

NOOTER/ERIKSEN S.R.L.

CODE OF ETHICS

CODE EDITIONS	
III Edition November 2020	Approved by the Board of Directors on 30th November 2020
II Edition September 2010	Approved by the Board of Directors on 30th September 2010
I Edition October 2006	Approved by the Board of Directors on 23rd October 2006

2. General rules of conduct

2.1. Handling of Information

Any information relating to corporate activity must be handled in full respect of the privacy of those concerned, to the level of protection required by the law, and for these purposes, specific policies and procedures for the protection of information are applied and continuously updated.

2.2. Anti-Corruption

Nooter/Eriksen conducts its business with loyalty, fairness, transparency, integrity and in full compliance with applicable laws and regulations. In this context, Nooter/Eriksen considers corruption an intolerable obstacle and therefore forbids, without exception, any corrupt behavior towam 0b 2692 re W*58 81 143.42 548.95 Tm 0 G [(F27IM W* n F2 12 Tf 1 0 0

cooperation, in order to ensure respect for the interests of all stakeholders and guarantee the complete and correct performance of control and audit activities.

For this purpose, Recipients must not conceal documents or information, provide false information or counterfeited documents or use any other deceptive means to impede or obstruct the performance of control, audit and/or supervision activities by Corporate Bodies or competent authorities.

6. Mode of implementation

6.1. Supervisory Body

With the approval of the Model, of which the Code of Ethics is an integral part, Nooter/Eriksen has appointed the Supervisory Body, an internal body of the company entrusted with the task of supervising the functioning of the Model.

The duties of the Supervisory Body, whose specific functions and attributions are listed in the Model, include the following:

- Supervision of the effectiveness of the Model and assessment of consistency between actual conduct and the established Model;
- Control of the adequacy of the Model to prevent conduct conflicting with the provisions of the Model and the law, also as a result of any changes in the law, or any developments in or changes to business activity and indication of the need to review the Model or company policies and procedures conflicting with the latter;
- Verification of reports received concerning behavior considered to be in violation of the Model.

The Supervisory Body operates with impartiality, authority, continuity, professionalism, independence, and to this end:

- Is free to access all the sources of information of Nooter/Eriksen;
- Has the right to view documents and consult data;
- suggests possible updates to the Code of Ethics, the Model and the Protocols of Prevention, also on the basis of the reports provided by Employees;
- Can carry out checks, including periodical ones, on the functioning of and compliance with the Model;
- Has adequate human and material resources available to enable it to operate rapidly and efficiently.

6.2. Communication and training

The Code of Ethics shall be brought to the attention of all Recipients and, as far as possible, to the attention of all external interlocutors, by means of appropriate communication activities, including:

- Delivery of a copy of the Code of Ethics to all Recipients, together with a formal declaration that the Code of Ethics is binding from a disciplinary point of view for all Employees, by means of an internal circular and by posting the Code of Ethics on the company website; the Code of Ethics document is accessible to all;
- Introduction in all Nooter/Eriksen contracts of an informative note relating to the adoption of the Code; publication of the Code on the company website;
- Insertion of express termination clauses in supply and collaboration contracts, explicitly referring to compliance with the provisions of the Code of Ethics.

