

# CODE OF ETHICS



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## **1 FOREWORD**

The Code of Ethics defines the rules of conduct to be complied with in carrying out activities and provides guidelines to be followed in dealing with stakeholders, colleagues and in relations with customers, suppliers and partners, with other companies, bodies, public institutions and the media.

This Code sets out certain principles and rules of conduct that must be followed by directors, employees, staff, partners and all those who work internally or externally for Amarc DHS s.r.l. (hereinafter the "recipients") in the performance of their activities.

The Code is one of the tools provided by the company in order to ensure effective prevention, detection and combating of violations of laws and regulations applicable to its activities.

Compliance with the general principles and rules of conduct contained in the Code must be considered by all staff - and primarily employees - as an integral part of the contractual obligations.

In general terms, even before the specific cases highlighted below, this document aims to raise awareness and to involve, with regard to its values, all those who, one way or another, come into contact with Amarc DHS s.r.l..

These values are considered to be of such fundamental importance by our company as to be expressed and repeated at every opportunity, even where they may seem inappropriate, such as, for example, in the text of a contract.

The company appeals to all those who feel or think they are more enlightened, or think they have understood more than others, to be its custodians and defenders and to disseminate it in the most convincing way possible, always remembering that without these values one will not go far, neither personally nor at the corporate level.

Below these values will be expressed in a detailed and sometimes even formal manner.

This is why, in this foreword, the intention is to try to concentrate them in the following thoughts:

"Hoping that everyone can always search for beauty, beauty in thoughts, in conduct and in projects. Education is beautiful, solidarity is beautiful, helping others is beautiful, not polluting and respecting nature is beautiful, building is "beautiful" as opposed to "ugliness" in consuming or destroying what has been done by others".

Hoping that all of you can be among those who will have added something to this world and not among those who consumed that added by others.

## **2 GUIDE TO THE USE OF THE CODE**

### **2.1 Description of the Code of Ethics**

The Code defines the principles and standards of conduct of the Company's business, as well as the commitments and responsibilities of its staff.

Amarc DHS s.r.l. acts in full compliance with the law, with transparency, integrity and professional commitment in order to develop its value for the benefit of shareholders as well as the professional development of its human resources.

In this regard, the Code provides information concerning the solution of ethical and commercial issues. In particular, the conviction to act in some way to the advantage of the company does not justify the adoption of practices contravening these principles.

All actions, operations and transactions related to the Company's business must be undertaken and pursued in full compliance with legality, impartiality and the principles of fair competition, must be managed with utmost integrity, must be based on completeness and transparency of information, must be supported by documentary evidence and must be able to be subjected to audit and control.

Relations with the Authorities must be characterised by utmost transparency and collaboration, in full respect for their institutional roles.

The Code, together with all other rules, policies and regulations issued by the Company, constitutes the programme for assuring effective perception and detection of violations of the law.

### **2.2 Recipients of the Code of Ethics**

The Code applies to all Company staff and all other parties or companies acting on behalf of the same, which are, therefore, committed to complying and ensuring compliance with the content of this Code of Ethics within the scope of their functions and responsibilities, as well as in execution of their activities.

The Company will endeavour to ensure that stakeholders adopt Codes of Conduct whose principles are inspired by, and in any case not in conflict in any way with, those of this Code.

The Company must endeavour to ensure that the Code is considered a "best practice" for conducting business on the part of those with whom it collaborates on a long-term basis, such as consultants and experts.

### **2.3 Consultation of the Code of Ethics**

The Code is brought to the attention of all stakeholders of the Company. It is also available on the Company's website.

### **3. GENERAL PRINCIPLES**

#### **3.1 Impartiality**

In decisions that influence relations with its stakeholders, Amarc DHS s.r.l. avoids any discrimination based on the age, sex, state of health, race, nationality, political opinions or religious beliefs of its stakeholders.

#### **3.2 Probity and confidentiality**

Within the scope of their professional activities, the Company's staff are required to diligently comply with current legislation, confidentiality of information in its possession, the Code of Ethics, internal rules adopting legally, professionally and ethically correct and loyal conduct in all work phases.

Under no circumstances can the pursuit of the interests of Amarc DHS s.r.l. justify failure to comply with the same or give rise to unfair or dishonest conduct.

#### **3.3 Integrity and honesty in the event of potential conflicts of interest**

In conducting any activity, situations in which the individuals involved in transactions are, or may only appear to be, in conflict of interest must be avoided.

By this is meant both the case in which a member of staff pursues an interest other than the business purpose and the balancing of stakeholder interests or takes "personal" advantage of the business opportunities of the company, as well as in the case in which the customer or supplier or public institution representatives act in contrast with the duties of trust associated with their position.

In this case, employees and staff must avoid any situation and refrain from any action that could juxtapose a personal interest with those of the Company or that could interfere with or hinder their ability to take decisions, in an impartial and objective manner, in the interest of the Company.

Employees and staff must therefore exclude any possibility of overlapping or nevertheless intersecting, by exploiting their functional position, any economic activities linked to their personal and/or family interest with their duties within the Company.

Any situation of conflict of interest, even indirect or potential, must be promptly reported to any competent bodies (e.g. Supervisory Board pursuant to Legislative Decree 231/01, Legal Representative of the Company, etc.) in order to evaluate its existence and severity and exclude or mitigate the consequential effects.

It is essential to behave honestly and with sincerity, at the cost of sacrifices that will no doubt be reciprocated in terms of peace of mind and concrete results.

### **3.4 In particular for conflicts of interest**

No Amarc DHS s.r.l. employee or contractor considered strategic may carry out activities in favour of the competition, take on the position of a consultant or member of the Board of Directors of competitor companies or provide their professional services in favour of competitors; in addition, no one may use, at work or in their leisure time, corporate assets or provide services that the company offers to its customers, without the prior authorisation of the competent department or their direct supervisor; no one may, during their working hours, carry out other activities inconsistent with their duties or organisational responsibilities, or use corporate assets outside such duties.

### **3.5 internal controls**

It is the policy of Amarc DHS s.r.l. to disseminate at all levels a culture oriented to exercising control, characterised by awareness of the existence of internal controls and appreciation of the positive contribution these provide to improving efficiency.

By internal controls is meant all those tools necessary or useful for addressing, managing and verifying the Company's activities with the objective of ensuring compliance with the law and with corporate procedures, protecting corporate assets, efficiently managing activities and providing accurate and complete accounting and financial data.

The responsibility for implementing an effective internal control system is common to every level of the organisational structure; consequently all Amarc DHS s.r.l. staff, in their respective functions, are responsible for the definition and proper functioning of the control system.

Within the scope of their responsibilities, senior managers are required to participate in the corporate control system and involve their staff.

### **3.6 Transparency and completeness of information**

Amarc DHS s.r.l. staff are required to provide complete, transparent, understandable and accurate information in order that, in establishing relations with the company, stakeholders are able to make independent and conscious decisions regarding the interests involved, the alternatives and the relevant consequences. In particular, in the formulation of any contracts, Amarc DHS s.r.l. specifies to the contractor the conduct to be adopted in all the foreseeable circumstances, in a clear and understandable manner.

### 3.7 Duties of staff

Amarc DHS s.r.l. expects its staff, in the performance of their duties, to adopt ethically irreproachable as well as legally and professionally proper conduct, in order to reinforce mutual trust and consolidate the Company's image.

Staff are therefore required:

- to act with probity and integrity in relationships with each other, with shareholders, competing companies, customers and, generally, third parties, whether general governments or private entities;
- to comply with legislation specific to each of the jurisdictions in which the Company operates;
- to avoid conflicts of interest with the Company they belong to and in any case conduct giving rise to negative publicity for the same.

### 3.8 Health, sustainability and environmental protection

Staff, whose physical and moral integrity is considered a primary value to the company, are guaranteed working conditions that respect individual dignity in safe and healthy workplaces.

Within the scope of the defined corporate strategies and in consideration of the specific nature of the services provided, it has been chosen to strengthen the focus on social and environmental aspects in conducting business, pursuing the path of sustainability, providing transparent information on the values that guide corporate conduct and on the policies implemented in the economic, social and environmental fields.

Amarc DHS s.r.l. is committed to protecting the environment as a primary asset, ensuring compatibility between economic initiatives and environmental needs, both in compliance with current legislation as well as taking into account the development of scientific research and the related best practices.

It is both a duty and a pleasure to accompany the actions of all with a great attention to the environment, and through the daily work in the pursuit of our values the intention is to contribute to the "construction" of a better environment anywhere in the world the resources, services and products of Amarc DHS s.r.l. are deployed.

### 3.9 Employee training

Adequate training in the area of administrative liability of Entities will be provided to its employees. Employees are required to participate in courses organised by the company.

### 3.10 Grants and sponsorships

The activities for which our company may grant sponsorships must regard issues of social value (e.g. environment, sport, entertainment, art, innovation, solidarity), paying particular attention to potential individual or corporate conflicts of interest.

## **4. RULES OF CONDUCT**

### **4.1 Relations with human resources (safety, health, privacy)**

Relations between employees of the same or different companies must always be based on the principles of civil coexistence and must take place with mutual respect for the people's rights and freedom.

Furthermore, in relations with both subordinates as well as superiors and colleagues in general, it is necessary to adopt conduct appropriate to the decorum and dignity of the human being and of the places where the activity is carried out.

The "Human Resources" function is required to intervene, in the appropriate manner, in cases brought to its attention, informing the Management.

Personnel are hired with a regular employment contract, any form of illegal work or exploitation not being tolerated. Any form of discrimination, both in the selection phase as well as in that of career management and development, must be avoided.

Upon establishment and during the course of employment, personnel receive clear and specific information on regulatory and remuneration aspects.

For the entire duration of employment, they receive indications (internal company communication is considered an important vehicle as a means of sharing information and as a motivational tool for personnel) to enable them to understand the nature of their duties, allowing them to adequately carry them out in an adequate manner, in accordance with their qualification.

The conditions of employment are those indicated by the National Collective Bargaining Agreement applied. A work environment in accordance with applicable safety and health legislation is ensured by monitoring, management and prevention of risks related to performance of the professional activity.

Recipients are required to put in place all the prevention and safety measures required by current legislation on which they will have received adequate information, education and training.

Personal data relating to internal and external staff must be processed by each recipient in full compliance with current legislation, with procedures suitable for ensuring utmost transparency to those concerned and inaccessibility to third parties, except for justified reasons.



## 4.2 Hierarchical relations within the company

The relations between levels of responsibility, related to the various hierarchical positions in the Company, must be conducted with loyalty and integrity, in accordance with corporate secrecy.

All those responsible for specific activities and organisational structures must exercise the powers related to the mandate received with careful balance, respecting the personal dignity of their staff.

As regards the manner of exercising the powers conferred, express reference should be made to the specific corporate procedure.

All members of organisational structures or specific working groups must, in turn, provide utmost collaboration with the managers of both, complying with the instructions for execution and regulation of work provided by the latter and, in general, by the Company.

## 4.3 Relations with the management and among employees

All staff, contractors and employees of Amarc DHS s.r.l. must comply with the confidentiality obligations and non-competition agreements, performing their duties with total loyalty and, simultaneously, everyone indistinctly, albeit hierarchically organised, must comply with and apply the ethical and conduct principles of diligence, honesty and equality, fostering mutual cooperation and solidarity and facilitating the creation of a working environment suitable for protection of the individual and the worker.

## 4.4 relations with public authorities and institutions and other entities representing collective interests

All those who, for whatever reason, entertain on behalf of Amarc DHS s.r.l. relations with domestic, EU and foreign state or governmental authorities and public institutions, as well as with other entities representing collective interests, and with the natural persons representing them, must operate in constant and rigorous compliance with current legislation in Italy and in the country where the relation is established, basing their activities on integrity and transparency.

In particular, consistent with the principles pursuant to this Code, it is forbidden, in relations with representatives of Italian or international general governments, to directly or indirectly:

- Promise or make payments in cash, gifts or gratuities outside the scope or for purposes other than those of an institutional or business nature.
- Promise or grant advantages of any kind, in order to influence their independence of judgement or to obtain any advantage for the Company.
- Engage in deceitful conduct which might lead the general government to make a technical and economic evaluation error regarding the products and services offered/supplied.
- Allocate public grants, subsidies, incentives, benefits or funding for purposes other than those for which they were obtained.

Relations with the parties listed above are exclusively restricted to the functions delegated for this purpose, in compliance with the Company's hierarchical and organisational structure.

Those who, in the name and on behalf of the company, entertain relations with general governments in any capacity, must reject any conduct which could be even only interpreted as collusive or otherwise liable to compromise the aforementioned principles. In particular, gifts and courtesies (where permitted by current legislation) to representatives of public institutions must always be of symbolic value and proportionate to the circumstances and, in any case, not such as to be interpreted as aimed at obtaining undue advantages for the Company.

#### **4.5 Relations with political, trade union and charity organisations**

Any form of direct or indirect contribution to parties, movements, committees and political and trade union organisations, to their representatives and candidates, is forbidden, except those required by specific provisions of the law and in compliance with the forms, ways and content provided for therein, subject to approval by of the Company's Board of Directors.

Without prejudice to that provided for by current legislation and agreements, all employees are aware that any involvement in political and/or trade union activities takes place on a personal basis, at their own expense and in their own time.

#### **4.6 Relations with public supervisory authorities**

The recipients of this Code, during audits and inspections by the competent public authorities, must adopt an attitude of utmost availability and cooperation with regard to inspection and control bodies.

Transparent and responsible conduct is also required in the preparation of periodic reports and all other communications to be sent to the said authorities according to legal and regulatory provisions.

Vis-a-vis such entities, it is also forbidden to conceal information or provide false documents or those certifying untruths, to prevent or hinder in any way the functions of the public supervisory authorities which come into contact with the company by virtue of their institutional functions.

#### **4.7 Relations with customers (customer satisfaction) and suppliers**

Contractual relations and communications to customers and suppliers must be based on the principles of integrity, honesty, professionalism and transparency; also through the explicit acceptance of this Code of Ethics advertised and distributed by suitable communication means.

It is forbidden to entertain direct or indirect relations with persons connected with criminal organisations and in any case operating beyond the bounds of legality.

The selection of suppliers and procurement of goods and services must be in accordance with the principles of this Code and of internal procedures, using the approved form and in compliance with the organisational structure. In any case, selection must take place exclusively based on objective parameters of quality, value for money, ability and efficiency.

In business relations with customers and suppliers, gifts, benefits, services of any other kind, whether direct or indirect, gratuities and acts of courtesy or hospitality are forbidden, unless they are of a nature and value that do not compromise the Company's image and such as not to be able to be interpreted as aimed at obtaining favourable treatment that is not determined by market rules.

Through each recipient, it is considered essential to maintain high standards of quality of services and maximise customer satisfaction. The internal procedures and information technologies used support these objectives, also through attentive customer monitoring and complaint management.

#### **4.8 Money and free services offered to third parties**

No Company employee must promise or pay sums of money or goods in kind of any entity or value to any person to promote or facilitate the interests of one or more companies, even in the presence of unlawful pressure.

The only exceptions are small gifts or courtesies common in commerce of low value (gifts for advertising or festivities, invitations to conferences or meetings for presentations, greetings cards, etc.) when not forbidden.

No Company employee must circumvent the requirements of the preceding paragraph by resorting to other forms of aid or contributions which under the guise of sponsorships, assignments, consulting, advertising, etc. instead have the objectives forbidden in the first paragraph.

Any Company employee receiving explicit or implicit requests for such benefits from any person must immediately suspend all business relationship with the same and immediately inform their superior or, failing that, the Company Director and the Supervisory Board (SB).

#### **4.9 Money, gifts and free services offered by third parties**

In carrying out their duties, no staff members, neither directly nor indirectly through members of their family, may solicit or accept money, other gifts and favours of any value from third parties having business or work relations with the Company.

In the case of gifts, services, donations, etc., staff are required to immediately inform the Human Resources Department, with which it will agree the conduct to be adopted.

#### **4.10 Accounting transparency**

The completeness and clarity of accounting data, reports and financial statements represent a fundamental value in relations with shareholders, third parties and controlling bodies.

For such value to be complied with it is first of all necessary that the basic information and accounting records of transactions are complete, truthful, accurate and verifiable.

Any conduct aimed at altering the accuracy and veracity of the data and information contained in financial statements, reports and other corporate disclosures required by law addressed to shareholders, third parties and institutions is forbidden.

All those preparing such documents are required to verify, with due diligence, the accuracy of the data and information to be used in the preparation of the above documents, maintaining, for each transaction, adequate supporting documentation of the activity carried out.

The Company requires that the directors, function managers, employees and staff in general all adopt proper and transparent conduct in the performance of their duties, particularly in relation to any request made by shareholders, other corporate bodies and the SB in the exercise of their respective institutional functions.

It is forbidden for Company directors to engage in any conduct to the detriment of the integrity of corporate assets and to put in place any simulated or fraudulent act, intended to influence the intention of members of the shareholders' meeting to obtain the undue formation of a majority and/or a different resolution.

#### **4.11 Corporate communication**

To avoid the dissemination of incorrect news and information or the occurrence of situations involving liability of any kind and content for the Company, the Company's external communication must be clear, precise and truthful, aimed at facilitating the knowledge of and consent towards corporate policies and the Company's programmes and projects.

Particular attention should be paid to the external communication of documents, news and information concerning events that occur within the scope of direct activities of Amarc DHS s.r.l. not in the public domain.

The communication of information to the public and media in general, must, in particular, be managed by the specifically dedicated and authorised function.

These relations must be based on compliance with the same rules outlined for relations with public institutions. In any case, they must nevertheless be based on safeguarding the Company's image.

#### **4.12 Confidential information**

Confidential information and documents, personal data of staff and suppliers, work projects, know-how and technological processes must be adequately and continuously safeguarded and protected with regard to both third parties as well as colleagues that are not directly involved in the same.

Those who, for business reasons, have access to them must, however, process them according to the instructions and procedures established by the employer. At any time and, in particular, during the conclusion and execution of contracts, the obligation of confidentiality must be strictly observed in relations with third parties, the press and those not authorised to communicate.

Company employees and staff undertake to protect privacy, with reference to data pertaining to both other Company employees as well as customers, suppliers, consultants, any other contractors and all those who have business relations with the same, in compliance with the law.

It is forbidden for the staff of Amarc DHS s.r.l. to use or communicate to others, without justified reason, privileged information relating to financial instruments issued or contracted by the latter in their possession.

#### **4.13 Protection of corporate assets**

All staff are responsible for the preservation and protection of the assets and tools that are personally assigned to them for business purposes and must contribute to safeguarding all company assets. To this end, they must pay utmost attention to compliance with the operating and security procedures established by the Company.

In any case, documents relating to the Company's activities, work tools and any other tangible or intangible assets owned by the same must be used solely for achievement of the institutional purposes of the Company and with the procedures established by the same. They may not be used by staff for personal purposes or be transferred by them or made available, even temporarily, to third parties. Exceptions are any "fringe benefits" (such as company cars for private use) for which the management has also authorised use of the same for personal purposes, in compliance with current regulations.

## **5. REGULATORY PRINCIPLES OF LEGISLATIVE DECREE 231/2001**

### **5.1 Overview**

Introduction of administrative liability of legal entities represents one of the most significant reforms that, in implementing the commitments taken at the EU and international level, have recently been introduced in the Italian legal system. Legislative Decree no. 231 of 8/6/2001, implementing Delegating Law no. 300 of 29/9/2000, is in fact part of the broad international movement to combat corruption that requires Member States, and therefore also Italy, to adopt homogeneous means of repression and prevention of crime involving the financial sector.

The liability of legal persons (called entities) introduced in the Italian legal system is in several aspects of a decidedly criminal nature, despite being expressly defined as "administrative" firstly by the delegating law and subsequently by Legislative Decree 231/01.

The related liability is of a hybrid nature: the peculiar characteristics of criminal and administrative liability coexist and the criminal justice system is adopted for the purpose of its investigation and consequent imposition of the sanction.

There are three essential conditions for liability of the entity: a crime to which the law attributes liability of the entity has been committed; the crime was committed in the interests or to the advantage of such entity; the perpetrator of the crime is in a so-called "top management" position, pursuant to Art. 5, letter a) or is a so-called "subordinate", pursuant to Art. 5, letter b).

The liability of the entity, therefore, derives from commission, by a person belonging to the same, of crimes strictly specified by the decree or by another law already in force before the crime was committed.

Amarc DHS s.r.l. requires its staff to comply with the regulatory provisions in force in the country in which the activity is carried out, in particular, the provisions of Legislative Decree 231/2001, as amended and supplemented, in accordance with the organisational model put in place, referred to herein in its entirety.

## **6. IMPLEMENTATION AND GUARANTEES**

The Company's commitment is focused on achieving the highest standards of "best practices" relating to its business, ethical and social responsibilities towards all its stakeholders.

The Code defines the expectations of the Company towards its staff and the responsibility they must take for transforming these policies into reality.

The Company's management responsibly ensures that these policies and expectations are understood and put into practice by staff. The management is held accountable to the competent internal control bodies and finally must provide assurance that the commitments expressed in the Code are implemented.

Any measures for violations of the Code will be adopted in accordance with applicable legislation and the relevant national employment contracts, and will be commensurate with the particular violation of the Code.

The measures may also include termination of the fiduciary relationship between the Company and the staff member, with the contractual and legal consequences with regard to the employment relationship provided for by current legislation.

The Supervisory Board pursuant to Legislative Decree 231/2001 is assigned the following tasks for implementation of the provisions contained in the Code of Ethics:

- take decisions in regarding significant infringements of the Code;
- express binding opinions on the revision of the most significant policies and procedures in order to ensure consistency with the Code of Ethics;
- ensure periodic review of the Code of Ethics.

The SB operates with impartiality, authority, continuity, professionalism and autonomy and suggest any updates to the Code, also based on the feedback received from stakeholders.

The SB also operates with ample discretion and with the complete support of the Company's top management, with which it collaborates in absolute independence.

Final approval of the Code, however, lies with the Board of Directors which also ensures its dissemination in the original Italian version or in another language outside and inside the company, bringing it to the knowledge and attention of all personnel.

## **7. REPORTING IN THE EVENT OF VIOLATION OF THE PROVISIONS OF THE CODE OF ETHICS**

In order to ensure the efficacy of the Code of Ethics, the Company has put in place information channels through which anyone becoming aware of any unlawful conduct put in place in the Company may freely, directly and confidentially report it to the SB.

It is the obligation of all employees and staff members to promptly report any conduct, also by third parties, not compliant with the principles of the Code. Confidentiality concerning the identity of the whistleblower is guaranteed, except for requirements linked to the performance of the duties of the SB, as too is the immunity of the whistleblower against retaliation, illegal influencing, uneasiness and discrimination of any kind in the workplace, for having reported the violation of the contents of the Code of Ethics.

Should a staff member wish to appeal against a violation (or alleged violation) of the Code, the latter must contact his direct superior.

Should the dispute remains unresolved, or the staff member feels uncomfortable in contacting his direct superior for submission of the appeal, the same may contact the SB.

Should a third party wish to appeal against a violation (or alleged violation) of the Code, the same must contact the SB.



## **8. DISCIPLINARY SYSTEM**

### **8.1 Against employees**

Failure to comply with and/or violation of the rules of conduct indicated in the Code by Company employees constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions.

The sanctions which may be imposed will be applied in accordance with the provisions of the law and of the National Collective Bargaining Agreement applied. Such sanctions will be imposed based on the importance of the individual cases considered, and will be commensurate with their severity.

Ascertainment of the aforementioned infringements, management of disciplinary proceedings and imposition of sanctions remain the responsibility of the competent corporate functions.

This Code must be exhibited in a public place accessible to all Company employees as provided for by Law 300/70 (Workers' Statute).

### **8.2 Against senior managers and directors**

In the event of violation of the rules of conduct indicated in the Code of Ethics by senior managers and/or directors, the Company will evaluate the facts and conduct and take appropriate action against those responsible in accordance with the provisions of the law and of the applicable National Collective Bargaining Agreement, bearing in mind that such violations constitute a breach of the obligations arising from the employment relationship.

In the event of violation of the Code by the heads of company functions, the SB will inform the entire Board of Directors which will take appropriate action in accordance with the law.

### **8.3 Against staff, consultants and other third parties.**

Any conduct put in place by staff, consultants or other third parties linked to the Company by a contractual relationship not of an employment nature in violation of the Code, may, in the most severe cases, lead to termination of the contract, without prejudice to a possible claim for compensation should such conduct cause damage to the Company and this also regardless of termination of contract.

### **8.4 Exceptions**

Any exceptions, even if only partial and limited in time and nature, to the provisions of the Code may only be authorised for serious and justified reasons by the Board of Directors, in consultation with the SB.

## **9. SUPERVISORY BOARD (SB)**

The SB is responsible for verifying the functioning of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 and its maintenance through periodic updating.

The SB undertakes to use the financial resources made available by the company, in compliance with the purposes for which they were granted, refraining from any abuse.

Within the corporate context, any information of any kind, also coming from third parties, and pertaining to the implementation of the Organisational Model pursuant to Legislative Decree 231/01 (of which this Code of Ethics is an integral part) in at-risk areas must be brought to the attention of the SB.

In particular:

- Any reports relating to the commission of crimes pursuant to the Decree regarding the company's activities or conduct not in line with the rules of conduct adopted by the same must be accepted.
- The flow of reports, including those of an informal nature, must be channelled towards the Company's SB.
- The SB will evaluate the information received and any consequent measures according to its reasonable discretion and responsibility, possibly interviewing the whistleblower and/or the person responsible for the alleged violation and justifying in writing any refusals to proceed with an internal investigation.
- Reports must be in writing and concern any violation or suspected violation of the model. The SB will act to protect whistleblowers against any form of retaliation, discrimination or penalisation, also ensuring confidentiality of their identity, without prejudice to legal obligations and protection of the rights of the Company or persons wrongly and/or maliciously accused.
- The SB will consider reports, even if anonymous, presenting the facts.

The SB also monitors the adequacy of and compliance with the Code of Ethics, according to the methodological and operational procedures that govern its operation, described in the Organisational Model with reference to the provisions of Legislative Decree 231/01.

Communications to the SB (such as reports of alleged violation, request for clarification or an opinion) must be preferably made in a non-anonymous form and may be sent by recipients and all other stakeholders to the following address:

Supervisory Board  
Lawyer Carlo Grignani, Via Agnello 12, 20121 – Milano  
[carlo.grignani@advant-nctm.com](mailto:carlo.grignani@advant-nctm.com)

The Company undertakes to ensure the confidentiality of the whistleblower's identity and to protect from possible intimidation or retaliation those who in good faith report alleged violations of the Code, subjected to the disciplinary measures applicable at any time. This Code, in force from the date of issue or revision is available at [www.amarcdhs.it](http://www.amarcdhs.it) and is distributed case by case to recipients in the manner considered most suitable for effective dissemination. Revisions of this Document take place upon approval by the management, taking into account comments received from recipients, changes in legislation and the experience acquired in implementation of the Code itself. The changes are published and made available via the appropriate means.