



CORNELIANI

CODE OF ETHICS

Adopted by the Board of Directors on 27/09/2022
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Preamble

This Code of Ethics is an official document that describes the system of values and principles that Corneliani S.p.A. (hereinafter also referred to as “Corneliani” or “Company”) is committed to complying with in its business and in managing relations with stakeholders, and must therefore be adopted by all those who work with it (so-called Recipients), i.e. directors, employees, representatives, collaborators in general, whatever the form of collaboration, business partners and any other person acting on behalf of the Company.

The Recipients, not only have to comply with the provisions of this Code of Ethics, but must also undertake to ensure that the principles and values are observed within the scope of their functions and duties. Under no circumstances the belief that one is acting in the interest of or on behalf of the Company can justify conduct contrary to these principles.

The Company has drafted this Code of Ethics also taking into account the sustainability issues that will increasingly characterise the company’s business. The goal of creating positive social and environmental impacts along the entire supply chain is reflected in this Code, but also in further corporate regulations submitted to the attention of the various stakeholders.





General principles

- 2.1 Ethics, transparency, fairness, professionalism
- 2.2 Integrity and consistency
- 2.3 Corporate Responsibility
- 2.4 Legality and honesty
- 2.5 Honesty
- 2.6 Environmental Protection
- 2.7 Racism and xenophobia

General principles

2.1 ETHICS, TRANSPARENCY, FAIRNESS, PROFESSIONALISM

Corneliani S.p.A. bases its business on ideals of fairness and professionalism, and all decisions are reached by ensuring the utmost transparency, with the aim of creating well-being for stakeholders, who are considered fundamental to the achievement of short- and medium-term goals.

2.2 INTEGRITY AND CONSISTENCY

All those who perform their work within the company orient their behaviour towards the achievement of the company values by the example of their actions. Everyone, within the scope of the responsibilities and activities related to their role, must contribute with loyalty, transparency, honesty and legality.

The Company embraces values of loyalty and honesty, by virtue of which it is committed to honouring its commitments, promoting a sense of integrity, cooperation, trust and mutual respect. These principles are considered fundamental for the protection and continuous improvement of Corneliani's corporate climate and image.

2.3 CORPORATE RESPONSIBILITY

Corneliani requires each employee to personally contribute to the achievement of the result of his or her own work and that of the team. Therefore, the following are considered as valuable behaviours: a pro-active attitude, planning the activities to be carried out including the definition of roles and responsibilities, and monitoring the work activities through to the end result.

The Company carries out its activities as a responsible citizen of the local communities in which it operates, interacting transparently with local actors and collaborating with stakeholders in promoting the development of the territory. For this reason, it intends to conduct all activities with respect for local and national communities. Corneliani promotes dialogue with its stakeholders as a tool of strategic importance for the proper development of its business and establishes, where possible, a well-established dialogue with the associations representing its stakeholders, in order to cooperate in the respect of mutual interests.

Corneliani's business is managed with a view to sustainability, as it aims to meet the needs of its stakeholders without compromising the well-being of future generations.

Corneliani is committed to using its resources efficiently and responsibly, with the aim of creating value towards:

- the territory, the environment and the community;
- customers, thanks to a high quality offer;
- employees, in respect of whom the Company intends to establish a stimulating environment characterised by equal opportunities and equality.

One of Corneliani's goals is to develop a responsible and sustainable supply chain, based on a constant sharing of good practices and the principles set out in this Code of Ethics.

2.4 LEGALITY AND HONESTY

Corneliani recognises as a fundamental principle compliance with the laws and regulations in force in all the countries in which it operates, and therefore bases its business on respect for the legislation and all the rules in force, as well as the principles and procedures laid down for this purpose.

The following provisions are to be considered binding and must be taken into account in every aspect regarding the working environment by all Recipients of this Code, such as

- general prohibition of any act contrary to the law, whether overtly or covertly, as well as of anything contrary to the policy outlined in these regulations;
- prohibition of the offer or acceptance of benefits that exceed the usual use or the traditional rules of trade or common courtesy, with particular care to avoid that such practices may give rise to expectations as to the Company's suitability or the existence of any advantages.

The repression of all conducts contrary to the behaviours laid down in these rules will be carried out with the utmost diligence Corneliani is committed to ensure that any dispute in which it becomes involved is handled according to the principles of transparency, legality, fairness and verifiability. Under no circumstances shall the pursuit of the Company's interest be able to justify unlawful conduct.

Corneliani requires its shareholders, directors and employees in general, and anyone performing, in any capacity whatsoever, representative tasks, even de facto, to comply with the law and all applicable regulations and with the principles and procedures predetermined for this purpose, as well as to behave ethically, so as not to prejudice their moral and professional reputation.

Corneliani requires its shareholders, directors and employees in general, and anyone performing, in any capacity whatsoever, representative tasks, even de facto, to comply with the law and all applicable regulations and with the principles and procedures established for this purpose, as well as to behave ethically, in such a way as not to prejudice their moral and professional reliability.

2.5 HONESTY

Honesty is the fundamental principle for all Corneliani's activities, which marks its initiatives, reports and communications and is an essential element of management.

Relations with stakeholders are characterised by fairness, cooperation, loyalty and mutual respect and esteem.

All Corneliani's employees and collaborators must also comply with the duties of honesty and diligence imparted by the Company, avoiding wrongdoing in any way, not only when it is evident, but also when it is expressed through illegitimate acts or undue advantages arising from situations of conflict of interest.

2.6 ENVIRONMENTAL PROTECTION

Corneliani's activities are managed with the aim of ensuring a balanced and sustainable development, facilitating an efficient use of the resources employed in its production activities and committing itself to scrupulously comply with applicable environmental protection regulations and international policies.

Corneliani is committed to promoting responsible behaviour and practices in order to reduce the direct and indirect impacts of its business activities, by seeking solutions to reduce, as far as possible, air, water or soil pollution and the waste of natural resources (water, plants, etc.) and energy.

The Company assesses the environmental impacts of all corporate processes and activities, with a view to minimising environmental risks and with the aim of achieving high standards of environmental protection through the implementation of appropriate management and monitoring systems. Furthermore, Corneliani requires its production processes to be structured in such a way as to optimise the use of materials and avoid waste. One of the company's objectives is to reduce waste production and optimise waste recovery, including through the use of responsible disposal methods.

In the process of procuring raw materials of animal origin, the Company undertakes to request guarantees from suppliers that these materials do not derive from cruel breeding and/or harvesting practices, thus prohibiting any harmful treatment and conduct.

Corneliani also intends to implement systems that provide for the awareness and involvement of staff (both employees and collaborators), to promote a sense of responsibility for compliance with the environmental policy, objectives and programmes, the monitoring of constant compliance with the environmental policy adopted and the prevention of pollution and environmental accidents.

The Company is also certified according to the UNI EN ISO 45001:2018 and UNI EN ISO 14001:2015.

2.7 RACISM AND XENOPHOBIA

Corneliani firmly condemns all forms of racism and xenophobia. The Recipients of this Code of Ethics, therefore, shall, by virtue of their role, prevent propaganda or incitement and incitement to deny the Shoah or crimes of genocide, crimes against humanity and war crimes, and immediately inform the Company and the competent authorities of propaganda, incitement and incitement to deny the Shoah or crimes of genocide, crimes against humanity and war crimes, which may have come to their knowledge in the workplace.



Relations with external stakeholders

- 3.1 Relationships with suppliers
- 3.2 Customer relations
- 3.3 Local communities and mass media
- 3.4 Public Administration

Relazioni con gli stakeholder esterni

3.1 RELATIONSHIPS WITH SUPPLIERS

Corneliani is committed to cooperating with suppliers who share the same values and principles, with the aim of establishing long-lasting relationships based on mutual trust. Should unexpected events occur, the Company undertakes not to exploit information asymmetries or weaknesses of the counterparty to obtain undue advantages.

The Company only selects suppliers who are careful to promote policies that respect workers' rights, human rights, animals and the environment, and this process is carried out by applying objective criteria, based on the principles of impartiality, fairness and quality. All suppliers who establish a relationship with Corneliani are required to comply with a "Suppliers' Code of Conduct", which sets out all the principles that must inspire their work and all sub-suppliers they may use.

Relations with suppliers are considered a fundamental element in Corneliani's business, in order to guarantee a range of quality products that best meet customers' interests and expectations.

Contracts concluded with suppliers shall be drawn up with the utmost transparency, and the remuneration paid to them shall be exclusively defined in relation to the services and conditions stipulated in the contract.

3.2 CUSTOMER RELATIONS

Corneliani bases its business on excellence, in the sense not only of product quality, but also of special attention to customers' needs, professionalism, availability and promptness in responding to commercial requests, and punctual examination of complaints, in order to fully satisfy its customers.

The company's strategies are developed on the basis of its relationships with customers, as they are considered by the company to be a fundamental element that enables the creation of competitive advantages.

The Company is committed to providing maximum transparency in the entire sales process, and to this end provides the customer with adequate information on the quality of the product offered and undertakes to promptly respond to any suggestions or complaints, with the aim of consolidating the relationship in the medium to long term.

3.3 LOCAL COMMUNITIES AND MASS MEDIA

Corneliani SpA undertakes to direct its activities towards improving the welfare of the local communities with which it interacts in the course of its business, thus avoiding implementing policies that could potentially cause them irreparable harm.

Relations with the mass media are deemed fundamental for the purposes of creating and enhancing the Company's image and must be maintained exclusively by the persons appointed to them, in accordance with internal policies and procedures.

The communications disseminated by the Company towards the external environment must be inspired by criteria of clarity, transparency, and must be homogeneous. The means of communication used, including, for example, websites, must be developed in compliance with this Code of Ethics.

The Company undertakes to maintain relations with the Political and Trade Union Organisations guaranteeing the utmost transparency, independence and integrity, not making direct or indirect contributions to them.

3.4 PUBLIC ADMINISTRATION

Relations with the Public Administration are carried out in compliance with the principles of transparency, fairness and loyalty and must only be entered into by the Functions and competent and authorised positions, in compliance with corporate procedures.

Corneliani strongly forbids any form of public or private corruption, passive or active, as it is contrary to the system of values by which it is inspired.



Relations with internal stakeholders

- 4.1 Respect for human rights
- 4.2 Impartiality and equal opportunities
- 4.3 Harassment and mobbing
- 4.4 Occupational Health and Safety Management
- 4.5 Personnel selection and training
- 4.6 Alcohol and drugs abuse / Smoking

Relations with internal stakeholders

4.1 RESPECT FOR HUMAN RIGHTS

Respect for human rights is considered an essential element in Corneliani's business, as they are considered to be the basis of a society founded on principles of solidarity and equality.

The Society stands for ideals such as freedom, dignity and equality, guaranteeing respect for the individual freedoms recognised by the United Nations Universal Declaration of Human Rights and international conventions.

Corneliani is also against to any form of discrimination and exploitation of child labour and therefore undertakes to collaborate only with partners who can guarantee respect for individual rights and freedoms. Corneliani recognises the right of workers to join any political party or association within the legally recognised forms in the countries where they operate.

4.2 IMPARTIALITY AND EQUAL OPPORTUNITIES

The Company strictly forbids any form of discrimination on grounds of sex, race, language, religion, political opinion, trade union membership, personal and social status.

Every Corneliani employee is offered the same opportunities, with the aim of preserving and protecting the diversity of individuals, establishing relationships based on shared values and principles of honesty, collaboration and mutual respect, in compliance with what is described in this Code of Ethics.

4.3 HARASSMENT AND MOBBING

Corneliani intends to create a working environment that promotes mutual respect and the employee's freedom of expression, and therefore does not tolerate any form of harassment, bullying practices or attitudes considered equivalent to them, including but not limited to:

- intimidating acts, capable of producing hostile environments, isolation or marked by discrimination;
- attitudes that have the effect of preventing or hindering the work performance of others;
- actions that interfere with the career opportunities of others.

The Company encourages anyone who is the victim of or witnesses the attitudes described above and/or conduct that is unlawful or contrary to this Code of Ethics and/or to the Organisation, Management and Control Model pursuant to Legislative Decree 231/01, to report it through the use of the Whistleblowing channel made available by the Company (see paragraph 7 below).

4.4 OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT

Corneliani is committed to implementing all actions necessary to prevent occupational injuries and illnesses by continuously improving safety standards in the workplace.

One of the company's objectives is to develop a workplace health and safety culture based on awareness of the risks to which employees are exposed, by organising training courses and periodic checks, with the aim of ensuring that workers are protected.

Each employee is obliged to observe the preventive health and safety measures established by the Company, disseminated through guidelines, training and information, in such a way as to prevent him or her from harming themselves or others.

The Company is also certified according to the UNI EN ISO 45001:2018 and UNI EN ISO 14001:2015.

4.5 PERSONNEL SELECTION AND TRAINING

Corneliani's personnel selection and advancement process is guided by principles of fairness and equity, and the assessments to which employees are subjected are conducted on the basis of objective and verifiable considerations. Every candidate is offered the same job opportunities and career advancement, without any form of discrimination or favouritism.

The Company strongly prohibits conduct by employees aimed at soliciting, exerting pressure on and thereby influencing personnel selection and evaluation processes, including through third parties.

Employment contracts are drawn up in compliance with the laws in force in the countries in which Corneliani operates and up-to-date staff training is ensured.

At the establishment of the employment relationship, the employment documents and the necessary personal protective equipment (if applicable for the job) are handed over. Each employee/contractor receives detailed information on the nature of the duties and tasks to be performed, on the regulatory framework and minimum salary levels as regulated by the national collective labour agreement; he/she is carefully informed on the rules and procedures to be adopted, also in order to avoid possible health risks associated with the work activity and, on the contents of the Code of Ethics. This information is presented to the employee/contractor so that acceptance of the assignment is based on an effective understanding.

4.6 ALCOHOL AND DRUGS ABUSE / SMOKING

The Company, in order to provide an environment that respects the sensitivities of all workers, does not tolerate work activities being carried out under the effects of alcohol or drug abuse, nor does it tolerate drugs being consumed or disposed of for any reason in the course of work activities. In addition, the Company has provided for a general prohibition on smoking in the workplace.



Ethics in Business Management

- 5.1 Absence of conflicts of interest
- 5.2 Protection of privacy
- 5.3 Fairness and transparency of company accounting information
- 5.4 Management of financial resources
- 5.5 Taxation
- 5.6 Donations, gifts and other benefits
- 5.7 Intellectual Property Protection
- 5.8 Proper use of company assets

Ethics in Business Management

5.1 ABSENCE OF CONFLICTS OF INTEREST

The Recipients of this Code of Ethics must avoid situations and/or activities that may generate conflicts of interest, which are detected when a person's own, family or financial interests conflict with or are capable of interfering with the interests of the Company.

Conflicts of interest may be caused by, but are not limited to, the following:

- economic or financial interests of the Recipients and/or its family members in dealings as suppliers, customers and competitors;
- using one's position in the Group or information gathered in the course of one's work to exploit one's personal interests, contrary to the interests of the company;
- Existence of personal relationships between company personnel bound by hierarchical relationships;
- performing work activities of any kind for customers, suppliers, competitors in conflict with the interests of the Company;
- accept money, favours or benefits not due from persons or companies that are or intend to enter into business relations with the Company.

The Company undertakes to avoid the occurrence of such situations, deemed potentially harmful, and encourages the Recipients of this Code of Ethics to report alleged or potential conflicts of interest through use of the Whistleblowing channel made available.

5.2 PROTECTION OF PRIVACY

Corneliani is committed to protecting the personal data of its employees and of third parties with whom it interacts (including, for example, customers and suppliers), ensuring that they are not disclosed externally.

The Company collects, in the course of its business, a significant amount of personal data and confidential information, the processing of which is carried out in compliance with the rights and freedoms of the data subjects, guaranteeing compliance with the applicable legislation on the protection of personal data ("Privacy Legislation") and, in particular, the European Regulation 2016/679 (General Data Protection Regulation - "GDPR") and other applicable local regulations.

Personal data are stored in such a way as to prevent unauthorised parties from accessing them, and to this end Corneliani ensures that security measures are in place to protect the databases.

5.3 FAIRNESS AND TRANSPARENCY OF COMPANY ACCOUNTING INFORMATION

The Company ensures honesty, integrity and fairness in all areas of its business and requires the same in its relations with all parties with whom it does business. All Recipients shall be informed of the existence of the Code and its provisions and shall undertake to comply with.

Corneliani acknowledges as a fundamental principle the correct provision of information to shareholders, competent bodies and offices, regarding significant facts concerning the company's management and accounting.

Corneliani's activities and operations must be adequately recorded, and the decision-making, authorisation and performance processes must be made verifiable, ensuring the presence of an adequate documentary support that enables checks to be carried out at any time to ascertain the characteristics of and reasons for the operation and to identify the persons who authorised, performed, recorded and verified the operation.

Accounting records must be kept in an accurate, complete and timely manner, in order to provide a true and fair view of the financial position and business operations. To this end, all employees involved in bookkeeping must ensure maximum cooperation, the completeness and clarity of the information provided, and the accuracy of the data and processing.

Transactions or operations must be accounted for in compliance with the regulations in force, and accounts must be kept in accordance with the principles of truthfulness, completeness and transparency, ensuring that management facts are correctly and promptly represented.

The accounting records must be consistent with the information in the supporting documentation, which must necessarily be retained in such a way as to facilitate the reconciliation of the transaction.

The financial statements and corporate communications required by law must be drawn up clearly and give a true and fair view of the assets and financial situation of the Company.

Corneliani prohibits conduct aimed at preventing or hindering, through the concealment of documents or other suitable artifices, the carrying out of control or auditing activities legally conferred to shareholders, other corporate bodies or auditing firms. It is prohibited to engage in fictitious or fraudulent conduct for the purpose of determining the majority in the shareholders' meeting in order to procure an unfair profit for oneself or others.

Moreover, it is prohibited, even by means of concealed conduct, to return contributions made by shareholders or to release them from the obligation to fulfil them, except in cases of legitimate reduction of share capital. It is prohibited to distribute profits or advances on profits not actually earned or allocated to reserves or to distribute unavailable reserves. It is forbidden to carry out reductions in capital, mergers or demergers in violation of laws protecting creditors;

It is forbidden to fictitiously form or increase the capital of the Companies, by allocating shares or quotas for a sum lower than their nominal value, reciprocal subscription of shares or quotas, significant overvaluation of contributions in kind or credits, or of the assets of the Companies in the event of transformation.

Any kind of transaction that may cause damage to creditors is prohibited.

Finally, it is forbidden to engage in unlawful transactions on the shares or quotas of subsidiaries and to carry out transactions to the detriment of creditors.

5.4 MANAGEMENT OF FINANCIAL RESOURCES

The Company prohibits any conduct that may constitute or be connected to terrorist activities or subversion of the State's democratic order or that may constitute or be connected to offences, including transnational ones, relating to criminal association, including mafia-type offences, money laundering, the use of money, goods or utilities of unlawful origin, inducing people not to make statements or to make false statements to the judicial authorities, personal aiding and abetting, or relating to possible violations of the provisions against illegal immigration and trafficking in arms. With specific reference to both national and international anti-money laundering rules and regulations, Corneliani puts in place the necessary controls for the prior verification of available information on business counterparties before establishing business relations with them.

In the context of the management of financial resources, the Company undertakes to respect the following principles:

- all payments and other transfers made by or to the Company must be accurately and fully recorded in the company books and records;
- cash payments, even for small amounts, must be kept to a minimum;
- all payments must be made only to the recipients and for the activities contractually formalised and/or decided by the Company;
- false, incomplete or misleading records must not be created and hidden or unregistered funds must not be established, nor funds must be deposited in personal accounts or accounts not belonging to the Company;
- no unauthorised use shall be made of the Company's funds or resources.

5.5 TAXATION

Corneliani undertakes to apply the tax regulations in force in the countries where it operates and ensures that its relations with the tax authorities are conducted in accordance with values of transparency and fairness.

The information recorded in the accounts must be reported in the Company's tax returns. The Company emphasises that it does not engage in aggressive tax planning aimed at obtaining undue tax advantages as a result of artificial arrangements that do not reflect the company's reality, due, for example, to asymmetries between the tax systems in the jurisdictions in which it operates.

5.6 DONATIONS, GIFTS AND OTHER BENEFITS

The Company prohibits fraudulent practices and conduct, acts or attempts of corruption, favouritism and more generally conduct contrary to the law and the provisions of this Code.

Corneliani's employees may not under any circumstances receive or offer, directly or indirectly, even by inducement, any gifts, gratuities, money or benefits of any kind which may even only be interpreted as exceeding normal business or courtesy practices, or which may in any case be interpreted as aimed at acquiring favourable treatment for themselves or in the conduct of activities related to the Company.

These principles must also be observed in all relations with customers, suppliers and third parties in general, including public officials and the mass media.

5.7 INTELLECTUAL PROPERTY PROTECTION

The Company's activities are based on the ideals of legality and transparency and condemns all possible forms of disruption to the freedom of industry or trade, as well as all possible forms of unlawful competition, fraud, counterfeiting or usurpation of industrial property titles, calling upon all those who work in the interest of the Company to comply with the existing legislation protecting instruments or signs of authentication, certification or recognition, for the protection of industry and trade.

The Company safeguards its intellectual property rights, including copyrights, patents, trademarks and distinctive signs, by adhering to the policies and procedures provided for their protection.

At the same time, Corneliani directs its actions towards respecting the intellectual property of others.

Industrial and intellectual property rights and copyrights on the assets (e.g. patents, trademarks, distinctive signs, trade secrets deriving from discoveries and inventions developed in the course of working activities) belong to Corneliani, which retains the right to use them in the manner and at the times it deems appropriate, in accordance with current legislation.

Corneliani undertakes to protect its intellectual property rights and not to use assets and services protected by the rights belonging to others. Likewise, the Company does not violate licence agreements of others' intellectual property rights or make unauthorised use of them.

The following is a non-exhaustive list of prohibitions of conduct in the area of intellectual property protection:

- to counterfeit, alter or use trademarks or distinctive signs or patents, models and designs owned by third parties;
- to bring into the State and/or placing on the market products with false or misleading signs;
- to manufacture and trade goods produced in violation of industrial property rights;
- to prevent or disrupt the exercise of industry or trade by using violence against property or by fraudulent means;
- to sell or otherwise put into circulation, on domestic or foreign markets, industrial products with counterfeit or altered names, trademarks or distinctive signs, causing harm to national industry;
- to deliver to the buyer a movable asset for another, or a movable asset different from that stated or agreed due to its origin, source, quality or quantity;
- to disseminate, without authorisation, by means of placing in a telematic network system with connections of any kind, intellectual works – or parts thereof – protected by copyright;
- duplicate, reproduce, transmit and disseminate in public in an abusive manner, i.e. without having obtained the necessary consent or assignment of the right from the owner of the work or the holder of the economic exploitation rights, of intellectual works.

5.8 PROPER USE OF COMPANY ASSETS

Corneliani's resources are used with the utmost transparency and regular reporting to the relevant internal and external control bodies.

Each employee and contractor is obliged to use company assets with diligence, behaving responsibly and safeguarding them. Company assets must be used appropriately and in accordance with the company's interest, preventing third parties from misusing them.

It is expressly forbidden to use company property, for personal or non-service-related needs, for purposes contrary to the law, public order or morality, as well as to commit or induce the commission of offences or incite racial hatred, encouragement of violence, discriminatory acts or the violation of human rights.

With particular regard to IT tools, it is expressly forbidden to carry out conduct capable of damaging, altering, deteriorating or destroying IT or telematic systems, softwares and data, of the Company or of Third Parties, as well as unlawfully intercepting or interrupting IT or telematic communications. It is also prohibited to illegally break into computer systems protected by security measures, as well as to obtain or disseminate access codes to protected computer or telematic systems.



Internal control system

Ways of implementing the code of ethics

Approval of the Code of Ethics and its amendments

Internal control system

Corneliani is committed to spreading a culture within the company that is characterised by an awareness of the existence of a mentality oriented towards strengthening the internal control system.

The responsibility for establishing an effective internal control system pertains to every level of the organisational structure; all employees and collaborators, within the scope of their functions, are therefore responsible for the definition and proper functioning of the control system.

Each activity must be adequately documented and, where possible, formalised in such a way as to allow traceability at any time, control over the reasons for and characteristics of the operation as well as identification of the person responsible for authorising, verifying or carrying out that activity.

Directors, department heads, employees and collaborators, each within the scope of their competences and functions, are required to strictly observe the procedures. They also have a duty to cooperate with the Supervisory Board with full availability.

Whistleblowing System

Legislative Decree 24/2023, which was definitively approved by the Council of Ministers on 9 March 2023, was published in the Official Gazette on 15 March 2023. This decree implements EU Directive 2019/1937 on the protection of persons who report breaches of Union law.

The Company has adopted a specific channel for management of reports in accordance with Article 6 of Legislative Decree 231/01 (Article 6, Paragraph 2-bis), also in accordance with the provisions of Legislative Decree 24/2023, identifying the Supervisory Board as the entity in charge of management.

In line with the provisions of current legislation, unlawful conduct within the meaning of Legislative Decree No. 231/2001 and violations of the 231 Model adopted by Corneliani can be reported, and the following types of reports can be made:

- offences relating to the application of national and EU instruments listed in the Annex to the Decree as well as national implementing acts of EU acts listed in the Annex to Directive 2019/1937 (even if not included in the Annex to the Decree) in the field of public procurement; financial services, products and markets, and prevention of money laundering and terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and feed safety and animal health and animal welfare; public health; consumer protection; privacy and data protection; and security of network and information systems;
- acts or omissions that are detrimental to the financial interests of the European Union;
- acts or omissions concerning the internal market (including competition and state aid violations and corporate tax violations);
- acts or conduct that, while not constituting an offence, defeat the object and purpose of the laws and regulations listed in the Annex as well as those protecting the financial interests of the European Union and regulating the internal market.

Whistleblowers can submit reports through a specific platform, which is accessible at the following link:

- <https://corneliani.segnalazioni.net/>;

or by registered mail to the following address:

- Via M. Panizza 5, 46100 Mantua, for the attention of the Supervisory Board.

It should be noted that:

- it is possible to send reports anonymously or personally, but the latter method would facilitate the investigations to be carried out after receiving the report;
- it is advisable to sufficiently detail the circumstances surrounding the violation or alleged violation so that a full assessment can be carried out.

Reports of violations or suspected violations must be promptly sent to the Supervisory Board, so that it can adequately assess them, and where necessary initiate the relevant investigations to verify the truthfulness and relevance of the event described in the report.

The Company undertakes to apply all necessary measures to ensure confidentiality of the whistleblower's identity at the different stages of report handling.

The Company also undertakes to protect the whistleblower by providing for a general prohibition of retaliation (e.g. sanctions, demotion, dismissal, transfer or other organisational measures that could have a negative impact on working conditions) for reasons related to the report. This protection also extends to the whistleblower's facilitators and colleagues.

Finally, it should be noted that Cornelianì has adopted a specific company procedure to regulate the handling of reports pursuant to this Paragraph.

Ways of implementing the code of ethics

Cornelianì S.p.A. undertakes to supervise the observance of the Code of Ethics by all Recipients, resorting to information, prevention and control measures that ensure the transparency of the operations and behaviours carried out and, if deemed necessary, applying corrective actions and penalties appropriate to the violations ascertained.

The Company ensures that the contents of this Code of Ethics will be brought to the attention of the Recipients through appropriate communication measures.

Cornelianì S.p.A., in order to facilitate reports of violations of the Code of Ethics, even potential ones, provides the following direct communication channels with the Supervisory Board:

- a dedicated mailbox: organismodivigilanza@corneliani.it;
- <https://corneliani.segnalazioni.net/>;
- an address to which the written report should be forwarded: Via Panizza 5, 46100 Mantua, for the attention of the Supervisory Board.

Reports of violations or suspected violations of the Company's Code of Ethics must be promptly forwarded to the Supervisory Board, so that it may assess them adequately and initiate, where necessary, the relevant investigations, aimed at verifying the truthfulness and relevance of the event described in the report.

The Company undertakes to apply all the necessary measures to ensure the confidentiality, throughout the different stages of the handling of the report, of the identity of the reporting person.

The Company also undertakes to protect the reporting person if he/she is subjected to discriminatory or retaliatory treatment (e.g. sanctions, demotion, dismissal, transfer or other organisational measures that have a negative effect on working conditions) for reasons related to the report.

Approval of the Code of Ethics and its amendments

This Code was approved by resolution of the Board of Directors on 27/09/2022 and updated by resolution of the Board of Directors on 27/09/2023.

Any changes/updates are subject to the approval of the Board of Directors.

Corneliani ensures that the Code of Ethics is effectively disseminated within the Company, ensuring that subsequent amendments and additions are made known to the Recipients of the same.

The Company undertakes to initiate specific training and communication activities with the appropriate tools towards the Recipients of the Code.

In particular, in order to make the Code of Ethics fully operational, Corneliani:

- ensures the timely dissemination among the Recipients of the Code of Ethics and subsequent updates and amendments;
- provides employees with adequate training and information support, also in order to allow the resolution of interpretative doubts concerning the provisions contained in the Code of Ethics;
- ensures that employees who report violations of the Code of Ethics are not subject to any form of retaliation;
- adopts sanctions that are fair and commensurate with the type of violation of the Code of Ethics, in compliance with the legal and contractual provisions applicable to each individual case;
- activates periodic audits to ascertain compliance with the rules of the Code of Ethics.

CORNELIANI S.p.A.

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