



dnata S.p.A.

Code of Ethics

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1.0	01.05.2026	IFU	Mariaelena De Renzis	Board of Directors

Revision History

Rev.	Date	Status	Changes/Comments
1.0	01.05.2026	IFU (First Emission)	First emission following the change of Company name from Airport Handling S.p.A. to dnata S.p.A. dated 16/01/2026.

Icon Guide



Useful Tips

This contains additional information and guidance for better understanding of the section.



Attention

Before taking action the reader must verify critical information.



Caution information

Prompt for the reader to proceed with caution and consider alternative requirements and outcomes e.g., refer to regulatory/statutory requirements in conjunction with the section.



References

Information on documents cited in this Standard.

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1 | Purpose and Scope

1.1 Purpose

This Code of Ethics (hereinafter also referred to as the “**Code of Ethics**” or the “**Code**”) sets out the ethical commitments and responsibilities for the conduct of the Company’s business and is addressed to the members of the Board of Directors and the Board of Statutory Auditors, the management, the employees and contractors of dnata S.p.A. (hereinafter also referred to as the “**Company**”), as well as to all those (such as, for example, consultants) who work - on a permanent or temporary basis - on behalf of or for the benefit of the Company or who have business dealings with it (hereinafter, collectively, also referred to as the “**Recipients**”).

1.2 Scope

This Code of Ethics represents and constitutes the set of values, principles and rules that guide the Company’s conduct both internally and towards all categories of stakeholders with whom it interacts, with a view to promoting clear guidelines for behavior and consolidating a positive corporate reputation.

The Code of Ethics also serves as a tool for monitoring relations with third parties, whether economic, financial, social or relational, with particular attention to issues of conflicts of interest, competition, and relations with customers, suppliers, the public administration, the market and the stakeholder community in general.

dnata S.p.A. undertakes to disseminate the Code to all Recipients and to provide the necessary tools for its application to prevent breaches of legal provisions and the principles of transparency, fairness and integrity, which must therefore always be ensured and adopted by the Recipients themselves.

This Code of Ethics, approved by the Board of Directors, forms an integral part of the Organizational, Management and Control Model adopted by the Company pursuant to Legislative Decree No. 231 of 8 June 2001, which the Company undertakes to apply, strengthen and develop over time.

To ensure full compliance with and the correct interpretation of the Code of Ethics, regarding the aspects and/or critical issues relevant to the correct application of Legislative Decree No. 231 of 8 June 2001, the “**Guarantor of the implementation of the Code of Ethics**” (hereinafter also “**Guarantor**”), identified within the Supervisory Body appointed by the Company pursuant to the aforementioned Decree. The role of the Guarantor is set out in paragraph 8.1 below.

2 | Terms and Abbreviations

Abbreviation	Definition
Code of Ethics (or Code)	The Code of Ethics adopted by dnata S.p.A., this document.
Guarantor	Guarantor of the implementation of the Code of Ethics

3 | Reference

The contents of this Code of Ethics have been drawn up in accordance with and in line with the following internal and external documents.

3.1 External references

Reference	Description
Borsa Italiana Corporate Governance Code	It is a set of principles and recommendations aimed at listed companies to ensure sound, transparent and efficient management.
Charter of Fundamental Rights of the European Union	It brings together in a single document all the civil, political, economic and social rights of citizens and residents of the European Union, guaranteeing protection against discrimination and abuse (dignity, freedom, equality, solidarity, citizenship, justice).
United Nations Universal Declaration of Human Rights	It is the fundamental document that enshrines the inalienable rights of every individual, regardless of race, sex, language or religion.

3.2 Internal references

Reference	Description
Environmental Policy	This is the document issued by dnata S.p.A. in which the company commits to prioritising sustainability, improving its environmental and energy performance through the use of technologically advanced methods.
dnata's Quality and Safety Policy	This document sets out the company's commitment to rigorous management of safety, employee health and the environment, fostering a corporate culture focused on quality and continuous improvement, in line with the group's guidelines.
dnata Anti-Bribery and Corruption Policy	This document sets out the Group's commitment to operating ethically and complying with anti-corruption laws in all its global operations. The Policy establishes clear rules for staff and third parties, based on honesty and integrity, to ensure compliance and prohibit unethical practices.
dnata Anti-Slavery and Human Trafficking Policy	The document sets out the Group's commitment to combating modern slavery, adopting a zero-tolerance policy in respect of human rights and the law. In accordance with the Modern Slavery Act 2015, dnata ensures transparency and integrity in all its operations and throughout its supply chain, requiring its suppliers and business partners to adhere to the same ethical standards.

4 | Roles and Responsibilities

4.1 Role

4.1.1 Corporate Bodies

- Board of Directors, Chief Executive Officer, Senior Management
- Responsibilities: adopting and disseminating the code of ethics and overseeing its effective implementation and updating

4.1.2 Guarantor of the implementation of the Code of Ethics

- Supervisory Body appointed by the company
- Responsibilities: oversees the ethical culture and ensures compliance with the principles

4.1.3 Target Recipients

- Company employees and contractors

- Responsibilities: they are required to be familiar with the Code, to ensure their conduct complies with its principles, and to report any breaches.

4.1.4 Managers

- Responsibilities: ensuring that staff are aware of the rules; promoting an ethical working environment.

5 | Ethical Charter

5.1 Mission

dnata S.p.A. provides 24/7 services to become a leading company in the ground handling sector, in the knowledge that achieving this goal depends on the satisfaction of its customers and all stakeholders involved, directly and/or indirectly, in its business. Among its primary objectives, the Company aims to create value for all stakeholders, in accordance with the principles set out in this Code of Ethics.

5.2 Ethical values and general principles of conduct

The Company regards compliance with applicable laws and regulations, as well as fairness and transparency in the conduct of its business, as fundamental principles underpinning its operations. It firmly believes that ethical business conduct forms the basis for the growth of a healthy and competitive enterprise and is essential for creating value and building market confidence.

5.2.1 Compliance

In the performance of their duties and during their respective activities, all Recipients are required to comply with the laws and regulations in force in Italy and in all countries in which the Company operates, as well as with this Code of Ethics, and to adhere to the principles of fairness, transparency and objectivity.

dnata S.p.A. requires all Recipients of this Code to comply with this requirement and to conduct themselves in a manner that does not compromise the Company's moral and professional integrity.

5.2.2 Confidentiality

The information, data and knowledge acquired, processed and managed by the Recipients in the course of their work must remain strictly confidential and be adequately protected; they must not be used, communicated or disclosed either within or outside the Company, except in accordance with the applicable laws and regulations, as well as the current company procedures. dnata guarantees the protection of personal data acquired in the course of its business and undertakes to process personal data in compliance with the relevant legislation and, in particular, with Regulation (EU) No 2016/679 (GDPR) and Legislative Decree No. 196 of 30 June 2003, as amended by Legislative Decree No. 101/2018 (hereinafter, the Privacy Code, collectively referred to as the Applicable Legislation).

Each Recipient must conduct themselves with the utmost confidentiality, even outside working hours, to protect the Company's technical, financial, legal, administrative, commercial, and personnel management know-how.

Furthermore, all those who, in the course of their duties, have access to sensitive, confidential or material information (such as, for example, business plans, strategic plans, economic/financial plans, accounting, commercial, management and operational data, corporate agreements, commercial agreements and contracts, company documentation, know-how, and databases relating to suppliers, customers, employees and partners in general), are required to prevent any misuse or unauthorised disclosure of such information.

In particular, each Recipient is required:

- to process only the data and information necessary for the company department or the area in which they carry out their activities;

- to communicate the information and data acquired in accordance with current company procedures;
- to store data and information in such a way as to render them inaccessible to unauthorised persons.

It is prohibited to access third-party information systems to which access is not freely permitted, for the purpose of retrieving and/or copying information or altering and/or destroying the data contained in such systems.

5.3 Conflict of interest

dnata S.p.A. maintains a relationship of trust and loyalty with its employees and contractors, who are required, in the performance of their duties and functions, to pursue the Company's objectives and general interests, placing them above their own, and to report, each to their designated contact, any potential or actual interest they may have, on their own behalf or on behalf of third parties, in a specific circumstance or transaction of the Company, specifying its nature, terms, origin and scope.

The directors and management of dnata S.p.A. are required to manage, in accordance with applicable company procedures, any activity that may be deemed, even only potentially, to conflict with the interests of the Company.

5.3.1 Gifts, benefits and other services

It is prohibited to accept or receive from third parties, or to offer, provide, promise or grant to third parties, on behalf of and in the interests of the Company, money, gifts, benefits or other advantages.

In particular, no offer, provision or acceptance, whether direct or indirect, of money, gifts or benefits of any kind to third parties is permitted for the purpose of influencing them in the performance of their duties and/or gaining an undue advantage, or which may even be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at securing favourable treatment in the conduct of any activity related to the Company, or which is intended to influence the recipient and induce them to behave in a manner contrary to their official duties, obligations of loyalty or otherwise likely to distort competition.

Only gifts of modest value, of a purely symbolic nature, are permitted. In any case, such gifts must always be made in accordance with the rules set out in company procedures and properly documented.

Anyone receiving gifts or offers of gifts that do not comply with the above must immediately inform the Guarantor, who will in turn involve the relevant departments to take the necessary measures.

5.3.2 Fighting corruption

In dealings between the Company and third parties, the Recipients must act in accordance with ethical standards and in compliance with applicable legislation. Such dealings must be conducted without resorting to unlawful means.

Corrupt practices, unlawful favours, collusive behaviour, and the solicitation of personal benefits for oneself or others are expressly prohibited, even if such behaviour may result in an advantage, even a potential one, for the Company and/or even if such behaviour is characteristic of commercial practice commonly found in a particular market or country in which the Company operates.

Recipients are required to be mindful of the risk of encountering corruption-related issues in the performance of all business activities, and in particular:

- when identifying a new business partner;
- when entertaining business partners or potential business partners, officials or representatives of the Public Administration or Institutions;
- when offering sponsored trips
- when making facilitating payments, where these are permitted under local law

For further and more specific guidelines on conduct, please refer to the provisions of the Company's Anti-Bribery and Corruption Policy.

All cases of potential or confirmed corruption must be reported in accordance with the procedures adopted by the Company.

5.3.3 Environmental protection

The Company conducts its business with due regard for the environment and public health, with a view to sustainable growth, in the shared interest of all stakeholders. Indeed, its investment decisions are guided by a commitment to protecting the environment and public health.

5.3.4 Protection of the individual

In accordance with fundamental human rights, the Company firmly opposes any form of labour exploitation, *modern slavery* or human trafficking, both in the conduct of its own operations and throughout its supply chain.

dnata S.p.A. is committed to respecting the fundamental rights of all those with whom it interacts in any capacity, safeguarding their physical and moral integrity, ensuring equal opportunities for all and respecting the rights of all workers. The Company rejects all forms of discrimination based on age, gender, sexual orientation, health status, race, nationality, cultural background, political opinions and religious beliefs.

Furthermore, the Company rejects and combats all forms of harassment, whether physical, verbal, written or through visual representations.

To safeguard the physical well-being of everyone with whom it interacts, dnata S.p.A. is committed to fostering a culture of respect for the principles of safety and security by setting appropriate objectives for all business processes, aimed at the continuous improvement of performance. The Company is convinced that these objectives can only be achieved by constantly safeguarding the health and safety of its employees, operators, carriers and the wider community through careful management of its activities.

6 | Internal Standards of Conduct

The directors and management of dnata S.p.A. must set an example and serve as a role model for all the Company's employees and contractors by demonstrating impeccable conduct in the performance of their duties and responsibilities, and by consistently fostering a spirit of collaboration, trust, mutual respect, cohesion and team spirit, with a view to safeguarding and enhancing the working environment, image and reputation of the Company.

The Company's employees and contractors shall carry out their duties, contributing to the achievement of the Company's objectives, with professional rigour, loyalty, honesty and good faith, fairness, commitment and a spirit of cooperation, in compliance with the law, company procedures and regulations, and in accordance with this Code of Ethics.

The principles of cooperation, loyalty and mutual respect must underpin relations between employees and staff at all levels, and between them and any third parties with whom they come into contact in the course of their work.

6.1 Protection of workers

dnata S.p.A. undertakes to ensure, in compliance with current legislation and to safeguard working conditions, a suitable environment in terms of workplace health and safety, as well as the health and physical and mental well-being of its employees and contractors, by adopting all necessary measures to this end.

The Recipients, in turn, undertake to comply with the prevention and safety measures put in place and to behave in accordance with applicable legislation and internal company procedures.

The management of employment relationships is free from gender discrimination and is geared towards ensuring equal opportunities, as well as promoting the professional development of every employee and contractor, in line with the expectations and skills acquired by everyone.

6.1.1 Relationship with Human Resources

The Company recognizes that the development, motivation and professionalism of its workforce are essential strategic factors for long-term success and is committed to fostering a harmonious and collaborative working environment. The Company expects every employee to help safeguard the Company's reputation, by committing to maintaining an atmosphere of mutual respect, acting with honesty, transparency and loyalty in full compliance with the law, company procedures and the provisions of this Code of Ethics.

The Company complies with national legislation and key international conventions on workers' and children's rights, safeguarding the physical and moral well-being of its staff and ensuring their right to working conditions that respect their personal dignity.

6.1.2 Staff selection

The assessment of candidates to be selected and recruited by the Company is based solely on the match between the expected and required profiles, as well as on transparent and verifiable merit-based criteria, whilst fully safeguarding candidates' privacy. The Company does not tolerate any form of discrimination, favoritism, nepotism or cronyism. Candidates are required to be transparent regarding any previous working relationships with the Public Administration or other bodies that could give rise to potential conflicts of interest.

The information requested from candidates is strictly related to the assessment of the professional and psychological aptitude requirements of the role, whilst respecting the privacy and opinions of each individual candidate.

The Company does not tolerate the recruitment or employment of foreign nationals without a valid residence permit, nor of employees below the minimum age for employment as established by current legislation.

Furthermore, the Company does not tolerate any form of illegal employment, and all recruitment carried out by the Company is in compliance with current legislation.

Upon recruitment, the Company provides employees with an employment contract that sets out in full the terms and conditions of employment, as well as the relevant legal provisions and remuneration details. Disciplinary policies and procedures must be clearly defined and promptly communicated to employees.

6.1.3 Human resources management

The Company ensures equal opportunities for all employees and contractors in employment and career progression, avoiding any form of discrimination.

The Company also ensures compliance with current legislation regarding working hours, rest periods, weekly rest, compulsory leave and annual leave, and pays its employees a salary sufficient to guarantee a decent standard of living for the employee and their family, in accordance with the provisions of the applicable legislation.

The Company guarantees that social security contributions are calculated in accordance with applicable legislation and paid regularly.

6.2 Protection and utilisation of company assets

The Company's corporate assets comprise all tangible and intangible assets that are identifiable and directly attributable to the Company and the prestige of its brand: infrastructure and property, equipment and vehicles, as well as the know-how of the Company's employees and collaborators, which ensure excellence and a customer-centric approach.

The protection and preservation of these assets is a fundamental value for safeguarding the Company's interests, and it is the responsibility of all Recipients (in the performance of their duties and/or business activities) not only to protect these assets, but also to prevent their fraudulent or improper use.

The personal use of company assets, or any use unrelated to the pursuit of the Company's business objectives, is not permitted.

Regarding IT equipment, any use that contravenes the relevant regulations is prohibited.

6.3 Accuracy and transparency of accounting and internal control

In maintaining its accounts, the Company acts in strict compliance with the applicable regulations governing the preparation of financial statements and, more generally, the mandatory administrative and accounting documentation.

Accounting records of operational events, as well as corporate information and data, are provided to third parties in accordance with the principles of transparency, fairness, accuracy and completeness.

Every action, operation or transaction must be correctly recorded in the company's accounting system in accordance with the criteria set out by law and applicable accounting standards and, furthermore, must be duly authorised, verifiable, legitimate, consistent and appropriate in accordance with internal company procedures.

Recipients are required to cooperate fully to ensure that management events are recorded correctly and promptly in the company's accounts and to retain all relevant supporting documentation in such a way that it is easily accessible and available for consultation by authorised auditors.

dnata S.p.A. requires and promotes full compliance with internal control processes as a means of improving operational efficiency.

The internal control system comprises control activities carried out on processes, to safeguard company assets, managing corporate activities effectively and providing clear information on the Company's financial position, results of operations and cash flows, as well as activities aimed at identifying and mitigating business risks.

The Recipients are required, within the scope of their responsibilities, to cooperate actively to ensure the proper and effective functioning of the internal control system.

The relevant company departments are guaranteed free access to data, documentation and any information useful for carrying out their control activities.

Anyone who becomes aware of possible irregularities, omissions, falsifications or alterations to accounting records and/or related documents is required to inform the relevant company department or the Guarantor without delay, even anonymously, so that they may carry out the necessary internal investigations to ascertain the facts and take the measures deemed most appropriate.

The Board of Statutory Auditors is promptly informed of any reports received by the Guarantor and of the measures subsequently taken.

7 | Standards of Conduct in Dealings with Third Parties

7.1 General provisions

dnata S.p.A. is particularly committed to building a relationship of trust with all its stakeholders.

In carrying out its activities, the Company, in accordance with the provisions of this Code of Ethics, adheres to the principles of maximum transparency, clarity, fairness, efficiency and equity.

In their dealings with third parties, within the scope of their responsibilities, the Recipients are required to provide clear and comprehensive information regarding obligations, constraints and compliance with the law and this Code of Ethics, as well as to adhere to the general principles that must guide the Recipients themselves in their dealings with third parties.

In relations with suppliers, customers and partners, any behaviour that might lead employees to breach company rules or ethical principles will not be tolerated. Relations with third parties must therefore uphold the company's integrity: no external request may compromise staff compliance with rules and ethical standards.

Recipients are not permitted to receive or use confidential data or information received from third parties in any form unless agreements have been entered into with those third parties regarding the use of such information; such agreements must be approved in advance by the relevant company department.

7.2 Competitiveness and relations with competitors

The Company complies with the relevant competition laws and refrains from engaging in conduct that could constitute unfair competition. The Company also promotes fair competition within the sector in which it operates, believing that this will lead to ever-higher standards of service for customers and the wider stakeholder community.

Company employees must not:

- carry out work for competing companies;
- without the Company's prior consent, acting as an employee, consultant, member of the Board of Directors or the Board of Statutory Auditors, providing professional services to competing companies or to subsidiaries of, or companies affiliated with, such competitors;
- without the Company's prior consent, representing a supplier or customer of the Company or carrying out work on their behalf.

Employees and contractors of the Company must not hold any financial interests of any kind or shareholdings in competing companies where this could give rise to a conflict of interest.

7.3 Relations with institutional authorities, the public sector, public bodies, political organisations and trade unions

Relations with institutional authorities, the public administration, political and trade union organisations, and local and national public bodies are guided by the principles of fairness, impartiality and independence, and are reserved exclusively for the company departments designated for this purpose.

Such relations must also be characterised by the utmost transparency, clarity and fairness, and must be such as not to lead the public bodies with which relations are maintained in various capacities to partial, distorted, ambiguous or misleading interpretations of the conduct adopted.

As already highlighted in section 5.3.2, any corrupt conduct or conduct aimed at unlawfully influencing the decisions of representatives of the public administration is prohibited, as is any non-transparent conduct towards such persons (such as the sending of false or altered information or documents). Furthermore, specifically in relation to dealings with the judicial authorities, any conduct aimed at unlawfully influencing the outcome of proceedings and trials is prohibited, such as the bribery of judges and their assistants and the influencing of witnesses.

Finally, dnata S.p.A. does not make any contributions, whether direct or indirect, in any form whatsoever, to political or trade union parties, movements, committees or organisations, nor to their representatives.

Recipients must acknowledge that any form of involvement in political activities takes place on a personal basis, in their own free time, at their own expense and in accordance with the laws in force.

The Company maintains a relationship of cooperation and dialogue with trade unions and trade associations in accordance with the principles of fairness and transparency and the provisions of the law and applicable collective agreements.

7.4 Relations with suppliers

To clarify further the provisions already set out in Chapter 5, and as referred to in paragraph 7.1, in dealings with suppliers, it is never permissible to accept or make offers of money or gifts with the aim of obtaining advantages of any kind (e.g. financial benefits, preferential treatment, recommendations).

The collection of information relating to suppliers, whether from public or private sources, through specialised bodies and/or organisations, must be carried out by lawful means in compliance with applicable laws (such as, for example, the Data Protection Code) and exclusively under the supervision and responsibility of the relevant Departments/Divisions.

Furthermore, the selection of suppliers and the formulation of terms and conditions for the purchase of goods and services are carried out through clear, certain and non-discriminatory procedures, and are guided by values and criteria such as competition, objectivity, fairness, impartiality, equity, price, the quality of the goods and services, guarantees of support and, in general, a thorough and precise evaluation of the tender. In the selection of suppliers, undue pressure that might favour one supplier over another and undermine the credibility and trust that the marketplaces in the Company regarding transparency and rigour in the application of the law and company procedures is neither permitted nor accepted.

7.5 Customer relations

To clarify further the provisions already set out in Chapter 5, and as referred to in paragraph 7.1, in dealings with customers or potential customers, offers of money or gifts intended to secure advantages of any kind (e.g. financial benefits, preferential treatment, recommendations) are not permitted. In any case, acts of commercial courtesy must never be performed in circumstances where they could be misinterpreted.

The collection of information relating to customers or potential customers, whether from public or private sources, through specialised bodies and/or organisations, must be carried out by lawful means in compliance with applicable laws (such as, for example, the Personal Data Protection Code) and exclusively under the supervision and responsibility of the relevant Departments/Divisions.

Furthermore, in commercial or promotional dealings and relationships, the following are prohibited: illegal or collusive conduct and practices; unlawful payments; attempts at bribery and favouritism; and direct or indirect solicitation of personal or career advantages for oneself or others, in contravention of applicable laws and regulations, as well as the provisions of this Code of Ethics.

7.6 Relations with the media

One of the Company's primary objectives is to ensure the transparency of corporate and financial information communicated externally and equal access to information; this is constantly monitored by the Company's internal control system with the aim of maintaining a high level of stakeholder trust and satisfaction.

The Company's communications with external parties must therefore comply with laws and regulations, and must be truthful, clear, transparent, unambiguous and not manipulative.

Recipients must refrain from issuing, for any reason whatsoever, communications—whether formal or informal—to external parties without the prior authorisation of the relevant company department, and must exercise the utmost care and caution when expressing opinions and comments on matters of public and/or social relevance that could, directly or indirectly, in various ways, damage the interests, prestige and image of the Company.

8 | Implementation and Monitoring of the Code of Ethics

8.1 Guarantor of the implementation of the Code of Ethics

To ensure full compliance with and the correct interpretation of the Code of Ethics, with regard to matters and/or issues relevant to the proper application of Legislative Decree No. 231 of 8 June 2001, the role of "Guarantor of the implementation of the Code of Ethics" is established, to be fulfilled by the Supervisory Body appointed by the Company in accordance with the aforementioned Decree.

The Guarantor has the following duties:

- to cooperate with the Company to ensure the widest possible dissemination of the Code of Ethics at all levels of the organisation through an appropriate information and awareness-raising plan;

- promptly notify the Board of Directors of the need to update the Code of Ethics to ensure its ever-increasing effectiveness in practice, as well as in response to changes in the Company's requirements and/or applicable legislation;
- to clarify any doubts regarding the correct interpretation and implementation of the Code of Ethics, as a constant reference for the correct conduct to which the Recipients are required to adhere in the performance of their duties and in the conduct of their business;
- to verify the validity of alleged breaches of the provisions of this Code of Ethics and, in the event of breaches, to involve the relevant company departments, urging them to take appropriate measures in accordance with applicable laws, regulations and national collective labour agreements; and, in the event of particularly serious incidents, to inform the Board of Directors without delay. Should the report received not relate to material breaches within the meaning of Legislative Decree No. 231 of 8 June 2001, the Guarantor shall share the report with the Board of Directors, which shall involve the other departments potentially concerned, depending on the nature of the report;
- to guarantee the confidentiality of the identity of all those who, in good faith, report any irregularities or breaches, by promoting the Company's initiatives aimed at protecting them from pressure, interference, intimidation and retaliation, in accordance with the applicable legal provisions;
- report any irregularities that arise or are discovered in the course of their duties to the relevant company departments, so that the necessary corrective measures can be taken;
- coordinate with the relevant company departments to promote communication and training programmes for employees and other Company staff, aimed at improving understanding of the objectives to be pursued and the standards of conduct to be observed in the performance of their duties.

8.2 Breaches of the Code of Ethics

Any breach of the principles and provisions set out in this Code of Ethics must be reported promptly, including anonymously, by anyone who becomes aware of it, in accordance with the Whistleblowing Procedure adopted by the Company, to which full reference is made.

Reports must be submitted via the Platform accessible via the link:

<https://digitalplatform.unionefiduciaria.it/whistleblowingnew/en/accessoprincipale/identificazionegruppo?TOKEN=AHWB>.

8.3 Amendments to the Code of Ethics

The provisions of this Code of Ethics may be amended only by resolution of the Board of Directors.

