



**Ethical code
Of
Planet Pellami Italia Srl**

Approved by the Board of Directors on 31/08/2023

Revision history

			Approved
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Summary

1. PREMISE	6
2. TERMS AND DEFINITIONS	6
3. THE CONTEXT OF REFERENCE	8
3.1 Legislative Decree 231/01 and the Relevant Regulations	8
3.2 Actions exempting Administrative Liability	8
4. PURPOSE OF THE CODE OF ETHICS	9
5. RECIPIENTS OF THE CODE OF ETHICS	11
6. GENERAL PRINCIPLES OF BEHAVIOUR	12
6.1 Adherence to and compliance with laws	12
6.2 Impartiality	13
6.3 Professionalism	13
6.4 Integrity	13
6.5 Honesty	13
6.6 Correctness and transparency	13
6.7 Confidentiality and protection of personal data	14
6.8 Anti-corruption	14
6.9 Transparency in the management of financial resources and tax obligations	17
6.10 Protection of competition	18
6.11 Integrity of the person and protection of individual personality	18
6.12 Quality	19
6.14 Responsibility towards the community	19
6.15 Repudiation of criminal organizations	20
6.16 Prevention of money laundering and self-laundering of money or other benefits	20
6.17 Correct use of the computer system and protection of copyright	21
6.18 Use and protection of company assets	22
6.19 Respect for Quality and company organisation	22
6.20 Respect for safety and health at work	22
6.21 Environmental protection	23
6.22 Collaboration with the Authorities in case of investigations	23
7. SPECIFIC PRINCIPLES OF BEHAVIOR	24



7.1. Management of the Company	24
7.2 Relationship with customers	24
7.3 Relationship with suppliers of goods and services	25
7.4 Relations with Members	26
7.5 Enhancement of the investment for Members	27
7.6 Relationship with employees.....	27
7.7 Staff selection	28
7.8 Establishment of the employment relationship	28
7.9 Personnel management.....	29
7.10 Dissemination of personnel policies	29
7.11 Enhancement and training of human resources.....	29
7.12 Management of employee working time.....	29
7.13 Worker involvement	30
7.14 Safety and health	30
7.15 Protection of privacy	30
7.16 Integrity and protection of the person	31
7.17 Abuse of alcohol or drugs and smoking ban	31
7.18 Duties of employees and collaborators	32
7.19 Relationship with external collaborators/consultants.....	32
7.21 Relationship with the Public Administration	32
7.22 Relations with the Supervisory, Regulatory and Guarantee Authorities and with Institutional Bodies	35
7.23 Relations with the political world (contributions, sponsorships, donations)	35
7.24 Relations with the press and media	36
8 METHODS OF DISSEMINATION AND REPORTING OF VIOLATIONS	36
8.1 Dissemination and information	36
8.2 Liability.....	36
8.3 Reporting System.....	37
9. The SANCTION SYSTEM.....	39
9.1 Sanctions	39
9.2 Discipline of Sanctions.....	39
10. PUBLICITY AND ENTRY INTO FORCE.....	41
10.1 Disclosure	41
10.2 Implementation	41





1. PREMISE

Planet Pellami Srl. It has been on the market since 1998.

Located in Castelfranco di Sotto (Pisa), in the heart of the leather district, it is known in Italy and abroad for its trimming and selection activities of bovine crust and being at the forefront of its sector, it offers an excellent price-quality ratio and punctuality of deliveries in conjunction with market needs.

The organization of the company, thanks to the professionalism of the staff and the continuous improvement of working methods, has allowed gradual growth in the national and foreign markets.

The prestige of Planet Pellami Italia srl lies in the trimming of the splits which are selected into various articles according to customer needs, measured, palletised and finally ready for shipping.

2. TERMS AND DEFINITIONS

For the purposes of this document, it means:

- A. **"Recipients"**: all subjects, categories of subjects and entities to which this document - directly and/or indirectly - is addressed and in particular, to Employees, Collaborators, Suppliers, Customers, Consultants, Professionals, Members, to corporate bodies and more specifically general to all *stakeholders*;
- B. **"Managers"**: all the subjects included in the company's organic structure with Management or Area Manager (RA) functions;
- C. **"Clients"**: understood in the following meanings;
 1. **"Final Customer"**: natural and/or legal person who purchases a service or product relating to the activity carried out by the company;
 2. **"Public Administration"**: the set of authorities to which the Italian State or, in the case of activities also carried out abroad, the foreign State, entrusts the care of public interests, as well as the allocation of goods and services of public utility, such as regional, national and community public bodies, public officials, those in charge of public functions or services.

The employees of Local Health Authorities, Ministries, public companies, pharmacists, veterinarians, doctors, representatives of political institutions, regional directors, etc. belong to the "Public Administration". The aforementioned Public Administration may, in compliance with current legal



provisions, tender, purchase, entrust (outsource) one or more services or parts thereof.

- D. “Regulatory package”, this document intends to indicate the entire documentary system consisting of the Code of Ethics, the Code of Conduct and the Corporate Governance Model adopted by Planet Pellami Srl
- E. “Whistleblower” is the employee/collaborator who makes a report. The role of the whistleblower is to make the report without adopting further corrective initiatives/actions.
- F. “Report”, information regarding behavior and practices that do not comply with what is established in the Organisation, Management and Control Model adopted pursuant to Legislative Decree 231/2001 and in the company Code of Ethics. The report can be:
- In good faith, if the person making the report, in the absence of prejudice, has reasonable certainty of the truth of what has been reported and if it is not carried out for the sole purpose of causing unfair damage or obtaining a personal benefit.
 - Detailed, if it allows the identification of factual elements reasonably sufficient to start an investigation (e.g.: the offense committed, the reference period and possibly the value, the causes, the purpose of the offence, the company/division involved, the people/units involved, the anomaly on the control system). For this type of report, the Report Management Structure evaluates whether useful feedback can be obtained with the available investigation tools (verifiable detailed report), or not (non-verifiable detailed report).
 - In bad faith, if from the results of the investigation phase it is revealed that it was carried out for the sole purpose of causing unfair damage to the person and/or company reported or to obtain a personal benefit.



3. THE CONTEXT OF REFERENCE

3.1 Legislative Decree 231/01 and the Relevant Regulations

Legislative decree no. 231 of 8 June 2001, which introduces the "Discipline of the administrative liability of legal persons, companies and associations even without legal personality", introduced into the Italian legal system the completely innovative concept of administrative liability (comparable substantially to criminal liability) of companies for illicit actions committed by their directors/employees in the exercise of their business, without prejudice to personal liability for the illicit act.

Administrative responsibility is added to the responsibility of the natural person who materially committed the crimes and aims to involve, in the punishment of the same, the entities in whose interest or advantage such crimes were committed.

The involvement of the legal person consequently determines a strong interest on the part of the shareholders in carefully monitoring the regularity and legality of the behavior of the personnel mentioned above.

The liability provided for by the Legislative Decree. 231/2001 also includes crimes committed abroad, provided that the State in which the crime was committed does not prosecute them.

The key points of the Decree concern:

- a) The identification of persons who, by committing a crime in the interest or to the advantage of the entity, can determine its liability, that is:
 1. natural persons who hold top positions ("top management") (representation, administration or management of the organization or other organizational unit or people who effectively exercise management and control);
 2. natural persons subject to the management or supervision of one of the above-mentioned subjects.
- b) The list of crimes that are part of the provisions of the Legislative Decree. 231/2001.

3.2 Actions exempting Administrative Liability

The articles 6 and 7 of the legislative decree provide that companies, in the event of criminal proceedings against them, can benefit from an exemption if they demonstrate that they have implemented a series of actions aimed at avoiding the commission of offenses by directors, employees and consultants.

To benefit from this exemption the company must demonstrate that:



- a) the management body has adopted and effectively implemented, before the commission of the crime, an organization and management model suitable for preventing crimes of the type that occurred (hereinafter the "Model");
- b) the task of supervising the functioning and observance of the Model as well as proposing its updating has been entrusted to a Supervisory Body of the Entity (hereinafter "SB"), equipped with autonomous powers of initiative and control;
- c) the persons who committed the crime acted by fraudulently evading the aforementioned Model;
- d) there has been no omitted or insufficient supervision by the SB;
- e) to have achieved adequately **sanctioning system** towards employees who violate the rules established by the procedures constituting the Model and the Code of Ethics;
- f) to have trained and informed its staff on the responsibilities deriving from the behaviors adopted in the exercise of their functions;
- g) to have prepared a Code of Ethics.

4. PURPOSE OF THE CODE OF ETHICS

This document, called the Code of Ethics, regulates the set of rights and responsibilities that the company expressly assumes towards those with whom it interacts in carrying out its business, formalizing the values and ethical principles that Planet Pellami Srl intends to pursue and disseminate to the within its organization and constituting the guide and reference in every activity of the company.

The purposes of the Code of Ethics are:

- define and explain the company's principles and rules of conduct and relationships with employees, collaborators, commercial partners, institutions and in general with any other stakeholder;
- indicate the principles of behavior which the recipients of this Code of Ethics are required to observe;
- make those who operate in the sphere of action of Planet Pellami Srl responsible for the observance of these principles, strengthening the awareness and commitment of the structure managers in the application of the sanctions in force, in order to ensure the effectiveness and effectiveness of this Code of Ethics.

In full harmony with the positions expressed and protected by the accreditation system to which it adheres, the organization is aware of contributing with its work, with a sense of responsibility and moral integrity, to the development process of the Italian economy and to the civil growth of the village.



The company believes in the value of work and considers legality, correctness and transparency of action to be essential prerequisites for achieving its economic, productive and social objectives.

The company affirms the adequacy of its Code of Ethics in pursuing its social mission.

The Code of Ethics is aimed at explaining the reasons for behavioral choices, which must translate into concrete ethical actions, such as to become a moral/personal pact with all Company Representatives, meaning Administrators, Auditors and any other employee.

The Code of Ethics also has the aim of introducing and making binding for the company the principles and rules of conduct relevant for the reasonable prevention of the crimes indicated in Legislative Decree no. 231/2001.

The company condemns any behavior that differs not only from the Law, but also from the provisions of the Organization Model and the Code of Ethics, even if the behavior is carried out in the interests of Planet Pellami Srl or with the intention of giving it an advantage.

The company undertakes to comply with all laws and provisions, both national and international, regarding anti-money laundering, in particular, but not exclusively, Legislative Decree 231/01.

The Code of Ethics, considered as a whole and together with all the specific implementation procedures approved by the company, is considered an integral part of the subordinate employment contracts in place and to be stipulated, pursuant to art. 2104 cc (Diligence of the worker).

Violation of its provisions will therefore constitute an offense of a disciplinary nature and, as such, will be prosecuted and sanctioned by the company pursuant to and for the purposes of Art. 7 (Disciplinary sanctions) of Law no. 300/1970 (Workers' Statute - Rules on the protection of the freedom and dignity of workers, freedom of association and trade union activity in the workplace and rules on placement) and may lead to compensation for damages caused to the organization.

As for collaborators, consultants and self-employed workers (specified below among the recipients) who provide their services on behalf of the company and other third parties, the signing of this Code of Ethics or an extract of it or, in any case, adherence to the provisions and principles set out therein represent a sine qua non of the stipulation of contracts of any nature between the company and such subjects. The provisions thus signed or, in any case, approved, even for conclusive facts, constitute an integral part of the contracts themselves.



Based on what has been described so far, any violations by the subjects referred to in the previous paragraph of specific provisions of the Code of Ethics, based on their severity, may legitimize the company's withdrawal from the contractual relationships existing with said subjects and they can also be identified ex ante as causes for automatic termination of the contract pursuant to Art. 1456 cc (express termination clause).

5. RECIPIENTS OF THE CODE OF ETHICS

The way of behaving that people adopt is made up of many small actions and decisions that are taken during work. Carrying out work with awareness of company rules and principles, shared by consensus, leads to nourishing the Company's style, based on integrity, correctness and responsibility.

The Code of Ethics is aimed at explaining the reasons for behavioral choices, which must translate into concrete ethical actions, such as to become a moral/personal pact with all Company Representatives, meaning Administrators, Auditors and any other employee.

Through the adoption of the Code of Ethics, the company intended to define moral values, clear rules and procedures to comply with.

Planet Pellami Srl, by adopting the Code of Ethics, intends to communicate externally the principles and rules of conduct of the Company and its subsidiaries, according to the general principle of legality, understood as compliance with all Laws, Regulations, Administrative Provisions and in general of the regulatory provisions in force.

Therefore, the rules contained in the Code of Ethics apply to those who within the Company carry out, even de facto, management, administration, direction or control functions, as well as to the people of Planet Pellami Srl and to those who, although not belonging to the personnel of Planet Pellami Srl, are bound by contractual and collaborative relationships with the same.

In particular, the Code of Ethics is aimed at:

- Employees
- Collaborators
- External and internal consultants
- Providers
- Clients
- Professionals
- Members
- Social bodies



The recipients of this Code of Ethics are required to learn its contents and respect its precepts.

Company employees, in addition to the respect due to the regulations in force and the provisions of collective bargaining - where applicable - undertake to adapt the methods of carrying out their work activities to the purposes and provisions set out in this Code of Ethics. This is true both in intra-company relationships and in relationships with parties external to the company and, in particular, with Public Administrations and other public authorities.

The Code of Ethics will be made available to them, as specified below.

The management, or a delegate, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the organization.

An essential requirement of any relationship of profitable collaboration with the company is represented by the respect, by the other recipients, of the principles and provisions contained in this Code of Ethics, also in fulfillment of the duties of loyalty, correctness and diligence that arise from legal relationships established with Planet Pellami.

In this sense, at the time of signing contracts or agreements, the company through the appropriate clause informs its interlocutors of the adoption of this Code of Ethics and the Organization, Management and Control Model by referring to the Company's website for vision.

6. GENERAL PRINCIPLES OF BEHAVIOUR

6.1 Adherence to and compliance with laws

Compliance of behavior with the law is a mandatory requirement for all Recipients.

Each Recipient undertakes to comply with all national and international rules, laws, directives and regulations and all generally recognized practices, including compliance with the principles of good performance, personal honesty, impartiality and transparency of administrative activity.

The worker's behavior must be based on the pursuit of efficiency and effectiveness of the services to which he is dedicated and no personal and/or Company objective can be pursued and achieved in violation of the law.

The Recipient must therefore be aware of the appropriate behaviors and implications relating to their activity.



In case of doubt, you should seek advice either from your Manager or from your contact point in the Company, who will provide you with the appropriate additional training.

If the Recipient becomes aware of the violation of regulations which could give rise to a risk of involvement of the Company, he must immediately report the matter to the Supervisory Body.

6.2 Impartiality

In decisions that affect relationships with its stakeholders (relationships with customers, relationships with members, personnel management or work organization, selection and management of suppliers, relationships with the surrounding community and institutions that represent it), the company avoids any discrimination based on the age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors.

6.3 Professionalism

Each person carries out their work activity and services with diligence, efficiency and correctness, making the best use of the tools and time at their disposal and assuming the responsibilities connected to the obligations.

6.4 Integrity

The Company does not approve or justify any action of violence or threats aimed at obtaining behavior contrary to current legislation, including ethical legislation, and/or the Code of Ethics.

6.5 Honesty

As part of their work, the people of the company are required to know and diligently respect Model 231 and the laws in force. Honesty represents the fundamental principle for all the company's activities, for its initiatives and constitutes an essential value of organizational management. Relationships with stakeholders, at all levels, must be based on criteria and behaviors of correctness, collaboration, loyalty and mutual respect. Under no circumstances can the pursuit of corporate interests justify dishonest conduct.

6.6 Correctness and transparency

People do not use for personal purposes information, goods and equipment at their disposal in carrying out the function or task assigned to them. Each person does not accept or make pressure, recommendations or reports for himself or others that could cause harm to the company or undue advantages for himself, for the company or for third parties. Each person rejects and does not make promises of undue offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favoring any interest group or individual.



6.7 Confidentiality and protection of personal data

The Recipient is required to maintain confidentiality on the company information of which he becomes aware as it is the property of the company. Likewise, it refrains from searching for confidential data referring or referable to the company or to any of the Recipients.

The Recipient who becomes aware of confidential information not in the public domain must avoid its disclosure (including friends and family), unless formally authorized.

Personal data must be processed in compliance with the laws in force governing the matter of privacy as well as the guidelines and provisions issued by the Privacy Authority.

With regard to this topic, the company pays particular attention to the Recipient:

- to conduct in compliance with EU Regulation 2016/679 process the data of which it will come into possession and/or become aware in compliance with "EU Regulation 2016/679 of the European Parliament and Council of 27 April 2016, relating to the protection of natural persons with regard to the processing of personal data, as well as to the free circulation of such data and which repeals Directive 95/46/EC" and Legislative Decree no. 101/18, containing provisions for the adaptation of national legislation to the provisions of Regulation (EU) 2016/679, with particular reference to lawfulness, correctness, confidentiality and security;
- to use the data exclusively for purposes related to carrying out the activities covered by the service. Any processing of data for different purposes is prohibited;
- to maintain the most absolute confidentiality, also on the part of its staff and/or collaborators, on all information of which it may become aware during the performance of the assigned task.

The Company, in accordance with current legislation, guarantees interested parties that the processing of their personal data, whether common, particular or judicial, is carried out in compliance with suitable security measures. To this end, the Company has also taken steps to comply with the so-called General Data Protection Regulation (GDPR 2016/679).

6.8 Anti-corruption

The Company does not allow acts of corruption or incitement to corruption against the Public Administration and private entities, whether committed directly by company representatives or committed indirectly through individuals acting on behalf or in the interests of the Company itself, in Italy and abroad. 'abroad; in the conduct of its activities, therefore, prohibits any action towards or by third parties capable of damaging the impartiality and autonomy of judgment of the Public Administration, of "public officials", of "public service representatives" and of private entities.



In detail, Planet Pellami prohibits anyone, directly or indirectly, from:

- offer, promise, give, pay, or authorize someone to offer, promise, give or pay, directly or indirectly, material benefits, economic advantages or other benefits to a Public Subject¹ or to a private individual (Active Corruption);
- accept, or authorize someone to accept, directly or indirectly, economic advantages or other benefits, or requests or solicitations for economic advantages or other benefits, from a public entity or a private individual (Passive Corruption);

when the intention is:

- induce a Public Entity or a private individual to improperly carry out any function of a public nature, or any activity associated with a business, or reward him for carrying it out;
- influence the adoption of an official act, even if only in temporal terms, or its omission by a Public Body or any decision in violation of an official duty;
- obtain or secure an improper advantage in relation to business activities; or in any case, violate any applicable laws.
- In this context, it is therefore expressly forbidden to submit to pressure or persuasion activities carried out directly or through third parties by a public entity aimed at creating a state of psychological subjection in the private individual which leads him to act in the direction desired by the affected entity. of public attributions.
- In particular, Marchini Costruzioni personnel, directly or indirectly through third parties, are strictly prohibited from:
 - promise or grant money, advantages or any other benefit, in order to obtain the release of concessions, licenses and authorizations from the Italian or foreign Public Administration, as well as contributions, social security and welfare benefits
 - behave in ways that conflict with the provisions of the Code of Ethics
 - present untruthful declarations or implement tricks and deceptions aimed at unduly obtaining contributions, disbursements, financing or taking on contracts;
 - prevent or hinder the exercise of inspection functions by the Italian or foreign Public Administration, in order to avoid the application of a sanction or to negotiate its amount;
 - adopt fraudulent, deceptive or unfair behavior that may mislead the Public Administration, in particular the National Anti-Corruption Authority (ANAC), in the exercise of its functions, as regards the awarding and execution of public contracts.

¹Meant as a Public Administration Body and/or Public Official and/or Public Service Representative.
ETHICAL CODE



- Prohibited conduct includes the offering or receipt by Personnel of Marchini Costruzioni, (direct corruption) or anyone acting on behalf of the company (indirect corruption), of an economic advantage or other benefit in relation to business activities, and therefore is not limited to cash payments but includes:
 - giveaways;
 - expenses for attention to third parties, meals and transport, hospitality in general;
 - contributions in kind, such as sponsorships;
 - contributions to political associations or foundations;
 - a. commercial activities, jobs (consultancy, hiring, collaboration) or investment opportunities;
 - b. confidential information that could be used to trade in regulated securities and products;
 - c. personal discounts or credits;
 - d. assistance or support for family members; And
 - e. other advantages or other utilities.

All this even if the conduct and benefits mentioned were aimed at the benefit of third parties to induce the Public Official to behave contrary to their duties.

Gifts, payments or other benefits, including hospitality treatments, may be given or received if they fall within the context of acts of commercial courtesy, taking into account the regulatory and ethical principles, customs and practices of the individual countries in which the Company operates, and are such that they do not compromise the integrity and/or reputation of one of the parties and such that they cannot be interpreted by an impartial observer as aimed at creating an obligation of gratitude or acquiring advantages in an improper manner.

In compliance with the principle of traceability and documentability, it is necessary to keep evidence of the recipients of said gifts. The person who incurred the entertainment expense must therefore indicate on the expense receipt (e.g. tax receipt, receipt, invoice, shipping document, etc.), the name of the person/persons and the company to which they belong who benefit from the expense. .

A gift or economic advantage or other benefit - including hospitality - offered to, or received by, Marchini Costruzioni personnel is considered to be of "modest value" if its actual or estimated value does not exceed (or probably does not exceed):

1. individually, the amount of €150, or
2. cumulatively, when received from or offered by the same person or entity in one year, the amount of €300, even if individually each gift or benefit does not exceed the amount indicated in point 1 above.

Anyone who receives offers of gifts, economic advantages, or other benefits including hospitality treatments that cannot be considered as acts of commercial courtesy of "modest



value" must refuse them and immediately inform their direct superior and the Supervisory Body pursuant to Legislative Decree. lgs. 231/2001 of Marchini Costruzioni.

Any gift, economic advantage, or other benefit, including hospitality given by Marchini Costruzioni personnel, even if paid through the use of personal economic resources, to a public official or private individual must be reasonable and done in good faith in scope of a normal commercial relationship, according to the criteria and methods indicated by this code.

Personnel are considered at risk of committing a crime if they:

- a) has a Relevant Contact with a Public Official, in relation to his work activity;
- b) supervises the supervision of employees or Suppliers liable to maintain such Relevant Contact; or
- c) is involved in issues related to financial control or other activities covered by Anti-Corruption legislation; And
- d) is identified as a person at risk by a manager, as they fall into one of the above-mentioned categories.

In compliance with the principle of transparency and traceability, it is therefore necessary to always maintain documentary evidence (e.g. e-mail, minutes, minutes, etc.) of every communication or meeting with Public Officials in the context of a Relevant Contact with indication, in this last case, place and date of the meeting, together with a summary of the topics discussed and the related conclusions. The contact must take place respecting the perimeter of responsibilities explained in the company organization chart, in the organizational procedures and instructions and in Model 231 and must be followed by timely reporting to the hierarchical or functional superior, to the CEO and to the Supervisory Body (hereinafter also "OdV") any critical issues.

6.9 Transparency in the management of financial resources and tax obligations

Accounting information must be based on the principles of correctness, accuracy, completeness, transparency, and competence of the basic information and subsequent recordings.

The Recipient must comply with current regulations and any applicable national and international accounting principles.

Every operation and transaction must be legitimate, accurate, coherent, congruous, correctly recorded, authorized and documentable.

For each of them it must be possible to verify the decision, authorisation, execution and motivation process.

For each operation, adequate supporting documentation must be kept in the records which allows:



- easy accounting verification and reconstruction;
- the accurate reconstruction of the operation;
- the identification of the different levels of responsibility.

Therefore, each Recipient is required to:

- a) collaborate to represent management facts correctly, accurately, completely and faithfully in accounting;
- b) immediately report to the Supervisory Body any omission, inaccuracy or falsification of the accounting records and/or supporting documents of which he becomes aware.

It is prohibited to carry out simulated accounting transactions, adopt fraudulent conduct, conceal, omit, cancel, destroy accounting records or documents and hinder the exercise of supervisory functions.

Planet Pellami Srl undertakes to carry out with completeness and transparency all the tax obligations required by current legislation and to collaborate with the financial administration.

Tax declarations and the payment of taxes represent behaviors that are not only mandatory from a legal point of view but also unavoidable in the context of the company's social responsibility.

The Recipients of this Code must not in any way commit or participate with others in committing criminal violations of tax legislation.

6.10 Protection of competition

The Company promotes the principle of fair competition by adopting behaviors of correctness, transparency and fair competition towards operators present on the market. This loyalty is required of all operators also with a view to equal employment opportunities, should the conditions arise, between social and profit enterprises.

6.11 Integrity of the person and protection of individual personality

The company's workers and collaborators are a particularly indispensable factor for its success. For this reason, Planet Pellami protects and promotes the value of human resources with the aim of improving and increasing the assets and competitiveness of the skills possessed by each collaborator.

The company guarantees the physical and moral integrity of its workers, working conditions that respect individual dignity and safe and healthy working environments, as



well as the equal dignity of the sexes in professional classifications, salary levels and opportunities for development and advancement of workers and collaborators.

The company promotes the protection of individual freedom and personality as indispensable.

It repudiates any activity that could lead to any possible exploitation or reduction of the person to a state of subjection.

Furthermore, the company attributes primary importance to the protection of minors and to the identification and sanction of exploitative behavior of any nature towards them.

To guarantee full respect for the person, the company is committed to respecting and ensuring that the Recipient respects the legislation in force for the protection of work, with particular attention to child labour.

Any Recipient who becomes aware of commissions of acts or behaviors that may constitute a violation of this commitment must, without prejudice to legal obligations, immediately communicate it to his superiors and to the Supervisory Body.

6.12 Quality

Planet Pellami is committed to and responsible for ensuring quality in every activity, consistently with its long-term strategy.

The company orients its activity towards the satisfaction and protection of its customers as well as the appreciation of the community in which it operates, in awareness of its role in the socio-economic context.

The company undertakes to offer its services on a regular and continuous basis, guaranteeing the participation of its customers and consumer associations in the process of improving the services offered. Each Customer can send their contribution, general or relating to the individual specific case, in the form of reports of disservice, observations, complaints and suggestions, through the Customer Service contacts, as well as request information concerning them at any time.

The activities are implemented by the company through a set of processes managed through a quality management system that offers uniformity, transparency and improvement of the service to the outside world.

6.14 Responsibility towards the community

The company is aware of the influence, even indirect, that its activities can have on the conditions and general well-being of the community, as well as the importance of social acceptance of the communities in which it operates. For this reason, the company intends to conduct its activities with respect for local and national communities, and support



initiatives of cultural and social value in order to obtain an improvement in its reputation and social acceptance.

6.15 Repudiation of criminal organizations

The Company is aware of the risk that locally established criminal organizations could influence business activity, exploiting it to obtain illicit advantages and is committed to preventing and combating the risk of criminal infiltration within its organisation.

To this end, all recipients of this Code are required to comply with the rules established by the Company for assessing the reliability of the various subjects who have relationships with the Company itself (staff, suppliers of goods and services, customers).

Payments and other financial transactions must be made through authorized intermediaries, so that their traceability is guaranteed, on the basis of suitable documentation.

Except for adequately motivated exceptions, transfers of credit or debt to third parties are not permitted.

Factoring, assignment or advance contracts or contracts of an equivalent nature, signed with credit institutions or other companies specialized in credit management and collection activities, are excluded from the aforementioned prohibition, without the need for specific justification.

All recipients of this Code are prohibited from submitting to extortion requests of any kind made by anyone; each recipient is in any case required to inform the Supervisory Body and the Police Authority.

6.16 Prevention of money laundering and self-laundering of money or other benefits

The Company absolutely prohibits all recipients of the Code from purchasing, replacing or transferring money, goods or other benefits in the knowledge of their criminal origin; or carry out other operations in relation to them, in order to hinder the identification of their criminal origin.

The Company prohibits the use of money, goods or other benefits in economic or financial activities in the knowledge of their criminal origin.

Furthermore, the Company prohibits:

- collect sums in cash (with the exception of small payments which must be kept track of in the accounts);
- receive payments from encrypted accounts or from unidentifiable subjects;
- make payments in cash or with non-traceable means (with the exception of modest amounts which are in any case kept track of in the accounting);



- make payments to encrypted accounts;
- make payments in countries other than those of the supplier's residence or where the service was performed.

The Company undertakes to comply with all regulations, both national and international, aimed at combating money laundering and self-laundering of money, goods or other benefits.

6.17 Correct use of the computer system and protection of copyright

In the use of IT and telematic resources, the Recipients are inspired by the principle of diligence and correctness and respect the internal security rules.

The Recipients must refrain from those activities aimed at illicitly damaging an IT or telematic system of Planet Pellami Srl, of other companies, of the State or of another public body or in any case of public utility.

In no way can the belief of acting for the benefit of the Company justify damaging information, data and computer programs of the Company itself or of third parties.

The Company undertakes not to reproduce, use, possess or disseminate intellectual works in violation of the intellectual property rights of the legitimate owners and refuses any modification or update of operating systems or application programs with violation of the contractually agreed user license conditions. defined with suppliers.

All material assets of which the company has ownership, possession or rights of use and which are made available to Company Persons for the exercise of work activities within the company (such as, by way of example: hardware, software licenses , e-mail, telephone equipment, vehicles, systems, machinery, equipment, equipment and instruments, etc.) constitute company assets and as such:

- can be used by each Company Entity, only if expressly authorized;
- they must be used correctly;
- must be correctly kept in order to avoid theft, loss, damage resulting from negligence, incompetence, etc.;
- any defects, faults, destruction, etc. must be promptly communicated to the responsible or hierarchically superior parties. Unless expressly authorised, the goods listed above must generally be used exclusively for work and non-personal purposes, with an absolute prohibition on:
 - use to procure for oneself or third parties any benefit or profit;
 - use (with particular reference to IT tools and the Internet) for leisure and non-professional purposes, especially if they may cause damage to the decorum and ethics of the Company and other Company Entities;
- duplication in any way and for any reason of software products, unless expressly authorized



Compliance with the above points is more fundamental than ever in the context of the activities carried out by Planet Pellami Srl

6.18 Use and protection of company assets

All company assets must be used in accordance with permitted purposes and in compliance with laws, management systems, procedures and company regulations. Conduct aimed at using company assets for the pursuit of personal purposes, unrelated to the corporate purpose or incompatible with the correct performance of work activities, is absolutely prohibited.

Each employee has the duty to work diligently to protect company assets, through responsible and diligent behavior in order to avoid malfunctions, damage and theft. The use of company assets for personal purposes must be authorized in advance in writing by the direct hierarchical superior.

6.19 Respect for Quality and company organisation

The Company pursues Quality Management in the implementation of company activities, taking care, in particular, of company organization and relationships with third parties.

6.20 Respect for safety and health at work

The Company undertakes to protect, disseminate and consolidate a culture of safety and health in the workplace, developing awareness of risks and promoting responsible behavior by all employees and collaborators.

The Company promotes the culture of safety at work, also through information and training meetings aimed at staff.

The Company also undertakes, in line with the Confindustria Guidelines, to clearly explain and make known the fundamental criteria on the basis of which decisions, of all types and at all levels, regarding health and safety are taken and implemented. safety at work (also with regards to risk prevention, information and training activities and provision of the necessary means), consistent with the following principles:

- avoid risks;
- evaluate risks that cannot be avoided;
- combat risks at source;
- adapt work to man, in particular as regards the design of workplaces and the choice of work equipment and work and production methods, in particular to mitigate monotonous work and repetitive work and to reduce the effects of these works on health;
- take into account the degree of evolution of the technique;



- replace what is dangerous with what is not dangerous or less dangerous;
- plan prevention, aiming for a coherent complex that integrates technique, work organization, working conditions, social relations and the influence of work environment factors;
- give priority to collective protection measures over individual protection measures;
- give adequate instructions to workers.

6.21 Environmental protection

The environment is a primary asset that Planet Pellami Srl undertakes to safeguard, ensuring full compliance with the regulations in force on the matter; to this end, the company plans its activities by seeking a balance between economic initiatives and essential environmental needs, taking into consideration the rights of future generations. Planet Pellami Srl is therefore committed to improving the environmental impact of its activities, as well as preventing risks for the population and the environment in compliance with current legislation.

6.22 Collaboration with the Authorities in case of investigations

The Company recognizes the value of the judicial and administrative function and pursues the objective of maximum integrity and correctness in relations with the competent authorities.

To this end, it prohibits any behavior aimed at or suitable for interfering with the investigations or checks carried out by the competent authorities and, in particular, any conduct aimed at hindering the search for the truth, including through inducing people called by the judicial authority to do not make statements or make them false.

The Organization undertakes to adopt all measures necessary to provide the collaboration requested by the Authorities, within the limits of compliance with current legislation.



7. SPECIFIC PRINCIPLES OF BEHAVIOR

7.1. Management of the Company

The Company pursues its corporate purpose in compliance with the law and the Articles of Association, ensuring the correct functioning of the corporate bodies and the complete formalization of their acts.

The Company considers its mission to be the achievement of positive economic results. We therefore propose to safeguard the assets, avoiding excessively risky or burdensome choices.

Having particular reference to the acquisition of financing from institutional investors, the Company pursues development appropriate to the resources at its disposal.

In its capacity as a taxpayer, the Company seeks the correct and timely fulfillment of all obligations imposed on it by current regulations.

The Company intends to operate towards directors, shareholders and third parties inspired by the principle of transparency. To this end:

- guarantees directors and auditors full knowledge of the matters subject to decision, through truthful and complete information and access to company documentation, and respects and guarantees their autonomy of judgment and opinion;
- ensures that members are informed of the general trend and the most significant facts concerning corporate management and business developments;
- appreciates that the control and supervisory bodies rigorously exercise their function and arranges for them to have the necessary collaboration for this purpose

7.2 Relationship with customers

The Company competes fairly on the market, respecting competition rules.

The Company does not offer or accept money or equivalent values to promote or facilitate the conclusion of business for its own benefit; gifts are permitted where they are of modest value and cannot be interpreted as a tool for seeking favors or privileges.

The company undertakes to guarantee adequate quality standards of the goods produced on the basis of predefined levels and to periodically monitor the perceived quality.

The Company bases its activity on quality, mainly understood as customer satisfaction; ensures correctness and clarity in negotiations, as well as the faithful and diligent



fulfillment of the commitments undertaken. For this reason it resorts to litigation only when its legitimate claims cannot otherwise be satisfied.

Relationships with customers are governed by current laws and this Code of Ethics.

The Recipient who maintains relationships with customers must behave in an ethical, correct, transparent and confidential manner.

The Recipient must not, either for his own interest or for that of the company:

- make unethical compromises of any nature;
- offer/accept money and/or other benefits to obtain real, potential and/or perceived favoritism and/or privileges of any nature and/or establish tacit agreements to this effect;
- offer/accept gifts, if not of modest value.

These rules of conduct cannot be circumvented by resorting to third parties for whose actions the Recipient is responsible.

The Recipient may immediately terminate any relationship/negotiation with a customer who does not intend to comply with this Code of Conduct, upon communication to his/her direct Manager.

7.3 Relationship with suppliers of goods and services

The Company considers suppliers a competitive factor and an active part of the production process; selects and identifies them exclusively based on their corporate utility and the quality of the offer; acts correctly towards them; promotes their qualification; where necessary, monitors compliance with laws and regulations; works to ensure that they adopt adequate codes of ethics and conduct.

The Recipient must behave towards suppliers in an honest, transparent, confidential manner, respectful of the laws in force and of this Code of Conduct to build a relationship of collaboration and mutual trust.

The Recipient must avoid any inconvenient situation that puts the integrity of the company name at risk, just as he must not in any way:

- accept gifts, gifts (if not of modest value and compliant with company procedures), services, promises of any kind from suppliers,
- offer gifts, freebies (if not of modest value and compliant with laws and company procedures), services, promises of any kind to suppliers.



The company delegates the choice of suppliers to functionally competent people who carry it out according to objective criteria of competitiveness, quality, cost-effectiveness and integrity.

Each exception must be adequately justified and documented.

The Recipient must communicate if a supplier does not intend to comply with the Code of Conduct, so that the company can take appropriate measures, which may go as far as terminating the relationship.

Contracts stipulated in favor of persons/companies reported by the Public Official under conditions other than those of the market or unreasonable or unfairly advantageous are prohibited, and in any case with the aim of inducing the Public Official himself to grant favors or advantages towards Planet PellamiS.rl

The Company may also be held responsible for corrupt activities committed by subcontractors and/or suppliers, including consultants, brokers and intermediaries, who provide services in favor or on behalf of Planet PellamiS.rl and their sub-contractors or sub- contractors. The Company therefore requires its suppliers and external collaborators to respect the ethical and social responsibility principles contained in the Code of Ethics. In this regard, the Company will include in the contracts, and where possible will include in those between its assignees and third parties, specific contractual clauses which inform on the policies and procedures adopted by the Company, as well as on the consequences that behavior contrary to these rules may have for the contractors.

Planet PellamiS.rl personnel are therefore prohibited from giving or promising benefits to administrators, general managers, managers in charge of drafting corporate accounting documents, auditors and liquidators of third-party companies so that, to the detriment of the latter, they commit or omit acts, in violation of their duties of loyalty or inherent to their office, for the benefit or interest of the Company.

The procurement process and the envisaged protocols therefore define the roles and responsibilities of the main actors involved in the process and the general rules for the main sensitive activities (item and supplier details, Purchase Requests, market research and Offer Requests , selection of suppliers, qualification process and verification of ethical requirements of suppliers, assignment of contracts, receipt of materials, services and benefits, management of contracts and disputes, standard contractual protection clauses).

7.4 Relations with Members

Members are not just a source of financing, but a subject with opinions and moral preferences of various kinds. To orient yourself in investment decisions and corporate resolutions, you therefore need all the relevant information available. Planet Pellami Srl creates the conditions so that the participation of Members in relevant decisions is full and informed.



Planet PellamiS.rl pursues its mission while ensuring, at the same time, full transparency of the choices made; therefore, it adopts organization and management models to guarantee correctness and truthfulness to corporate communications (financial statements, periodic reports, information prospectuses, etc.) and fiscal communications, and to prevent the commission of corporate crimes such as false accounting, market manipulation, false communications to bodies control and supervision, etc.

All of Planet PellamiS.rl's financial communications are characterized not only by mere compliance with regulatory provisions, but also by comprehensible language, exhaustiveness, timeliness and information symmetry towards all investors.

7.5 Enhancement of the investment for Members

Planet PellamiS.rl works to ensure that the economic/financial performances are such as to safeguard and increase the value of the company, in order to adequately remunerate the risk that the members assume with the investment of their capital.

7.6 Relationship with employees

The Company considers work as the main factor of success and ensures that workers and collaborators are involved in the company's aims and projects.

The Company respects employment contracts and social security regulations; pursues the objective of stable employment; promotes the constant improvement of professionalism through the planning of training activities.

The Company implements all the initiatives and measures necessary to guarantee the psychophysical integrity of the workers, as well as the healthiness and decorum of the working environments, not only respecting the relevant regulations, but promoting the culture of safety, giving itself an adequate organization of work, strengthening prevention measures.

The Company ensures equal dignity of the sexes in professional classifications, salary levels and development and advancement opportunities for workers and collaborators.

The Company pursues full respect for the human person in the work environment; considers any behavior or attitude aimed at humiliating and offending the dignity and sensitivity of work colleagues and particularly subordinates as reprehensible and subject to disciplinary sanctions, as well as any practice of sexual harassment.

The Company considers the Union an important tool for representing workers and promoting their living and working conditions; rejects any practice of trade union discrimination; recognizes the elected representatives; guarantees the free and autonomous exercise of trade union activity in the workplace, in full compliance with the laws and contracts in force



Relationships with employees are regulated both by specific contracts, stipulated in accordance with current legislation, and by national collective sector agreements.

The company encourages equal opportunities.

Any racial, sex, nationality, religion, age, status, physical condition, language, trade union or political discrimination and any form of favoritism in hiring, remuneration, promotion or dismissal is prohibited.

The general criteria just exposed then develop into the following specific behavioral criteria set out below.

7.7 Staff selection

The evaluation of the personnel to be hired is carried out based on the correspondence of the candidates' profiles with those expected and with company needs, in compliance with equal opportunities for all interested parties.

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

The personnel function, within the limits of the information available, adopts appropriate measures to avoid favoritism, nepotism, or forms of clientelism in the selection and hiring phases (for example, avoiding that the selector is linked by family ties to the candidate).

7.8 Establishment of the employment relationship

The staff is hired with a regular employment contract; any form of irregular work is not tolerated.

Upon establishment of the employment relationship, each collaborator receives accurate information relating to:

- characteristics of the function and tasks to be performed;
- regulatory and remunerative elements, as regulated by the national collective labor agreement;
- rules and procedures to be adopted in order to avoid possible health risks associated with work.

This information is presented to the collaborator in such a way that acceptance of the assignment is based on effective understanding.



7.9 Personnel management

Planet PellamiS.rl avoids any form of discrimination against its employees.

As part of the personnel management and development processes, as already indicated for the selection phase, the decisions taken are based on the correspondence between expected profiles and profiles possessed by the workers (for example in the case of promotion or transfer) and/or on considerations of merit (for example assignment of incentives based on results achieved).

Access to roles and assignments is also established taking into account skills and abilities; furthermore, compatibly with the general efficiency of work, flexibility in the organization of work is encouraged, in order to facilitate the management of maternity and child care in general.

The evaluation of workers is carried out in a broad manner, involving managers, the personnel function and, as far as possible, the subjects who have entered into a relationship with the person being evaluated.

Within the limits of available information and protection of privacy, the personnel function works to prevent forms of nepotism (for example, excluding hierarchical dependence relationships between employees linked by family ties).

7.10 Dissemination of personnel policies

Personnel management policies are made available to all workers through company communication tools (intranet, company web, organizational documents and communication from managers).

7.11 Enhancement and training of human resources

Managers use and fully enhance all the professionalism present in the company structure by activating the levers available to encourage the development and growth of their collaborators.

In this context, communication by managers of the collaborator's strengths and weaknesses is of particular importance, so that the latter can aim to improve their skills also through targeted training.

Planet PellamiS.rl makes information and training tools available to all its employees, with the aim of enhancing specific skills and maintaining the professional value of the staff.

7.12 Management of employee working time

Each manager is required to make the most of the working time of employees by requesting performance consistent with the performance of their duties and with the work organization plans.



It constitutes an abuse of the position of authority to request, as an act owed to the hierarchical superior, services, personal favors or any behavior that constitutes a violation of this code of ethics and conduct.

7.13 Worker involvement

The involvement of workers in carrying out the work is ensured, also by providing moments of participation in discussions and decisions functional to the achievement of company objectives.

The worker must participate in these moments with a spirit of collaboration and independent judgment.

Listening to various points of view, compatibly with company needs, allows the manager to formulate final decisions; the worker must, however, always contribute to the implementation of the established activities.

7.14 Safety and health

Planet PellamiS.rl is committed to spreading and consolidating a culture of safety by developing awareness of risks, promoting responsible behavior by all workers; Furthermore, it works to preserve, especially with preventive actions, the health and safety of workers, as well as the interests of other stakeholders.

The objective of Planet PellamiS.rl is to protect its human, capital and financial resources, constantly seeking the necessary synergies not only within the company, but also with suppliers, companies and customers involved in its business.

To this end, a widespread internal structure, attentive to the evolution of the reference scenarios and the consequent change in threats, carries out interventions of a technical and organizational nature, through:

- a continuous analysis of the risk and criticality of the processes and resources to be protected;
- the adoption of the best technologies;
- the control and updating of working methodologies;
- the contribution of training and communication interventions.

7.15 Protection of privacy

The worker's privacy is protected by adopting standards that specify the information that the company requests from the worker and the related processing and storage methods.



Any investigation into the ideas, preferences, personal tastes and, in general, the private lives of workers is excluded. These standards also provide for the prohibition, without prejudice to the hypotheses provided for by law, from communicating/disseminating personal data without the prior consent of the interested party and establish the rules for the control, by each worker, of the rules protecting privacy.

7.16 Integrity and protection of the person

Planet PellamiS.rl is committed to protecting the moral integrity of its workers by guaranteeing the right to working conditions that respect the dignity of the person. For this reason it protects workers from acts of psychological violence and counteracts any attitude or behavior that is discriminatory or harmful to the person, their beliefs and their preferences (for example, in the case of insults, threats, isolation or excessive intrusiveness, professional limitations).

Sexual harassment is not permitted and behavior or speech that may disturb the sensitivity of the person must be avoided (for example, the display of images with explicit sexual references, insistent and continuous allusions).

The employee of Planet PellamiS.rl who has reason to believe that he has been subjected to harassment or discrimination for reasons related to age, sex, sexuality, race, state of health, nationality, political opinions and religious beliefs, etc., can report the incident to the company which will assess the actual violation of this Code of Ethics and Conduct. However, disparities are not considered discrimination if justified or justifiable on the basis of objective criteria.

7.17 Abuse of alcohol or drugs and smoking ban

All Recipients of the Planet PellamiS.rl Code of Ethics must personally contribute to promoting and maintaining a climate of mutual respect in the work environment; particular attention is paid to the conditions of respect for the sensitivity of others. It will be considered conscious assumption of the risk of compromising these characteristics, being or being under the influence of alcoholic substances, narcotic substances or substances with similar effects, during work performance and in the workplace. Chronic dependence states, when they affect the working environment, will be - due to contractual implications - equated to previous cases; Planet PellamiS.rl is committed to promoting the social actions envisaged in this area by employment contracts.

It is forbidden to:

- possess, consume, offer or give away, for any reason, alcoholic, narcotic or similar substances during work performance and in the workplace;
- smoking in the workplace.



7.18 Duties of employees and collaborators

The employee and/or collaborator must act loyally in order to respect the obligations signed in the employment contract and the provisions of the Code of Ethics and Conduct, ensuring the required services. However, he is required to report any violation of the rules of conduct established by the internal procedures through the appropriate channels.

In particular, employees and collaborators must avoid any possibility of conflict of interest.

It is therefore the duty of the employee and/or collaborator of the company:

- inform their Managers of the existence of any close family relationships, both with third parties with whom relationships may be initiated or maintained on behalf of the company, and with other workers within the company;
- avoid those situations that may create conflicts or overlaps between the Recipient's corporate responsibilities and his personal interests;
- avoid negotiating and/or maintaining relationships with third parties who are in a potential situation of conflict of interest towards the Public Administration;
- In each of these cases, or when a possible conflict of interest arises, the Recipient will be responsible for immediately reporting it to his/her Manager and to the Supervisory Body for an appropriate evaluation.

7.19 Relationship with external collaborators/consultants

The company may immediately terminate any employment relationship established with external collaborators/consultants who do not agree to abide by this Code of Ethics and Conduct.

The Recipient who identifies the behavior of an external collaborator/consultant not adhering to this Code is required to promptly notify the Supervisory Body.

In relation to relationships with external collaborators and consultants, please also refer to the principles identified in the context of relationships with suppliers of goods and services.

7.21 Relationship with the Public Administration

Only the delegated or authorized functions directly emanating from the Company can maintain relations with the Public Administration, in compliance with the principles of ethics, correctness, honesty and transparency.



The Recipient must both avoid engaging in behavior contrary to the law and the Code of Conduct, and refrain from creating, encouraging or allowing situations of conflict of interest.

The Company, in relations with the State and Public Administrations, issues declarations and provides documentation, certifications and truthful information and bases its activity on the principles of correctness, transparency and verifiability.

The Company does not allow any practice that may even appear to be aimed at influencing, directly or indirectly, the behavior of public officials or at determining advantages or benefits that are not legally due.

In case of participation in public tenders or private negotiations with the State and Public Administrations, the Company strictly respects the rules that regulate the conduct of individual procedures.

Therefore, it is strictly prohibited:

- a) carry out to people belonging to the Italian Public Administration (or in any case operating in the public sector) and abroad, to their relatives, both Italian and foreign, and/or to people reported by them in order to receive interest or benefit:
 - promises of money and/or benefits of any nature;
 - gifts or gifts of a modest value or not falling within company custom, or such as to compromise the integrity and reputation of the parties, or which could be perceived as aimed at the improper acquisition of advantages for oneself, for others or for the company ;
- b) try to bribe and/or influence the public counterpart;
- c) defraud the Public Administration to achieve personal and/or corporate objectives;
- d) improperly and/or illicitly exploit knowledge and, in general, privileged paths to achieve one's corporate professional objectives;
- e) accept money, gifts, gifts (if not of modest value and compliant with internal procedures), promises, pressure, recommendations, services, benefits (unless it is a regular and legitimate activity contractual), conditions contrary to the values and principles expressed in the Code by members of the Public Administration;



- f) solicit or obtain confidential information that may compromise the integrity or reputation of the parties;
- g) succumb to the activity of pressure or persuasion, carried out by the public official or by a person equivalent to him, aimed at creating in the private individual a state of psychological subjection which leads him to act in the direction desired by the person invested with public duties.

The company, area or branch of society which, for a formally codified task, interacts with the Public Administration or with the personnel belonging to it must:

- a) Observe the previous points from (a) to (g);
- b) Document, as much as possible, the relationships with the Public Administration in writing;
- c) Draw up all contracts and agreements made in writing;
- d) Offer/accept gifts, freebies, services only if they are of modest value and if they are lawful and comply with all applicable laws, as well as make every effort to ensure that they are accurately recorded in the accounts;
- e) Do not delegate relations with the Public Administration to a consultant or a "third party" when conflicts of interest could arise;
- f) Immediately report any unethical and/or illegitimate behavior of the Public Administration to your Manager and/or the Supervisory Body.

It is not permitted to allocate grants or financing obtained from the State, from a public body or from the European Union for purposes other than those for which they were granted.

The recipient must not use or present false or misleading declarations and/or documents, or omit required information.

In general, it must not implement any artifice or deception to obtain disbursements or any unfair profit to the detriment of the State or other public body.



7.22 Relations with the Supervisory, Regulatory and Guarantee Authorities and with Institutional Bodies

In relations with the Supervisory, Regulatory and Guarantee Authorities and with the Institutional Bodies, the Company is inspired by principles of integrity and professional correctness, avoiding influencing their decisions or requesting preferential treatment through the promise, the offer or grant of compensation or other benefits.

The Company maintains relationships with the aforementioned subjects based on full and effective collaboration, promptly making available any information requested by them in carrying out the investigative activities and complying with the provisions issued.

In order to guarantee maximum transparency, the Company also undertakes to avoid taking any form of undue advantage from any personal or family relationships with officials of the Authorities.

The Company, in relations with the Institutional Bodies of the State, the Regions and Local Authorities as well as with the International ones, aimed at allowing the evaluation, by the Company itself, of the legislative and administrative activity in the sectors of interest, adopts, in every case, correct and transparent conduct, avoiding any attitude of a collusive or coercive nature.

Furthermore, in case of participation in judicial proceedings (administrative, civil or criminal), the Company undertakes to act in compliance with the law and the rules of this Code of Ethics. In particular, corporate bodies and employees with power of attorney to represent the Company in court are prohibited from promising or giving money or other benefits to the Judicial Authority, in particular to magistrates, judges, clerks and witnesses, to in order to influence the outcome of the process in a favorable sense for the Company.

7.23 Relations with the political world (contributions, sponsorships, donations)

Political contributions, Sponsorship activities and donations to charitable organizations could generate corruption issues.

The risks arise from the fact that economic benefits can be used as an improper means of corruption to maintain or obtain a business advantage.

It is however possible, on the basis of specific requests, to contribute to the activities of political parties, organizations and associations (provided not recently established, well known, reliable and with an excellent reputation in terms of honesty and integrity), also through the provision of financial resources, only in the cases and in the manner provided for by law and, in any case, within the scope of specific projects and initiatives clearly identified, respecting precise criteria of conduct, such as the clear and documentable destination of resources, the express authorization by the corporate bodies or managers responsible for managing these relationships.

The sponsorship and patronage activities may concern sporting events, shows, restorations of artistic and archaeological assets, cultural events and initiatives linked to



social, humanitarian and environmental themes, which offer a guarantee of quality and to whose success the Company can contribute .

In any case, in stipulating sponsorship or patronage contracts, the Company maintains correct and transparent conduct, avoiding any pressure on the interested parties.

Each liberal donation requires express authorization from the corporate bodies or managers responsible for managing these relationships and that payments must be made exclusively to the account registered in the name of the beneficiary body, while making payments to numbered accounts is prohibited. or in cash, or to a person other than the beneficiary institution or in a third country other than the country where the beneficiary institution is located.

7.24 Relations with the press and media

The Recipient responsible for providing external data and information relating to Planet Pellami S.r.l must act with honesty, transparency and fairness, guaranteeing all interested parties equal access to the data/information.

The other Recipients must never make statements, comments or interviews regarding the company, even through electronic tools such as email or the Internet.

Any request for information coming from outside or inside the company must be forwarded to the competent Recipient.

8 METHODS OF DISSEMINATION AND REPORTING OF VIOLATIONS

8.1 Dissemination and information

Planet Pellami S.r.l and its managers work to spread knowledge of the Code and its contents to all Recipients, ensure maximum dissemination among the Recipients themselves and guarantee its periodic updating.

Each Recipient is required to sign this list of attribution of qualifications and responsibilities.

The company and its managers guarantee adequate training on the Code of Ethics and Conduct to all internal and external Recipients, making themselves available to illustrate to the Recipient the company procedures relevant to their relationship with the company.

Planet Pellami S.r.l and its Managers work to spread knowledge of the Code and its contents also to the Group Companies, with particular reference to the Companies where Planet Pellami S.r.l exercises control.

8.2 Liability

The Managers verify the adherence of the Recipient's behavior to this Code and take steps to clarify doubts, questions or uncertainties expressed by the Recipients themselves.



The Recipient is required to report any violation of the Code of which he becomes aware to the aforementioned Body.

The workers of Planet Pellami S.r.l. they have the duty to report to the Supervisory Body any fact that occurs that appears to be in conflict with the Code of Conduct.

The Supervisory Body maintains the maximum possible confidentiality regarding violations and the identity of the Recipients who have reported them.

8.3 Reporting System

The Company provides an internal reporting channel for reporting, the prohibition of retaliation and a disciplinary system compliant with the provisions from the art. 6, c. 2-bis, as novated by Legislative Decree. n. 24/23² implementing Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, "concerning the protection of persons reporting breaches of European Union law and laying down provisions concerning the protection of persons reporting breaches of the provisions national regulations" ("Whistleblowing Decree"), through which the Whistleblowers, (in compliance with the Whistleblowing procedure) if they detect any illegal conduct or conduct involving a violation of the Code of Ethics, present detailed reports of illicit conduct based on precise factual elements to protect the integrity of the entity and concordant, of which they became aware due to the functions performed.

The Reporting System set up by the Company aims to:

- promote, within the Company, a culture based on responsibility and ethics, in the belief that the active participation and involvement of all employees/collaborators are a fundamental part of the Company's development process;
- allow the Company to be promptly informed of facts or conduct contrary to the ethical principles pursued, for the purpose of prompt intervention, as well as to identify and manage possible deficiencies in the internal control and risk management system;
- provide recipients with information on how to make and manage reports in a "responsible" manner.

Reports will be duly investigated, ensuring their confidentiality.

The Company undertakes to ensure adequate forms of protection for whistleblowers by establishing a prohibition on direct or indirect acts of retaliation against the whistleblower

²Legislative decree 10 March 2023, n. 24 implements in Italy the EU Directive 2019/1937 concerning the protection of people who report violations of Union law. This new regulation extends the scope of the subjects who can make reports, provides for a broader category of entities specifically identified with reference to various criteria relating to the size of the staff and the adoption of MOG 231 or not, as well as the carrying out of activities in sectors regulated by EU law.



for reasons connected, directly or indirectly, to the reporting in compliance with the Legislative Decree. n. 24/2023.

In any case, any retaliatory or discriminatory measures and dismissal adopted against the whistleblower for reasons directly or indirectly linked to the report are null and void. Furthermore, the sanctions referred to in the disciplinary system of the Organizational Model may be applied to those who violate the confidentiality of the whistleblower. The Whistleblowing decree provides for the provision of support measures for whistleblowers as well as the possibility for the latter to communicate to the ANAC the retaliation they believe they have suffered as a result of a report.

The protection provided in the event of retaliation is not guaranteed when the criminal liability of the reporting person for defamation or slander crimes or in any case for the same crimes committed with the complaint to the judicial authority or accountant or his civil liability, for the same reason, in cases of fraud or gross negligence.

The Company has identified the Supervisory Body as the body intended to receive any report regarding alleged violations of this Model and the Code of Ethics.

The SB, within its competence, manages the reports received in an objective, impartial and confidential manner and directly manages the investigation if the report is inherent to Model 231 and the Code of Ethics.

Otherwise, it will direct the report to the relevant corporate body which will, if necessary, start the investigation, proceed with the evaluation and decide the outcome.

In the event that the Body were to assess that there could be a case of conflict of interest with the competent corporate body, it will direct the report to the higher hierarchical level.

Reports can be addressed indifferently to two addresses:

- a traditional postal one:
Supervisory Body of Planet Pellami Srl,
Viale dell'Industria, 87/89, 56022 Castelfranco di Sotto PI
with the indication of the wording "To the Supervisory Body RESERVED";
- the other telematic: odvplanetpellami@libero.it

The person who makes reports which later turn out to be manifestly in bad faith, aimed at the sole purpose of damaging or causing prejudice to people, processes or the Company, may be subject, if certain conditions arise, to disciplinary measures in accordance with the provisions of the following paragraph, in line with the relevant CCNL, as well as further regulatory actions such as criminal liability for crimes of defamation or slander.

8.4 Collection and storage of reports



All information (also relating to reports relating to violations of the Model and/or the Code of Ethics) is stored by the SB in a specific archive (IT or paper) for a maximum period of 5 years³ starting from the date of communication of the final outcome of the reporting procedure.

9.The SANCTION SYSTEM

9.1 Sanctions

Violation of the principles and behaviors of the Code undermines the relationship of trust established between the company and the Recipient.

Planet Pellami S.r.l can protect itself by adopting any appropriate measure, i.e. evaluating appropriate disciplinary measures for its employees, including dismissal, while for third party Recipients the immediate interruption of the contractual relationship pursuant to art. 1456 of the Civil Code.

9.2 Discipline of Sanctions

In compliance with the principle of graduality and proportionality of sanctions in relation to the seriousness of the violation ascertained, the type and extent of each of them are determined in relation to the following general criteria:

- a) subjective element of the conduct (malice or negligence, the latter due to imprudence, negligence or incompetence also taking into account whether or not the event was foreseeable);
- b) relevance of the violated obligations;
- c) severity of the danger created;
- d) extent of the damage possibly created to the Company by the possible application of the sanctions provided for by the Decree and subsequent amendments and additions;
- e) level of hierarchical and/or technical responsibility;
- f) presence of aggravating or mitigating circumstances with particular regard to previous work performance, disciplinary records in the last two years;
- g) possible sharing of responsibility with other workers who contributed to causing the deficiency.

³As regulated by art. 14 of the Legislative Decree. 24/2023





10. PUBLICITY AND ENTRY INTO FORCE

10.1 Disclosure

This Code must be given maximum publicity through every suitable tool, accessible and visible to all.

In particular, it will be published on the company intranet as well as distributed to each Recipient and will be illustrated during the induction training of each new resource acquired.

10.2 Implementation

The provisions of this Code come into force from the fifteenth day following that of approval by resolution of the Sole Director of Planet Pellami S.rl.