

CODE OF ETHICS

DRASS SRL

(D. lgs. 8 June 2001, n. 231)

**Guidance for the administrative responsibility of legal entities, companies and associations, even
for those without legal representation
(art. 11, L. 29 September 2000, n. 300)**

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1 GLOSSARY

- **"Risk Analysis"**: Identification and assessment of Company procedures and activities that can lead to the commission of offenses set forth in Legislative Decree 231/2001;
- **"CCNL"**: National Collective Labour Contract;
- **"Code of Ethics"**: the commitments and ethical responsibilities in the conduct of business and corporate activities, undertaken by Drass Srl and Drass Group of Companies;
- **"Supervisory and Control Body" or "CB"**: internal body in charge of supervising the operation and observance of the code and any related updating;
- **"Consultants"**: those who act in the name and/or on behalf of the Company on the basis of a mandate or other collaboration relationship;
- **"Corporate Governance"**: Company management and rules of governance;
- **"D. 231/2001"**: the legislative decree n. 231 of 8 June 2001 and subsequent amendments;
- **"Operation at risk"**: a transaction deemed at the risk of committing crimes pursuant to Legislative Decree 231/2001;
- **"Sensitive Processes"**: procedure and Company activities that can lead to the commission of crimes provided for by Legislative Decree 231/2001;
- **"P.A."**: the Public Administration as a comprehensive tool, that is to say, officials and subjects in charge of public service;
- **"Partners"**: negotiating counterparts of the Company or suppliers, customers, both actual persons and legal entities, with which the Company has any form of contractually regulated relationship and/or collaboration (purchase and sale of goods and services, joint ventures, consortia , etc.), during which there is interaction with the interventions of sensitive processes;
- **"Crimes"**: the crimes to which the provisions of Legislative Decree 231/2001 apply (including any future additions);
- **"Stakeholders"**: the stakeholders with respect to the Company.

2 INTRODUCTION

Through this Code of Ethics compiled and approved by Drass Srl Administration Council, the Company intends to implement the Legislative Decree June 8, 2001, n. 231 relating to the administrative liability of legal persons for crimes committed by employees or individuals who hold a top position within companies.

In order to prevent the commission of crimes in the interest of the Company, in line with the provisions of the delegated legislator, an organizational and management model was set up to ensure the control of every operation at risk, through the regulation of behaviours already in use within Drass Srl.

The supervision on the implementation, on the effectiveness of this organizational model, is entrusted to an internal control system, providing the Company to identify a Supervisory and Control Body (known as an O.D.C.) responsible for the verification, control and maintenance of the Code of Ethics.

This Code of Ethics collects the principles and rules of conduct in which Drass Srl is reflected, for the purposes better specified below and outlines the general discipline to which all those who work for any reason in the corporate organization and with the Company are subject.

With reference to the prescriptive content, it is recalled that the Code recognizes juridical relevance and mandatory efficacy to the ethical principles and to the code of conduct described also in a perspective of prevention of corporate crimes.

Violation of the Code of Ethics compromises the relationship of trust between the Company and the violator, and is pursued incisively, with immediacy, through disciplinary procedures and sanctions, independent to criminal prosecution by law enforcement when a criminal activity has taken place.

This Code has the primary purpose of establishing and disclosing the values and conduct to which Drass Srl intends to make constant reference to the execution of its business activity.

Together with the application of content of the Organization, Management and Control Model prepared by the Company pursuant to Legislative Decree n. 231/2001, this Code discloses the company policy and is aimed at preventing and opposing the commission, even indirect, of the types of crimes assumed by the aforementioned legislation, made or attempted in the interest and/or for the benefit of the Company, by the subjects operating in "top" or subordinate position.

Direct recipients of the precepts contained in it, and therefore of this Code, are:

- Partners;
- Corporate bodies (the administrative body, the delegated bodies, the board of statutory auditors, the accounting auditor, the subjects who exercise, even in de facto, powers of representation, decision-making or / or control within Drass Srl);
- Staff in the broad sense (that is, the employees, the coordinated and continuous collaborators, the freelancers who collaborate permanently with the Company and who in any case act in its name, etc.) of Drass Srl;
- Consultants and suppliers of goods and services, including professional ones, and anyone who carries out activities in the name and on behalf of Drass Srl or under its control;
- Third parties who do not carry out activities in the name and on behalf of it (such as, for example, the clients of Drass Srl). The recipients of the Code are required to observe and respect its principles and to comply with its behavioural rules.

Knowledge and compliance with the provisions of the Code of Ethics represent an essential and essential requirement for the establishment, maintenance and profitable continuation of collaborative relationships with third parties, against which Drass Srl undertakes to disseminate all related information, in a context of total transparency.

Only those who fall into the categories sub 2), and 3) who do not observe, respect and in any case violate or violate the provisions of the Code are liable to disciplinary sanctions.

In the context of relations with personnel, any violation constitutes, in fact, an assessable breach pursuant to Articles. 2094 et seq. and 2119 of the Civil Code, with consequent application of disciplinary sanctions, given the mandatory nature of the Code pursuant to and for the purposes of articles 2104 Civil Code (diligence of the employee) and 2105 Civil Code (obligation of loyalty). The disciplinary system of Drass Srl also provides for the solvability of the employment relationship in cases of particular gravity, subject to the request for compensation for damages, in accordance with the combined provisions of Articles. 1218, 1223, 1224, 1453, 2119 c. ; of the provisions of Law 604 of 1966 and the CCNL applied by the Company. With regard to the categories referred to in points 4) and 5) the violation may be the subject of a specific "express termination clause" to be included in the contract or in the collaboration agreement or in the mandate intended to regulate the relationship with the Company.

To establish binding force, the Code is:

- Shared internally within Drass Srl, by delivering a copy of the same to its members, corporate bodies and staff. A copy of the Code is posted on the company notice board, as well as inserted in the page dedicated to the company intranet.
- Advertised externally through specific information sent to consultants, suppliers and customers, as well as by means of a notification in the company brochure and/or publication on the website of Drass Srl: www.drass.it

The Code of Ethics does not replace but supplements the disciplinary code, the regulations and the company directives on the subject of work regulation, on the use of company tools, any company directives in terms of execution of the work and of presence in the company.

In particular, it should be noted that employees must sign a copy of the Code of Ethics by receipt, acknowledging that they have read and understood its contents.

If there are doubts about how to proceed Drass Srl will adequately inform employees by identifying in the company organization a Supervisory and Control Body of the Code, authorized to provide any useful clarification or explanation about the correct application of the rules of the Code.

Possible interpretative conflicts between the principles and contents of the procedures of Drass Srl and the Code shall be deemed favourably resolved in favour of the latter. In any case, the Supervisory and Control Body takes care of defining every problem regarding the interpretative and applicative aspects of the Code and monitors compliance with the principles of the Code.

Based on the provisions of art. 6, paragraph 4 of Legislative Decree June 8, 2001, n. 231, the constant monitoring of the implementation and effectiveness of the prevention organizational model is entrusted to an internal control system (Prevention, Supervision and Control System also called SPVC), managed by the Supervisory and Control Body (ODC) in compliance with this Code and the Organization and Management Model, consisting of one or more persons in charge, which will be appointed until revoked by the Board of Directors of Drass Srl, based on the structural characteristics of the Company and the concrete possibilities for the realization of any illegal activity within it.

Please note that the Drass Srl ODC detects any violations of the rules of the Code, notifies the contact persons - managers and in any case the human resources office if they relate to subordinate workers who will take the necessary initiatives, including disciplinary ones, against the offenders in compliance with the law (art. 2016, 2119 cc and articles 3, L. 604 of 1966 and 7, L. 300 of 1970), of

the CCNL and of the disciplinary code.

In the case of an organic relationship, where the violation is therefore consumed by an administrator, or in any case by a legitimate subject to spend and/or to represent the Company, the detected and disputed violation by the member of management and/or control bodies will be evaluated depending on its seriousness and may even result in the revocation for "just cause" of the assignment, resolved by the Board of Directors.

In contractual relationships, depending on the seriousness of the violation, the signed contract can be considered terminated due to breach, imputable and important, in accordance with articles 1453 and 1455 cc.

If the offender turns out to be a shareholder of Drass Srl, the O.D.C. will assess, in coordination with the competent corporate bodies, the seriousness of the violation committed for the purpose of imposing the sanction.

Any changes or additions to this Code will be submitted to the Board of Directors for approval, except for those of a purely formal nature whose competence lies with the CEO.

3 PART I: GENERAL PRINCIPLES AND ETHICAL STANDARDS OF DRASS SRL

3.1 The Company and the Group

This Code (herewith also referred to as the "Code of Ethics") expresses the commitments and ethical responsibilities in the conduct of business and corporate activities, undertaken by the collaborators of Drass Srl and Drass Group of companies (hereinafter the reference to Drass must be considered extended to all the companies of the Group) whether they are employees, collaborators in various capacities or directors.

Drass Srl and the companies it controls and participates in, and in particular the companies Drass Galeazzi, Enkreo, Middle East DMCC, Drass Romania Srl, Drass Submarine, and Subspec constitute a Group present in the sector of high precision engineering. The achievement of the goals of Drass Srl is pursued by all those who work in the Company with loyalty, dedication, honesty, competence and transparency, in strict compliance with the laws and regulations in force in all countries in which the company operates.

3.2 Relations with private and public stakeholders

The presence of Drass Srl and Drass Group of Companies, widespread on domestic and international markets, means that the operations in different contexts and the multiplicity of its interlocutors makes the management of relations between the company and its interlocutors of fundamental importance, including all public or private subjects for these, Italians and foreigners - individuals, groups, companies, institutions - who have any contact with Drass Srl and/or have an interest in the activities that the company puts in place. Drass Srl bases its activities on the timely compliance with the law (Italian and of the countries in which the Company is active), market rules and the principles inspiring fair competition.

Drass Srl inspires its choices and the rules of conduct with the ethical principles and the values summarized below, which configure a specific corporate policy.

3.3 Principle of legality

The activity of Drass Srl is carried out in full compliance with the law and current regulations. To this end, all those who work with the Company are required to comply with the principle of legality. Therefore, Drass Srl condemns and dissociates itself from any criminally relevant conduct, carried out in its alleged and non-shared interest or to its advantage by the recipient subjects of this Code, which violates respect of the laws.

3.4 Principle of fairness

Drass Srl monitors that all the subjects operating within it comply with the principles of correctness, good faith and loyalty in the performance of their duties, competences and duties, internal and external, also for the purpose of protecting the image of the Company and the relationship of trust established with customers and, in general, with third parties.

3.5 Principle of honesty in business

Drass Srl staff must adopt a correct, transparent and honest attitude, both in the performance of

their duties, and in relations with other members of the Company, avoiding pursuing illicit or illegitimate purposes, or generating hypotheses of conflict of interest to obtain an undue advantage, precisely or third parties.

In no case should staff behave, or justify behaviour, that does not comply with the law, the principles of this Code or that is otherwise contrary to the rules of civil coexistence and respect for the personal and or legal sphere of others.

3.6 Principle of providing transparent and comprehensive information

Drass Srl, respecting the principle of transparency, is committed to disclosing correct, truthful and complete information to third parties.

3.7 Principle of pursuing fair competition

In accordance with national and EU anti-trust regulations, as well as guidelines and directives from the National Competition and Market Authority, Drass Srl does not engage in conduct, or sign agreements or otherwise commit to companies that may adversely affect the competition regime between the various players in the target market.

3.8 Principle of impartiality

Drass Srl is committed to ensuring that all members of the Company and all those who in any way act on its behalf act with impartiality, fairness and loyalty, not only in the fulfillment of their duties, tasks and duties, but also inter-company relations and with its private or institutional partners.

3.9 Principle of independence

The activities carried out by Drass Srl staff are entrusted and managed with independence and diligence, depending on the type of activity required and its delicacy and difficulty.

3.10 Principle of confidentiality and privacy protection

Drass Srl pays special attention to the implementation and strict compliance with personal data privacy and protection requirements, as well as the recommendations and communications made by the National Data Protection Authority personal information.

Each employee of the Company is required not to use, nor advertise, confidential information or data if not within the limits and depending on the exercise of their skills, duties and prerogatives.

3.11 Principle of diligence and accuracy

Drass Srl guarantees that its personnel will carry out their duties with the necessary diligence and accuracy, according to levels of professionalism appropriate to the tasks or competences assigned or agreed with the company, in compliance with the directives given by the hierarchical and/or responsible superiors and, in general, of corporate quality standards.

3.12 Principle of fairness and equality

Drass Srl is intent on developing the corporate spirit of belonging and condemns any form of discrimination and/or abuse in any capacity and for whatever reason, both in the context of internal

and external relations.

In this regard, Drass Srl is watching that none of its members discriminate on the basis of age, gender, sexual orientation, nationality, race, political and/or union views, religious beliefs, and promotes the organization of meetings and/or events aimed at the development of the group spirit among the members, knowledge and mutual respect.

3.13 Principle of quality of products and services

Drass Srl takes particular care regarding the satisfaction of its Customers, both current and potential, the demands and expectations of this, with the aim of providing, in its sector of activities, products and services that guarantee maximum professionalism, care, timeliness and adaptability.

3.14 Hierarchical principle

With a view to synergy, efficiency and effectiveness of the business processes, Drass Srl adheres to the hierarchical principle according to which every single resource, based on its level of placement in the Organization Chart of the Company, is evaluated with predominantly meritocratic criteria, and is responsible for its own actions and omissions in good faith, constituting the absolute nucleus of any form of collaboration with society.

In this way, the person who has the functions of management, coordination, management and/or representation in the company, including at the sector or function level, will exercise management, coordination and control over the respective activities and those responsible for its processes.

3.15 Principle of professionalism

The entities operating within Drass Srl, i.e. those to whom the Company entrusts the performance of certain services, tasks or initiatives, are equipped with proven requirements of competence, professionalism and experience. With particular reference to its staff, the Company is attentive to the training, updating of skills and constant professional growth.

3.16 Principle of personal protection

In accordance with the rules of law to protect the psychophysical and moral integrity of the person in general and employees in particular, Drass Srl ensures to its staff safe and dignified working conditions, constantly monitoring the state of maintenance and safety of machinery, plants and work environments, periodic medical checks, as well as ensuring, when personnel operate outside the company, that agreements with their business partners and with customers guarantee acceptable personal safety standards.

3.17 Principle of environmental protection

Drass Srl contributes to the dissemination and awareness of environmental protection issues and manages its activities in an eco-friendly way, in accordance with existing national and EU regulations. The company protects and guarantees the expectations of its customers in relation to environmental issues, taking every appropriate tool of protection and caution, condemning any form of damage and compromise of the ecosystem.

3.18 Principle of traceability

Every operation and transaction carried out in the name and on behalf of Drass Srl must be correctly annotated, registered, authorized, legitimate, consistent for business purposes, consistent with the company's expectations and speakers, and verifiable through adequate documentation identifying those responsible and the reasons that justify their adoption.

Therefore, all the expenses and operations relating to the activity are subject to the provisions of the specific procedures of the integrated management system.

4 PART II: ETHICAL PRINCIPLES AND STANDARDS RELATING TO INTERCURRENT RELATIONSHIPS BETWEEN DRASS SRL AND THIRD PARTIES

The following rules of conduct relate to Drass Srl activity and are identified as areas of risk. All recipients of this Code are required to always comply with the precepts and prohibitions laid down by the current law enforcement rules, with respect to which D.lgs. 231/2001 has the administrative responsibility of the Company.

4.1 Relations with the public administration

It must be noted that certain behaviours within normal business practice may be considered unacceptable, if not even contrary to provisions of laws and/or regulations, if held against civil servants or officials acting on behalf of the Public Administration.

Drass Srl prohibits any form of undue payment of money, gratuities or other benefits in favour of officials, employees of the Public Administration, persons in charge of a public service, Italian or other countries, or officials and agents of the European Communities, besides that of modest value.

It is not permitted, either directly or indirectly through an intermediary, to offer money, gifts, compensation, promised services or benefits or any other advantages in favour of officials and employees of Public Administration nationally or internationally, so that they fulfill, favour, facilitate, or in any case carry out acts relating to their office, or acts contrary to their office duties, for the benefit of Drass Srl or the companies it controls or participates in.

Any attempt to improperly influence the decisions of officials who negotiate or make decisions on behalf of the Public Administration is expressly prohibited.

Both illegal payments made directly by Italian bodies or their employees and illicit payments made through third parties acting on behalf of such entities both in Italy and abroad are considered acts of corruption.

It is strictly prohibited to offer or accept any object, service, or favour of value to obtain more favourable treatment or advantage in relation to any relationship with the Public Administration. In those countries where it is the custom to offer gifts to customers or others, it is possible to act in this way when these gifts are of an appropriate nature and of modest value, but always in accordance with the laws. However, this should never be interpreted as a search for favours or undue shortcuts or facilitations.

In the specific case of the making of a tender with the Public Administration, operations are conducted in accordance with the law and the correct practice and commercial competition.

If the company uses a consultant or a third party to be represented in relation with the Public Administration, in the contractual relation with the same stipulated or contracted, it should expressly provide for compliance with the same directives that apply to the company's employees.

In addition, the company should not be represented, in relation with the Public Administration, by a consultant or a third party when even a potential conflict of interest can be created.

The company complies with and is committed to complying with prohibitions related to hiring, under the company, former employees of the Public Administration (or their relatives), who have personally and actively participated in the business negotiation, or to support the requests made by the

company to the Public Administration.

However, in the evaluation of the curricula special attention is paid to those who have personally and actively participated in the business negotiation, or to endorse the requests made by the company to the Public Administration.

In the course of a negotiation, interrelationship or business relationship with the Public Administration, the following actions or actions that can be considered to be targeted at:

- a) examine or propose employment and/or commercial opportunities that may bring benefits to employees of the Public Administration on a personal or family basis;
- b) offer in any way gifts, gratuities, or even non-economic benefits;
- c) solicit or obtain confidential information that could compromise the integrity or reputation of both parties.

The company can contribute to the financing of political parties, committees, public organizations or political candidates provided that they are in compliance with existing regulations and with full transparency.

Any conduct contrary to these obligations should be immediately reported to the monitoring body.

[v. artt. 318-322 c.p., *Reati contro la pubblica amministrazione* - Offences against the public administration]

4.2 Public disbursements

The documentation provided by Drass Srl in order to obtain contributions, grants, funding from the State, public bodies or the European Communities, in favour of Drass Srl itself or of subsidiary companies must be complete, transparent and truthful: such disbursements cannot be obtained by omitting information due, fraud or false claims or information.

Once obtained, these sums cannot be allocated for purposes other than those for which they were disbursed.

[v. artt. 316bis - 316 ter -640 bis c.p., *Reati in materia di erogazioni pubbliche* - Offences relating to public disbursements]

4.3 Relationships with the public administration via computer system or telematics

All those who operate through the use of computer systems must comply with the procedures provided by the organizational model adopted by Drass Srl, regulations respecting the use of work tools, and the operating rules of good management; and must immediately report any damage caused unintentionally.

In particular, it is forbidden to manipulate or alter the operation of computer or telematics systems or to intervene without rights on the data, information or programs contained in them, harming the state or other public body in the interests of society. It is also forbidden to violate in any way the code of digital administration (alteration of the digital signature) by obtaining for yourself or for others an unfair advantage or procuring harm.

[v. Art. 640 ter, *Frode informatica aggravata* - Aggravated computer fraud]

4.4 Principle of transparency in social communications

The budgets, periodic reports provided by law and all other social communications must be clearly drawn up and represent the company's economic, capital and financial situation in a fair and truthful manner.

In such communications, therefore, it is forbidden to expose material facts that do not meet the truth or evidence and deliberately or partially omit information due, and in any case the omission of information imposed by law, that would cause a significant change to the Company's economic, capital or financial situation and mislead the recipients of such communications.

[v. artt. 2621-2622 c.c., *Reati societari* - Corporate offences]

4.5 Duty to convene meeting of shareholders

Directors and statutory auditors must arrange for the meeting of shareholders to be convened in a timely manner and within the time frame set by the law or statute of Drass Srl.

[v. art. 2631 c.c., *Reati societari* - Corporate offences]

4.6 Complaints to the Registry of Companies. Social Budget Deposit

Complaints, communications or filings with the Registry of Companies must be carried out by the responsible parties in a timely and complete manner, without omissions and in accordance with the rules of this type of practice and documentation.

In particular, they will have to provide the Social Budget in a timely manner with the relevant bodies.

[v. art. 2630 c.c., *Reati societari* - Corporate offences]

4.7 Conflict of interest

Directors and General Managers have an obligation to report to the supervisory body, without delay, cases where they themselves, or they by way of a third party, have a conflict of interest with Drass Srl.

In particular, they have an obligation to disclose the existence of any financial relationships, interests, or any case of sharing personally or by means of family members with competitors or with subsidiaries or affiliates controlled, involved and/or financed by Drass Srl.

In the exercise of their duties they must pursue and guarantee only the interest of society: no promise or giving of utility can be accepted to omit acts of their office or to carry out acts contrary to the obligations your office.

In particular, it is forbidden to deliberate or contribute to the deliberation of acts relating to social goods against society. [v. art. 2634- 2635 c.c., *Reati societari* – Corporate offences]

4.8 Social activity control

The Directors may not prevent or in any way hinder the performance of control or auditing activities that the law attributes to the Shareholders, to the Board of Statutory Auditors, to the Independent Auditors. [v. art. 2625 c.c., *Reati societari* – Corporate offences]

4.9 Relationships with the supervisory authorities

It is forbidden to obstruct in any way the exercise of the functions of the supervisory authorities to which the Company is subject: the communications intended to it must fully, transparently and faithfully represent the economic situation, Company's financial assets and assets.

[v. art. 2638 c.c., *Reati societari* – Corporate offences]

4.10 Crimes with the purpose of terrorism, evading the democratic order, against an individual person, and transnational crimes

It is forbidden to use corporate structures to violate general laws concerning crimes of terrorism and the evasion of democratic order (see art. 270, 280, 280-bis and 289-bis c.p., Article 1 of L. 06/02/1980 no.15) and art. 2 of the 1999 New York Convention on the Repression of Terrorism Financing.

It is also forbidden to use the Company's facilities for offences of enslavement or servitude (see art. 600 c.p.), induction or exploitation of child prostitution (see art. 600-bis c.p.), trafficking in persons or sale of slaves (see art. 601 and 602 c.p.), trade or distribution of child pornography and sex tourism (see art. 600-ter, 600-quater and 600 quater.1 c.p.).

In the same way, it constitutes an administrative responsibility of the Company, as well as the direct managers, the use of Company structures to carry out or facilitate the commission of transnational crimes such as:

- a) criminal association (Article 416 of the Criminal Code); mafia-type association (article 416-bis of the Civil Code); criminal association aimed at smuggling foreign manufactured tobacco (article 291-quater, Presidential Decree January 23, 1973, n. 43); association aimed at the illicit trafficking of narcotic or psychotropic substances (Article 74, Presidential Decree 9 October 1990, No. 309); money laundering (art. 648-bis c.p.)
- b) use of money, goods or utilities of illicit origin (art. 648-ter c.p.);
- c) illegal immigration as envisaged by art. 12 of the Consolidated Law on immigration regulations and rules on the status of foreigners (Legislative Decree 25 July 1998, n. 286 and subsequent amendments and additions). By way of example, we mention, among others, the completion, for profit, of acts aimed at procuring the entry of a foreigner in the territory of the State in violation of the provisions governing immigration and the condition of the foreigner; the illegal entry or stay in the State territory of five or more people; the concurrence of three or more persons or use of international transport services or forged or altered documents or otherwise illegally obtained to procure the illegal entry or stay of the foreigner in the State; illegal immigration for the purpose of recruiting people for prostitution or sexual exploitation or concerning entry into the State of minors to be used in illegal activities in order to favour their exploitation; the facilitation of the illegal stay of the foreigner in the territory of the State, in order to derive an unjust profit from the illegal status of the foreigner or in the context of the activities punished;
- d) inducement not to make statements or to make false statements to the judicial authority (art. 377-bis c.p.) and personal aid (art. 378 c.p.).

For these offences the characteristic of transnationality is when the offense has been committed in

more than one State, or, if committed in a State, a substantial part of the preparation and planning of the offense took place in another State, or again if committed in a State, an organized criminal group is involved in it, engaged in criminal activities in several States.

4.11 Manslaughter, serious and life-threatening injuries caused by non-compliance with accident prevention and health and safety protection at work regulations

It is absolutely forbidden to violate the provisions intended to ensure health and safety in the workplace. The crimes referred to in art. 25, introduced in Legislative Decree 231/01 with the art. 9 of the law of 3 August 2007 n. 123 and then replaced by Article 300 of Legislative Decree 9 April 2008, No. 81, containing new provisions for health and safety at work, are those provided by Articles 589 and 590, third paragraph of the Criminal Code. In the event of serious serious injuries or manslaughter caused by failure to comply with these provisions, the entity's independent responsibility would be released before the law.

In particular, Drass Srl constantly monitors its plants and machinery, wherever located and operating, regardless of the legal obligations and the prevention of imminent risks that are in any case strictly respected, to guarantee the maximum safety and quality of its services.

To this end, the Head of the Risk Prevention and Protection Service has been appointed, to whose directives all the subjects operating in the Company must strictly abide.

The staff and collaborators of Drass Srl ensure the maximum availability and collaboration towards the Manager, or anyone who comes to carry out inspections and checks on behalf of the INPS, the Ministry of Health, the Ministry of Labour - Territorial Inspectorate of Labour and any other Public Administration competent in the matter.

If a member, an employee, an operator of Drass Srl finds anomalies or irregularities in terms of safety and health of the working environment, he must promptly inform the Internal Manager of the Risk Prevention and Protection Service and the Head of the Personnel Department.

In carrying out the tasks entrusted to him and within the framework of the relations he has with the Workers' Representative for safety, or with the aforementioned public bodies, the Internal Head of the Risk Prevention and Protection Service assumes all responsibility for his own operated, together with the Company.

4.12 Receiving and laundering money

It is forbidden to: purchase, receive or conceal, or in any way interfere in the purchase, receipt or concealment of money or things from a crime (see article 648); replace or transfer money or other benefits from a crime or work to prevent the discovery of its criminal origin (see article 648); use in economic and financial activities money or goods or other benefits deriving from a crime (see article 648 of the Civil Code).

4.13 Protection of authors, industrial property rights and holders of related rights

Drass Srl guarantees that the management of the content distributed to its final customers is carried out in full compliance with copyright and in full compliance with the laws protecting industry and commerce and intellectual and industrial property.

(See in particular what is regulated by Article 25 of Legislative Decree 231/01 relating to "Crimes related to copyright infringement": this article was added by letter c) of paragraph 7 of Article 15, L. July 23, 2009, n. 99

4.14 Environmental protection

With regards to the registered office, or any other production site where Drass Srl is required to operate, the environmental and landscape impact is taken into account and any form of damage and/or deterioration of the environment is forbidden.

In particular, the Manager in charge carries out the necessary coordination and control regarding the implementation of the provisions of the law, national and international, concerning environmental, construction, urban planning, pollution and waste disposal, etc.

(Legislative Decree 7/7/2011, No. 121 which introduced Article 25 into Legislative Decree 231/01 relating to the so-called Environmental Crimes).

5 PART III: IMPLEMENTATION OF SANCTION AND FINAL LAW PROCEDURES

5.1 System of internal control

The implementation of the criminal offence prevention system within Drass Srl is entrusted to the control system managed by a dedicated control body within the Company.

The person to whom this task is assigned is identified on the basis of the necessary professional qualification and efficiency: he must maintain a position of neutrality with respect to the subjects on which he is called to perform the control activity.

5.2 Functions of supervisory body: monitoring the prevention of unlawful activities

The Supervisory Body is responsible for operational compliance with the organizational model adopted by Drass S.r.l. for the prevention of offences.

It is also responsible for constant regulatory and operational adjustment in order to guarantee its effectiveness.

5.3 Obligation to communicate

The Supervisory Body must be constantly informed about any course of action at risk of crime undertaken by subjects who hold top positions within Drass Srl.

Communications to the Supervisory Body can be made by email to the address of the persons belonging to this, preferably PEC addresses.

5.4 Reporting irregularity

Anyone who becomes aware of behaviours that could be criminal in nature must immediately notify the executive body responsible for internal control. Failure to report will be assessed as a disciplinary offence and reported, where appropriate, to the competent bodies where it can be identified in a criminal liability profile.

5.5 Initiative powers

The Supervisory Body is endowed with autonomous powers of initiative. It can undertake the verifications and necessary controls required to verify the regularity of operations carried out in the name and on behalf of Drass Srl.

It is up to this body to report to the Human Resources the behaviours identified, for the purpose of promptly activating the appropriate disciplinary procedures in case of ascertained violation of the organizational model of prevention. Human Resources will report the outcome of the procedure to the Supervisory Body.

Where facts are found which may be of a criminal nature, the Supervisory Body has the obligation to report them promptly to the relevant judicial authorities.

5.6 Disciplinary sanctions

In the event of violation of the organizational model adopted by Drass Srl or of the principles established by this Code of Ethics by employees, the penalties provided for by the National Collective Labour Agreement (CCNL) are applied to management, employees and workers in the metalworking sector and Company disciplinary regulations.

For those who hold the office of Administrator, the appointment will be revoked.

Failure to comply with the ethical rules contained in this Code by collaborators or external consultants which Drass Srl uses in the performance of social activities implies the termination of the contract concluded with them.

Drass Srl will take action to ensure that subsidiary or financed companies comply with the rules of this Code of Ethics also by introducing suitable contractual conditions.

5.7 Final law: postponement

The content of this Code must be coordinated with the provisions of the Articles of Association, the Civil Code and the Criminal Code with reference to the criminal cases applicable to the activity of Drass Srl, as well as the National Collective Labour Contract and that of Executives, of the Disciplinary Code and other behavioural rules, as well as any other special and regulatory law in force at the time.

Respecting operational and behavioural aspects, the Code is implemented in a coordinated manner with the provisions of the Organization, management and control model for the purpose of crime prevention adopted by Drass Srl.

The Code automatically incorporates every present and future law that defines or integrates the list of typical predicate crimes, as well as aims at preventing and prosecuting corporate crimes, constituting a valid legal defence for Drass Srl and its activity.

6 CODE OF ETHICS DISSEMINATION AND APPLICATION

Dissemination of the Code of Ethics is an integral part of the internal and external corporate communication plan prepared by the respective corporate functions in charge of this, circulating the Code of Ethics and its subsequent revisions.

This Code, consisting of 20 pages, takes effect from 01/06/2019. Failure to comply with the rules of conduct set forth herein will result in the application of the sanctions specified in the sanctioning system by means of the organizational model adopted by Drass Srl for organizational management and control, as specifically communicated to all company personnel, including by means of communication posted on the bulletin board or in any place accessible to all.