

TORINO
AIRPORT



SAGAT

SAGAT
HANDLING



CODE OF ETHICS

VERS.	Of	NOTES
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Rev. 1	April 3, 2008	New structure and new contents.
Rev. 2	February 8, 2011	transposition in par. 3.2.1 of the Turin Joint Note to prot. 2011/0002
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1. INTRODUCTION

On November 27, 2002, the Board of Directors of SAGAT S.p.A. issued the first Code of Ethics ¹, amended in the sessions of April 3, 2008, February 8, 2011, March 29, 2012 and October 27, 2023.

The Code of Ethics, the Organization, Management and Control Model and the Internal Control System are the elements that demonstrate the Sagat Group's commitment to wanting to play the role of an ethical and socially responsible company.

1.1 Purpose and scope

The Code of Ethics clearly defines the moral and professional values, responsibilities and commitments that SAGAT S.p.A., its subsidiaries ², its shareholders, its directors and its employees are required to comply with in the conduct of business and company activities. Furthermore, the ethical principles contained in this document must be the basis of the behaviors adopted by customers and suppliers who come into contact with the Group Companies, for the parts within their respective areas of responsibility.

1.2 Purpose

The Code of Ethics aims to create a shared culture of legality, fairness and transparency in the relations within and outside the Group, as well as a positive corporate reputation.

The objectives are part of the company's intangible assets that are used to pursue the corporate purpose as defined in art. 3 of Title I of the SAGAT S.p.A. Articles of Association: "increase airport activity with criteria of economy and efficiency, the air connection of the Piedmont Region with the main national and foreign centers and contribute to the economic and tourist development of Turin and Piedmont, directly or through its subsidiaries".

The Sagat Group is convinced that this intangible asset promotes shareholder investments, customer loyalty, the attraction of the best human resources, supplier peace of mind, reliability towards creditors and effective and efficient work organization.

1.3 Structure

The Code of Ethics is structured in such a way as to present:

- the *General Principles*, or the reference values in Sagat's activities (Chap. 2);
- the *Criteria of Conduct*, which illustrate the rules that must be followed in order to comply with the General Principles (Chapter 3);
- the *Implementation Procedures*, which describe the application mechanisms and the control system for compliance with the Code of Ethics (Chapter 4).

¹ Subsequently adopted by Sagat Handling S.p.A. in the Board of Directors meeting of 14/03/2003

² Hereinafter, "Sagat Group" shall mean the parent company Sagat S.p.A. and all its subsidiaries.

2. GENERAL PRINCIPLES

All recipients of the Code, in carrying out the activities within their competence and exercising their responsibilities, must base their conduct on the following principles.

- Honesty and diligence:
all company activities must be carried out in strict compliance with applicable laws, the Code of Ethics, company procedures, internal regulations, Service Orders and, where applicable, the rules of professional ethics.
- Non-discrimination:
avoid any discrimination based on the age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of one's interlocutors.
- Responsibility:
the top management, directors and managers of the company structures, in carrying out their duties, must constantly be inspired by morally, ethically and professionally impeccable conduct and represent a model of reference for all employees.
- Responsibility towards the community:
aware of the influence, even indirect, that its activities can have on the economic and social development of the territory, as well as the public service nature of its corporate purpose, the Sagat Group directs all its efforts and activities in a consequently responsible manner.
- Personal safety and environmental integrity:
the Group pursues the physical integrity of its employees through working conditions that respect individual dignity and safe and healthy work environments.
The Group also recognizes the protection of the environment as a primary asset and, to this end, is committed to not harming the environment and to maintaining, in all circumstances, a behavior of utmost care for environmental protection in full compliance with the relevant legal provisions.
- Fairness and transparency:
in conducting any activity, situations must always be avoided where the parties involved in the transactions are, or may even only appear to be, in conflict of interest.
A conflict of interest is considered to exist in the event that a director, an employee or a collaborator pursues an objective different from that pursued by Sagat or procures or attempts to procure or procures for third parties, a personal advantage in connection with the performance of activities carried out in the interest of the Sagat Group.
The execution of contractual agreements must comply with what has been established by the parties, eliminating situations of ignorance or abuse.
- Fairness and loyalty:
internal work activities and contractual elements are based on criteria of loyalty and the absence of any form of abuse.
- Value creation:
all activities must keep in mind the objective of maximizing the value of the company, in order to adequately remunerate the shareholders' capital, without ever justifying any violation of the General Principles.

- Protection of assets:
it is the responsibility of all recipients of the Code of Ethics to ensure, in the performance of their duties, the protection and preservation of the company's assets and to prevent their fraudulent or improper use.
Corporate assets include both tangible physical assets such as, for example, real estate, infrastructure, equipment, cars, vehicles, computers, etc. and intangible assets such as, for example, confidential information, know-how, technical knowledge, etc.
Employees may only use the aforementioned assets in the interest of the company, for the performance of their duties or to achieve the goals related to their work activities.
Altering the operation of the telematic or IT system or the data and information contained therein, the installation and use of unauthorized *software*, and the unauthorized duplication of *software* and databases in violation of copyright laws are not permitted in any way.
- Value of human resources:
since the quality of human resources is an indispensable factor for success, it is necessary to pursue continuous improvement in order to increase the experience and the wealth of skills possessed by each person.
- Objectivity and impartiality:
hierarchical relationships must not give rise to opportunities in which the exercise of the principle of authority is detrimental to the dignity, professionalism and autonomy of the employee. The choices of internal organization are made in order to maximize the overall value of the company and to safeguard and increase the professional value of employees.
- Collaboration:
everyone must constantly encourage collaboration with colleagues, ensuring a corporate climate within the Sagat Group Companies inspired by feelings of trust, mutual respect, cohesion and team spirit.
- Confidentiality:
the directors, managers, employees and collaborators of the Sagat Group must keep the information, data and knowledge acquired, processed and managed in carrying out their work strictly confidential and protected, even outside working hours.
The Sagat Group ensures the protection of the information in its possession and refrains from disclosing personal data, except in cases of express and informed consent and in accordance with applicable laws.
The Sagat Group prohibits access to third-party information systems, where this is not freely permitted, in order to retrieve and/or copy information, as well as alter and/or destroy the data contained in such systems.
- Effectiveness of communication:
the internal information and data necessary for the performance of work duties must be provided and received in full, transparent, comprehensible, accurate and in a timely manner, so that they allow for decisions to be made with the greatest possible awareness of the interests involved, the existing alternatives and the possible consequences.
The information and data communicated externally through the relevant office must be truthful and transparent.

The Sagat Group creates and preserves the conditions so that the participation of shareholders in decisions within their competence is widespread and informed and ensures that all shareholders are given equal information.

➤ Accuracy and completeness:

Sagat Group employees who record and process data, information and knowledge must do so with precision and accuracy.

Anyone who is aware of omissions, falsifications, alterations of accounting records or related documents, must promptly inform their direct supervisor and the Internal Audit Service manager.

➤ Quality of services:

The Sagat Group focuses its activities on improving the satisfaction of passengers and customers, implementing monitoring, listening to requests that can increase the quality of services provided and implementing measures within its competence to achieve excellence in compliance with the principle of value creation.

➤ Anti-money laundering, tax and customs regulations:

The Sagat Group ensures compliance with the obligations in the fight against money laundering and the financing of terrorism, deriving from both national and international regulations, as well as the laws, regulations and provisions of the competent authorities in fiscal, tax and customs matters.

➤ Financial market regulations:

The directors, managers, employees and collaborators of the Sagat Group must comply with the regulations on privileged financial information, as well as refrain from any behavior that may constitute or facilitate the violation of the rules on *insider trading* (transactions on financial instruments based on key information before it becomes public knowledge).

3. STANDARDS OF CONDUCT

This Chapter 3 describes the ethical standards of conduct that addressees must follow concretely and to which they must aspire.

The purpose of this Chapter is therefore to provide tools and references so that everyone's actions can fully reflect the General Principles set out in the previous Chapter.

Each recipient of the Code of Ethics is obliged to report to his/her superior and to the Internal Audit Service the occurrence of events or the manifestation of behaviors that may constitute, or lead to the establishment of, violations of the provisions of this Code of Ethics.

3.1 Relations with the Corporate Bodies

3.1.1 Board of Directors

The Board of Directors is responsible for the functions and responsibilities of the strategic and organizational guidelines, as well as the responsibility for the functionality and adequacy of the Internal Control System.

The functions of the Board, its rights and duties, including those typical of the Chairman and the Chief Executive Officer, are listed in the provisions of the law and in the Company Bylaws, which are referred to here in full and to which reference is made.

The Directors of the Sagat Group Companies are required to:

- to all play an active role in their position, thus allowing the Companies to benefit from their skills;
- participate continuously in the meetings of the Board of Directors;
- to inform the Board and the Board of Auditors in the event that they hold an interest on their own behalf or on behalf of third parties that may give rise to a conflict of interest. The disclosure requirement applies throughout the entire duration of the position held, that is, even if the interest arises at a time subsequent to the appointment;
- to keep confidential the documents and information acquired in carrying out their duties, unless otherwise required by law;
- To always make the Company's interest prevail over the particular interest of individual shareholders;
- To submit the Company's financial statements to specific accounting control procedures;
- to act in compliance with the Articles of Association.

The Board of Directors undertakes to make its Internal Control System³ effective, efficient and transparent, and to guarantee the independence of the Service responsible for its supervision.

3.1.2 Board of Statutory Auditors

The functioning of the Board of Statutory Auditors, its rights and duties are defined by the regulations in force and by the Company Bylaws: "The Board of Statutory Auditors monitors compliance with the law and the Bylaws, compliance with the principles of correct administration and in particular the adequacy of the organizational, administrative and accounting structure adopted by the Company and its actual functioning."

³ The composition and functioning of the Internal Control System are described in the Organization, Management and Control Model pursuant to Legislative Decree 231/2001.

The Group Companies undertake to make available in a timely, accurate and transparent manner all accounting, operational and any other information, in order not to hinder the controls that the Board must carry out.

3.2 Relations with employees

Without prejudice to the obligations and provisions of the laws and of the individual and collective bargaining in force, each employee and each collaborator must avoid conduct contrary to corporate ethics, as identified in this Code of Ethics, which are reflected in the reputation and image of the company.

3.2.1 Personnel recruitment

The assessment of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles with respect to those expected and the company's needs, in compliance with equal opportunities for all interested parties, according to principles of transparency, publicity and impartiality.

The information requested is strictly related to the verification of the aspects envisaged by the professional and psycho-aptitude profile, respecting the private sphere and the opinions of the candidate.

3.2.2 Establishment of the employment relationship

The staff is hired with a regular employment contract; no form of forced and/or illegal work is tolerated. The Sagat Group is committed to ensuring that every employee receives a copy of the Code of Ethics when the employment relationship is established.

3.2.3 Personnel management

Also in the context of personnel management processes, as well as in those of selection, decisions are made based on the correspondence between expected profiles and actual profiles and/or on considerations of merit.

Training is provided based on specific professional development needs.

The Sagat Group complies with current legislation regarding working hours, rest periods, weekly rest, compulsory and optional leave and holidays.

The Sagat Group pays its employees a salary that ensures the worker and his family a decent life in compliance with the provisions of applicable law.

The Sagat Group complies with current legislation on social security contributions.

3.2.4 Health and safety

The Group is committed to disseminating and consolidating a culture of safety by developing risk awareness and promoting responsible behavior by all employees and strives to preserve, especially through preventive actions, the health and safety of workers.

To this end, the Parent Company and Sagat Handling have been equipped with a specific Service in charge of this that, attentive to the evolution of the reference scenarios and the consequent change of threats, carries out monitoring and targeted interventions:

- the continuous analysis of risk, critical processes and resources to be protected;
- assessing the adequacy of the technologies adopted;
- the control and updating of work methods;
- the provision of training and communication interventions.

The Group also strives to continuously improve the efficiency of the company structures and processes that contribute to the continuity of services provided to passengers, with particular attention to those relating to public health and safety.

3.2.5 Privacy Policy

The Group collects and processes personal data in full compliance with current legislation. Any investigation into the ideas, preferences, personal tastes and, in general, the private life of employees is excluded. It is also ensured compliance with the prohibition, except as provided by law, to communicate or disseminate personal data without the prior consent of the person concerned.

3.2.6 Integrity and protection of the person

The Group is committed to protecting the moral integrity of its employees by guaranteeing the right to working conditions that respect the dignity of the individual. For this reason, it safeguards workers from acts of psychological violence, and opposes any attitude or behavior that is discriminatory or harmful to the person, their beliefs and preferences (for example, in the case of insults, threats, isolation or excessive intrusion). Any act or behavior that constitutes sexual harassment is considered inadmissible and any behavior or speech that may disturb the sensitivity of the person must be avoided.

Any employee who believes they have been harassed or discriminated against for reasons related to age, sex, sexuality, race, health status, nationality, political opinions and religious beliefs, etc., can report the incident to the company, which will assess the actual violation of the Code of Ethics with the utmost respect for confidentiality.

3.2.7 Duties of hierarchical superiors

In compliance with the General Principles, the hierarchical superior, to the extent of his competence:

1. is responsible for the employees under their management, coordination and control for the performance of the functions delegated to them;
2. uses and fully enhances all the professional skills present in his/her structure;
3. is required to fulfill the organizational and control obligations that are incumbent upon him and in particular diligently supervises to prevent violations of the law or of this Code and facilitates the control of his work by the competent Bodies;
4. behaves in an exemplary manner, demonstrating dedication to work, loyalty and competence;
5. precisely and bindingly assigns clear, ambitious but realistic objectives;
6. performs his/her role by trusting his/her associates, taking into account their personal and professional aptitudes as well as their experience;
7. is available to his/her collaborators to deal with professional and personal problems;
8. promptly reports to his/her superior and to the Internal Audit Service any news known to him/her or reported by his/her collaborators regarding potential or actual violations of the law or of this Code.

It constitutes an abuse of the position of authority to request, as a duty to the hierarchical superior, services, personal favors or any behavior that constitutes a violation of this Code of Ethics.

3.2.8 Employee duties

In compliance with the General Principles, employees must act loyally in order to comply with the obligations established by current legislation, collective bargaining agreements, this Code of Ethics, internal procedures and regulations and Service Orders.

It is also forbidden to carry out activities during working hours that are different from and not compatible with one's duties and organizational responsibilities.

Furthermore, situations in which conflicts of interest may arise must always be avoided, such as, for example, having economic interests with suppliers, customers, or competitors (qualified shareholdings, professional appointments, etc., even through family members) or performing work activities.

In the event that even the appearance of a conflict of interest arises, the employee must notify his/her manager and the Internal Audit Service, which will assess the actual presence on a case-by-case basis.

It is the duty of the employee to protect the privacy and confidentiality of information learned in the course of their duties and to use such data only for defined and appropriate purposes, ensuring to guarantee its protection, integrity and confidentiality, in accordance with the provisions of applicable laws.

3.3 Customer relations

The Sagat Group is aware of the fact that relations with passengers and customers must be continuously strengthened through the efficiency and quality of services rendered, which must aim to meet their reasonable expectations and needs.

The contracts stipulated with customers must be set up in such a way as to comply with current regulations and be complete but easy to understand. Their behavior must be consistent with the content of the Code and specific clauses can be included in the contracts to protect the interests of the Group.

The agreed remuneration must be commensurate with the service specified in the contract and, in any case, with the professional skills and the actual service performed.

3.3.1 Customer satisfaction

The Sagat Group is committed to ensuring adequate quality standards of the services offered on the basis of predefined levels and to periodically monitor both the perceived quality and the quality objectively provided.

The Service Charter is published in accordance with the Italian Prime Ministerial Decree of 30 December 1998. The surveys are designed to always be:

- impartial, in the processing;
- reliable, in statistical value;
- homogeneous, in the units of measurement;
- shared, in the methodology;
- comparable, in comparisons.

Employees, to the extent of their competence, undertake to ensure that communications to passengers are truthful, timely and understandable and always and in any case presented with courtesy and kindness.

The Group also undertakes to respond to suggestions and complaints from passengers and is open to listening to associations for their protection, using appropriate communication systems.

3.4 Relations with Suppliers

The relationships that the Sagat Group Companies establish with their suppliers are based on contractual terms and on the indispensable requirements of mutual loyalty, transparency, collaboration and benefit.

The agreed remuneration must be commensurate with the service specified in the contract and, in any case, with the professional skills and the actual service performed.

Since the Group intends to operate only with qualified and reputable individuals and companies, the conduct of suppliers must be consistent with the content of the Code and the contracts entered into contain specific clauses to protect the interests of the Group in the event of violations of ethical principles.

The processes for choosing suppliers are adequately formalized and consistent and respectful of the provisions of current regulations.

All employees, in relation to their duties, shall endeavor to:

- comply with the internal principles and procedures for the selection of suppliers and external collaborators;
- promptly inform their supervisor and the Internal Audit Service in the event of uncertainties relating to possible violations of the Code by suppliers and external collaborators.

The Group has also introduced the **Supplier Code of Conduct** which identifies the behavioral and ethical criteria that are prerequisites for entertaining and managing business relationships with the companies of the SAGAT Group.

The SAGAT Group suppliers are required to apply the Code, meaning

- (i) all economic operators participating in negotiations or procedures aimed at the assignment of works, services and supplies by SAGAT Group companies;
- (ii) economic operators entrusted with works, services and supplies by companies of the SAGAT Group, including consultants, professionals and external collaborators;
- (iii) their subcontractors.

Suppliers are required to inform their employees, collaborators, and auxiliaries in any capacity who are involved in relations with the SAGAT Group of the contents of this Code of Conduct as well as to guarantee and verify compliance by the aforementioned parties.

3.5 Relations with external partners

In relations with external partners, it is prohibited to:

- provide or promise services or agree on compensation that are not adequately justified in light of the relationship established with them;
- authorize and make payments in cash, except for negligible amounts.

3.5.1 Gifts, complimentary items and benefits ⁴

The requirements listed below do not allow for exceptions.

- Receiving gifts is allowed only if they are of modest value, if they are attributable to normal business practices or out of courtesy.

⁴ It should be noted that a gift must be understood as, in addition to material goods or money, any type of benefit such as, for example, airline tickets, free participation in conferences with characteristics that go beyond the normal duration and nature, promises of job offers, discounts on services provided, etc.

Gifts received or sent through family members or friends or acquaintances must also be considered in this category.

- It is only permitted to give gifts to third parties if they are aimed at promoting the image of the Turin Airport, if they are of modest value, and if they are adequately documented, justified, and authorized.
- It is forbidden to give, promise or receive money whether the conduct is carried out in the exclusive interest of the agent, or whether it is carried out with an advantage or in the interest of the Group.

In any case, it is forbidden to give gifts and business courtesies, regardless of their value, to third parties who have expressly informed the Sagat Group that they cannot accept them due to company *policy*.

If gifts or benefits are received from third parties that do not comply with the above, they must be returned to the sender immediately, informing him of the company policy.

If this is not possible, or in case of doubt, you are required to notify the Internal Audit Service, which will assess the appropriateness and will inform the sender of the Sagat Group's policy on gifts.

If third parties offer services such as participation in events or invitations to conferences, for which the economic value is difficult to determine, the possible acceptance of the invitation must be submitted for authorization at several levels: that of the direct superior and the HR manager in the case of employees belonging to a Directorate and of the CEO and the HR Director in the case of employees who report directly to the CEO.

3.5.2 External communication

The Sagat Group's external communication, conveyed directly or through the media, is based on respect for the law, professional conduct practices, and is carried out with clarity, truthfulness and timeliness, in pursuit of the maximum protection of confidential or sensitive information.

In particular, it is forbidden to submit untruthful statements to national or EU public bodies in order to obtain funding, grants or disbursements of various kinds and not adequately report the allocation of the sums received.

The corporate communication policy states that any form of pressure or assuming preferential attitudes by the media must be avoided and that, to ensure completeness and consistency of information, the relations between the Group and the mass media are the sole responsibility of the department in charge or are carried out with its coordination and under its supervision. Therefore, personnel must refrain from issuing institutional communications to third parties, including passengers, outside of what is permitted by their duties.

3.5.3 Economic relations with political parties and trade unions

The Group Companies undertake to maintain a constant dialogue with trade associations and trade unions, within the framework of the applicable laws and collective bargaining agreements.

They shall refrain from taking initiatives that may constitute forms of undue pressure on political or trade union representatives or political or trade union organizations. The aforementioned Companies therefore do not finance parties, their representatives or candidates, nor do they sponsor conferences or events that have an exclusive purpose of political propaganda.

The addressees of this Code may not engage in political activities at the Company's premises or use its property or equipment for this purpose. They must also clarify that

any political opinions they express to third parties are strictly personal and do not represent the position of the Company to which they belong or of the Group.

3.5.4 Contributions and sponsorships

Sponsorships provided by the Group are intended only for events that offer quality guarantees and in respect of which any possible conflict of interest can be excluded. Contributions, benefits or other benefits are paid directly or indirectly only to events or activities in the interest of the Group, which offer quality guarantees and in respect of which any possible conflict of interest can be excluded.

3.5.5 Relations with Institutions⁵

Relations with the Institutions must be maintained in constant compliance with the law and in maximum transparency, clarity and fairness. These relationships must be exclusively aimed at pursuing the company's interests and developing the company's projects.

In the context of any relationship with the Italian and/or foreign Public Administration, conduct aimed at illegally influencing the decisions of Public Officials or Public Service Representatives is not permitted, in order to obtain an undue or illegal profit or advantage for the Company. In particular, it is not permitted - not even through a third party - to offer money or gifts to managers, officers or employees of the Italian or foreign Public Administration as well as to members of Supervisory Authorities or their relatives, whether Italian or from other countries, except in the case of goods or benefits of modest value and/or attributable to normal correct courtesy relations, such as not to compromise the integrity or reputation of one of the parties.

The Sagat Group requires offering the utmost availability and collaboration to anyone who carries out inspections and controls on behalf of any public entity.

It is forbidden to hide, destroy or alter records, minutes, accounting records and any type of document that may compromise the transparency and traceability of financial reporting, as well as to lie or make false statements to the competent Authorities.

The Sagat Group guarantees that relations with the Judicial Authorities of every order and degree, the auxiliaries and the bodies of the Judicial Police are based on maximum transparency, fairness and collaboration; in this regard, it is forbidden to behave in a way that may, even indirectly, hinder the work of the aforementioned subjects (such as, for example, inducing people to make false or reticent statements to the Judicial Authorities).

The Parent Company and Sagat Handling have adopted a specific Organization, Management and Control Model for the prevention of crimes against the Public Administration pursuant to Legislative Decree no. 231/2001, to which reference is made and which is referred to here for the relevant parts.

⁵ "Institutions" here refers to all Bodies or personnel related to the State Administration, public Bodies, regional and municipal Bodies and Administrations, Organizations under public law, Concessionaires of public works or public services and private entities to which public law regulations apply.

4. IMPLEMENTATION PROCEDURES

This Chapter 4 describes the tools that the Sagat Group uses to support the implementation and control process of the Code of Ethics.

4.1 Responsible for internal control

The Internal Audit Service of the Parent Company is responsible for the following tasks regarding the implementation and control of the Code of Ethics:

- periodically reviewing the Code of Ethics;
- submitting any changes and additions to be made to the Board of Directors for approval;
- monitoring the state of dissemination of knowledge and understanding of the Code of Ethics;
- evaluating and supervising training activities on the topics covered by the Code;
- verifying the application of and compliance with the Code of Ethics;
- receive and examine reports of violations of the Code of Ethics;
- contributing to the assessment of conduct in order to identify contractual sanctions in cases of violation;
- notify the Chair of the Board of Directors of the violations ascertained and any consequent actions taken;
- receive a copy of the Company Policies, Regulations and Procedures that directly concern the topics covered by the Code of Ethics and the MOG, in order to express their opinion;
- personally conduct or authorize an independent investigation, in cases where this task cannot be carried out by internal resources, regarding alleged violations of the Code.

These activities are carried out with free access to all documentation deemed useful.

4.2 Training and communication - reporting methods

The Code of Ethics is brought to the attention of all employees through its delivery at the time of hiring and its inclusion on the company intranet. After the delivery, the signature of a specific letter of acknowledgment and adherence to the Code is required.

Specific training courses are also provided, to be delivered according to the roles and responsibilities of the recipients, with attendance registration.

The Code of Ethics is brought to the attention of third parties through its publication on the website or by providing them with an extract containing the parts of greatest interest to them.

Anyone can report, in writing and in a non-anonymous form, any violation of the Code of Ethics to the Supervisory Body established pursuant to Legislative Decree 231/2001 for conduct "relating to events that could generate violations [...] of the Code of Ethics in relation to the crimes provided for by Legislative Decree 231/01" or to the Internal Audit Service which will analyze the report, possibly listening to the author. The Parent Company's Internal Audit Service acts in such a way as to guarantee the reporters against any type of retaliation intended as an act that may give rise to even the mere suspicion of being a form of discrimination or penalization. The confidentiality of the identity of the reporting party is also ensured, without prejudice to legal obligations.

Reporting methods

The reports covered by this Code can be made by:

- a) Use of the Whistleblowing Portal accessible at the following link <https://Sagatspa.segnalazioni.net/> :

There are two ways to send the report: by registering, or in a totally anonymous format.

In the first case, the whistleblower can create an account on the platform, choosing a Username and Password. In this case, the platform allows to separate the identification data of the registered reporting party from the content of the report, providing for the adoption of codes replacing the identification data, so that the report can be processed anonymously and the subsequent association of the report with the identity of the reporting party is possible where expressly provided for by law. Registration allows the reporting party to monitor, through the aforementioned substitute codes, the management of the report; Alternatively, the whistleblower can send a report without prior registration; in this case, the report will be assigned a code, which the whistleblower can use to monitor the management of the report. The report can be made either in writing or by recording a message in the voice mailbox, using the appropriate link.

- b) Direct meeting, previously agreed upon, with the Head of the Internal Audit Service of the Sagat Group (also called: Recipient). In this case, the Recipient, with the consent of the reporting person, documents the report itself by recording it on a device suitable for storage and listening, or by drafting a special report that can be verified, corrected and confirmed by the reporting person with his/her signature.

The nominative reports favor the speed and effectiveness of the investigations, as well as any dialogue with the reporting person, however we also accept anonymous reports.

If the report is received anonymously in writing, the Supervisory Body and/or the Internal Audit Service will evaluate the opportunity to proceed with the relevant investigations as long as the report contains sufficiently specific references to carry out the necessary investigations.

The same recipients may also be addressed requests for clarification or advice in case of doubts about the ethics of a behavior or the application of an ethical rule set out in the Code. The requests and the related responses will be treated with the utmost confidentiality. Reports and requests for clarification can also be sent to the Supervisory Body and/or Internal Audit in the following ways:

- by e-mail to: odv@sagat.trn.it;
- by e-mail to: internal.audit@sagat.trn.it;
- by ordinary mail, to the address: Servizio Internal Audit - Sagat S.p.A. - strada San Maurizio, 12 - 10072 Caselle Torinese - Turin.

Please note that the submission, with willful misconduct or gross negligence, of unfounded reports constitutes punishable conduct also for the purposes of applying the disciplinary system referred to in paragraph 7 of the General Part of the Organizational Model, unless the conduct constitutes a more serious offense.

4.3 Violations of the Code of Ethics

4.3.1 Responsibility

Given that, as already explained in Chapter 3, it is the responsibility of everyone to report cases of violation or alleged violation of the Code of Ethics, it is up to each manager or

director of the organizational unit of the Company to ensure with normal diligence that no violations are committed by the employees operating in their organizational unit.

4.3.2 Preliminary investigation

The Supervisory Body or the Internal Audit Service, possibly with the collaboration of the Human Resources Director and the Head of the Legal Service or external collaborators, carries out its own investigation in relation to the reports that may be received, or in relation to any circumstance that the Internal Audit Service may detect as a result of independently conducted investigations.

4.3.3 Sanctions

Employees

All the provisions included in the Code derive from or are attributable to the laws in force⁶ and to contractual obligations.

Therefore, if an employee engages in conduct that constitutes a violation of the law or contractual obligations, after the completion of the investigation as described in the previous paragraph, the sanctions may be imposed, graduated according to the seriousness of the conduct, provided for by collective bargaining for violations of the employment contract, in compliance with the procedures provided for by art. 7 of Law no. 300 of 30/5/1970 (Workers' Statute) and any applicable regulations.

Managers

The behavior of a manager that constitutes a violation of the Code of Ethics, ascertained in accordance with the provisions of the previous paragraph 4.3.2, may justify, in the most serious cases, dismissal, to be imposed in accordance with the provisions of the law and the collective agreement applied.

Collaborators and suppliers

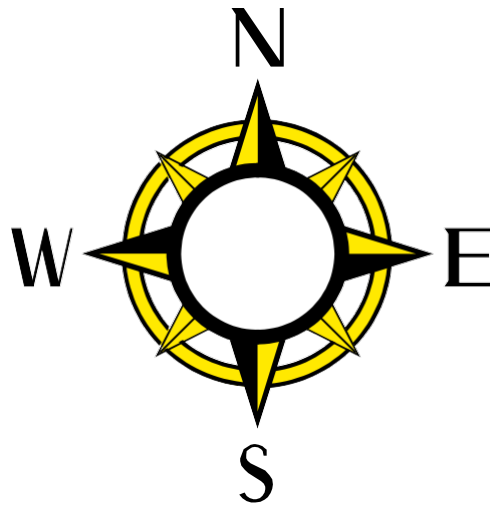
The violation of the Code of Ethics by a collaborator of one of the Sagat Group Companies, ascertained in accordance with the provisions of the previous paragraph 4.3.2, may be assessed as conduct contrary to the rules of fairness and as the execution of the collaboration contract not in good faith, in contrast with the provisions contained in articles 1175 and 1375 of the Italian Civil Code, with the consequence that the Company may withdraw from the collaboration agreement or wait for the outcome of the criminal proceedings to exercise withdrawal.

Damages

In accordance with and in compliance with the current provisions of law and collective agreement, any right of the Company is hereby reserved with regard to any compensation for damages caused to it as a result of the violation of the duties and principles described in the Code.

⁶ For example, art. 2104 of the Italian Civil Code "Diligence of the employee": The employee must use the diligence required by the nature of the service due, by the interest of the company, and by the higher national interest. He must also observe the provisions for the discipline of work given by the employer and by the collaborators from whom he hierarchically depends.

The Code of Ethics does not include all situations and does not always reflect everyday reality. However, it represents a "compass".



Whenever I have to make ethically difficult decisions, I have to ask myself the following questions:

- Is it legal?
- Does it comply with the Code of Ethics?
- Can I explain it to my family and friends?
- Would I feel comfortable if it were made public?