

# IRCA GROUP



## CODE OF ETHICS

Approved by the Board of Directors  
of IRCA S.p.A. on 19/04/2024

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## **1 Introduction and purpose**

This Code of Ethics is adopted by IRCA Group Luxembourg Midco 4 S.à.r.l. and the companies controlled by the latter, (hereinafter, each referred to as the “Company” and jointly “**IRCA Group**” or the “**Group**”).

The Group Companies in the context of their respective business activities and conduct of their businesses, take compliance with the law and regulations of the countries in which they operate as their guiding principles within a framework of legality, fairness, transparency, confidentiality and respect for human dignity.

The Group Companies are committed to reconciling the pursuit of competitiveness in the market with respect for professional integrity and to supporting, with a view to social responsibility and environmental protection, fair and responsible use of resources.

They pursue their goals of increasing production and market shares, as well as strengthening capabilities to create value, by providing facilities and processes with adequate standards of secure decision-making and operations required for the development of new businesses, efficient business selection and management mechanisms, and high-quality risk management and measurement systems.

IRCA Group has therefore decided to incorporate into this Code of Ethics (Code) the principles, values and rules of conduct which are the basis for the correctness of internal and external relations of both the Company and the Group. Furthermore, it ensures that anyone who works in the interests or for the benefit of the Group Companies is made aware of the required conduct and any conduct which is prohibited.

The Code of Ethics also includes a "special part" that supplements the general part and takes into account the specificities of individual Group Companies and their country of reference.

The Code is a reference standard: indeed, where an activity, action or operation is not governed by procedures, work instructions or other prevention protocols, it identifies the principles with which conduct must comply.

This Code of Ethics, which disseminates the principles of the Group's actions, also represents an essential element of the Role Model and the Company's control system.

As part of its business activities, with the aim of contributing to economic, environmental, and social progress, the Group is committed to implementing the OECD Guidelines called "OECD Due

Diligence Guidance for Responsible Business Conduct".

## 2 Sphere of application and dissemination of the Code of Ethics

The following parties are required to comply with the Code of Ethics: members of corporate bodies, management and employees of the Company (also referred to as "Internal Recipients"), as well as customers, suppliers, distributors and agents, advisers and all those who, regardless of the legal status of the relationship, operate in Italy and abroad to pursue the Group's objectives, within the scope of their own activities and responsibilities (hereinafter also collectively referred as "**Recipients**").

Every Recipient is, therefore, required to read and understand the Code of Ethics, to actively contribute to its implementation and to report any shortcomings and failures to comply with it.

Under no circumstances may a person's claim to act in the interest of one or more Group companies, or in his or her own private interest resulting from their position, justify the adoption of conduct in contrast with the contents of the Code of Ethics.

The Group Companies undertake to promote knowledge of the Code of Ethics with all Recipients, constantly monitoring compliance through:

- a) distribution and dissemination to all members of the corporate bodies and organizations and to all employees;
- b) publication on the company network;
- c) translation into at least 2 languages (English and Italian);
- d) publication on each Group company's website for the benefit of external parties such as suppliers, customers, distributors, advisers, institutions, authorities and third parties in general;
- e) inclusion, within appointment documents and contracts for consultancy services, supply of goods and services of special termination provisions or clauses or forfeiture of the relation in, in the event the obligations arising from this Code of Ethics are violated.

A hard copy of the Code of Ethics will always be available from the general secretary of each Group Company.

## 3 Principles

### 3.1. Lawfulness and compliance

Recipients are required to comply with the laws and regulations in force in the Countries in which they operate. If there are any doubts about how to proceed, the Recipient must contact the Company's Legal Department which will provide adequate information.

Internal Recipients are also required to comply with corporate regulations since they implement legal obligations.

In all cases, any form of non-compliance with the law, fraudulent behaviour and conduct, corruption and extortion shall not be tolerated, even if they are carried out for the benefit of Group companies and/or are committed indirectly through third-party companies or subjects.

### **3.2. Transparency**

The principle of transparency is based on the authenticity, clarity, and accessibility of information. This principle must be observed in relations with internal and external stakeholders, providing all stakeholders with necessary information which must be clear and unambiguous, adopting communication which is immediately understandable.

### **3.3. Integrity**

Paying or offering, directly or indirectly, payments, material benefits or other benefits of any kind to representatives of institutions, public officials and public or private employees, customers, suppliers or third parties in general with the intention of influencing or remunerating an action relating to their office or a behaviour, is not permitted.

Business courtesies, such as gifts or forms of hospitality, are allowed provided that they comply with internal procedures and only if they are of modest value, modest value means no more than Euro 160,00 (USD 175,00) and in any case they must not create an expectation of improper favours or advantage or compromise the integrity or reputation of one of the two parties.

Accepting money from individuals or companies that have or intend to enter into business relations with the Group is prohibited.

Gifts and gratuities may not be artificially divided in order to avoid subjecting them to the provisions of this Code.

Please consult the *Anticorruption Compliance Policy* for further details and for the applicable procedures.

### **3.4. Fair competition**

The Group Companies condemn the adoption of any forms of unfair competition, and refrain from

using unlawful techniques and means to obtain an advantage over competitors or to cause them damage in the event of direct or indirect competition.

All Recipients must pursue a culture of fair and transparent competition, in compliance with national and international antitrust regulations in force, in all relations with customers and suppliers.

All Recipients undertake not to engage in any conduct which may disrupt the freedom of industry and trade, not to use violence or threats in order to disrupt or obstruct the business of a competitor, not to adopt fraudulent means aimed at affecting the free market and not to engage in any misleading or defamatory conduct.

In relation to these principles, no written or oral agreements or understandings with competitors shall be entered into to fix prices or terms, limit production or divide customers, suppliers or markets.

### **3.5. Confidentiality**

Recipients shall ensure the confidentiality of information acquired during the activities carried out in the interest or to the advantage of the Company and the Group.

Recipients are required to process company data and information only within the scope and for the purposes of their professional and working activities, to protect data and information in compliance with the law and company regulations and not to disclose (communicate, disseminate, or publish in any way) information without the written consent of the Company.

## **4 Values**

### **4.1. Respect for the human being**

The centrality and enhancement of human resources, the promotion of human rights, protecting individuals, through impartiality in choices, freedom of thought, conscience and religion, security, adequate and continuous training is promoted.

#### ***Human Rights and Working Conditions***

Any kind of discrimination, corruption, forced labour, any form of human trafficking or forcible restriction of individual freedom, any kind of harassment, coercion and duress in the workplace is repudiated.

Respect for and protection of basic human rights is guaranteed to workers, paying special attention

to the most vulnerable people, in compliance with all applicable laws and regulations.

Each manager is expected to value the work of the people he or she manages and requires performance consistent with the performance of the tasks and duties assigned to them.

### ***Child labour***

Compliance with legal requirements and national regulations on child labour is guaranteed and, in any case, always in accordance with the standards and guidelines defined by the International Labor Organization.

### ***Diversity and Inclusion***

The right to diversity shall be protected, ensuring full dignity and fair treatment, and condemning all forms of physical, verbal, or psychological discrimination or marginalization, providing equal opportunities to all employees, identifying measures to monitor and prevent discrimination, and implementing appropriate corrective actions if disrespectful or unfair treatment has occurred.

All employees are entitled to a work environment free of discrimination on the grounds of ethnicity, age, religious profession or belief, gender, sexual orientation, nation of origin, or relating to other physical and personal conditions.

### ***Protection of Privacy***

The protection of privacy is guaranteed, in compliance with current regulations on the processing and storage of data and a commitment not to request information regarding the employee's private sphere, except in cases where the information must be made public by the person concerned by explicit regulatory provision.

### ***Freedom of Association***

Employees are guaranteed the right to free association and correct information on conditions of employment, including employment status, duties, remuneration, working hours, and termination processes.

## **4.2. Safety and Health of Workers**

Safety and health in the workplace are protected by ensuring respect for the psychophysical and moral integrity of workers.

The fundamental principles and criteria on the basis of which decisions, of all types and at all levels,



are made explicit and made known, through the documents required by the regulations, regarding occupational health and safety. Adequate training is provided to all personnel on occupational safety and appropriate protections in case of exposure to risks to personal safety, including through personal protective equipment (PPE), for free use.

The assessment and prevention of risks and emergency situations, the recording and investigation of any form of workplace accidents, including near misses, as well as the adoption of appropriate response plans that are known to and shared with all internal Recipients are tools for continuous improvement in actions to promote and maintain a healthy and safe work environment.

Internal Recipients, within the scope of their duties, actively participate in the process of preventing risks, safeguarding the environment, and protecting health and safety for themselves, colleagues and third parties.

It is forbidden to:

- possessing, consuming, offering, giving away for any reason drugs or substances of similar effect in the course of work and in the workplace;
- smoking in the workplace, with the exception of designated smoking areas.

#### **4.3. The Environment**

With a view to sustainable business development, the Group is committed to planning its activities by ensuring the best possible balance between economic initiatives and environmental protection, preserving the rights of present and future generations, and in all cases ensuring compliance with relevant national and international regulations.

Environmental protection represents a primary value in carrying out business from the management of daily activities to strategic choices. Investment and business decisions are shaped by respect for the environment and the regulations protecting it.

The Group is committed to using socially and ecologically sustainable crops for the main raw materials, also contributing to the protection of natural resources.

In particular, the Company and the Group undertake to:

- i. design and implement production processes and corporate activities with criteria aimed at preventing pollution, reducing environmental impact, preventing possible accidental events, adopting for this purpose the best techniques available on the market;

- ii. ensure observance of current environmental and safety legislation by all those who work on behalf of the Company, making sure that staff are constantly updated on developments in environmental regulations and making them aware of the objectives that the Company pursues on environmental protection;
- iii. establish and maintain a dialogue with local communities, representative local agencies and with any other interested party, through clear and transparent periodic communication on company strategies and on the results achieved on environmental protection.

### ***Waste***

The Company and the Group are committed to:

- i. manage waste sensitively, paying special attention to regulations and procedures regarding waste disposal;
- ii. use materials efficiently by reducing waste and implementing strategies and objectives aimed at improving materials management and reducing consumption;
- iii. implement a system to identify, manage, reduce, and responsibly handle disposal and recycling.

### ***Emissions***

The Company and the Group are committed, in particular, to:

- i. set goals and improvement programs aimed at ensuring the efficient use of natural resources, and specifically at minimizing greenhouse gas emissions and water consumption and reducing waste in the electrical and water distribution network and minimizing the visual and acoustic impact caused by the Company's facilities;
- ii. monitor, track and document performance.

### ***Management of chemicals and pesticides***

The Company and the Group are committed, in particular, to:

- i. Use chemical substances responsibly and in accordance with what is prepared by current regulations, minimizing the use of those that may become hazardous or could be used in a way that is dangerous to human health and the environment;
- ii. Raise awareness and educate co-workers and others in the industry about the proper use of chemicals in the supply chain.

### *Deforestation and Biodiversity*

The Company and the Group are committed, in particular, to:

- i. Promote sustainable agriculture and farming practices that preserve biodiversity, ensuring that business activities and production processes do not negatively impact forests and other lands.

Recipients are requested to work actively on environmental management and the continuous improvement of environmental protection, in line with the Company's policy.

#### **4.4. The Territory and the Community**

The Company and the Group develop their activities in the national and international territory with an awareness of their role and responsibility within the economic and social community in which they operate.

The Company and the Group work responsibly with the communities in which they operate, respecting local populations, cultural differences, their traditions, and customs, and respecting the environment and biodiversity.

#### **4.5. Quality**

The Group Companies pursue excellence and innovation by constantly seeking high standards of quality which must be observed at every stage of production and marketing of products.

The focus on maintaining these standards is present in all phases of the project, from product conception to its implementation and marketing.

In the development part, the company is in continuous contact with the customer, in order to collect and confirm all the characteristics of the product, whether for sensory aspects, food safety aspects, suitability for the customer's use and compatibility with its production processes.

In the scale-up and production part, IRCA Group has strategically chosen for several years to equip all its production facilities with GFSI (Global Food Safety Initiative) recognized food safety certifications such as BRC, IFS and FSSC 22000.

The use of third-party certifications, issued by registered certification bodies and based on shared and globally recognized standards, allows the Company to offer broad assurances of the compliance of all its processes, starting from the selection and control of raw materials, to production processes and distribution.

Even at this stage, specific customer requests for direct verification of processes or compliance with

additional specific standards (proprietary or related to specific industry needs) can be discussed and implemented.

Finally, there is a dedicated team in the group to manage compliance aspects of raw materials, processes and finished products that can meet mandatory and voluntary requirements and support customers where necessary. Application of principles and values.

### **5.1. Relations with shareholders**

In accordance with its defined principles and values, the Group is committed to the following in its relations with shareholders:

- a) transparency and periodic information to shareholders, in compliance with the laws and regulations in force;
- b) accurate and regular disclosure to shareholders of any action or choice that may influence or have consequences for their investments;
- c) conscious and informed participation of the shareholders in the corporate decisions, favouring the proper functioning of shareholder meetings in compliance with the right of each shareholder to obtain clarifications, express an opinion and formulate proposals;
- d) utmost confidentiality of information relating to non-recurring operations which must also be observed also by all the Recipients.

### **5.2. Managing conflicts of interest**

Any situation which may generate a conflict of interest, even if only potential, must be avoided. This means any situation which may interfere with the ability of the company to make decisions in a transparent and free manner, performing the delegated functions and responsibilities assigned in the exclusive interest of Group Companies, and ensuring compliance with the principles and contents of this Code.

Decisions concerning first and second-degree family members, a spouse or co-habitant and those relating to external individuals, such as, for example, employee applicants, professionals and suppliers, with whom there are, directly or indirectly, professional and economic relationships that, due to their structure are considered lasting, lead to situations of potential conflict of interest.

Should Recipients find themselves in situations which may interfere with their ability to make decisions independently and in the exclusive interest of the Company or Group, they must promptly report the potential conflict of interest at all times to their immediate superior which will

assess the actual relevance of the case.

If an Internal Recipient is aware of a conflict interest but has not reported it at the appropriate time, He/She may face disciplinary proceedings, according to their position in the company and the seriousness of the situation which has not been reported. Equally, measures will also be taken against external Recipients, such as contract termination, suspension, or termination of business relations.

### **5.3. Transparency of company accounting**

The Group is committed to full transparency, reliability and integrity of information concerning company accounting.

All operations and transactions must be correctly recorded, authorized, verifiable, legitimate, consistent and appropriate.

Every operation must be adequately supported by documentation so that at any moment checks can be carried out which confirm the characteristics and reasons for the operation and identify who authorized, carried out, recorded, and checked the operation.

Conduct that may prejudice the transparency and traceability of financial reporting is prohibited. Recipients who become aware of omissions, falsifications or negligence are required to report the facts to their immediate superior.

### **5.4. Selection, management, and development of human resources**

The Group promotes the respect of the principles of equality and equal opportunities in human resource selection and management.

Personnel selection is carried out on the basis of objective and transparent criteria which assure that professional profiles correspond to the aptitudes required for positions being recruited, avoiding any form of discrimination, patronage, nepotism or favouritism or corrupt acts, ensuring in this way equal opportunities for all relevant parties and candidates.

Employment relations are formalized via formal contracts, and we refuse to enter into any type of undocumented employment, including with regard to foreign nationals living in Italy or employment relations which constitute exploitation.

Wages and social security contributions must be at least equal to national legal standards or, where absent, to industry standards in the country, and in any case must be sufficient to guarantee the basic needs of the individual.

Working hours, hours of rest, overtime and breaks must be at least equal to national legal standards and, where absent, to industry standards. Workers must be granted the annual leave and sick leave to which they are entitled according to national legal standards and, where absent, industry standards.

Overtime must be voluntary, limited, regulated by a collective bargaining agreement, and paid as a minimum in accordance with national legal standards or, where absent, industry standards in the country. The Group assigns roles and expertise on the basis of specific skills possessed by our employees, that pay, and regulatory arrangements are based solely on merit and competence, without any discrimination and that there is fair and transparent evaluation of human resource activities.

The Group is committed, within the limits of the company organisation, to support flexibility in working hours which help employees manage maternity and childcare in general.

The Group encourages the professional development of its employees and provides appropriate tools and training plans to enhance specific skills and expertise. Every employee has a suitably documented training plan.

Recipients at all levels are requested to work together to maintain a climate of mutual respect and prevent harassment or conduct which in any way may be related to mobbing or bullying practices that are prohibited without exception.

### **5.5. Safeguarding company assets**

All internal Recipients must safeguard company assets, diligently taking care of movable and immovable assets, technological and IT resources, equipment, information, and know-how owned or used by Group companies.

All Recipients must:

- ✓ use IT resources, email, company assets and equipment exclusively for corporate activities, acting responsibly and in compliance with internal regulations;
- ✓ guard their personal password and login to company or third-party databases and not reveal them to unauthorized third parties;
- ✓ immediately notify their immediate superior of any malfunctions or risk situations detected during the use of company assets.

Internal Recipients are expressly prohibited from:

- ✓ sending emails which are detrimental to an individual's privacy;
- ✓ accessing websites and obtaining or disseminating information which offends common decency;
- ✓ disseminating information which is harmful to individual or collective reputation;
- ✓ disseminating confidential information of any kind on the network or using any other means of communication;
- ✓ carrying out activities which are not part of the company purpose;
- ✓ changing the IT configurations put in place by the Company to protect the integrity of its networks and databases and which prevent the display and capture of inappropriate content and, in any case, content that is not relevant to work;
- ✓ using email for discussions on issues unrelated to corporate activities, except for communications/consultation activities of workers' trade union representatives;
- ✓ carrying out activities which may constitute an infringement of copyright law, including unauthorized copying, downloading, and installing of files, software, audio and video CDs/DVDs, cloning or programming smart cards;
- ✓ performing activities which compromise the security of the company's IT resources and network in any way.

Every individual is responsible for protecting the resources entrusted to him/her and is obliged to inform his/her immediate superior promptly of any threats to the Company.

## **5.6. Copyright protection**

As a general rule, Recipients must ensure compliance with internal, national and international rules on the protection of intellectual property and support correct use of all creative intellectual property including IT applications and databases. They must also diligently perform the administrative tasks necessary to ensure correct use of intellectual property, with particular reference to management of the computer system, the company's website and other internal and external means of communication.

Internal Recipients are prohibited from:

- carrying out any action aimed, in general, at duplicating computer programs protected by copyright or databases on a computer's hard disk;
- installing IT programs or applications without having received prior authorization from the

relevant IT security function;

- posting images, texts and films on the company IT network, website or through any type of multimedia or printed medium for which copyright has not been correctly respected;
- using images, films, texts, or other intellectual property protected by copyright for company publications or productions commissioned by each Company. Copyright for using material must be duly acquired.

### **5.7. Combating money laundering, funding of terrorism and organized crime**

Recipients are bound to comply with Group Company directives and legal provisions to prevent activities being used for the purpose of employing funds obtained illegally, laundering the proceeds of criminal activities, self-laundering and funding terrorism.

Recipients involved in managing accounting in the general ledger, suppliers and customers must also comply with the existing regulations regarding restrictions on the use of cash and bearer securities.

### **5.8. Management of Financial Resources**

Group Company personnel responsible for managing financial resources, both in terms of financial and investment policy choices and bookkeeping, are required to observe the general principle that all financial transactions must, at all times, be traceable to a legitimate source and motive, be explicitly authorized and correctly recorded as well as accompanied by all other appropriate information to identify the persons responsible for each stage of the decision-making process. Recipients must comply with the regulations adopted by each Group Company.

### **5.9. Relations with Public Authorities and Supervisory Authorities**

The Group keeps fair and transparent relations with Public Authorities. Public Authority means any public body or its representative, independent administrative agency, and natural or legal person acting as a public official or public service appointee.

Only appointed and authorized company functions may enter into commitments with Public Authorities and in any case with Public Institutions, strictly complying with legal provisions and applicable regulations, and in no way may the integrity and reputation of the Company be compromised.



Any activity by a person acting on behalf of the Company aimed at influencing the independent judgement of a public official or person in charge of a public service, to ensure advantages of any kind to the Company, is absolutely prohibited.

#### **5.10. Relations with political and trade union parties, organizations and associations**

Group Companies do not fund political parties, their representatives, or candidates, and do not support events whose sole purpose is political propaganda. They also refrain from exerting any direct or indirect pressure on political figures.

The Group Companies guarantee that all trade union organizations represented are treated equally and funding or donations of any kind are not provided.

#### **5.11. Contributions and sponsorships**

The Group Companies may make contributions in response to appeals for support from registered non-profit organizations and associations, with formal articles of association and deeds of incorporation, which have the highest cultural, social and charitable values or which involve a significant number of citizens.

Sponsorship activities, which may cover culture, social issues, the environment, sport, entertainment and art, are set aside for high quality events or where the Company may collaborate on the planning in order to guarantee originality and effectiveness.

Payment of such contributions must always be made in compliance with current legal provisions, internal regulations and be correctly and adequately documented.

#### **5.12. Relations with customers**

The Group promotes the continuous improvement of the quality of its products offered to customers.

The Group undertake to use genuine raw materials, not to sell products which are altered, counterfeit or harmful to health and to provide complete and accurate information on the composition and ingredients of the products offered and ensure traceability of the food chain.

Recipients carry out work guaranteeing professionalism and high-quality results, also ensuring that information regarding customers is kept confidential.

#### **5.13. Relations with suppliers and advisers**

Suppliers and advisers are a fundamental factor for achieving competitive advantage and, for this

reason, we believe that building mutual trust is necessary, creating agreements which can guarantee continued competitiveness over time for both parties.

Screening and selection processes are based on the principles of lawfulness, fairness and transparency.

Objective and impartial criteria based on quality, skills, expertise, level of innovation, cost, and any services in addition to the services/products offered are used to choose suppliers and advisers.

Contracts or formal orders issued by the Company must always be in place for the execution of activities by suppliers and advisers.

If a supplier is based in a country considered risky (defined as such by recognized organizations with regard to corruption or terrorism risk, for example), contracts must include specific clauses to ensure that the supplier complies with particular social obligations (for example, provisions guaranteeing respect for the fundamental rights of workers, the principles of equal treatment and non-discrimination, and the protection of child labor).

Remuneration is always commensurate with the service described in the contract and payments are made exclusively to the party which signed the contract and in the country of the parties or where the contract is performed.

Any breach of the principles of legality, fairness and confidentiality is just cause for the termination of relations with suppliers.

#### **5.14. Relations with the media**

Information reported to anyone outside the company must always be truthful and transparent. The Group communicates with the media accurately and without discrimination. Relations with the media can only be handled by the company functions and individuals appointed to do so.

### **5 Dissemination, information and reporting**

Group Companies inform all Recipients of the provisions and methods of applying the Code of Ethics, urging full compliance.

Companies shall ensure dissemination of the Code of Ethics, provide interpretation and clarification of the principles and provisions contained therein, check compliance of the Code and update the provisions as required when situations change (e.g. company structure, sector, market).

In the event Recipients become aware of alleged violations of this Code of Ethics or of conduct that does not comply with the code of conduct adopted by the Company, they must immediately report the unlawful situations following the procedures set forth in the Special Section.

In order to encourage the possible reporting of wrongdoing, the Group guarantees the necessary confidentiality to the Whistleblower in order to protect him or her from any internal retaliation or discriminatory acts.

The recipients of the reports must evaluate whether the Code of Ethics has been violated and, if deemed necessary, the imposition of possible disciplinary sanctions and/or actions against third parties.

## **6 Violations and sanctions**

Compliance with the provisions of this Code of Ethics is considered an essential part of an employee's contractual obligations.

Any violation of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, with all legal consequences, including with regard to the preservation of the employment relationship, and may result in compensation for damages arising therefrom.

Compliance with the principles of this Code of Ethics is part of the contractual obligations undertaken by suppliers and consultants and other parties in business relations with the Company.

Consequently, any violation of the provisions contained herein may constitute a breach of the contractual obligations assumed and/or result in the application of the disciplinary system defined by the Company

## **7 Special Part: Supplementary Rules of Conduct applicable to IRCA and directly and indirectly Subsidiaries**

### **8.1. IRCA**

IRCA has adopted the Role Model pursuant to Legislative Decree n. 231/2001, of which this Code of Ethics constitutes an essential part.

## **8.2. IRCA and Controlled Companies**

All Recipients, if they become aware of alleged violations of this Code of Ethics or conduct that does not comply with the rules of conduct adopted by the Company, must report without delay following the instructions of the whistleblowing procedure adopted by the Company.

The Company reserves all action against anyone who makes untruthful reports in bad faith.

In order to facilitate the submission of reports, the Company, in addition to the additional channels provided by the relevant procedure, has made available an IT platform that allows reports to be made both in written form and by voice recording. The platform accessible through at the following link:

- For Irca: <https://whistleblowersoftware.com/secure/irca>.
- For other Companies: <https://whistleblowersoftware.com/secure/ircagroup>.

With regard to violations and sanctions, compliance with the provisions of this Code of Ethics should be considered an essential part of the contractual obligations of employees pursuant to and for the purposes of article 2104 of the Italian Civil Code.

Any violation of the provisions of the Code of Ethics may constitute a breach of employment relationship obligations and/or a disciplinary offence, in accordance with the procedures envisaged by article 7 of the Workers' Charter and the applicable collective Labor Agreement, with all the legal consequences, including possible dismissal from the employment relationship, and it could involve compensation of damages arising from the same.

Compliance with the principles of this Code of Ethics is part of the contractual obligations undertaken by suppliers and advisers and other parties in business relations with the Company.

Consequently, any violation of the provisions contained therein may constitute a breach of contractual obligations undertaken and/or lead to application of the disciplinary system established in accordance with Legislative Decree 231/01.