



CAVIRO EXTRA

Code of Ethics

Rev. of 11/20/2023

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1 INTRODUCTION

This Code of Ethics (hereinafter the "Code of Ethics" or, more simply, the "Code") expresses the commitments and ethical responsibilities in the conduct of business and corporate activities undertaken by the collaborators of CAVIRO EXTRA S.P.A. (hereinafter also the "Company"), whether they are directors or employees in any sense of the word of this company (hereinafter the "Collaborators").

1.1 THE MISSION OF CAVIRO EXTRA S.P.A.

The mission of CAVIRO EXTRA S.P.A. is the production and sale of ethyl alcohol of agricultural and non-agricultural origin and its derivatives, as well as the processing and transformation of products and by-products deriving from winemaking and the production, transformation and sale of oenological products and derivatives intended for oenology.

1.2 A COOPERATIVE APPROACH TO STAKEHOLDERS

CAVIRO EXTRA S.P.A. aspires to maintain and develop a relationship of trust with its stakeholders, i.e. with those categories of individuals, groups or institutions whose contribution is required to achieve the company's mission or who have an interest at stake in its pursuit of activities.

Stakeholders are those who make investments related to the activities of CAVIRO EXTRA S.P.A., i.e., the collaborators, customers, suppliers and partners of CAVIRO EXTRA S.P.A..

In a broader sense, stakeholders are also all those individuals or groups, as well as the organizations and institutions that represent them, whose interests are influenced by the direct and indirect effects of CAVIRO EXTRA S.P.A.'s activities, such as the local and national communities in which CAVIRO EXTRA S.P.A. operates (hereinafter the "stakeholders").

1.3 UNETHICAL BEHAVIOR

In the conduct of corporate activities, unethical conduct compromises the relationship of trust between CAVIRO EXTRA S.P.A. and its stakeholders.

The behaviors of anyone, individual or organization, who tries to appropriate the benefits of the collaboration of others, exploiting positions of strength, are unethical, and favor the assumption of prejudiced and hostile attitudes towards the company.

1.4 THE VALUE OF REPUTATION AND FIDUCIARY DUTIES

Good reputation is an essential intangible asset for CAVIRO EXTRA S.P.A..

Externally, it promotes social approval, the attraction of the best human resources, customer loyalty, the serenity of suppliers, and reliability towards third parties in general.

Internally, it helps to make and implement decisions without friction and to organize work without bureaucratic controls and excessive exercises of authority.

The Code of Ethics clarifies the particular duties of CAVIRO EXTRA S.P.A. towards stakeholders (fiduciary duties).

1.5 THE VALUE OF RECIPROCITY

This Code of Ethics is based on an ideal of cooperation with a view to the mutual benefit of the parties involved, respecting the role of each.

CAVIRO EXTRA S.P.A. therefore requires that each stakeholder act towards it according to principles and rules inspired by a similar idea of ethical conduct.

1.6 THE STRUCTURE OF THE CODE OF ETHICS

This Code of Ethics consists of:

- the *general principles on relations with stakeholders*, which define in an abstract way the reference values in the activities of CAVIRO EXTRA S.P.A.;
- the *criteria of conduct towards each class of stakeholders*, which specifically provide the guidelines and rules to which CAVIRO EXTRA S.P.A. employees are required to comply in order to comply with the general principles and to prevent the risk of unethical conduct;
- the *implementation mechanisms*, which describe the control system aimed at compliance with the Code of Ethics and its improvement.

1.7 RECIPIENTS AND SCOPE OF APPLICATION OF THE CODE OF ETHICS

The Code of Ethics applies to CAVIRO EXTRA S.P.A. and is consequently binding for its collaborators, who are required, without distinction or exception, to observe and ensure compliance with the principles identified below.

In no way can the belief that we are acting for the benefit of the Company justify the adoption of conduct that is contrary to these principles.

The Code of Ethics is valid both in Italy and abroad, while taking into account the cultural, social, economic and regulatory diversity of the various countries in which CAVIRO EXTRA S.P.A. operates or may operate.

2 GENERAL PRINCIPLES

2.1 IMPARTIALITY

In decisions that affect relations with its stakeholders (the selection and management of personnel, the organization of work, the management of customers to be served, the selection and management of suppliers, relations with the surrounding community and the institutions that represent it), CAVIRO EXTRA S.P.A. avoids any discrimination based on age, sex, to the sexuality, state of health, race, nationality, political opinions and religious beliefs of his interlocutors.

2.2 HONESTY

In carrying out activities and relationships of any kind and nature, CAVIRO EXTRA S.P.A. collaborators are required to diligently comply with current legislation, the Code of Ethics and internal regulations.

Under no circumstances can the pursuit of the interest or advantage of CAVIRO EXTRA S.P.A. justify a course of action that does not comply with an honest line of conduct.

2.3 FAIRNESS IN THE EVENT OF POTENTIAL CONFLICTS OF INTEREST

In the conduct of any activity, situations must always be avoided where the parties involved in the transactions are, or may even appear, in conflict of interest.

This means both the case in which an employee pursues an interest other than the company's mission and the balancing of stakeholders' interests or "personally" benefits from the company's business opportunities, and the case in which the representatives of customers or suppliers, or of public institutions, act contrary to the fiduciary duties linked to their position, in their relations with CAVIRO EXTRA S.P.A..

2.4 CONFIDENTIALITY

CAVIRO EXTRA S.P.A. ensures the confidentiality of the information in its possession and the protection of the personal data of the interested parties, avoiding improper use of the information itself, and refrains from seeking confidential data, except in the case of express and conscious authorization and compliance with the legal regulations in force.

In addition, CAVIRO EXTRA S.P.A. collaborators are required not to use confidential information for purposes unrelated to the exercise of their activity.

2.5 VALUE OF HUMAN RESOURCES

The collaborators of CAVIRO EXTRA S.P.A. are an indispensable factor for its success and for the realization of its mission.

For this reason, CAVIRO EXTRA S.P.A. protects and promotes the value of human resources in order to maximize their degree of satisfaction and to improve and increase the wealth of skills possessed by each collaborator.

2.6 FAIRNESS OF AUTHORITY

In the management of relationships that involve the establishment of hierarchical relationships - especially with collaborators - CAVIRO EXTRA S.P.A. undertakes to ensure that authority is exercised fairly and correctly, avoiding any abuse.

In particular, CAVIRO EXTRA S.P.A. guarantees that authority is not transformed into an exercise of power detrimental to the dignity and autonomy of the collaborator, and that the choices of work organization safeguard the value of the collaborators.

2.7 INTEGRITY OF THE PERSON

CAVIRO EXTRA S.P.A. guarantees the physical and moral integrity of its employees, working conditions that respect individual dignity and safe and healthy working environments.

Therefore, requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviors that are harmful to the moral and personal beliefs and preferences of each person, are not tolerated.

2.8 TRANSPARENCY AND COMPLETENESS OF INFORMATION

The collaborators of CAVIRO EXTRA S.P.A. are required to provide complete, transparent, comprehensible and accurate information, so that, in setting up relations with the company, stakeholders are able to make autonomous decisions that are aware of the interests involved, the alternatives and the consequences that may derive from them.

In particular, in the formulation of any form of agreement, CAVIRO EXTRA S.P.A. takes care to specify to the policyholder, in a clear and understandable manner, the conduct to be adopted in the performance of the relationship established.

2.9 TRANSPARENCY OF CORPORATE ACCOUNTING

CAVIRO EXTRA S.P.A. promotes maximum transparency, reliability and integrity of information relating to corporate accounting. This Code requires that every operation and transaction be correctly recorded, authorised, verifiable, legitimate, consistent and congruous.

All actions and transactions of the Company provide for proper registration and the possibility of verification of the decision-making, authorization and execution process. For each operation, adequate documentary support is required in order to be able to proceed, at any time, to carry out checks that certify the characteristics and reasons for the operation and identify who authorized, carried out, registered, and verified the operation itself.

2.10 TAX COMPLIANCE

CAVIRO EXTRA S.P.A. undertakes to carry out all the tax obligations required by current legislation with completeness and transparency and to collaborate, where required, with the Tax Authorities. Tax returns and the payment of taxes are not only mandatory behaviors from a legal point of view but also unavoidable in the context of the Company's social responsibility.

2.11 DILIGENCE AND ACCURACY IN THE FORMULATION AND EXECUTION OF CONTRACTS

In the formulation of any contracts, CAVIRO EXTRA S.P.A. takes care to specify to the policyholder, in a clear and understandable manner, the conduct to be adopted in the performance of the relationship established.

Contracts and work assignments must be carried out in accordance with what is consciously established by the parties.

CAVIEO SCA undertakes not to exploit conditions of ignorance or incapacity of its counterparts.

2.12 QUALITY OF SERVICES AND PRODUCTS

CAVIRO EXTRA S.P.A. directs its action towards the full satisfaction of its customers by listening to requests that can lead to an improvement in the quality of products and services.

For this reason, CAVIRO EXTRA S.P.A. directs its research, development and marketing activities to high quality standards of its services and products.

2.13 FAIR COMPETITION

CAVIRO EXTRA S.P.A. intends to protect the value of fair competition by refraining from collusive, predatory conduct and abuse of dominant position.

2.14 RESPONSIBILITY TOWARDS THE COMMUNITY

CAVIRO EXTRA S.P.A. is aware of the influence, even indirect, that its activities can have on the conditions, economic and social development and general well-being of the community, as well as the importance of social acceptance of the communities in which it operates.

For this reason, CAVIRO EXTRA S.P.A. intends to conduct activities aimed at achieving the corporate purpose in terms of social appreciation, respecting local and national communities, and supporting initiatives of cultural and social value in order to achieve an improvement in its reputation and social acceptance.

2.15 ENVIRONMENTAL PROTECTION

The environment is a primary asset that CAVIRO EXTRA S.P.A. is committed to safeguarding; To this end, it plans its activities by seeking a balance between economic initiatives and essential environmental needs, in consideration of the rights of future generations.

CAVIRO EXTRA S.P.A. is therefore committed to improving the environmental and landscape impact of its activities, as well as to preventing risks to the population and the environment not only in compliance with current legislation, but also by taking into account the development of scientific research and the best experiences in the field.

2.16 PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE

CAVIRO EXTRA S.P.A. recognises the protection of health and safety in the workplace as a fundamental and essential importance within the company's organisation.

Consequently, the Company adopts in the exercise of the company the measures that, according to the particularity of the activity carried out, the experience and the technique are necessary to protect the physical integrity and moral personality of the workers.

The search for advantages for the Company, if they involve or may involve the intentional or negligent violation of the regulations on the protection of safety and health at work, is never justified.

3 CRITERIA OF CONDUCT

3.1 GENERALITY'

3.1.1 PROCESSING OF INFORMATION

Stakeholder information is processed by CAVIRO EXTRA S.P.A. in full respect of the confidentiality and privacy of the data subjects.

To this end, specific policies and procedures for the protection of information are applied and constantly updated; in particular, CAVIRO EXTRA S.P.A.:

- defines an information processing organisation that ensures the correct separation of roles and responsibilities;
- classifies information by increasing levels of criticality, and adopts appropriate countermeasures at each stage of processing;
- subjects third parties involved in the processing of information to the signing of confidentiality agreements.

3.1.2 GIFTS, GIFTS AND BENEFITS

Any form of gift that can even be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any activity related to CAVIRO EXTRA S.P.A., is not permitted.

It should be noted that a gift means any type of benefit (free participation in conferences, promise of a job offer, etc.).

This rule concerns both gifts promised or offered and those received, and does not allow exceptions even in those countries where offering gifts of value to business partners is customary.

In particular, any form of gift to government representatives, public officials or persons in charge of public service, or to their family members, which may influence the independence of judgment or induce to ensure any advantage, is prohibited.

The gifts of CAVIRO EXTRA S.P.A. are characterized by the fact that they are aimed at promoting the brand image of the Company.

The gifts offered, except those of modest value, must be adequately documented to allow verification and authorized by the department manager. Collaborators of CAVIRO EXTRA S.P.A. who receive gifts or benefits not provided for by the permitted cases, are required, according to the established procedures, to deposit them with the legal department for the destination referred to in the established procedures.

3.1.3 EXTERNAL COMMUNICATION

CAVIRO EXTRA S.P.A.'s communication with its stakeholders (including through the mass media) is based on respect for the right to information; under no circumstances is it permitted to disseminate false or tendentious news or comments.

Each communication activity complies with the laws, rules, practices of professional conduct, and is carried out with clarity, transparency and timeliness.

To ensure completeness and consistency of information, CAVIRO EXTRA S.P.A.'s relations with the mass media may only be maintained with the coordination of the department in charge or the general management.

CRITERIA OF CONDUCT IN RELATIONS WITH PERSONNEL

3.1.4 PERSONNEL SELECTION

The assessment of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with those expected and the company's needs, in compliance with equal opportunities for all interested parties.

The information requested during the selection and recruitment phase is closely linked to the verification of aspects provided for by the professional and psycho-aptitude profile, respecting the private sphere and opinions of the candidate.

In the selection and recruitment phases, the company function in charge, within the limits of the available information, adopts behaviour to avoid favouritism, nepotism, or forms of clientelism (for example, avoiding that the recruiter is linked by family ties with the candidate).

3.1.5 CONSTITUTION OF THE REPORT

The staff is hired with a regular employment contract; no form of irregular work is tolerated.

Upon establishment of the employment relationship, each employee receives accurate information relating to:

- characteristics of the function and tasks to be performed;
- regulatory and remuneration elements, as regulated by the national collective bargaining agreement in force;
- rules and procedures to be adopted in order to avoid possible health risks associated with work;
- this Code of Ethics.

This information is presented to the employee in such a way that the acceptance of the assignment is based on an effective understanding.

3.1.6 PERSONNEL MANAGEMENT

3.1.6.1 STAFF EVALUATION

CAVIRO EXTRA S.P.A. avoids any form of discrimination against its collaborators.

As part of the personnel management and development processes, as well as in the selection phase, decisions taken are based on the correspondence between expected profiles and profiles possessed by collaborators (e.g. in the event of promotion or transfer) and/or on the basis of merit considerations (e.g. allocation of incentives based on the results achieved).

Access to roles and positions is also established in consideration of skills and abilities; moreover, compatibly with the general efficiency of work, those flexibilities in the organization of work that facilitate the management of the state of maternity and in general of the care of children are favored.

The evaluation of collaborators is carried out in a broad manner involving the managers, the personnel function and, as far as possible, the subjects who have entered into a relationship with the assessed.

Within the limits of available information and the protection of privacy, the personnel function works to prevent favoritism, forms of clientelism or forms of nepotism (for example, excluding hierarchical relationships of dependence between collaborators linked by family ties).

3.1.6.2 DISSEMINATION OF PERSONNEL POLICIES

Personnel management policies are made available to all collaborators through corporate communication tools.

3.1.6.3 ENHANCEMENT AND TRAINING OF RESOURCES

The managers make full use of and enhance all the professional skills present within CAVIRO EXTRA S.P.A., taking steps to promote the development and growth of their collaborators (for example, through exchange programmes between qualified personnel from different divisions, mentoring of experienced personnel, experience aimed at covering positions of greater responsibility).

In this context, it is particularly important for managers to communicate the strengths and weaknesses of the employee, so that the latter can tend to improve their skills also through targeted training.

CAVIRO EXTRA S.P.A., in order to enhance the specific skills and preserve the professional value of the staff, provides all collaborators with the information and training tools necessary for this purpose.

Institutional training is provided at certain times in the employee's corporate life (for example, for new hires there is training for the purposes of Legislative Decree 231/2001, an introduction to the company and its business) and recurring training aimed at operational staff.

3.1.6.4 MANAGEMENT OF EMPLOYEES' WORKING TIME

Each manager is required to enhance the working time of collaborators by requesting services consistent with the performance of their duties and with the work organization plans.

It constitutes abuse of the position of authority to request, as an act due to the hierarchical superior, performance, personal favors or any behavior that constitutes a violation of this Code of Ethics.

3.1.6.5 EMPLOYEE ENGAGEMENT

The involvement of collaborators in the performance of the work is ensured, also by providing moments of participation in discussions and decisions functional to the achievement of company objectives.

The collaborator must participate in these moments with a spirit of collaboration and independence of judgment.

Listening to the various points of view, compatibly with the company's needs, allows the manager to formulate final decisions; The collaborator must, however, always contribute to the implementation of the established activities.

3.1.7 INTERVENTIONS ON THE ORGANIZATION OF WORK

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and/or professional retraining actions.

In addition, in the event of new or unforeseen events, which must in any case be made explicit, the collaborator may be assigned to different tasks than those previously carried out, taking care to safeguard his or her professional skills.

3.1.8 SAFETY, HEALTH AND ENVIRONMENT

CAVIRO EXTRA S.P.A. is committed to spreading and consolidating a culture of safety by developing awareness of risks, promoting responsible behaviour by all employees.

In addition, it works to preserve, especially with preventive actions, the health and safety of workers, as well as the interest of other stakeholders.

To this end, it carries out technical and organisational interventions, through:

- the introduction of an integrated risk and safety management system aimed at identifying the main critical issues of the processes and resources to be protected;
- the adoption of the best technologies;
- the control and updating of working methods;

- the contribution of training and communication interventions.

CAVIRO EXTRA S.P.A., for all the sites in which it currently operates and in which it will operate, undertakes to adopt all the requirements included in the implementation protocols for the maintenance of safety and health certifications. In this regard, it undertakes the time technically necessary to ensure that each operating site complies with the requirements dictated by the certifications in terms of safety and health.

It also undertakes to apply all the safeguards for the protection of safety and the environment that are necessary due to technological progress.

3.1.9 PRIVACY PROTECTION

The privacy of the employee is protected by adopting standards that specify the information that the company requests from the employee and the related processing and storage methods.

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

These standards also provide for the prohibition, except in the cases provided for by law, of communicating/disseminating personal data without the prior consent of the data subject and establish the rules for the control, by each collaborator, of the rules to protect privacy.

3.1.10 INTEGRITY AND PROTECTION OF THE PERSON

CAVIRO EXTRA S.P.A. is committed to protecting the moral integrity of its employees by guaranteeing the right to working conditions that respect the dignity of the person. For this reason, it protects workers from acts of psychological violence, and counteracts any discriminatory or harmful attitude or behavior against the person, his beliefs and preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitations).

The Supervisory Body, upon receipt of the communication from the collaborator, who believes that he or she has been the subject of harassment or to have been discriminated against for reasons related to age, sex, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc., will assess the actual violation of the Code of Ethics.

3.1.11 PROHIBITION OF CHILD LABOUR AND FORCED LABOUR

CAVIRO EXTRA S.P.A. does not employ children, either directly or indirectly, under the age required by law and always carries out checks on the age of workers at the time of hiring. CAVIRO EXTRA S.P.A. repudiates any form of slavery, forced or forced labor, servitude, human trafficking or involuntary labor.

3.1.12 DUTIES OF COLLABORATORS

3.1.12.1 OBLIGATIONS OF CONDUCT

The collaborator 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.

3.1.12.2 INFORMATION MANAGEMENT

The collaborator must know and implement the provisions of the company policies on information security to ensure its integrity, confidentiality and availability.

He is required to draw up his documents using clear, objective and exhaustive language, allowing any checks by colleagues, managers or external parties authorized to request them.

3.1.12.3 CONFLICT OF INTEREST

All collaborators of CAVIRO EXTRA S.P.A. are required to avoid situations and activities in which conflicts of interest may arise and to refrain from personally taking advantage of business opportunities of which they have become aware in the course of carrying out their duties.

By way of example and not limited to, the following situations may result in conflicts of interest:

- carry out a top management function (managing director, director, function manager) and have economic interests with suppliers, customers, or competitors (ownership of shares, professional appointments, etc.) also through family members;
- take care of relations with suppliers and carry out work, even by a family member, with suppliers;
- accept money or favours from persons or companies that are or intend to enter into business relations with CAVIRO EXTRA S.P.A..

If an employee finds himself in a situation that, even potentially, may constitute or determine a conflict of interest, he or she must notify his or her manager, who, in accordance with the procedures provided, informs the Supervisory Body of CAVIRO EXTRA S.P.A., which assesses his or her actual presence on a case-by-case basis.

The collaborator is also required - in accordance with the provisions of the current employment contract - to provide information to his or her Manager and to the Supervisory Body, about the activities carried out outside working hours, in the event that these may appear to be in conflict of interest with CAVIRO EXTRA S.P.A..

3.1.12.4 USE OF COMPANY ASSETS

Each collaborator is required to work diligently to protect company assets, through responsible behavior and in line with the operating procedures set up to regulate their use, accurately documenting their use.

In particular, each employee must:

- use the assets entrusted to him scrupulously and sparingly;
- avoid improper use of company assets that may cause damage or reduce efficiency, or in any case in contrast with the interest of the company.

Each collaborator is responsible for the protection of the resources entrusted to him or her and has the duty to promptly inform the relevant business units of any threats or events harmful to CAVIRO EXTRA S.P.A..

CAVIRO EXTRA S.P.A. reserves the right to prevent distorted use of its assets and infrastructures by using any form of data collection and operational control system, as well as risk analysis and prevention, without prejudice to compliance with the provisions of the laws in force on the confidentiality of information (privacy law, workers' statute, etc.).

3.1.12.5 USE OF COMPUTER SYSTEMS

Each Employee is responsible for the security of the IT systems used, is subject to the regulatory provisions in force and the conditions of the license agreements and is required to make the necessary commitment in order to prevent the possible commission of crimes through the use of IT tools.

Except as provided for by civil and criminal laws, the improper use of company assets and resources includes the use of network connections for purposes other than those related to the employment relationship or to send offensive messages or messages that may cause damage to the company's image.

In particular, each collaborator is required to:

- scrupulously adopt the provisions of the company's security policies, in order not to compromise the functionality and protection of IT systems;

- not to send threatening and abusive e-mail messages, not to resort to low-level language, not to express inappropriate comments that may offend the person and/or damage the corporate image;
- Do not browse websites with indecorous and offensive content.

3.2 CRITERIA OF CONDUCT IN CUSTOMER RELATIONS

3.2.1 IMPARTIALITY

CAVIRO EXTRA S.P.A. undertakes not to arbitrarily discriminate against its customers in the performance of its activities.

3.2.2 CONTRACTS AND COMMUNICATIONS TO CUSTOMERS

The contracts and communications to customers of CAVIRO EXTRA S.P.A. (including advertising messages) are:

- clear and simple, formulated with a language as close as possible to that normally used by the interlocutors;
- compliant with current regulations, without resorting to elusive or otherwise incorrect practices;
- complete, so as not to neglect any relevant element for the customer's decision;

The purposes and recipients of the communications determine, from time to time, the choice of the most suitable contact channels for the transmission of content without making use of excessive pressure and solicitation, and undertaking not to use misleading or untruthful advertising tools.

3.2.3 BEHAVIOURAL STYLE OF EMPLOYEES

The style of conduct of CAVIRO EXTRA S.P.A. towards customers is based on availability, respect and courtesy, with a view to a collaborative and highly professional relationship.

Each collaborator, therefore, must:

- observe internal procedures for managing customer relationships;
- provide, with efficiency and courtesy, within the limits of the contractual provisions, products and services of a level that can meet the expectations and needs of the customer;
- provide accurate and comprehensive information about products and services so that you can make informed decisions.

3.2.4 QUALITY CONTROL

CAVIRO EXTRA S.P.A. undertakes to guarantee adequate quality standards of the products and services offered on the basis of predefined levels and to periodically monitor the perceived quality.

To this end, a capillary quality control system is operational in the company, as required for obtaining ISO certifications.

CAVIRO EXTRA S.P.A., for all the sites in which it currently operates and in which it will operate, undertakes to adopt all the requirements included in the implementation protocols for the maintenance of quality certifications. In this regard, it undertakes the time technically necessary to ensure that each operating site complies with the requirements dictated by the quality certifications.

3.2.5 CUSTOMER ENGAGEMENT

CAVIRO EXTRA S.P.A. undertakes to always respond to suggestions and complaints from customers and associations to protect them by using suitable and timely communication systems (e.g., call center services, e-mail addresses).

It is the responsibility of CAVIRO EXTRA S.P.A. to inform customers of the receipt of their communications and of the time required for replies, which, in any case, must be short.

3.3 CRITERIA OF CONDUCT IN RELATIONS WITH SUPPLIERS

3.3.1 CHOICE OF SUPPLIER

The procurement processes of goods and services are based on the search for the maximum competitive advantage for CAVIRO EXTRA S.P.A., the granting of equal opportunities for each supplier; they are also based on pre-contractual and contractual conduct held with a view to indispensable and reciprocal loyalty, transparency and collaboration.

In particular, CAVIRO EXTRA S.P.A. collaborators involved in these processes are required to:

- not preclude anyone, in possession of the required requirements, from competing in the stipulation of contracts, adopting objective and documentable criteria in the choice of the shortlist of candidates;
- ensure sufficient competition in the selection of the supplier by considering an appropriate shortlist of candidates (e.g. considering at least three companies); Any exceptions must be authorized and documented.

In any case, in the event that the supplier, in carrying out its activities for CAVIRO EXTRA S.P.A., adopts conduct that is not in line with the general principles of this code, CAVIRO EXTRA S.P.A. is entitled to take appropriate measures to the point of precluding any other opportunities for collaboration.

3.3.2 INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS

The stipulation of a contract with a supplier must always be based on extremely clear relationships, avoiding, where possible, forms of dependence.

Thus, by way of example and not exhaustively:

- any contract whose performance is repeated and/or split (e.g.: contracts of duration) whose significant amount must be constantly monitored;
- as a rule, binding long-term projects are avoided by using short-term contracts involving renewals with price revisions, or consultancy contracts without adequate transfer of know-how, etc.;
- it is not considered correct to induce a supplier to enter into a contract that is unfavourable to him by letting him understand a subsequent more advantageous contract.

To ensure maximum transparency and efficiency of the purchasing process, CAVIRO EXTRA S.P.A. prepares:

- the separation of roles between the unit requesting the supply and the unit stipulating the contract;
- adequate traceability of decision-making processes;
- the storage of information as well as contractual documents for the periods established by the regulations in force and referred to in the internal purchasing procedures.

Finally, to ensure transparency in relationships, CAVIRO EXTRA S.P.A. sets up a system for monitoring the ownership structure of its suppliers.

3.3.3 PROTECTION OF ETHICAL ASPECTS IN SUPPLIES

Violations of the general principles of the Code of Ethics entail sanctioning mechanisms, also aimed at avoiding crimes against the public administration attributable to the activities of CAVIRO EXTRA S.P.A..

To this end, specific clauses are prepared in the individual contracts.

In particular, contractual clauses are introduced in contracts with suppliers from "risk" countries, defined as such by recognised organisations, which provide:

- a self-certification by the supplier of adherence to specific regulatory and social obligations (e.g., measures that guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, the protection of child labor);
- the possibility of making use of control actions at the production units or operational offices of the supplier company, in order to verify compliance with these requirements.

3.4 CRITERIA OF CONDUCT IN RELATIONS WITH THE COMMUNITY

3.4.1 RELATIONS WITH PUBLIC INSTITUTIONS

Relations with local, national and international public institutions, aimed at protecting the overall interests of CAVIRO EXTRA S.P.A. and related to the implementation of its programs, are reserved exclusively for the functions and responsibilities delegated to it.

These relationships must be oriented towards criteria of maximum transparency and correctness, rigor and consistency, avoiding collusive attitudes.

CAVIRO EXTRA S.P.A. adopts specific organisational models for the prevention of crimes against the public administration.

3.4.2 ECONOMIC RELATIONS WITH PARTIES, TRADE UNIONS AND ASSOCIATIONS

CAVIRO EXTRA S.P.A. does not finance parties either in Italy or abroad, their representatives or candidates, nor does it sponsor congresses or parties that have an exclusive purpose of political propaganda. He refrains from any direct or indirect pressure on political exponents.

If, for reasons strictly related to the presence of CAVIRO EXTRA S.P.A. in the area, it is deemed appropriate to carry out interventions of this nature, the competent department must request prior authorization from the Supervisory Body, which will assess it on a case-by-case basis. The requested intervention can be implemented only and exclusively after the specific authorization of the Supervisory Body.

CAVIRO EXTRA S.P.A. does not provide contributions to organizations with which a conflict of interest may be identified; however, it is possible to cooperate, even financially, with these organizations for specific projects if the purpose of the mission of CAVIRO EXTRA S.P.A. is clear and documentable.

3.4.3 CONTRIBUTIONS AND SPONSORSHIPS

CAVIRO EXTRA S.P.A. can adhere to requests for contributions limited to proposals from organizations and associations that are openly non-profit and with regular statutes and articles of association, which are of high cultural, social or charitable value or, in any case, which involve a significant number of citizens.

Sponsorship activities, which may concern the issues of health and safety in the workplace, the environment, social issues, sport, entertainment and art, are intended only for events that offer a guarantee of quality or for which CAVIRO EXTRA S.P.A. can collaborate in the design, in order to guarantee originality and effectiveness.

In any case, in choosing the proposals to join, CAVIRO EXTRA S.P.A. pays particular attention to any possible conflict of interest of a personal or corporate nature.

3.4.4 ENVIRONMENTAL POLICY

With regard to environmental protection, CAVIRO EXTRA S.P.A. defines environmental policies and sustainable industrial development, drawing up implementation guidelines within the Company by promoting the following environmental policy instruments:

- voluntary agreements with environmental and trade institutions and associations;
- environmental management systems aimed at the continuous improvement of environmental performance and organization;
- a periodic system for the acquisition of environmental data;
- awareness-raising and environmental training activities for employees, which aim to internally disseminate initiatives and increase the skills and professionalism of employees;
- control of the performance of company actions in terms of environmental impact.

CAVIRO EXTRA S.P.A., for all the sites in which it currently operates and in which it will operate, undertakes to adopt all the requirements included in the implementation protocols for the maintenance of environmental certifications. In this regard, it undertakes the time technically necessary to ensure that each operating site complies with the requirements dictated by environmental certifications.

4 IMPLEMENTATION METHODS

4.1 DUTIES OF THE SUPERVISORY BODY pursuant to Legislative Decree 231/01 REGARDING THE IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS

With regard to the Code of Ethics, the Company's Supervisory Body is responsible for the following tasks:

- express binding opinions on violations of the Code of significant importance;
- transmit to company management and administrative bodies the request for the application of any sanctions for violations of this Code of Ethics; express binding opinions on the revision of the most relevant policies and procedures, in order to ensure their consistency with the Code of Ethics;
- monitor the periodic review of the Code of Ethics;
- receive and analyze the supervisory reports of the Code of Ethics;
- ensure the protection of whistleblowers within the limits provided for by law.

To this end, the Supervisory Body evaluates:

- communication and ethics training plans.

4.2 COMMUNICATION AND TRAINING

The Code of Ethics is brought to the attention of internal and external stakeholders through specific communication activities.

In order to ensure the correct understanding of the Code of Ethics for all CAVIRO EXTRA S.P.A. employees, the personnel department prepares and implements a training plan aimed at promoting knowledge of ethical principles and standards. Training initiatives are differentiated according to the role and responsibility of the Collaborators; For new hires, a special training program is provided that illustrates the contents of the code whose compliance is required.

4.3 "WHISTLEBLOWING" REPORTS

CAVIRO EXTRA S.P.A. has adopted an internal channel for reporting violations and unlawful conduct in accordance with the provisions of the applicable legislation on whistleblowing (Legislative Decree 24/2023). The management of reports is entrusted to the "Whistleblowing Function", specifically identified for this purpose by the Company's administrative body.

The whistleblower is protected against any retaliation, i.e. any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report and which causes or may cause unjust damage to the reporting person, directly or indirectly.

The confidentiality of the identity of the whistleblower is also ensured, except in cases expressly provided for by law.

For further information on the channel, methods and conditions for making reports as well as on the protection measures applied to the whistleblower, please refer expressly to the "Whistleblowing Procedure", Annex VII of the Model 231 adopted by CAVIRO EXTRA, published on the company website.

4.4 VIOLATIONS OF THE CODE OF ETHICS

CAVIRO EXTRA S.P.A. promotes the prevention of any form of violation of this Code of Ethics and, to this end, encourages stakeholders to promptly report to the Supervisory Body any conduct carried out in violation of this document.

In the event of ascertained violation of the Code of Ethics, the Supervisory Body reports the report and requests the application of any sanctions deemed necessary to the Company Management, and in the most significant cases, to the Board of Directors and the Chairman, as provided for by the disciplinary system adopted by CAVIRO EXTRA.

4.5. SUPERVISORY BODY POLICY ON THE PROCESSING OF PERSONAL DATA

In order to carry out control and verification activities, updating of the 231 Model and its annexes, meetings, drafting of minutes, etc., the Supervisory Body may process personal data (including special data, or data relating to criminal convictions or offences), including data provided by the Company Caviro Extra S.p.a., in order to collect the evidence necessary to carry out the tasks covered by the assignment, or in fulfillment of the obligations provided for by Legislative Decree no. 231/01.

Pursuant to Regulation (EU) 2016/679, and based on what is reported in the "Opinion on the subjective qualification for privacy purposes of the Supervisory Bodies provided for by art. 6, Legislative Decree no. 231 of 8 June 2001", published by the Privacy Guarantor on 12.05.2020, the members of the SB are authorised by the Data Controller to process all data for the purpose of carrying out the functions they are called upon to perform.

The Supervisory Body, therefore, complies with the requirements of current legislation and requires all its members to comply with the same rules, binding them to confidentiality.

During the period in which the Supervisory Body is in office, personal data are not communicated to third parties without the prior explicit consent of the interested party or in compliance with legal obligations, and after the end of the assignment the Supervisory Body is limited to the mere storage of the records, in accordance with EU Reg. 2016/679. In any case, the dissemination of personal data is not envisaged.