

DIEMMEBI SPA

ORGANISATIONAL AND MANAGEMENT MODEL AS PER ITALIAN LEGISLATIVE DECREE No. 231/2001

CODE OF ETHICS

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1. Introduction

This Code of Ethics is the official document created to define and to express the fundamental ethical values and principles that guide DIEMMEBI SPA in conducting its business and its corporate activities.

It therefore contains the measures that DIEMMEBI SPA adopts, from an ethical-behavioural point of view, towards parties involved, directly or indirectly, in the Company's activities, as well as to adapt its organisation to the requirements of Italian Legislative Decree no. 231/2001 and to prepare guidelines on the behaviour to be followed in the pursuit of the company's goals.

1.1. Recipients

As such, the Code of Ethics is aimed at senior management - including directors and auditors - employees, contractors, consultants and, in general, any third party who enters into a relationship with DIEMMEBI SPA.

These parties must never fail to comply with the values of honesty, moral integrity, correctness, and transparency and they must always behave in a way that complies with this Code of Ethics.

2. Mission and values

DIEMMEBI SPA is a manufacturing company which, through the dynamism and conscious responsibility of all its workers, researches, develops, and distributes safe and reliable products, for people's wellness and experience.

It seeks improvement by researching and offering products of Italian style, with innovative content and timeless lines, inspired by the canons of industrial design to make them competitive and affordable.

In order to achieve these goals, DIEMMEBI SPA acknowledges and pursues the values described below.

2.1. Legality

Recipients are required to comply with the regulations in effect in the country in which they work.

Recipients are also required to comply with the Company's regulations and this Code of Ethics, as they implement regulatory obligations.

In no circumstance whatsoever can pursuing the interests of DIEMMEBI SPA justify an act that runs contrary to an honest course of action.

DIEMMEBI SPA will not enter into, nor will it sustain, any type of relationship with a party who behaves in a way that is contrary to that established in this specific point of the Code of Ethics.

2.2. Moral integrity, correctness, loyalty and good faith

Recipients, in carrying out their activities and in their relationships, of any type and nature, must behave in a way that is based on respect for the fundamental principles of moral integrity, correctness, and loyalty in pursuing the Company's goals.

Each recipient's behaviour, actions, and operations, in carrying out their functions or assignments, are to be based on the principles of honesty and good faith as well as being legitimate from a formal and substantive point of view, in accordance with current regulations and internal procedures.

2.3. Transparency, completeness and reliability

In performing their work or professional activities, each recipient's actions, operations, negotiations, and, generally, behaviour are to be based on the utmost transparency and reliability.



Recipients are required to provide information that is transparent, truthful, complete, understandable, and accurate, so that, in establishing relationships with the Company, *stakeholders* are able to take independent decisions, aware of the interests involved, the alternatives, and the relevant consequences.

DIEMMEBI SPA promotes and circulates, at every level in the Company, a culture of control, raising awareness among employees of the importance of the internal control system and compliance with current regulations and company procedures in carrying out work activities.

2.4. Responsibility

Every recipient carries out his or her work activities and his or her assignment with professionalism, diligence, efficiency and correctness, making the best use of the tools and time available and assuming the responsibility connected with the commitments undertaken. Taking on responsibility is essential in being able to reach the highest level of ethical behaviour.

2.5. Confidentiality

DIEMMEBI SPA ensures the confidentiality of personal information and data which is subject to processing, as well as the protection of information acquired in relation to the work activities carried out, in compliance with current laws on privacy and confidentiality in the countries in which it operates.

DIEMMEBI SPA requires that recipients do not use the information available for their own interests, in order to derive undue profit from it, or to use the information in a way which runs contrary to the law or, in any case, in a way that might damage the rights, assets, goals, or the good of the Company.

2.6. Equal opportunities and impartiality

DIEMMEBI SPA guarantees equal opportunities. Under no circumstances whatsoever will discrimination be tolerated against an individual based on their race, skin colour, sex, country of origin, age, religious beliefs, civil status, sexual orientation, military position or war veteran, disability, or any other personal characteristic not related to work.

This policy is adopted, in particular, in every stage and in every aspect of employment at DIEMMEBI SPA, including the selection and hiring of personnel, training, career advancement, and dismissal.

2.7. Free competition and the Market

DIEMMEBI SPA recognises the value of competition, adopting the principles of correctness, fair competition, and transparency towards every operator on the market, respecting domestic and supranational laws on the subject and expecting every recipient to comply with the same.

DIEMMEBI SPA also recognises the important of intellectual property and promotes and expects its respect from every recipient.

2.8. Protecting the environment and the environmental management system

DIEMMEBI SPA recognises protecting the environment as an essential value and operates in compliance with current regulations and the best corporate practices, adopting the measures necessary to contain the environmental impact of its activities, to preserve the health of communities. The Company also implements measures aimed at raising awareness and respect for the environment by recipients.

2.9. Conflicts of interests

In carrying out their activities and/or assignments, recipients pursue the goals and general interests of DIEMMEBI SPA.



When an employee, a member of a corporate body, or, in general, anyone who operates in the name and on behalf of DIEMMEBI SPA, carries out any activity, they must avoid situations in which the parties involved in the operations and transactions are, or may be, or even appear to be, in a conflict of interests. Every situation must be avoided that might interfere with the ability of DIEMMEBI SPA to make impartial decisions.

Parties who find themselves in a situation of a conflict of interests, even if only a potential situation, must immediately notify their supervisor who will assess which behaviour to adopt.

3. Criteria for behaviour towards employees

3.1. Enhancing Human Resources

Human resources constitute an essential company asset; developing and enhancing people represents a fundamental factor in the Company's growth and continuity. DIEMMEBI SPA undertakes to provide update and training programmes to enhance specific professional skills and to consolidate those already acquired.

3.2. Employee rights.

3.2.1. Selecting personnel

Assessing which people to hire is done on the basis of how well a candidate's profile fits with those required and with the Company's needs, in accordance with the principles or equal opportunities and impartiality.

The Human Resources team, within the limits of the information available, adopts appropriate measures to avoid favouritism, nepotism, or forms of cronyism in the selection and hiring phases.

The information requested is strictly connected to verifying aspects of the professional profile and the psychometric profile, in compliance with the confidentiality surrounding privacy.

3.2.2. Protecting people

Everyone is requested to collaborate in order to maintain a climate of mutual respect for each other's dignity, honour and reputation.

Employees who believe they have suffered discrimination may report the details to their supervisor.

3.2.3. Formalising the employment relationship

Every member of staff is hired with a regular employment contract; no form of irregular work is permitted under any circumstances, neither by DIEMMEBI SPA nor by its suppliers, sub-contractors or contractors. At the start of the collaboration, the employee/contractor/director receives details and up to date information regarding:

- the characteristics of the tasks and the function to perform;
- the regulatory and remuneration elements, as regulated by the applicable national collective bargaining agreement;
- the regulations and procedures to be adopted in order to avoid risks to health which may be associated with the work activity;
- this Code of Ethics.

This information is given to the staff member in such a way that acceptance of the assignment is based on the effective understanding of such information.

3.2.4. Employee training

Managers use and fully exploit every professional in their organisation by activating the levers available to encourage the development and professional growth of their personnel.



In this context, communication by managers of each staff member's strengths and weaknesses is of particular importance, so that the staff member can improve their skills, including through targeted training.

DIEMMEBI SPA provides every member of staff with information and training tools to enhance specific skills and to maintain their professional value.

3.2.5. Safeguarding privacy

DIEMMEBI SPA safeguards the *privacy* of its employees, in accordance with current regulations on the subject, undertaking to not communicate nor disclose, except for legal obligations, personal data without the prior consent of the interested party. The acquisition, processing and storage of this information takes place as part of specific procedures aimed at ensuring that only authorised parties can access such information and in full compliance with the regulations regarding *privacy*.

3.2.6. Security and safety of health and working conditions

Providing a safe and secure workplace and safeguarding the health of employees are two of the greatest priorities of DIEMMEBI SPA.

DIEMMEBI SPA undertakes, in compliance with current regulations on the subject, to maintain a safe working environment and to provide employees, depending on the activity, with all the equipment suitable and necessary to keep them from any risk or danger.

DIEMMEBI SPA notifies employees of the conditions imposed by the law, as well as the practices and procedures adopted by the Company regarding health and safety at work.

Employees, in turn, undertake to comply with the conditions imposed by the law and every practice and procedure adopted by DIEMMEBI SPA.

The Company keeps its facilities, offices and systems operational in order to comply with all the standards regarding health, safety and security.

3.2.7. Child labour

DIEMMEBI SPA opposes any and every form of child exploitation. Should DIEMMEBI SPA become aware of any breach of this principle, it is bound to interrupt every relationship with the party responsible for such exploitation.

3.3. Employee duties.

Employees must act loyally, in compliance with the commitments made in signing the individual employment contract, with the Code of Ethics, and with company regulations, ensuring a high standard of performance.

Employees must avoid any behaviour that might damage DIEMMEBI SPA assets, the management of the Company, relationships with interested parties, and the image of DIEMMEBI SPA.

Decisions taken by each person must be based on the principles of sound, prudent management, they must be taken carefully by evaluating the potential risks, in the knowledge that personal choices contribute to the Company achieving positive results.

Every operation and transaction must be based on the utmost correctness, from a management point of view, completeness and transparency of information, legitimacy, from a formal and substantive point of view, and clarity and truthfulness in accounting records, in compliance with current regulations and company procedures, and they must be subject to verification.

3.3.1. Confidentiality and information management

Employees are required to keep information learned in carrying out their tasks confidential, in accordance with the law, regulations, and the circumstances. Employees must comply with this duty of confidentiality even after the employment relationship has ended, endeavouring to comply with the commitment given by current legislation on *privacy*; employees must also take particular care of any documents or information entrusted to them.



Confidential information includes that information which would be useful to a competitor or which could damage DIEMMEBI SPA if disclosed to a competitor or to the general public. Specifically, confidential information includes: developments not yet common knowledge and everything that regards the Company's intellectual property, the Company's financial and economic data, product prices and company policies, information on customers and suppliers and, in any case, every internal document.

3.3.2. Gifts, gratuities and other benefits

Giving and receiving gifts and gratuities is normally prohibited, with the exception of gifts of modest value, which must not be a cause of embarrassment or obligation on the part of DIEMMEBI SPA and must not be aimed at influencing the ability to take independent decisions.

In case of doubt regarding compliance with the Code of Ethics or behaviour consistent with giving or receiving gifts, recipients should contact their supervisor or the Supervisory Body.

3.3.3. Use of company assets and IT systems

Employees must use company assets and resources made available to them to carry out their tasks in such a way as to ensure their integrity and value and, in any case, in compliance with company procedures governing their use.

With regard to using IT systems, each employee is responsible for the security of the systems used and is subject to current regulatory provisions and the conditions of any licence agreement.

Except as provided for by civil and penal law, improper use of company goods and resources includes using network connections for purposes other than those inherent to the employment relationship or to send offensive messages or that might damage the image of DIEMMEBI SPA.

Each employee is required to make the necessary commitment in order to prevent a potential crime from being committed through the use of IT tools.

3.3.4. Contractor obligations

The provisions of this paragraph (3.3) extend to every contractor, consultant, agent, and representative working for the Company.

4. Criteria for behaviour towards suppliers

4.1. Choosing a supplier

The methods used to choose suppliers must comply with current regulations and the internal procedures implemented by DIEMMEBI SPA for this purpose. Purchasing processes are based on searching for the greatest competitive advantage for DIEMMEBI SPA and on providing every supplier with an equal opportunity.

In selecting a supplier, DIEMMEBI SPA adopts objective and transparent criteria, as provided for by current regulations and/or by internal procedures without precluding any supplier, who meets the necessary requirements, from having the opportunity to compete in bidding for a contract.

Also when selecting a supplier, the Company takes the following into account: the supplier's ability to ensure that suitable corporate quality systems are implemented; that the supplier has the appropriate organisation and means available; that the supplier is able to meet the confidentiality obligations.

DIEMMEBI SPA requires suppliers to comply with international labour standards (so-called ILO standards) and the minimum targets set by domestic and international regulations on health and safety in the workplace and on the environment.

Every selection procedure must be carried out in compliance with the broadest competition conditions and any potential exception from this principle must be authorised and justified.

With the application of specific contractual clauses, suppliers are required to adhere to and to comply with the principles set out in this Code of Ethics, with current regulations and, in particular, with Italian Legislative Decree no. 231/2001, which constitutes a non-negotiable condition to establishing and continuing a contractual relationship.



DIEMMEBI SPA reserves the right to adopt a register of suppliers with qualification criteria that do not constitute a barrier to entry to other suppliers.

4.2. Transparency towards suppliers

Relationships with suppliers are governed by the regulations in this Code of Ethics and are subject to constant, careful monitoring, including with a view to the consistency of performance and of goods supplied with regard to the agreed fee.

The fee agreed must be a function of the performance indicated in the contract and payment may not be made to any party other than the contractual party, nor to a country other than that of the contractual party's.

5. Criteria for behaviour towards customers

5.1. Equality and impartiality

DIEMMEBI SPA promotes compliance with the principle of impartiality and, therefore, rejects any form of discrimination in relationships with customers. The Company provides messages, communications, and transparent contracts, avoiding hard to understand formulas and unlawful or improper commercial initiatives.

DIEMMEBI SPA promotes the greatest courtesy and availability in managing relationships with end customers.

5.2. Quality and customer satisfaction

DIEMMEBI SPA maintains superior standards of quality and safety and periodically monitors the quality of the service provided to customers and promotes continuous improvement in the quality of the products it offers.

DIEMMEBI SPA identifies the needs of customers and aims to achieve their maximum satisfaction.

6. Criteria for behaviour in dealings with a Public Administration body, Public Officials, and Public Services employees

For the purposes of this Code of Ethics, the terms Public Administration (PA), Public Officials (PO) and Public Service employees (PSEs) are understood as being any public entity, independent administration, any party who acts in a capacity of a public official or a public service employee, or as a member of a body of the European Union or a foreign country.

6.1. Rules for general behaviour in relationships with the PA

DIEMMEBI SPA relationships with a Public Administration body are based on the most rigorous observance of the laws and regulations in effect and they cannot, in any way whatsoever, be undertaken or continued if they compromise the integrity and/or the reputation of DIEMMEBI SPA.

DIEMMEBI SPA deals with supervisory authorities (the Italian Revenue Agency, the Italian Customs Agency, etc.) in a transparent way by providing the information requested in a timely, clear, truthful, and complete way.

6.2. Rules for behaviour relating to the risks of corruption

It is not permitted, neither directly nor indirectly, nor through a third party, to offer or promise money, gifts or compensation, services, benefits or favours, in any form whatsoever, to exercise unlawful pressure, to a Public Administration body, a Public Official, a Public Service employee, with the aim of influencing an official act to be performed in a certain way or contrary to the duties of the office, nor is such an offer or



promise permitted if the aim is to favour or damage a party in a civil, penal, or administrative judicial process in order to illicit, directly or indirectly, an advantage for DIEMMEBI SPA.

Anyone who receives, whether they are explicit or implicit, benefits of any kind whatsoever from a party at a Public Administration body, or a Public Official, or a Public Service employee, must immediately suspend the relationship with the same and must notify their supervisor and the Supervisory Body in writing.

The provisions given in the points above must not be circumvented by resorting to different forms of benefit or contribution which, under the guise of an assignment, consultancy, advertising, etc. has the same purpose as those expressly prohibited.

6.3. Rules for behaviour relating to the risks associated with receiving public funds

It is not permitted to use or to submit false statements or documents or to attest to untrue things, or to omit information in order to obtain, to the benefit or in the interests of DIEMMEBI SPA, contributions, financing, or other disbursements, however denominated, granted by the State, by a Public Body, or by the European Union.

It is also prohibited to mislead someone, with artifice or with deception, in the pursuit of the above, in order to procure DIEMMEBI SPA an unjust result from another's loss.

An "unjust result" can be direct or indirect and can include, in addition to contributions, financing and other disbursements granted by the State, or by a Public Body, or by the European Union, concessions, authorisations, licences, or other administrative benefits.

6.4. Rules for behaviour related to the risk connected to using public funds

It is prohibited to use contributions, financing, or other disbursements, however denominated, granted to the Company by the State, by a Public Body, or by the European Union for purposes other than those for which the same were granted.

6.5. Rules for behaviour related to the risk of IT fraud against the PA

It is prohibited to alter, in any way whatsoever, the operation of an IT or telematic system or to intervene unlawfully, with any means whatsoever, on data, information or programs within such a system or relevant to it, in order to obtain an unjust results from another's loss. This prohibition is reinforced if the damaged party is the State or a Public Body.

7. Criteria for behaviour in dealings with a Judicial Authority

DIEMMEBI SPA actively collaborates with the Judicial Authorities. It refrains from any form of conditioning towards parties called on to make statements to a Judicial Authority.

No one must destroy or alter records, minutes, accounting records, or any other type of document, lie, or make false or untrue statements to the competent authorities. Furthermore, no one must try to persuade someone else to provide false or misleading information to the same authorities.

8. Criteria for behaviour towards foundations, ONLUS (non-profit organisations), political parties and trade union organisations

DIEMMEBI SPA does not make contributions, neither in Italy nor overseas, to political parties, their representatives or candidates, nor to trade union organisations, and does not sponsor conferences or events that have, as their sole purpose, a political agenda.

It refrains from any pressure, direct or indirect, on political representatives (such as, for example, accepting notifications regarding whether to hire someone, stipulating consulting contracts, etc.).

Assuming a commitment and managing a relationship, of any kind, towards foundations and ONLUS (non-profit organisations) is reserved exclusively to those corporate functions duly appointed and responsible and those personnel duly authorised in compliance with the delegation system, company procedures and



operating instructions. The process of disbursing such contributions must be done in compliance with current regulatory provisions and the financial flow must be suitably documented.

9. Criteria for behaviour towards independent auditors and statutory auditors

Relationships with independent auditors and statutory auditors are based on the utmost professionalism, transparency, and collaboration. In respect of the role carried out by these parties, every recipient of this Code of Ethics undertakes to release the information requested with completeness and to execute any requests and required compliance promptly.

10. Criteria for behaviour towards the media

Every communication of information or data leaving the Company and regarding DIEMMEBI SPA must be truthful and transparent.

In order to ensure the consistency of information, dealings with the press are reserved to those functions duly appointed and responsible and communications must be done in compliance with the procedure adopted.

It is, therefore, prohibited:

- to disseminate misleading or untruthful information through the various tools/media, including the internet;
- to communicate false news to the press or to other media outlets or to disseminate false or
 misleading news regarding financial instruments or data regarding the issuer's situation; it is also
 prohibited for intermediaries to disseminate reports about the Company with exaggerated and/or
 false data forecasts or suggestions.

11. Criteria for behaviour related to accounting, administrative, and financial activities associated with corporate reporting

Every operation and transaction carried out must be legitimate, consistent, and congruous, properly authorised and suitably recorded in such a way that the related decision-making and actuation process can be verified at any moment.

Accounting records must be based on accurate and verifiable information and they must fully comply with the criteria indicated by law, by the applicable accounting principles, and by the internal accounting procedures.

Every record must allow the relative operation to be reconstructed and must be accompanied by suitable documentation.

No financial transaction may be carried out unless it complies with the procedures established by DIEMMEBI SPA and unless it is supported by suitable documentation.

Without prejudice to the provisions of the Italian Civil Code, to tax legislation, and to other domestic regulatory sources, the accounting system must allow, at any time, each payment operation to be promptly verified, including the substantive reasons leading to such a payment, the parties who authorised the payment, and the relative supporting documentation.

Recipients are responsible for ensuring that documentation is easily available and organised, according to logical criteria.

Recipients who become aware of any omission, falsification, negligence in keeping records or other documentation on which the accounting records are based, are required to refer the matter to their supervisor and to notify the Supervisory Body.

DIEMMEBI SPA, as a tax payer, properly and promptly fulfils its obligations in relation to current tax laws.



It is expressly prohibited for any party, for any reason whatsoever, whose work involves managing the Company's economic, equity, or financial situation to behave in any way whatsoever that might prevent a control activity or an audit by a competent body; to this end, in particular, it is strictly prohibited to conceal material and/or documents in such a way as to divert, prevent, or obstruct such control activities or audits.

It is also prohibited to falsify or circulate (buying and/or selling) bank notes, coins, legal tender, duty stamps, or watermarked paper. Anyone who receives counterfeit or stolen banknotes or coins or legal tender as payment must inform their supervisor and the Supervisory Body, so that they may make the appropriate report.

12. Anti-money laundering, self-laundering, collection and payment legislation

DIEMMEBI SPA undertakes to comply with the laws and provisions, both domestic and international, regarding anti-money laundering and the fight against financing international terrorism.

Directors, employees, and contractors must not, in any way whatsoever and under any circumstances whatsoever, be involved in events related to laundering money deriving from unlawful or criminal acts.

Before establishing a relationship or signing a contract with non-occasional suppliers and other partners and/or customers in business relationships, employees and/or contractors must act in compliance with company protocols and procedures, and must avoid performing any suspicious activity in terms of fairness and transparency. Specifically, employees and contractors must assure themselves, in advance, of the counterparty's moral integrity, reputation, and good name.

With particular regard to traceability and record keeping, recipients must comply with the following:

- no financial transaction done by or in favour of DIEMMEBI SPA may be done in cash or by using a bearer savings book or any other method similar to cash;
- every financial transaction done by or in favour of DIEMMEBI SPA must be accurately and completely recorded in the accounting books and all other mandatory records;
- payments must only be made to the recipients towards whom there is the obligation.
- payments must not be made to any party (natural or legal person) on the lists linked to the fight against funding international terrorism (UN lists, EU lists, and OFAC lists on the Banca di Italia website, Financial Intelligence Unit section);
- false, incomplete, or misleading records must not be created and hidden and unrecorded funds
 must not be set up. Funds may not be deposited into personal or non-company accounts and no
 unauthorised use of DIEMMEBI SPA funds or resources may be made.

13. Internal control and risk management system

13.1. Culture of internal control and risk management

DIEMMEBI SPA promotes and circulates, at every level in the Company, a culture of control, raising awareness among employees of the importance of the internal control and risk management system and compliance with current regulations and company procedures in carrying out work activities in order to:

- ascertain the adequacy of the various company processes in terms of efficiency, effectiveness, and economy;
- ensure the reliability and correctness of accounting records and to safeguard company assets;
- ensure the compliance of accounting and tax obligations with current legislation and internal directives.



The internal control system includes all the control activities that individual corporate functions carry out on their own processes, in order to protect company assets, to manage company activities effectively, and to provide clear information on the Company's equity, economic, and financial situation, as well as every activity aimed at identifying and limiting company risk.

Employees and contractors are required, as far as they are responsible, to actively cooperate in the proper and effective operation of the internal control system and to responsibly safeguard company assets, whether tangible or intangible, instrumental to the activity being carried out, and not to use such assets improperly.

The responsible corporate bodies and the Supervisory Body are guaranteed free access to data, documentation and any other information useful to carrying out a control activity pursuant to Italian Legislative Decree 231/2001.

14. Method of implementing the Code of Ethics

14.1. Implementing guarantees and reports in the case of a breach of the Code of Ethics

Senior Management is responsible for supervising the compliance with and the updating of the Code of Ethics, of promoting and disseminating its ethical principles, of proposing any improvements to it, and of clarifying any doubts on its interpretation. Senior Managers will collaborate closely with the Supervisory Body in relation to the corporate impacts connected with the offences set out in Italian Legislative Decree 231/2001

Every employee and contractor, in the event they become aware of an alleged breach of this Code of Ethics, must, without delay, notify their supervisor or company contact person, who shall verify the validity of the alleged breach, contacting, if necessary, the party who made the report and/or the alleged author of the breach.

14.2. Approving changes to the Code of Ethics and its distribution

This Code of Ethics has been approved by the Board of Directors of DIEMMEBI SPA; any changes and/or updates to it shall be approved by the same body and shall be communicated promptly to recipients.

Recipients are made aware of the Code of Ethics through the following main methods: notifications posted on company noticeboards, distribution to every employee, publication on the Company's intranet, publication on the DIEMMEBI SPA website.

Internally, ensuring personnel have adequate knowledge and understanding of the Code of Ethics is done through training programmes and by employees signing, as acceptance, their receipt of and understanding of the same.

14.3. Breaches of the Code of Ethics and the Sanctions System

Alleged breaches of, or behaviour not complying with, the principles contained in the Code of Ethics and which might have an impact on the Control, Organisational and Management Model, pursuant to Italian Legislative Decree 231/2001, must be brought to the attention of the Supervisory Body.



14.3.1. Employees

Failing to comply with and/or breaching the rules regarding behaviour given in the Code of Ethics constitutes non-fulfilment of the obligations deriving from the employment relationship, pursuant to articles 2104, 2105 and 2106 of the Italian Civil Code, and leads to disciplinary sanctions being applied, in compliance with the law and the relevant national collective bargaining agreement. Sanctions will be commensurate to the particular breach of the Code of Ethics.

14.3.2. Executives and directors

In the event that the rules regarding behaviour, as given in the Code of Ethics, are breached, the facts and behaviour will be assessed and appropriate action will be taken against those responsible, pursuant to the law and the applicable national collective bargaining agreement, bearing in mind that such breaches constitute non-fulfilment of the obligations deriving from the employment relationship.

14.3.3. Economic operators

Any behaviour taken by suppliers, contractors, consultants, or third parties connected to DIEMMEBI SPA through a non-employee contractual relationship which is in breach of the Code of Ethics may lead to, in the most serious cases, the termination of the contractual or fiduciary relationship, without prejudice to, in any case, the right of DIEMMEBI SPA to seek compensation for the damages incurred.