



*Deenova S.r.l.*

# ***ANTI-CORRUPTION CODE***

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## 1 Foreword

Corruption is a social phenomenon that continues to cause concern, is likely to have a deleterious impact on the economy and on the proper functioning of the markets, discouraging investments (both domestic and foreign) and undermining the basic principles of the economic system and its reliability.

In doing business, **Deenova Srl** is committed to fighting corruption and preventing the risks from unlawful practices, at all working levels and in all geographical areas, through the dissemination and promotion of ethical values and principles, and by effectively laying down rules of conduct and effectively implementing control processes, in line with the requirements set forth by the applicable regulatory frameworks and with the best international practices. In this context, during the meeting that saw the adoption of the Code of Ethics, the Board of Directors approved this Anti-Corruption Code, with the goal of reinforcing the measures aiming to prevent and oppose possible corrupt practices at national and international level.

**Deenova Srl** has always been aware of these issues and committed to disseminating, within its own structure, principles, values and behaviours that comply with the laws and regulations on fighting corruption, for example (It.) Law 190/12 with the title “Rules for the prevention and repression of corruption and unlawfulness in public administration”, which contains more stringent sanctions for corruption offences, introducing, among other things, the offence of bribery among private individuals that entails the administrative liability of the Entity, pursuant to (It.) Legislative Decree 231/01.

## 2 Purpose of this document

**Deenova Srl** is an organisation that operates in the sector of bedside uni-dose drug distribution and the traceability of medical devices. Taking into account its size and the fact that it operates around the globe, it wished to develop compliance measures that can prevent the risk of unlawful conduct in the relations with public and private bodies.

In accordance with the Recommendations set forth by the national and international legislations which govern its operation, **Deenova Srl** sees this Anti-Corruption Code as an opportunity to standardise and consolidate all conduct rules aiming to prevent and oppose corruption, thanks to an organic and consistent system that marries the principles of integrity and transparency and aims to prevent and mitigate the risks of unlawful practices in the company’s business affairs at all levels of perception.

## 3 Adoption and implementation

The Anti-Corruption Code applies, with immediate effect, to all recipients.

All components of any Entity in any way related with Deenova Srl, including temporary joint ventures (ATI) and temporary groupings of companies (RTI), regardless of their manner of incorporation, must undertake the commitment to rigorously comply with the principles of this Anti-Corruption Code.

## 4 Corrupt Behaviours

The following paragraph describes some of the most common ways in which the offence of corruption may be committed, at national, international or supranational level.

In particular and also taking into account the definitions contained in articles 318 et seq. of the Italian Criminal Code, it can be said that corrupt behaviour consists in giving (or even just promising) money, gifts, donations of any value, that are undue or not allowed by the national legislation in force, to Public Officials and/or Representatives of Public Bodies or Authorities and Italian and foreign Political Parties, or third parties in general, with the aim to:

- influence an act or a decision of the Official or of the Public Administration or Authority, convincing them to do or not do something in compliance with or in violation of their legal duty or, in any case, in order to procure an undue advantage;
- induce the Official to use their influence with a Public Administration or Authority to affect or influence an act or a decision in any way;
- induce any private individual to influence or exert pressure on a Public Official or a Public Administration or Authority for the aforementioned purposes.

Under Italian (and non-Italian) law, corrupt behaviour occurs whenever money, gifts, donations of any value are given (or even just promised) to the Directors, the members of the corporate bodies or the employees of a company so that they may be induced to perform or omit actions that are inherent to their office, in violation of the obligation of loyalty.

Moreover, a person holding the office of Director or member of a corporate body or an employee of the company is deemed to have been guilty of corrupt behaviour if they receive money or promises of money, gifts and/or donations of any value to perform or refrain from performing any act that is inherent to their office or in violation of the obligation of loyalty.

## 5 The Code of Ethics

In accordance with the provisions of the Code of Ethics, Deenova Srl undertakes to fight corruption in all its forms. In the paragraph dedicated to the “Relations with Public Institutions and Officials”, the Code of Ethics stipulates the following: “The Recipients undertake not to give or promise, directly or through intermediaries, sums of money or other equivalent payments to Public Officials, nor to use other forms of contributions which, in the guise of professional assignments, consultancy services, advertising or other, serve the same purpose of influencing their activities in the performance of their duties”. The paragraph of the Code of Ethics dedicated to the “Management of gifts, benefits or other advantages” also specifies that “the Recipients are forbidden from offering, paying, promising or granting to third parties or from receiving from third parties, directly or indirectly, including on festive occasions, any gifts, benefits or other advantages, also in the form of sums of money, goods or services. In particular, [the Recipients] are forbidden from giving or promising money or other benefits to third parties (for example, directors, general managers, executives, statutory auditors, persons subject to their management or supervision, etc.) so that they perform or omit actions, in violation of the obligations inherent to their office or the obligations of loyalty.

Only benefits of a low value are allowed, that can be directly ascribed to normal business courtesy and that can, in no way, lead the other party or external, disinterested parties, to gain the impression that the aim of such benefits is to concede or acquire unfair advantage, or give the impression of unlawfulness or immorality. In any case, such benefits must always be offered in compliance with the rules set forth by the corporate procedures and adequately documented.

## References to the regulatory framework and best practices

The Code is based on and must be interpreted in accordance with the principles set out:

- in the anti-corruption regulatory frameworks in force in the Countries in which **Deenova Srl** operates; and in any case;
- in the regulatory framework in force in the so-called “domestic” markets, in particular (It.) Legislative Decree 231/2001, the US Foreign Corrupt Practices Act (1977) and the UK Bribery Act (2010);
- in the related Conventions of the Council of Europe (Civil and Criminal Law Conventions on Corruption - 1999);
- in the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997) and in the United Nations Convention against Corruption (2003);
- in the self-regulatory rules and regulations adopted by trade associations;
- in international best practices.

## 6 General conduct principles

In order to comply with this Code, the main activities at risk<sup>1</sup> and instrumental activities must be performed in accordance with the following general principles:

- **Segregation of responsibilities:** the duties, operational activities and control roles must be adequately segregated, so that the person responsible for the operational activity and the person who controls and authorises such activity never coincide;
- **Systems of signing powers:** signing powers, formally defined, must be: (i) related to and consistent with the organisational and managerial responsibilities assigned and exercised within the defined quantitative limits; (ii) clarity and simplicity: the duties and responsibilities of all persons involved in the corporate processes, as well as the activities and the related controls, must be clearly defined and must envisage mechanisms that facilitate their application;
- **Impartiality and absence of conflicts of interest:** the Code’s Recipients must operate with professionalism, impartiality and in compliance with the Regulatory Framework on anti-corruption. They must, therefore, avoid any and all situations that may lead to a conflict of interest such as to influence - even potentially - their ability to act in the company’s interest and in compliance with the aforementioned Regulatory Framework;
- **Traceability and record keeping:** all activities - and the related controls carried out - must be traced and verifiable ex post, where possible, also with the use of adequate document/IT media; the documentation produced must be adequately archived. Specifically, relations with the Public Administration and with Private Individuals must be entered into exclusively by the members of the corporate bodies and departments that have been tasked therewith.

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<sup>1</sup> Activities at risk: i.e. those activities in the context of which the crimes and offences in question may be committed, pursuant to the express provisions of art. 6, paragraph 2, letter a) of the Decree.

No Recipient is allowed to unduly interfere, in particular by granting, giving or receiving, directly or indirectly, advantages of any nature, with the exception of normal or courtesy commercial practices, or in any way meant to procure undue favourable treatment in the performance of any corporate activity, also the event that such practices are considered “customary” in the Country where they operate, including facilitating payments.

## **7 The Areas at risk and the principles with which the Conduct must comply**

### **7.1 Loans**

Loans must be managed in accordance with the following principles:

- traceability of the relations entered into with the lending body or individual;
- completeness, accuracy and truthfulness of the documentation pertaining to the various stages of requesting and managing the loan;
- compliance with the existing proxies related to the execution of the loan application and of the documentation that relates to the reports to be sent to the lending body or individual;
- monitoring of the regular implementation of the project being financed and verification of the correspondence of the accounting status with the physical progress;
- correct bookkeeping.

The list of this chapter may be added to from time to time and on a case-by-case basis.

### **7.2 Acquisition and management of orders**

The acquisition and management of (public) orders must respect the following principles:

- analysis of the contract notice and/or of the request for an offer and launch of the activities that relate to the preparation of the offer proposal;
- identification of the persons responsible for preparing the offer proposal of the related deadlines and of the various authorisation stages;
- identification of the persons authorised to enter into relations with the customers during the preparation of the offer proposal and its submission;
- segregation between the person preparing the offer proposal and the person who checks it;
- authorisation, in compliance with the function of the corporate departments, of the essential elements (technical, industrial and commercial) and of the economic/financial analysis of the offer proposal, formalised in a specific document;
- compliance with the existing proxies relating to the execution of the offer to be sent to the customer and any related contracts;
- compliance, from the offer stage, with the principles of transparency and objectivity in the identification and selection of subcontractors, where applicable.

The acquisition and management of orders by the Public Administration by a negotiated procedure without prior publication of a contract notice must comply with the following principles:

- identification of the persons responsible for assessing whether the requirements of the negotiated procedure are met;

- analysis of the request to submit an offer and launch of the activities that relate to the preparation of the offer proposal;
- identification of the persons responsible for preparing the offer proposal, of the related deadlines and of the various stages of the authorisation and of the possible performance of the contract;
- identification of the persons authorised to enter into relations with the Public Administration during the preparation of the offer proposal and its submission;
- segregation between the person preparing the offer proposal and the person who checks it;
- authorisation, in compliance with the function of the corporate departments, of the essential elements (technical, industrial and commercial) and of the economic/financial analysis of the offer proposal, formalised in a specific document;
- compliance with the existing proxies relating to the execution of the offer proposal to be sent to the Public Administration.

In particular, in managing competitive tenders from Public Bodies, all Associates are forbidden from:

- promising or paying sums of money, promising or granting assets in kind or other benefits to Public Officials in a personal capacity with the aim of promoting or favouring the Company's interests, also as a result of unlawful pressure;
- resorting to other forms of assistance or contributions (gifts, entertainment expenses to third parties, assignments, consultancy services, assistance and help to relatives, etc.) with the same forbidden purposes as per the previous point;
- exercising undue pressure and influence on public officials, persons in charge of a public service and their relatives in order to obtain particular advantages for the Company during the performance of the activities under their purview;

In particular, in managing competitive tenders from Public Bodies, all Associates must:

- authorise, in compliance with the roles of the corporate departments, any changes to the offer proposal following negotiations with the Public Administration;
- comply with the existing proxies relating to the execution of the contract;
- comply, from the offer stage, with the principles of transparency and objectivity in the identification and selection of subcontractors, where applicable;
- regularly monitor the proper performance of the contracts;
- identify the persons responsible for testing activities in line with the provisions of the contract and the applicable regulatory provisions.

### **7.3 Procurement of goods and services**

The Recipients involved in the various processes that relate to the procurement of goods and services must act in compliance with the governance system, the corporate structure, and the internal authorisation processes.

The processes relating to the procurement of goods and services must be driven by the principles of:

- Cost effectiveness, efficacy, timeliness and fairness;
- Free competition, equality of treatment, non-discrimination, transparency;
- Proportionality and disclosure;

- Minimisation of risks and maximisation of value.

The procedures relating to the selection of suppliers to be used for the award of work or goods and services supply contracts are as follows:

- Market Investigation on the good or service to be purchased;
- evaluation of at least three offers from three different competitors, always in respect of the materiality thresholds defined by the Company;
- evaluation of the competitiveness of usual suppliers compared to the market investigation performed.

The following principles must be respected when acquiring goods or services:

- supplier qualification;
- identification of the roles, tasks and responsibilities of the persons meant to qualify the suppliers;
- segregation between the person who qualifies a new supplier and the person performing analysis and due diligence (checking the ethical, financial, technical, and occupational health and safety requirements, etc.) in preparation of said qualification;
- traceability of the documentation that relates to the qualification process;
- monitoring and regular update of the register of qualified suppliers for the purpose of checking that they continue to meet the qualification requirements;
- traceability of the evaluations and feedback received from the requesting departments in relation to the goods or services provided by the qualified suppliers;
- selection of suppliers;
- definition, scheduling and monitoring, and, in compliance with the existing powers, approval of the need to purchase goods and services;
- identification of the criteria (product categories, financial commitment, technical specifications) that render tender procedures mandatory;
- definition, as preparation for the tender, of the criteria for evaluating the offers;
- segregation of departments between the department that performs the technical evaluation, the department that performs the economic evaluation and the one responsible for awarding the tender;
- compliance with the existing proxies relating to the execution of the contract with the selected supplier;
- definition of the persons responsible and of the operational procedures in relation to possible contract renewals or extensions;
- traceability of the documentation that relates to the supplier selection process;
- management of the contract with the supplier by entrusting the negotiation to members of staff other than those that request the good or service; checking the supplier's performance;
- checking the correspondence between the activities performed thereby and the provisions of the contract (acceptance of the good or service).

In any case, the Associates involved in the process relating to the procurement of goods and services are forbidden from:

- carrying out services or making payments in favour of suppliers, associates, consultants or other third parties that operate on behalf of the Company that are not adequately justified in the context of the contractual relation therewith and of the prevailing local practices;

- maintaining relations with suppliers of goods and services if said suppliers are not reliable;
- promising or paying sums of money to Public Officials on a personal basis with the aim of promoting or favouring the Company's interests, also as a result of unlawful pressure;
- resorting to various forms of assistance or contributions - in the guise of sponsorships, assignments, consultancy services, advertising - with the same forbidden purposes as per above;
- setting up funds for the purchase of non-existent (in whole or in part) goods or professional services.

## **7.4 M&A transactions**

All M&A transactions must envisage due diligence on the counterparty in order to check:

- the identity and the reputation, honour and integrity requirements of the shareholders and directors of the company that forms the object of the M&A transaction, and, in the case of RTI, ATI or other forms allowed by law, of the Partner;
- the possible areas at risk from corruption of the company that forms the object of the M&A transaction, RTI, ATI or other form allowed by law;
- whether the company that forms the object of the M&A transaction, RTI, ATI or other form allowed by law has an anti-corruption policy in place;
- the existence of any proceedings, sanctions or convictions for violation of the anti-corruption Regulatory Framework imposed on the company that forms the object of the M&A transaction, and, in the case of RTI, ATI or other forms allowed by law, imposed on the Partner, the shareholders, the directors, or the management thereof.

Moreover, following the M&A transaction, the companies that form the object of the acquisition, merger and contribution must comply with the provisions of the Code.

## **7.5 Gifts and entertainment expenses**

All gifts and entertainment expenses must:

- be made or received in good faith and in relation to legitimate business purposes;
- not consist in payment in cash;
- not be motivated by the desire to exercise undue influence or by the expectation that it will be reciprocated;
- be reasonable and, in any case, such as to preclude being interpreted as meant to procure favourable treatment;
- be addressed to beneficiaries who perform tasks related to the company's activities and who meet generally recognised reputation and honour requirements;
- take into account the beneficiary's profile with regard to customary behaviour in institutional or professional relations;
- be envisaged by specific corporate provisions (e.g. gift catalogue, affiliated facilities);
- comply with generally accepted professional courtesy standards;
- comply with the applicable laws and regulations;
- gifts are allowed on the condition that they are of modest value, such as not to harm the reputation of one of the parties nor to be likely to be interpreted, by an impartial observer, as aiming to procure undue and/or improper advantage;

- gifts must not be offered to Public Officials with the goal of promoting or favouring the company's interests;
- entertainment expenses must be authorised in advance by the competent company Managers and be reasonable and cost-effective. If they are related to relevant external events, they must be authorised in advance in writing with documentation that proves the characteristics and purpose of the expenditure in detail;
- Associates must specify cases where the expenses were incurred in favour of persons who form part of the Public Administration.

It is also forbidden to:

- promise or pay sums of money, promise or grant assets in kind or other benefits to Public Officials in a personal capacity with the goal of promoting or favouring Company interests, also as a result of unlawful pressure;
- reimburse travel expenses that are not adequately justified in relation to the type of assignment performed by the members of staff;
- reimburse entertainment expenses that are not adequately justified in relation to the applicable local practices and/or with the goal of promoting or favouring Company interests, also as a result of unlawful pressure;
- set up funds for the reimbursement of wholly (or partly) inexistent expenses.

## 7.6 Sponsorships and contributions to associations and organisations

All sponsorships and contributions to associations or organisations must envisage preventive due diligence and subsequent control, in order to check:

- the nature, prominence or fame of the event, project or activity;
- the identity and the reputation, honour and integrity requirements of the recipients of the sponsorship or contribution;
- that the initiative is allowed by the law;
- that the event, the project or the activity that serve as justification for the disbursement were organised in compliance with the purposes of **Deenova Srl**;
- in this context, it is however required (in the meantime) that the sponsorship forms part of a budget that has been approved in advance by the competent bodies and that it is consistent with the same strategic guidelines that have been approved in advance.

The office or department proposing the sponsorship must also precisely indicate:

- the identity of the recipients, which must be controlled and be the object of a collection of information so that its reliability may be checked, with regard to the risk of setting up secret accounts to be used for corruption activities; the specific purpose of the expected disbursement/benefits;
- lastly, the office/department concerned is required to provide feedback on the use of the sponsorship in the sense of the need to collect proof that the sum disbursed was actually used for the purposes that had been indicated initially.

## 7.7 Selection and recruitment of Personnel

The selection and recruitment of Personnel are based on the principles of fairness and impartiality, and respect the worker's professional experience and skills.

When it comes to selecting and recruiting Personnel, **Deenova Srl** focuses on recruiting the best qualified people to fill the vacancies, avoiding favouritism and concessions of any kind and basing its choice exclusively on criteria of professional experience and competence.

In pursuing the company's goals, workers must operate in the knowledge that conduct which, although it may theoretically appear to favour **Deenova Srl**, violates the Code or the Anti-Corruption Regulatory Framework will not be tolerated.

In particular and in order to avoid (potential) conflict of interest situations, **Deenova Srl** requires its Personnel, from the moment they are hired, to declare the absence of conditions resulting in a conflict of interest between the individual and the company.

The following principles must be respected when selecting and recruiting personnel:

- segregation between the department that wishes to recruit personnel, the department that approves the recruitment budget, the department that selects and hires the candidates;
- definition, as a standard, of a short list of candidates to fill the vacancy;
- comparative assessment of the candidates based on criteria of professional experience, preparation and aptitude in relation to the tasks that form the object of the recruitment.

The selection of candidates and their assessment must be based on objective and meritocratic criteria and guarantee the perfect traceability of the selection and recruitment process through the appropriate forms so as to make it possible to retrace the responsibility for and the justification of the choices made.

It is not allowed to promise or carry out recruitment in favour of representatives of the Italian or foreign Public Administration for the sole purpose of influencing their independent judgement or inducing them to guarantee any advantage for the Company.

## 7.8 Appointments for professional services

The process of selecting the professionals who will be appointed must comply with the criteria of competition, transparency, competence, cost effectiveness, efficacy, promptness, and fairness.

In order to select the professional, it is necessary:

- to justify the need for the appointment and choose, as a standard, the professional from among at least two candidates with potentially suitable characteristics for the performance of the activity that forms the object of the appointment;
- to justify the need to turn to a specific professional (without launching the selection process) if this is required by the object of the appointment (known as *intuitu personae*);
- to ascertain that the professional meets the honour and professional experience requirements that are necessary for the performance of the appointment, and that no incompatibility and conflict of interest conditions exist;
- to check that the Country of which the professional is a resident or where they have their registered office is not on the list of Countries with privileged tax status, if said Country is different from the one where the services must be provided.

The services provided by the professional must be monitored, also through appropriate reports, in order to verify compliance with the terms and conditions of the appointment. The activities performed towards the appointment for professional services must be adequately documented and traceable.

In any case, the company's Associates involved in the management of consultancy services and professional appointments are forbidden from:

- providing services or making payments to Associates, suppliers, consultants, partners, or other persons who operate on behalf of the company, that are not adequately justified in the context of the contractual relation therewith;
- maintaining relations with consultants and/or consultancy firms if said subjects are not reliable;
- making payments to associates, suppliers, consultants, partners or other third parties that operate on behalf of the company, that are not adequately justified in relation to the type of service to be provided and to the applicable local practices;
- promising or paying sums of money to Public Officials in a personal capacity or to Private Individuals with the aim of promoting or favouring the Company's interests, also as a result of unlawful pressure;
- resorting to various forms of assistance or contributions, in the guise of sponsorships, assignments, consultancy services, advertising, with (essentially) the same forbidden purposes as per above.

## **7.9 Appointments for commercial promotion**

The process of selecting the Business Promoter must comply with the criteria of competition, transparency, competence, cost effectiveness, efficacy, promptness, and fairness.

During the selection of the business promoter, it is necessary to perform thorough due diligence in order to check in particular:

- that the business promoter meets the honour and professional experience requirements that are necessary for the performance of the appointment, and that no incompatibility and conflict of interest conditions exist;
- that the Country of which the business promoter is a resident or where they have their registered office is not on the list of Countries with privileged tax status, if said Country is different from the one where the promotion services must be provided.
- that the business promoter is not close to or approved by public officials for the sole purpose of influencing the independent judgement of the Public Administration or inducing the latter to guarantee any advantage for the Company;

The services provided by the business promoter must be monitored, also through appropriate reports, in order to verify compliance with the terms and conditions of the appointment. The activities performed towards the appointment for commercial promotion must be adequately traced and corroborated.

Moreover, it is forbidden to:

- give money, gifts, offers or promises of money to organisations, political parties, party officials, candidates for public posts or personnel of the customer or to people close to or

approved by public officials, also through the use of remuneration, fees or money paid by the Company to the business promoter, for the purpose of influencing the public organisation or the customer with regard to the sales contract;

- reimburse expenses of the business promoter and, in general, make other payments not envisaged in the contract.

## 7.10 Monitoring of accounting records

When it comes to keeping accounting records (general accounting, financial statements and other corporate disclosure), **Deenova Srl** has put in place an internal audit system and performs accounting audits that are adequate and sufficient to provide reasonable assurance regarding the reliability of the accounting disclosure and the preparation of the financial statements, in compliance with the generally accepted accounting principles and, in any case, with the Italian regulatory framework in force and the rules and regulations applicable in the country where it has its registered office or a stable operational presence.

The internal audit system envisages, therefore, specific audits at various organisational levels, with adequate means of implementation.

## 8 Personnel Training and dissemination of the Anti-Corruption Code

The Human Resources Office of **Deenova Srl** promotes awareness of the Code by the entire Personnel who, therefore, must comply therewith and contribute to its implementation.

The Human Resources Office of **Deenova Srl** prepares the annual training plan in accordance with the limitations placed by the Code and, with the operational support of the Human Resources Office, manages the training of

Personnel on the contents of the Code, providing proof thereof to the Supervisory Body.

In this context, the communication actions envisage:

- posting the Code on the website of **Deenova Srl**;
- making the Code available to the entire Personnel and distributing it to newly-hired staff on arrival, with signature as proof of receipt and of the commitment to know and comply with the related provisions.

The training path is structured in the following levels:

- Managers and personnel representing the Entity: introduction brochures, meetings with first-level Managers or classroom workshops with the executives who are most exposed to the risk of Corruption;
- Other personnel: information statement on recruitment for newly-hired staff; e-learning training course given electronically on the corporate intranet. Participation in the training sessions and in the e-learning course is mandatory; the Human Resources Office monitors participation and checks, in collaboration with the Supervisory Body, that all Personnel has followed the training.

Refresher training sessions for newly-hired staff on arrival at the company will be carried out in case the Code has been subject to significant amendments or if the regulatory framework has undergone amendments of importance for the Company's activity, if the Supervisory Body, due to the complexity of the topic, does not believe that the simple dissemination of the amendments with the methods mentioned above will be sufficient.

Each Company promotes awareness of and compliance with the Code also among its trade and financial partners, professionals, business promoters, associates of all types, customers, and suppliers. For this reason, these subjects must sign a declaration with which, aside from confirming receipt of the Code, they undertake to comply with its principles and to ensure that their associates also comply therewith.

The subjects listed above are also informed through the dissemination of an official communication of the existence of the Code, with invitation to read it on the Company's website.

## **9 Reports**

In order for these anti-corruption guidelines to be more effective, it is envisaged that, if an Associate becomes aware of conduct that constitutes corruption, or that, in any case, may constitute a violation of the anti-corruption principles contained in the Code of Ethics, in the Organisational Model, and in the Protocols and thus summarised in this Document, they must immediately inform the Supervisory Body of the Organisational Model, by the means envisaged therein.

The Supervisory Body will assess the reports received, carrying out all checks necessary also with the help of the Human Resources Office and, at the end of the investigation, if it finds that the Model or the Code of Ethics has been violated, it will formally notify the Board of Directors for the adoption of the ensuing necessary measures.

**Deenova Srl** also acquires and examines anonymous reports concerning possible violations of the Code and of the anti-corruption Regulatory Framework.

**Deenova Srl**, in order to protect and safeguard the author of the report, guarantees the discretion and confidentiality of the entire report management process, from receipt of the report to the investigation and conclusion.

The following transmission channels are envisaged for the reports concerning **Deenova Srl**:

- e-mail address: [odv.deenova@gmail.com](mailto:odv.deenova@gmail.com)
- postal address: Via Vittime della Strada 2  
29010 Gagnano Trebbiense  
Piacenza, Italy

## **10 Disciplinary measures and contractual clauses**

Violations of the behaviour principles indicated in the Code result in the Company taking internal action, by applying the disciplinary sanctions envisaged by the Collective Bargaining Agreement of reference and the Organisational Model, and external action, through full cooperation with the competent public authorities. Such violations will be prosecuted promptly and immediately, with adequate and proportional disciplinary measures, also taking into account the criminal nature of such conduct and the initiation of criminal proceedings in relation thereto.

## **11 Associates, auditors, consultants, partners, counterparties and other external subjects**

All behaviour by subjects other than **Deenova Srl** in violation of the Code or of the anti-corruption Regulatory Framework will be examined in order to assess the adoption of measures, such as unilateral withdrawal from the contract, to be set forth in appropriate contractual clauses.