

ORGANISATION, MANAGEMENT AND CONTROL MODEL

(pursuant to Lgs. D. 8th June 2001, n. 231 as amended)

- GENERAL PART -

Approved by the Sole Director on 05/07/2023

Contents

1) Company data3

- 1.1. Company identification data and offices3
- 1.2. Legal form3

2) Description of the activity3

- 2.1. Corporate purpose as per the Articles of Association3

3) Corporate organisation and company structure4

- 3.1. Shareholders and Administrative Body4
- 3.2. Company Representation4
- 3.3. Delegated bodies4
- 3.4. Corporate supervisory bodies4
- 3.5. Company Organization Chart5
- 3.6. Employed personnel and corporate organisation chart5

4) Certifications5

5) Supervisory Body5

- 5.1. Actual composition in the corporate context of the company6
- 5.2. Functions and powers6
- 5.3. Internal regulation7
- 5.4. Procedures and performance of the tasks of the SB7


6) Disciplinary system8

- 6.1. General principles8
- 6.2. Company reporting obligations8
- 6.3. Supervision of the Model and disciplinary system9
- 6.4. Complaint of violation of the Model10

7) Diffusion of the Model and staff training10

8) Information flows11

- 8.1. Preamble11
- 8.2. Protocol for information flows to the SB11
- 8.3. Protocol for information flows from the SB12

	
	Date 05/06/2023
	Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001, integrated with art. 30 of Legislative Decree no. 81/2008

[...]

1) Company data

1.1. COMPANY IDENTIFICATION DATA AND OFFICES

Name	NASTER S.R.L. SOLE SHAREHOLDER (hereinafter referred to as the " <i>Company</i> ")
Registered office	24057 – MARTINENGO, VIA TONINO DA LUMEZZANE
Branch offices and local units	Please refer to the Chamber of Commerce certificate in its most up-to-date version.
Tax Code/ VAT n.	00954820163
Duration	31.12.2040

1.2. LEGAL FORM

Pursuant to art. 1 of the deed of incorporation, the Company is incorporated in the form of a limited liability company (the deed of incorporation, in its most up-to-date version, is attached to this model).

2) Description of the activity

3

2.1. CORPORATE PURPOSE AS PER THE ARTICLES OF ASSOCIATION

The corporate object is the one resulting from the art. 3 of the Articles of Association (the latter, in its most updated version, is attached to this model).

Pursuant to art. 3 of the Articles of Association:

The company has the following activities as its purpose:

“the production and trade of adhesive tapes, adhesive protective film and packaging items; the production and trade of tapes and/or adhesive films and adhesive supports in general; trade, also through import/export activities, of the products indicated above and of the raw materials used for their production; the provision of services of assistance and consultancy to thirds in the above indicated sectors and products; the purchase, the reconditioning and the re-sell of plants and machines for the production of the above described products; the trade of textile articles made of leather and/or faux leather and/or other natural or synthetic materials, as well as the trade of raw materials and other articles and accessories, for the nautical and/or furnishing sector, for upholsterers, for furniture makers. It may also carry out commercial, industrial, movable and real estate operations, which will be deemed necessary or useful by the administrative body for the achievement of the aforementioned object, including the possibility of hiring and/or granting agencies, commissions, representations, with or without deposit and mandates.

It may also carry out financial transactions and acquire interests and shareholdings in other companies or businesses having similar or connected objects, both directly and indirectly; all of this not as a prevalent activity and not towards the public, not even occasionally or sporadically.

It may issue sureties and affix endorsements for obligations or debts, including those of third parties, grant pledges and mortgages and in general provide real and/or personal guarantees without limitation; even the latter activities not as a prevalent activity and not towards the public, not even occasionally or sporadically".

3) Corporate organisation and company structure

3.1. SHAREHOLDERS AND ADMINISTRATIVE BODY

The shareholding structure is formed by Corrado Malighetti.

The Administrative Body of the Company is the Sole Director.

Indeed, pursuant to art. 29 of the Articles of Association:

“The administration of the company is entrusted to one or more directors, up to a maximum of 5 (five), appointed by the shareholders with a decision taken pursuant to the previous art. 13”.

The Sole Director currently in office is Corrado Malighetti, appointed by deed dated 25/05/2023 with term of office until new deed.

Pursuant to art. 44 of the Articles of Association:

"The sole director and the board of directors have all the powers for the ordinary and extraordinary management of the company, which are not reserved to the assembly either by law or by these "rules of operation".

3.2. COMPANY REPRESENTATION

Art. 39 of the Articles of Association provides that

“The general representation of the Company before third parties and also in court, with the power to act in any location and degree of jurisdiction, including supranational or international, and also for revocation and cassation judgments, and to appoint lawyers and attorneys for the purpose, belongs to: a) the Sole Director; b) in the event of the appointment of a Board of Directors, to the Chairman and the Chief Executive Officers, within the scope of the powers conferred on them”

To date, the legal representation of the company belongs to the Sole Director.

No directors or proxies have been appointed.

3.3. DELEGATED BODIES


Pursuant to art. 44 of the Articles of Association it is envisaged that:

"Within the limits established by article 2381 of the civil code, the Board of directors may delegate its powers in management matters in whole or in part to one or more individual directors, possibly attributing to them the title of "managing director" for the purposes of general representation of the company".

The Company has not currently provided for any delegation of powers, and no special powers have been conferred, as clarified in the previous paragraph.

3.4. CORPORATE SUPERVISORY BODIES

Article 48 of the Articles of Association provides that:

	
	Date 05/06/2023
	Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001, integrated with art. 30 of Legislative Decree no. 81/2008

“If the shareholders deem it appropriate, or in the cases provided for by law, the assembly appoints a Supervisory Body made up of only one effective member (sole auditor), or a Statutory Auditor. Upon appointment, the shareholders may decide that the Supervisory Body is set up in collegial form (board of statutory auditors), made up of three effective members and two substitutes”.

Currently the Company does not have a Supervisory Body.

3.5. COMPANY ORGANIZATION CHART

SHAREHOLDERS' MEETING / SINGLE SHAREHOLDER
Mr. Corrado Malighetti
SOLE DIRECTOR
Mr. Corrado Malighetti

3.6. EMPLOYED PERSONNEL AND CORPORATE ORGANISATION CHART

For the average number of employees employed in the company please refer to the Chamber of Commerce certificate in its most up-to-date version. For the corporate organization chart, refer to the organization chart approved by the Company, in its most up-to-date version to be considered an integral part of this Model.

4) Certifications

To date, the Company has adopted a management system compliant with the Uni En Iso 9001:2015 certification dated 09/09/2022, with an expiry date at 14/12/2023. In particular, this is aimed at certifying the quality of the services and products provided by the Company. The scope of the certification application concerns the design and production of reels of protective polyethylene film, as well as the marketing of tapes and films for industrial packaging.


The Company has also chosen to offset the achievement of the efficiency of its business with sustainable development, adopting the inspiring principles of the ILO (International Labour Organisation) conventions and the UN Conventions on Children's and Human Rights. For this reason, the company has implemented a management system compliant with the SA 8000 international standard on corporate social responsibility, obtaining the related certification on 11/10/2022 and valid until 10/10/2025.

This management system has allowed the Company to implement and certify corporate performance in essential areas such as workplace safety, juvenile law, working hours, remuneration, equal opportunities and many others.

This Model refers in full, to the extent applicable and necessary to reduce the risk of committing the predicate crimes, the Management Systems referred to above.

5) Supervisory Body

Art. 6 par. 1, lett. b) of Lgs. D. n. 231/01 requires as a "further" condition to obtain the exemption of the entity from administrative liability deriving from a crime that the task of supervising the functioning and observance of the Model, as well as taking care of its updating, be entrusted to a body with independent powers of initiative and control (the Supervisory Body).

	
	Date 05/06/2023
	Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001, integrated with art. 30 of Legislative Decree no. 81/2008

On the basis of the express indications contained in the Confindustria guidelines, the requirements of the Supervisory Body (hereinafter referred to as the "SB") can be summarised as follows: (i) independence of the control initiative from any interference and/or conditioning by any member of the company organisation and independence from any direct involvement in decisions and operational activities in areas at risk, which could undermine the objectivity of judgment at the time of the checks; (ii) professionalism, understood as the overall set of tools and techniques that the body must possess or acquire, also through targeted consultancy, to effectively carry out the assigned activity; (iii) continuity of action, understood as the ability to continuously ensure the assigned verification and control activities.

While carrying out its activities and functions, the SB is not subject to the hierarchical power of any corporate body or function.

With regard to the composition, the law does not provide particular and detailed indications.

It is, therefore, permissible to opt for both a monocratic and collegiate composition, taking into account the company's organisational structure and relative size, with the possibility of making use of extraneous subjects.

5.1. ACTUAL COMPOSITION IN THE CORPORATE CONTEXT OF THE COMPANY

In consideration of the internal organisational structure of the Company, as well as the Confindustria Guidelines and the provisions of the law on the matter, the SB has been identified as a collegial body appointed by the Administrative Body, composed of three members, as it is believed that in this composition the Supervisory Body possesses all the requisites of autonomy, independence, professionalism and continuity of action required.

The only member of the Supervisory Body must also possess some subjective requisites as a further guarantee of the autonomy and independence required by the office, consisting of the following requisites of:

- (i) integrity pursuant to article 2, paragraph 1, letters a) and b) and par. 2 of M.D. n. 162/2000;
- (ii) absence of causes of ineligibility and forfeiture provided for by article 2382 of the civil code;
- (iii) absence of conflicts of interest and/or family relationships with other members of the corporate bodies and with the top management, pursuant to article 2399 of the civil code;
- (iv) absence of convictions (or plea bargains) even if not irrevocable for one of the crimes to which the Decree is applicable.


While carrying out its activities and functions, the SB is not subject to the hierarchical power of any corporate body or function.

The Administrative Body takes care of the appointment, revocation and replacement of the members of the SB with a specific resolution.

The appointment of the SB has a three-year term.

5.2. FUNCTIONS AND POWERS

The SB is entrusted with the following tasks: (i) supervising the effectiveness of the Model, i.e. supervising that the conduct implemented by the Company in pursuing its corporate purpose complies with the Model and the Code of Ethics; (ii) verifying the effectiveness and adequacy of the Model, i.e. its concrete suitability to prevent the occurrence of the offenses contemplated by the Decree; (iii) maintaining and updating the Model in order to adapt it to changes in activities and changes to the corporate structure, also through the formulation and presentation of proposals to the administrative body; (iv) reporting to the administrative body those ascertained violations of the Model that may

	
	Date 05/06/2023
	Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001, integrated with art. 30 of Legislative Decree no. 81/2008

determine the onset of liability for the entity, for the appropriate measures, as well as violations of the principles contained in the Code of Ethics.

Therefore, the SB must periodically: (i) verify the areas at risk, in order to adapt them to changes in the company's activities and/or structure and/or regulatory and jurisprudential evolution. To this end, the Supervisory Body must be notified of any situations that could expose the Company to the so-called administrative liability of the entity; (ii) verify compliance with the provisions of the Model and the Code of Ethics as well as the respective adequacy and effectiveness of the prevention of crimes referred to in the Decree. On the basis of these checks, the SB annually prepares a report to be presented to the administrative body which highlights the problems encountered and the corrective actions to be taken; (iii) allow an exchange of information with the other corporate functions (also through special meetings) aimed at keeping the mapping of the areas at risk of crime updated; (iv) carry out the various actions necessary for the implementation of the Model (for example: staff training, definition of protocols); (v) ensure that the corrective actions necessary to make the Model adequate and effective are taken promptly; (vi) promote initiatives for the dissemination and understanding of the Model by preparing the necessary documentation.

The SB is therefore assigned all the investigative capabilities and powers necessary to ensure timely and efficient supervision of the functioning of and compliance with the Model. To this end, the SB must have free access to the people and all company documentation and the possibility of acquiring relevant data and information from the responsible subjects, without restrictions and without the need for any prior consent within the limits and in compliance with the law and current procedures (including privacy, confidentiality obligations, etc.).

The SB is also provided with resources, including financial ones, that are adequate and suitable for the correct performance of the tasks entrusted to it. It has the possibility to benefit from the assistance of all the Company's structures or of external consultants to whom it can delegate limited areas of investigation.

Each member of the SB is required to maintain the secrecy of the information acquired in the exercise of their functions, without prejudice to the communication and action obligations established by the Model. They ensure the confidentiality of the aforesaid information and, with reference to reports of relevant unlawful conduct pursuant to the Decree and alleged violations of the Model (so-called "Whistleblowing"), ensure the confidentiality of the identity of the reporting party and undertake to use said information exclusively for purposes inherent to the performance of their function. Any information held by the members of the SB must be treated in accordance with the legislation in force on the subject (specifically: EU Regulation n. 2016/679 so called "GDPR" and Lgs. D. n. 196/2003 so called "Privacy Code" as amended by Lgs. D. n. 101/2018).

5.3. INTERNAL REGULATION

The establishment and proper functioning of the SB are dictated by the Internal Regulations adopted by the Supervisory Body itself and ratified by the Management Body.

5.4. PROCEDURES AND PERFORMANCE OF THE TASKS OF THE SB

The SB operates as a "Body of the Entity" with decisions taken by a majority of the members (in the case of collegial SB), unless otherwise determined in the SB Regulations. If appointed in collegial composition, the same may envisage in its internal organisation to assign supervisory activities to individual members, such as inspections, controls, accesses, collection of information and elements useful to update the Model. In this case, the elements collected by the individuals must be shared, examined and evaluated by the Body in its collegiality, which will take a position towards the outside with a decision taken unanimously or with the prevailing vote of the President, in the hypothesis of a collegial body.

The SB operates in full compliance with the criteria of secrecy and protection of privacy and with the safeguarding of due discretion, without these principles being able to be used by the Organisation or by third parties as an excuse to paralyse the power of investigation.

The SB takes care of documenting its activities and operations, keeping the documents for traceability purposes.

The SB operates in compliance with the existing corporate organisation and in particular with any other management and control body or function (such as, for example, directors, corporate bodies, heads of departments, executives and other supervisors) all responsible primarily and organically for their own competences.

The activities carried out by the Supervisory Body cannot be syndicated by any other body or structure of the Company. The Management Body is in any case called upon to carry out a supervisory activity on the adequacy of the work of the SB, as it is the Management Body itself which is responsible for the functioning and effectiveness of the Integrated Model 231 [...].

6) Disciplinary system

6.1. GENERAL PRINCIPLES

[...] An essential aspect for the effectiveness of the Model as well as for the purposes of exempting the Company from liability is the preparation of an adequate system of penalties applicable in the event of violation of the rules indicated therein as well as the provisions and principles contained in the Code of Ethics.

The application of disciplinary sanctions does not depend on the outcome of the conclusion of the criminal proceedings initiated by the judicial authority in the event that the behaviour to be censured integrates a relevant crime pursuant to the Decree.

In defining the sanctioning system, account was necessarily taken of the legislative, regulatory and statutory constraints and limits imposed on the company's disciplinary power, in particular by art. 7 of Law n. 300/1970 so called “*Workers Statute*”) and by the National Labour Collective Agreement of the sector and by the applicable Civil Code regulations.

The violation of the individual behavioural rules of the Model and/or of the Code of Ethics constitutes a disciplinary offence, with the effects provided for by the law and by the applicable collective bargaining agreement.

The exercise of the disciplinary power complies, in any case, with the principles: (i) of proportionality and adequacy of the sanction; (ii) of discussion with the interested party.

In particular, the principle of proportionality and adequacy of the sanction must also be applied taking into account: (i) the intentionality of the conduct; (ii) the relevance of the violated obligations; (iii) any recidivism of the behaviour or previous sanctions; (iv) the level of hierarchical and/or technical responsibility of the persons involved in the facts constituting the offence; (v) the consequences for the Company; (vi) other particular circumstances that accompany the violation (for example: concurrence of several subjects in the commission of the violation, behaviour subsequent to the fact, etc. ...);

It remains understood that the application of internal sanctions does not affect any right of the Company to take action against the person responsible for compensation for all damages suffered due to or as a consequence of the ascertained conduct.

6.2. COMPANY REPORTING OBLIGATIONS

The Company will communicate:

(i) in the *most suitable forms* the Sanction System to:

- a. Management Body,
- b. shareholders,
- c. employees,
- d. collaborators,
- e. all the interested subjects,

highlighting the possible consequences of violating the Model;

(ii) *formally* to all third parties with whom

- a. professional,
- b. commercial,
- c. service relationships,
- d. of any nature and type are established,

which adopted the integrated Model 231 and the related sanction system.

In each contract that will govern the relationship, the Company must agree on clauses that provide for the obligation for the third party to comply with the behaviours and procedures of the Organisation and Management Model in carrying out the activity covered by the contract, with relative indication of the sanctions envisaged in case of non-compliance.

These clauses must be expressly accepted by the third party pursuant to articles 1341 and/or 1342 Civil Code.

6.3. SUPERVISION OF THE MODEL AND DISCIPLINARY SYSTEM

Surveillance of the Model adopted by the Company is entrusted to the SB which, in the exercise of its functions, is also called upon to detect any violations of the Model itself:

	ACTION BY THE SB	CLARIFICATIONS
1	Reports must be sent to the SB by each function and by each manager or person in charge of processes and activities regarding any infringements of the Model.	<ul style="list-style-type: none"> - The SB will also examine unsigned reports and will also carry out the appropriate investigation on them to verify the validity or not of the news. - Both signed and unsigned reports cannot give rise to forms of retaliation against people.
2	Once the infringements have been directly detected or reported, the SB will carry out an investigation into the foundation, causes and possible ways of resolving the negative effects of the infringement and everything that may be useful for preventing the risk of the predicate offence.	The SB may request information and documents from the various functions to obtain data, elements and everything necessary to form the clearest possible picture of each position concerning infringements.
3	Upon completion of its supervisory activity and the conclusion of the investigations, the SB will make its own assessments regarding the existence or not of the reported/detected infringement, its causes and any need for corrective action on the Model.	

<p>4 If the report is deemed founded or the need to update the Model is in any case detected in order to avoid the recurrence of similar behaviour, the SB will send the documentation accompanied by a written opinion:</p> <ul style="list-style-type: none"> - to the Management Body; - to the Supervisory Body (if present within the Entity); - to the Employer pursuant to Legislative Decree 81/08 (in the event of non-compliance that affects the protection of occupational health and safety); - to the competent function. 	<p>The SB will provide indications for the corrective action or the appropriate suggestions for the intervention of competence to be taken and, where envisaged, for the activation of the Sanctioning System disciplinary procedure, with the related procedure by the Management Body.</p>
--	--

6.4. COMPLAINT OF VIOLATION OF THE MODEL

Violations of the provisions contained in the Model must be ascertained and brought to the attention of the Management Body.

Subsequently, they must be promptly and specifically contested by the Management Body or by the Shareholders' Meeting or by another delegated subject, in writing by registered letter with return receipt at the offender's domicile or via certified e-mail.

The dispute must contain the express indication of the fact that gave cause and the circumstances of time and place of the occurrence, and this regardless of any dispute of the crime by the competent judicial authority.

The Management Body may not issue any provision without the express indication of the fact that gave rise to it and the circumstances of time and place having been previously contested in writing.

In any case, the offender must be guaranteed a suitable period of time, from the contestation itself, for his/her own defence and to be heard, if he/she requests it. The offender will have the right to present his own defence, also in writing.


The decision measure must be motivated and communicated in writing to the domicile of the transgressor by registered letter with return receipt or by certified e-mail.

7) Diffusion of the Model and staff training

[...] Adequate information and constant training of personnel in relation to the principles and provisions contained in the Model are factors of great importance for the correct and effective implementation of the corporate prevention system. That is why the Company undertakes to make this Model (including all attachments) and the Code of Ethics communicated to all Recipients.

It should be noted that the Company's commercial partners, suppliers and external collaborators are also required to have full knowledge of the objectives of correctness and transparency that are intended to be pursued with the Model and of the methods through which the Company has intended to pursue them, undertaking to accept and respect them.

The information must be continuous, i.e. include every new circumstance affecting the crime risk scenario and carried out at least once a year.

	
	Date 05/06/2023
	Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001, integrated with art. 30 of Legislative Decree no. 81/2008

For each variation and implementation of the protocols of the Model, diligent information must be given to all subjects and interested parties [...].

8) Information flows

8.1. PREAMBLE

Lgs. D. 231/2001 imposes the provision in the Model of disclosure obligations:

- a. by the corporate bodies (Management Body and Supervisory Body) and by the Function Managers, towards the SB responsible for supervising the functioning and observance of the same (Information flows to the SB);
- b. by the SB to the corporate bodies (managing body and supervisory body) to report on its supervisory activity (information flows from the SB).

The obligation of a structured information flow is conceived as a tool to ensure the supervisory activity on the effectiveness and efficiency of the Model and for any subsequent verification of the causes that made it possible to commit the offences envisaged by the Decree, as well as for the purpose of conferring greater authority on requests for documentation that are necessary for the Supervisory Body during its checks.

8.2. PROTOCOL FOR INFORMATION FLOWS TO THE SB

The information flows to the SB can come from:	
I. HEAD OF COMPANY FUNCTION They can be of two types:	II. from a CORPORATE BODY They can be of two types:
1. Periodic flows: these flows must be sent by the Head of the function to the SB on an annual basis and must concern: <ol style="list-style-type: none"> a. a self-assessment on the application of the Model; b. the indication of any problems arising in the application of the protocols; c. significant events that determine a risk of predicate crime; d. any proposals to update the protocols. 	1. Periodic flows: these flows must be sent by the corporate body to the SB on an annual basis and must relate to resolutions or similar measures that can lead to changes in the functionality and structure of the Model.
2. Timely flows: these flows concern occasional news, relevant for the purposes of applying the Model, which should be immediately answered by the SB. In particular, the Function Manager must communicate: <ol style="list-style-type: none"> a. commission of crimes or performance of suitable acts aimed at its realisation; b. conduct that is not in line with the rules of conduct envisaged by the Model; c. any deficiencies in the current procedures; d. any changes in the corporate organisational structure; e. any violations of the Code of Ethics for the crimes 	2. Timely flows: these flows concern occasional news, relevant for the purposes of applying the Model, which should be immediately answered by the SB. In particular, the corporate body must communicate: <ol style="list-style-type: none"> a. news relating to proceedings and investigations on significant events that determine a risk of predicate crime; b. results of internal investigations for which infringements have emerged; c. disciplinary proceedings for infringements of the Model/Code of Ethics;

envisaged by the Model;

- f. transactions of particular importance or which present risk profiles such as to induce the recognition of a reasonable danger of committing crimes;
- g. provisions and/or news from judicial police bodies, or from any other authority, from which it can be inferred that investigations are being carried out, even against unknown persons, for the crimes referred to in the Decree;
- h. requests for legal assistance submitted by executives and/or employees and/or collaborators in the event of the initiation of legal proceedings for the crimes envisaged by the Decree;
- i. reports prepared by the Managers of other Functions as part of their control activity and from which facts, acts, events or omissions with critical profiles may emerge with respect to compliance with the provisions of the Decree;

news relating to the effective implementation, at all levels, of the Model with evidence of the disciplinary proceedings carried out and any sanctions imposed or the dismissal of such proceedings with the related reasons.

- d. possible commissions of crimes;
- possible violations of the Model.

8.3. PROTOCOL FOR INFORMATION FLOWS FROM THE SB

The information flows from the SB **are intended for the Management Body** (and for the Supervisory Body, where applicable)

The flows can be of two types:

1. Periodic flows: these flows must be sent by the SB to the Management Body on an *annual* basis and must concern:

- a. the overall functioning of the Model with the indication of any problems arising in the application of the protocols;
- b. the update of the Model;
- c. facts emerging from the control activity;
- d. the number and date of the meetings held in the period;
- e. the description of the activity performed;
- f. the reports received and the investigations carried out;
- g. the identified criticalities;
- h. the findings to be submitted to the management body to ensure the updating, effectiveness and efficacy of the Model;
- i. the sanctions proposed for the violation of the Model;
- j. the statement and request for financial means for the year (annual);
- k. the planning of the activity for the following (annual) period.

2. Timely flows: these flows concern occasional news, relevant for the purposes of applying the Model, of which it is appropriate to give immediate feedback to the Management Body (and the Supervisory Body, where applicable). In particular, the SB communicates:

- a. commission of crimes or performance of suitable acts aimed at its realisation;
- b. conduct that is not in line with the rules of conduct envisaged by the Model;
- c. any deficiencies in the current procedures;
- d. any changes in the organisational structure;
- e. any violations of the Code of Ethics for the crimes envisaged by the Model;
- f. transactions of particular importance or which present risk profiles such as to induce the recognition of a reasonable danger of committing crimes;
- g. provisions and/or news from judicial police bodies, or from any other authority, from which it can be inferred that investigations are being carried out, even against unknown persons, for the crimes referred to in the Decree;
- h. requests for legal assistance submitted by executives and/or employees and/or collaborators in the event of the initiation of legal proceedings for the crimes envisaged by the Decree;
- i. reports prepared by the Managers of other Functions as part of their control activity and from which facts, acts, events or omissions with critical profiles may emerge with respect to compliance with the provisions of the Decree;
- j. news relating to the effective implementation, at all levels, of the Model with evidence of the disciplinary proceedings carried out and any sanctions imposed or the dismissal of such proceedings with the related reasons.

[...].