

**BENACCHIO S.R.L.**

**The Code of Ethics**

Approved by the Board of Directors on 01/10/2021



**BENACCHIO**



*"It takes time to build a corporate work of art. It takes time to build a life. And it takes time to develop and grow. So, give yourself, your enterprise, and your family the time they deserve and the time they require."*



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Our organisation intends to offer services with high added value, to satisfy the needs of customers, to enhance the value of fundamental assets: this is the mission that Benacchio S.r.l. wishes to pursue. The fundamental tools for achieving these objectives are the use of advanced technologies and the widespread network system, which allow us to offer a wide and integrated range of services suited to the needs of the various customer segments present in the territory. Due to its size and the large number of people with whom it interfaces every day (employees, customers, suppliers), Benacchio S.r.l. is an important player in the economic scenario to which it belongs. For this reason, in addition to this Code of Ethics, it has drawn up a Charter of Values as an expression of all the ideals that the people who work in our company must be inspired to carry out their activities.

The Code of Ethics identifies, on the basis of the founding values of the corporate culture, a standard of conduct for all those involved in corporate activities. It constitutes a safeguard against the commission of offences pursuant to Legislative Decree 231/01 and operates in synergy with Model 231, reinforcing the existing company protocols. Since it is addressed to all corporate stakeholders, these subjects are identified as the "Recipients" of this document.



Why we have  
adopted a code

**Fairness,  
Moral integrity,  
Objectivity,  
Transparency  
Honesty  
are the fundamental principles  
that constantly guide the  
company's actions.**

- ▶ Benacchio intends to disseminate lines of conduct, which guide its activities in compliance with Legislative Decree no. 231 of 2001. The Code is shared with the aim of reaching all its Recipients, whether they are employees, managers, administrative staff or external partners.
- ▶ The desire to improve and learn from past experience has led us to:
  - To the dissemination of the corporate protocols established to guarantee the complete transparency of the activities we carry out, reinforcing the prevention measures, as well as the control by the top management figures;
  - Constant monitoring of the degree of dissemination and effective application of the values contained in this Code;
  - The integration of the principles of the Company's Management System with those set out in the Code;
  - The integration of the principles of the Company's Management System with those set out in the Code; - the empowerment of all corporate figures with respect to the principles set out in the Code of Ethics, with attention to reports of violations thereof that may lead to the adoption of disciplinary measures.

The relationship  
between the Code  
and other rules

- ▶ The Code is not antagonistic to the laws in force or to the National Collective Labour Agreement applied, but is a tool capable of reinforcing them. Benacchio is committed to full compliance with the laws and regulations in force in Italy and in all the countries in which it operates.



Through the Code Benacchio S.r.l. defines its own ethics and creates a structure to make it penetrate into all areas of the company, strong in the assumption that the ethical values, the foundation of the corporate culture, cannot be in conflict with the interests of the Company, nor constitute an obstacle to its achievement.

We involve management, equipping them with the appropriate tools to achieve a **sustainable, lasting development objective that respects the plurality of interests and stakeholders**. By promoting projects, actions and investments that are useful for increasing our company's assets, management and technology in the long term, managers contribute to ensuring that the principles set out here become part of the method of each work team. With this in mind, we have developed the **Managerial Model** as a tool for defining the guiding principles of the managers who lead the company and whose task it is to strengthen the internal and external trust, cohesion and team spirit of the workers. Managers work to ensure that employees understand that compliance with the rules of the Code is an essential part of the quality of work performance. In addition, managers have the task of facilitating the dissemination, among all levels, of a corporate culture characterised by the enhancement of control actions. In fact, the attitude to internal and external audits must be positive, conceived as an opportunity to improve efficiency. The persons appointed to carry out internal audits and the appointed auditing companies have free access to the data, documentation and information useful for carrying out the audit activity.

The Code of Ethics has **contractual value**, therefore compliance with the rules contained herein is to be considered an essential part of the contractual obligations of Benacchio S.r.l. workers, as provided for in Article 2104 of the Italian Civil Code.





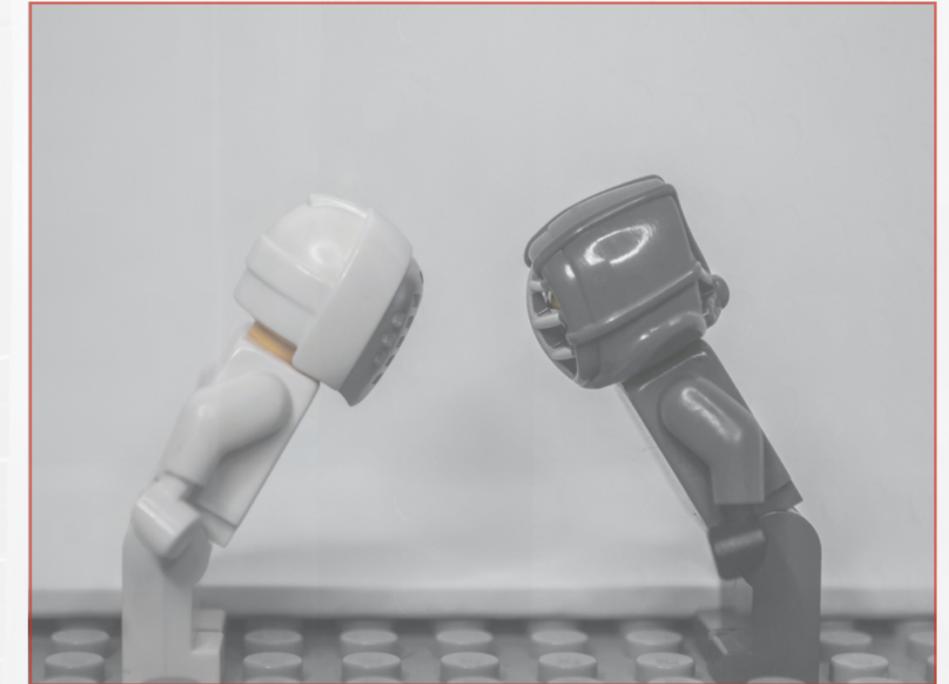
### Transparency

Our conduct is based on the truthfulness, accuracy and completeness of the information produced. Transparency is a modus operandi that the Company adopts both in disclosing information internally and in its relations with the outside world.



### Integrity

Benacchio S.r.l. is a company in which correctness, honesty, fairness and impartiality of behaviour, whether internal and/or external, constitute a common way of feeling and acting.



### Respect

Personnel are the key resource of Benacchio S.r.l. . Respect, opportunities for professional growth and development and recognition of personal merit are our guidelines.

The expression of the ideals to which all the people who work at Benacchio S.r.l. must be inspired to carry out their activities is contained in the Charter of Values; a reference point for the creation of a corporate culture consistent with the company's tradition.



Benacchio S.r.l. believes in fair competition and pursues it, adopting principles such as fairness and transparency towards all operators in the market. These values guide the company's activities and in particular those of an accounting, administrative-financial and communication nature.

In the fiscal sphere, the **principles** of **segregation** and **traceability** are applied; all operations and transitions must be oriented towards the utmost **correctness**, always making it possible to analyse the phases of management, the responsibilities of the various figures involved and keeping open the possibility of reconstructing the way in which they were carried out.

- Maximum **transparency** is applied to all accounting activities in compliance with current regulations and best business practices. In fact, Benacchio S.r.l. pursues the application of high standards of financial planning, aligning its tax system with the applicable accounting principles.
- Priority is given to the **accuracy** of the information exchanged, to formal and substantial legitimacy and to the clarity and truthfulness of accounting entries.
- All the documentation necessary for the correct **recording** of accounts is regularly recorded and stored. For each accounting operation, documentation is therefore kept on file that allows the identification of the different levels of responsibility. Company employees who become aware of omissions, falsifications, negligence in the accounts or in the documentation on which the accounting records are based, are required to report the facts to their superior or, alternatively, to the OdV.

From the point of view of communication, our company is committed to promptly provide both commercial partners and external parties entitled to make a request with complete and truthful information. In this sense, the Code of Ethics is a means of inspiring behaviour and directing corporate culture and decisions to the application of the principle of transparency.



The integrity of our business stems from the desire to pursue corporate objectives while respecting antitrust regulations and promoting fair competition between parties. To do so, we conduct our activities in a framework of **fair competition**, with honesty and respect for our counterparts and openly opposing any corrupt practice aimed at obtaining undue advantages. This applies both to our relations with the Public Administration (including in its capacity as a supervisory authority) and with private individuals. Benacchio S.r.l. is committed to adopting an uncompromising line against all conduct aimed at misappropriation as well as at giving an unlawful advantage. In no case, in fact, can the pursuit of the company's interest justify dishonest conduct.

Our company is aware of the importance of actively participating in the life of the community in which it is inserted, supporting activities in line with our mission and with the principles of the Code of Ethics. However, we consider it essential to regulate all donations, sponsorships and partnerships, with a view to constantly responding to the principle of traceability and transparency in decisions. For this reason, the choice of beneficiaries and the entire process culminating in the receipt of our contribution from third parties is monitored to **avoid the creation of conflicts of interest**, as well as the risk that what is donated to support a cause is used for corrupt purposes. Any situation that could potentially give rise to a conflict of interest must be promptly reported to your manager:

- Economic and financial interests of the employee and/or his/her family in the activities of suppliers, customers and competitors; using his/her position in the company or information acquired to gain a personal advantage. This also applies in relation to the purchase or sale of shares in Group or external companies when, in relation to the functions performed, one has knowledge of relevant information that is not in the public domain.
- Carrying out work, of any kind, for customers, suppliers, competitors.
- Acceptance of money, favours or benefits from persons or companies that have or intend to enter into business relations with Benacchio S.r.l.



As a company, we seek to reflect the principle of **inclusiveness** by acting responsibly and respectfully and encouraging our staff to do the same. Discussion, as a means of accelerating the sense of belonging and sharing a common vision, is of great importance. This is why we try to approach corporate decisions by sharing issues and valuing the contribution of our resources. The characteristics of the individuals who make up our company are respected and taken into account precisely because we believe that an attentive look at personnel can generate a strong incentive for the individual to act with professionalism, integrity and responsibility. By adopting a continuous improvement approach, we ask managers to make the most of the professionalism of the individual work teams, by setting up staff training courses that encourage professional and **personal development** and growth.

For us, employees have equal dignity, and regardless of their role in the company, we are committed to offering them **equal opportunities**. It goes without saying that discrimination based on: race, skin colour, sex, country of origin, age, religious belief, marital status, sexual orientation, sexual identity, individual expression, military or war veteran status, disability status, is repudiated and punished.

Benacchio S.r.l. also opposes the **exploitation of minors** or other classes of workers and regulates all employment relationships by contract. The above principles are applied to all aspects of employment, including selection, recruitment, training, career advancement and dismissal. In this regard, decisions in human resources management are made on the basis of the match between expected and offered profiles and the related assessments are carried out on the basis of merit criteria and rejecting favouritism, nepotism and forms of patronage. It should also be noted that disparities that can be justified on the basis of objective criteria are the result of the different qualities of individuals and do not constitute a discriminatory factor for the company.

The company expects employees at all levels to cooperate in maintaining a working climate of **mutual respect for the dignity, honour and reputation of each individual**. We demand that external and internal relations exclude forms of interpersonal harassment, understood as: the creation of an intimidating, hostile or isolating working environment towards the individuals who make it up, or unjustified interference with the performance of work by others, including the creation of obstacles to the individual work prospects of others for mere reasons of personal competitiveness.

Benacchio S.r.l. does not accept the occurrence of sexual harassment such as: the subordination of decisions of importance for the recipient's working life to the acceptance of sexual favours, proposals of private interpersonal relations conducted despite an expressed or reasonably evident dislike, which have the capacity, in relation to the specificity of the situation, to disturb the recipient's serenity with objective implications on his or her work expression.

Moreover, with a view to maintaining a work environment that respects the sensitivities of others, performance of work under the effects of alcohol or drug abuse shall be considered as a detrimental factor to the quality of the environment in which one works, taking into account the contractual consequences envisaged. Similarly, without prejudice to the general prohibition of smoking in the workplace, where this generates danger and in any case in work environments marked by specific indications, Benacchio S.r.l. in situations of working together will take into particular consideration the condition of those who feel physical discomfort in the presence of smoke and ask to be protected from contact with "passive smoke" in their workplace.



Company assets, and in particular communication tools and means of transport, are assigned to our personnel by reason of the work they perform, and all personnel are called upon to act as custodians of such assets. Therefore, the use of **computer systems** and related programs and applications must be limited to professional needs. To this end, we ask our staff to take appropriate care of the computer equipment provided and to comply with **copyright** laws, as well as to observe the prohibition of storing files or documents of an illegal, insulting or discriminatory nature and the prohibition of altering data, information and programs in any way.

The **protection of the privacy** of our employees is perceived as an aspect of great importance and is managed through the application of high security standards to regulate the type of information to be requested and the methods of data processing and storage.

Benacchio S.r.l. is committed to protecting information relating to its employees and third parties, generated or acquired internally and in business relations, and to avoiding any improper use of this information. Information, knowledge and data acquired or processed by employees during their work or through their duties belong to Benacchio S.r.l. and cannot be used, communicated or disclosed without specific authorisation from their superior. Without prejudice to the prohibition to divulge information concerning the company's organisation and production methods or to make use of it in such a way as to be prejudicial to it, each employee of Benacchio S.r.l. shall:

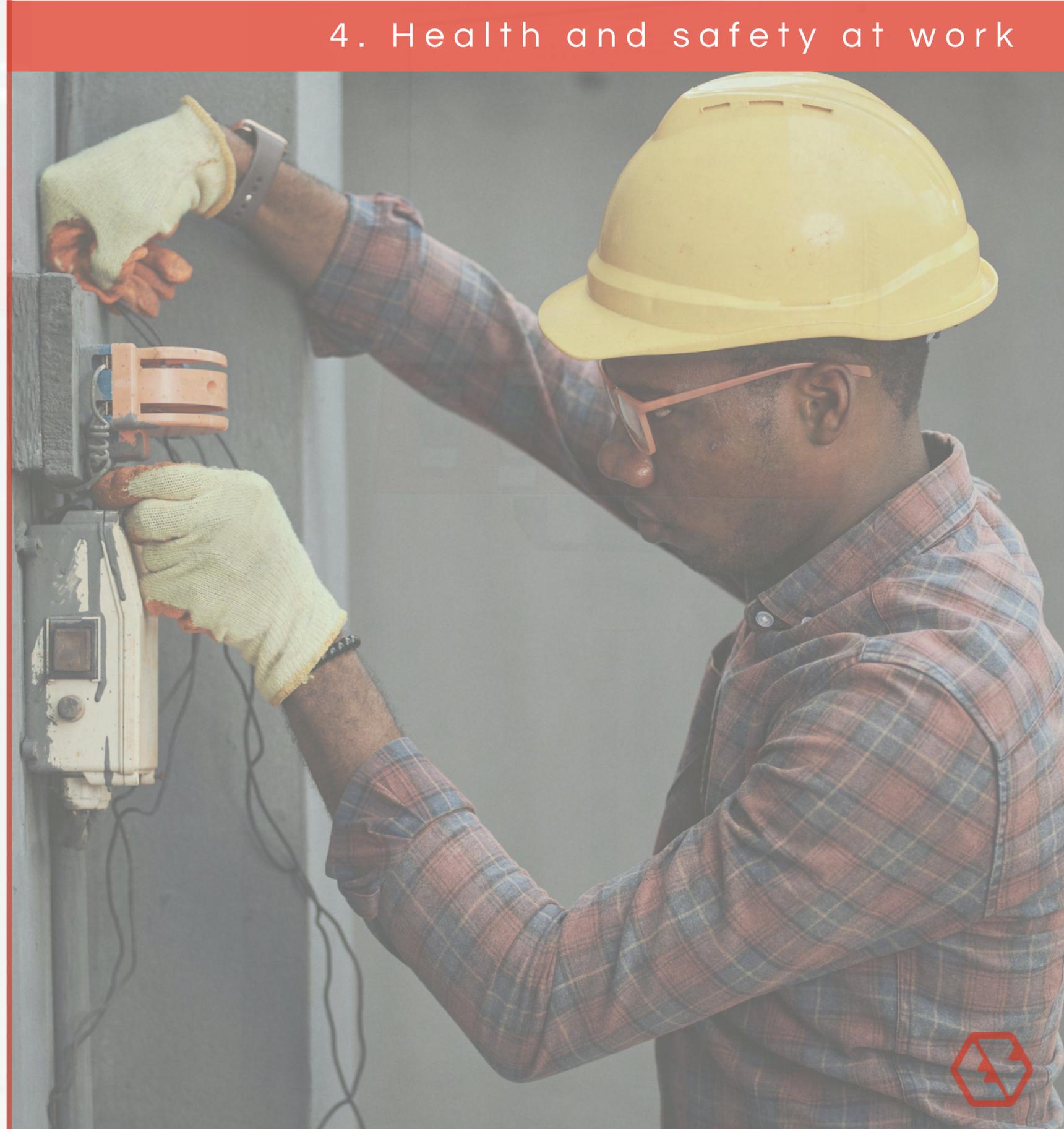
- Acquire and process, according to the methods defined by the specific procedures, only the data necessary and appropriate for the purposes of the Unit to which he belongs and in direct connection with his functions;
- Store the data in such a way as to prevent unauthorised persons from gaining knowledge thereof;
- Communicate such data within the framework of pre-established procedures and/or on the explicit authorisation of the superior positions and, in any case, after having ensured the D72 in the specific case of the data;
- Ensure that there are no absolute or relative constraints on the dissemination of information concerning third parties connected to Benacchio S.r.l. by a relationship of any kind and, if necessary, obtain their consent; associate the data in such a way that any person authorised to have access to it can easily draw as accurate, exhaustive and truthful a picture as possible.



We believe that investments in **occupational health and safety** should be directed towards both proper training of personnel, in accordance with the requirements of the legislation, and towards organisational tools of a technological or technical/instrumental nature.

We attach primary importance to safeguarding the health and safety of workers, aiming not only to comply with the requirements of the regulations, but also to continuously improve working conditions. With this in mind, we believe that knowledge of the risks present in the workplace is the best form of prevention. For this reason, we are committed to providing all our employees with timely **information and training** that takes into account the possible verifiable risks. We also believe that the experience of personnel who have been with our company for a longer period of time can greatly contribute to a realistic assessment of the risks present and, in particular, can help to increase the level of awareness of health and safety at work issues.

Benacchio S.r.l. hopes that, at each hierarchical level, during the performance of their role and in accordance with the training received, each person will work to identify possible sources of danger, to undertake and implement measures aimed at removing risks or, if this is not possible, at minimising them.



In carrying out the corporate mission, the behaviour of all the addressees of this Code must be inspired by the ethics of responsibility, and this consideration inevitably leads us to look at both society and the environment. We pay great attention to **environmental issues** and, whenever possible, opt for the adoption of corporate strategies and techniques that reduce the environmental impact generated by our activities. In order to do so, we are committed to staying constantly up-to-date on innovations derived from the development of scientific research and the availability of better techniques and technologies that can be applied to our reality. Furthermore, Benacchio S.r.l. operates in compliance with current legislation and in line with the following principles:

- Progressive integration of the care of the environmental aspects of the activities carried out with the company strategies;
- Sustainable management of the environment resource, also through policies to enhance the use of natural resources;
- Implementation of all actions necessary to ensure compliance with and adaptation to the regulatory provisions in force;
- Constant updating of personnel on the evolution of environmental legislation and regulations;
- Awareness and involvement of staff on environmental issues, in order to achieve high standards of professionalism.



Benacchio S.r.l. believes it is essential to create a solid sharing of the founding principles expressed in the Code of Ethics not only with internal staff, but also by exercising an influential role with regard to external parties such as: suppliers, project collaborators, consultants, business partners, etc.. All those who operate outside our company and whose activity contributes to the achievement of our corporate objectives, represent subjects whose work must necessarily be bound to respect the principles of: legality, independence, fairness, price equity, diligence, confidentiality, professionalism and good faith. In addition to this document, the company has adopted a **Code of Conduct for Suppliers and Partners** to define the ethical and social guidelines that our partners are required to comply with. This document is an integral part of the contracts and agreements stipulated with our business network. We believe that sharing these principles allows us to establish lasting relationships characterised by trust in our collaborators.

The supplier selection process, as well as the purchase of goods/services from third parties, are interpreted in terms of transparency and congruity between what is requested and what is provided. This is a process governed by specific internal procedures that the company has adopted to guarantee **impartiality** and to regulate the periodic monitoring of the possession of the requisites necessary to meet company needs.

Personnel involved in purchasing decisions must:

- Adequately inform third parties about the commitments and obligations imposed by the Code, requiring compliance with the ethical principles set out herein, within the scope of the activities that such parties carry out on behalf of Benacchio S.r.l.;
- Remain free from personal obligations towards suppliers, reporting any previous relations;
- Immediately report to the Supervisory Body any attempt or case of alteration of normal business relations;
- Refrain from offering goods or services to personnel of other companies/entities in order to obtain confidential information or direct or indirect benefits relevant to oneself or to the company. Neither must they accept goods or services from external or internal parties by engaging in behaviour aimed at favouring such parties.



With the aim of measuring the degree of compliance with the regulations in force, with particular reference to the regulations on health and safety at work and environmental protection, Benacchio S.r.l. has the right to carry out audits at its suppliers, according to the agreed methods.

All contracts stipulated with third parties are defined in compliance with the regulations in force and contain an indication of the **termination clauses**, in order to allow Benacchio S.r.l. to terminate relations with parties who fail to comply with the regulations.

Benacchio S.r.l. undertakes to inform third parties with whom it is bound by a contractual relationship about the contents of the same (understood as the definition of the characteristics of the activity, the method of providing the service requested and the payment times), as well as the consequences of any causes of termination of the relationship.

To this end, we adopt a line of correct and complete information on the content of the contract, towards suppliers and, in particular, thanks to the information concerning the Code of Ethics we communicate the expected behaviour to those with whom we have signed agreements or contracts.

Relations with third party suppliers of goods/services are also conducted in the total **absence of corruption**. Benacchio S.r.l. is not interested in any preferential treatment that does not derive directly from the excellence it represents. Therefore, company personnel must refrain from offering, promising or giving, directly or indirectly, values of any kind, be they gifts, commercial agreements, etc., that may influence a decision concerning company activity or allow an undue commercial advantage to be obtained.



Benacchio S.r.l. establishes a relationship with its customers that is characterised by a high level of professionalism and is based on availability, respect, courtesy and the search for and offer of maximum collaboration. All the relationships undertaken by the company are conducted with a view to maximising **quality**. In addition, the company aims to achieve customer satisfaction, rejecting all forms of arbitrary discrimination against customers that could compromise the principle of equality.

The adoption of high quality standards, however, is not the only goal to be achieved; in fact, it goes hand in hand with **customer protection**. Litigation with our customers is perceived as a failure, which is why we try to avoid it by resolving our customers' complaints quickly.

The activities of Benacchio S.r.l. constantly require the acquisition, storage, processing, communication and dissemination of news, documents and other data relating to negotiations, administrative procedures, financial transactions, know-how (contracts, deeds, reports, notes, studies, drawings, photographs, software). Benacchio S.r.l.'s databases may contain, among other things, personal data protected by privacy laws, data that cannot be disclosed externally due to negotiated agreements and data whose inappropriate or untimely disclosure could damage the company's interests. Adequate protection of confidential customer information and data is our primary goal; therefore, it is the obligation of every employee to ensure the confidentiality required by the circumstances for each piece of information learned in the course of their work.

Contracts and communications with our customers, constructed in accordance with adopted company procedures, are:

- Clear, simple and formulated in a language as close as possible to that customarily used by the interlocutors;
- Compliant with current regulations and the indications of the Authorities, without recourse to elusive or otherwise unfair practices (such as, for example, the inclusion of unfair practices or clauses against consumers);
- Complete, thanks to exhaustive and accurate information on the products and services provided, so as not to overlook any element relevant to the customer's decision;
- Adequate TO protect confidential customer information.



Employees and collaborators of our organisation who are called upon to illustrate or provide outside information regarding the objectives, activities, results and points of view of Benacchio S.r.l. by means of, for example: participation in conferences, congresses and seminars; writing articles, essays and publications in general; taking part in public speeches; are required to obtain the authorisation of the top management of the organisational structure they belong to regarding the texts, the reports prepared and the lines of action they intend to follow.



In relations with the **mass media**, information must be truthful and transparent. The company takes care to present itself accurately and uniformly in its communication with the outside world. Such relations are reserved exclusively for the company functions and responsibilities delegated for this purpose. It is forbidden for company employees to provide information to representatives of the mass media or to undertake to provide it without the authorisation of the competent functions. Furthermore, in no way may Benacchio S.r.l. employees offer payments, gifts or other advantages aimed at influencing the professional activities of mass media functions, or which can reasonably be interpreted as such.



Relations with public institutions, as well as those with supervisory authorities, are conducted in a **collaborative manner**, providing the information requested and relating to the company's activities. Relations with the Public Administration are conducted in such a way as not to lead to partial, false, ambiguous or misleading interpretations. In a word, the criterion of transparency and **maximum fairness** and clarity must also govern relations with the PA. The representatives of the Public Administration who are appointed to carry out checks at the company must receive full cooperation from our staff, allowing free access to data, information and documentation useful for carrying out the activities.

Gifts and acts of courtesy and hospitality towards representatives of governments, public officials and public employees are allowed only when they are of modest value, free from any assumption of obtaining undue advantage and in any case such as not to compromise the integrity of the relationship or the reputation of either party.

Benacchio S.r.l. has defined strict rules on the use of contributions and funding received from a Public Institution or the European Union, such as prohibiting the use of these resources for purposes other than those established.

Relations with Public Institutions are aimed at safeguarding the company's overall interests and are reserved exclusively for **persons identified** internally as responsible persons delegated to this function. The persons responsible make a prior assessment of the actions to be taken that may involve a relationship with the PA, sharing the objectives with management and subsequently monitoring their implementation.

Benacchio S.r.l. undertakes not to make contributions, direct or indirect or in any form to parties, movements, committees, associations or other bodies of a political or trade union nature, nor to their representatives. Recipients are free to provide political funding, on a personal level, to candidates, parties or committees of their choice, within the limits provided for by law. Under no circumstances shall Recipients be reimbursed or compensated for any personal political funding.



The effective application of the adopted Code of Ethics depends first and foremost on its **dissemination and sharing** with its addressees, whether internal or external to the company. The strategy implemented is based on:

- External sharing with all stakeholders through publication on the company website <https://www.benacchiosrl.it/>
- Internal sharing on the company intranet and posting a hard copy in a company location accessible to all employees. In addition, knowledge of the Code of Ethics is promoted internally through information meetings with staff. Training is also promoted by the Supervisory Board, which contributes to assessing the training plan and the initiatives organised according to the roles and responsibilities of the various company figures. Also as regards the training of new employees, a training activity is planned for them to illustrate the contents of the Code and the rules of conduct with which they are required to comply.



Company personnel are required to know and understand the principles of the Code, as well as the reference procedures governing the functions and responsibilities covered. Each worker is required to:

- Refrain from conduct contrary to the ethical principles and procedures adopted;
- Collaborate actively and fully with the Authorities during inspections or visits;
- Contact their superiors or the Supervisory Board if they need clarification on how to apply the rules of the Code;
- Carefully select their collaborators, in compliance with the specific procedures adopted and directing them to observe the ethical principles, by requesting confirmation that they have read the Code of Ethics;
- Collaborate with the internal functions, as well as with the Supervisory Board, in verifying possible violations;
- Promptly report to their superiors findings or news provided by stakeholders about possible cases of violation of the Code of Ethics. Reports of possible violations are sent, in accordance with the operating methods set out in the specific procedures, to the Supervisory Board.



The task of monitoring the implementation and application of the Code of Ethics falls to:



Benacchio has set up a [Supervisory Board](#) composed of two external members Roberto Grisenti (Company Lab 231 S.r.l.) as Chairman and Lawyer Massimiliano Redaelli and two internal members: Laura Forner (HR) and Corradin Egidio (PMO).

- Verify the application of and compliance with the Code of Ethics through monitoring activities and promote, if necessary, proposals for its updating in accordance with the evolution of civil awareness and legislation;
- Express binding opinions on the revision of corporate procedures, in order to ensure their consistency with the Code of Ethics and vice versa;
- Promote maximum dissemination and knowledge of the Code among employees and partners;
- The provision of every possible instrument of knowledge and clarification on the interpretation and implementation of the rules contained in the Code;
- Carrying out checks on any report of violation of the reference standards or the Code of Ethics, in order to assess the facts and allow the Board of Directors to implement sanctions if the violation is ascertained;
- Discourage any form of retaliation of any kind against those who have provided information on possible violations of the Code or the reference standards.



The provisions of this Code are an integral part of the contractual obligations assumed by the personnel, as well as by subjects having relations with the Company.

A violation of the principles and conduct indicated in the Code of Ethics compromises the relationship of trust between Benacchio S.r.l. and the person responsible for the violation and a **disciplinary measure** ensues. The possible resulting measures differ depending on the person responsible for the violation:

- Employees are punishable in accordance with the applicable employment contract, irrespective of any criminal relevance of the conduct enacted. Disciplinary measures range from a reprimand or warning to suspension without pay and, in the most serious cases, dismissal. Before a disciplinary measure is taken, the person concerned is given the opportunity to justify his or her conduct in accordance with the Workers' Statute.
- In the case of consultants, collaborators, customers and suppliers, there are specific procedures for terminating the contractual relationship, which are set out in individual contracts.
- In the case of persons in top positions, Directors or Legal Representatives, the SB formally notifies the Shareholders' Meeting, which will be convened in ordinary or extraordinary session at the express request of the SB itself. The company may also request compensation for any damage suffered.

It follows that all workers, as well as persons outside the company, are involved in relation to violations that require to be brought to the attention of the Management through a report. In this regard, the present Supervisory Board is one of the possible recipients of the facts to be reported. In fact, it is considered natural that, in the presence of irregularities with respect to the requirements of current legislation, the Code of Ethics or a company procedure, the employee who has knowledge of the facts, will turn to his superior or to the Supervisory Board.



All reports must be made in writing, possibly also anonymously, according to the forms and channels provided.



### Persons within the company

They can send their reports to  
[segnalazioni@benacchiosrl.it](mailto:segnalazioni@benacchiosrl.it)



### Personnel outside

the company can send their reports to [odv@benacchiosrl.it](mailto:odv@benacchiosrl.it).  
[odv@benacchiosrl.it](mailto:odv@benacchiosrl.it)

Once the report has been received, the Supervisory Board investigates its content, looking into possible violations of the Code of Ethics. To do so, it can call on the cooperation of both the person making the report and the person responsible for the alleged breach.

If the investigation leads to the ascertainment of a violation of the Code, or of the law, the Supervisory Board notifies the Management of the conduct that might require the adoption of a disciplinary sanction or the activation of contractual termination mechanisms.

The prerogative of the Supervisory Board, in managing the report, is to ensure the **protection of the reporter**.

The company will not tolerate prejudicial action taken against anyone who provides truthful information about a violation of the law, the Code or any other internal policy or procedure. Retaliation against anyone who reports wrongdoing will not be tolerated and anyone found to be doing so may be subject to disciplinary action. Victims of retaliation must also immediately report the case to their manager, the Human Resources Department and/or the Compliance Department.