completion of the assigned functions.

5.3.2 REPORTING PROBLEMS OR SUSPECTED VIOLATIONS

Violations of the Code of Ethics, possibly implemented by the recipients, are subject to the disciplinary system laid down in the corporate Model 231.

It should be noted, in fact, that in the event of violations of the Code of Ethics, DURANTE ADESIVI adopts disciplinary measures against those responsible for the violations, where deemed necessary for the protection of the interests of the organization, which may include the removal of those responsible from the organization, in addition to compensation for any damages derived from the violations.

Failure to comply with the rules of the Code of Ethics by the members of the corporate bodies may result in the adoption, by the competent corporate bodies, of the most appropriate measures provided for and permitted by law.

Violations of the rules of the Code of Ethics of DURANTE ADESIVI by employees constitute a breach of the obligations deriving from the employment relationship, with all contractual and legal consequences, also with reference to the relevance of the same as a disciplinary offence.

Violations committed by suppliers and external collaborators will be punishable in accordance with the provisions of the relevant contractual assignments, except for more significant violations of the law.

Particular attention is paid to the processing of computer data through the internal systems: any problem and suspected violation must be immediately communicated to the IT Services manager and/or Management for the appropriate actions.

5.3.3 DISCIPLINARY MEASURES RESULTING FROM VIOLATIONS

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed by the staff as well as by the subjects having business relations with DURANTE ADESIVI.

Violation of the principles and behaviours indicated in the Code of Ethics compromises the relationship of trust between the Entity and the perpetrators of the violation, whether they are directors, employees, consultants, collaborators, customers or suppliers.

For details of the disciplinary system and sanctioning mechanisms, please refer to Model 231 adopted by the company.

In general, violations will be prosecuted in the following terms:

- With regard to employees (including members of the corporate bodies and the SB itself) through appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the establishment of criminal proceedings in cases where the conduct constitutes a crime. In particular, the sanctions will be in accordance with the rule and the logics of the employment contract applied. Disciplinary measures range from reprimand or admonition to suspension without pay, demotion and, in the most serious cases, dismissal. Before a disciplinary measure is taken, the person concerned is given the opportunity to explain his/her behaviour;
- With regard to consultants, collaborators, customers, suppliers and other subjects with contractual relationships with the company, specific methods of termination of the contractual relationship will be activated.

Without prejudice, furthermore, to any compensation for damages that the Entity may suffer as a result of the violation by the aforementioned parties of the provisions contained in the Code of Ethics.

5.4 PUBLIC SERVICE ASSIGNMENT

DURANTE ADESIVI, in the event of carrying out any public service activities, which to date has never happened and is not anticipated, will apply the following behaviours:

- Respect for the principles of impartiality, typical of the Public Administration
- Non-acceptance of benefits, money and utility
- Non-acceptance of illegitimate influences by third parties
- Void conflicts of interest with their representatives

5.5 CONFIDENTIALITY

Recipients are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, known for the services performed.

The Entity implements measures to protect the information managed and prevent it from being accessible to unauthorised personnel.

5.6 DISSEMINATION, COMMUNICATION AND TRAINING

This Code of Ethics is brought to the attention of all internal and external parties interested in or otherwise involved in the mission of DURANTE ADESIVI through specific communication and training activities.

5.7 OPERATING PROCEDURES AND DECISION-MAKING PROTOCOLS

This Code of Ethics forms an integral part and constitutes an implementation of Model 231 adopted by DURANTE ADESIVI in order to prevent crimes committed in the interest or for the benefit of the organisation itself by the parties indicated by Legislative Decree 231 of 8 June 2001.

In order to prevent violations of current regulations, as well as the Code of Ethics itself, the Entity provides for the adoption of specific procedures by all those involved in the operational process, aimed at identifying the persons responsible for the decision-making, authorisation and performance of the operations themselves.

5.8 SYSTEM OF DELEGATIONS

Apart from the already qualified subjects (Management), DURANTE ADESIVI makes use of a system of delegations, on the basis of which certain activities can only be carried out by subjects expressly authorised to do so because they have power assigned by means of a specific official proxy and/or notarial power of attorney.

The above is appropriate in the event that operations at risk of predicate offences are carried out in the various phases by different subjects, whose competence is clearly defined and known within the organisation in order to avoid unlimited or excessive powers being attributed to individual subjects.

6.0 FINAL PROVISIONS

6.1 *CONFLICTS WITH THE CODE OF ETHICS*

In cases where even one of the provisions of this Code of Ethics conflicts with the provisions of the internal regulations or procedures, the Code of Ethics will prevail over any of these provisions.

6.2 *PROCEDURE OF APPROVAL AND AMENDMENTS*

This Code of Ethics was approved by the Company Board of Directors on the date of approval of the Organizational Management and Control Model.

Any variation and/or integration of this Code of Ethics will be approved by the Board of Directors after consulting the SB and promptly disseminated to all recipients of the same, in particular:

- The SB periodically reviews the Code of Ethics for legislative or corporate changes and proposes amendments and/or additions
- The Board of Directors examines the SB's proposals and deliberates accordingly, making the approved changes immediately operational

ANNEX A: "Corporate IT Regulations" of 07/08/2018