

Portogruaro, 3 June 2024

**To our valued
customers/clients, To our
valued suppliers,
To Partner Companies**

Subject: adoption of the Organisational Model and Code of Ethics pursuant to Legislative Decree 231/2001

CAP ARREGHINI has always been inspired by models of behaviour based on maximum transparency and the strictest compliance with rules, laws and regulations in the pursuit of continuous improvement of processes and procedures.

Those involved in the day-to-day running of the company, whether internal or external, have a clear reference point in the adopted Organisational Model with regard to the above conduct, which prescribes the rules of conduct to be followed, including for the prevention of offences referred to in Legislative Decree 231/2001. this document is available to anyone on the company website and is also valid in the context of Cap Arreghini's relations with external parties.

At the same time as adopting the Organisational Model, the company has codified the principles of conduct that have always characterised its policy by adhering to a Code of Ethics.

That said, with a view to continuous improvement and in compliance with the requirements of Legislative Decree 231/2001, we hereby announce that the company's Board of Directors, at its meeting on 13 December 2023, **approved the adoption of the Organisational, Management and Control Model and the Code of Ethics pursuant to Legislative Decree 231/2001, also appointing the Supervisory Body**. At the same time as adopting the Model, the company introduced a *whistleblowing* system with the characteristics defined by Directive (EU) 2019/1937 (the Whistleblowing Directive) and the subsequent Legislative Decree No. 24/2023.

The following email address has been set up to communicate directly and confidentially with the Supervisory Body

email address: odv.gm@studiolegalemc.com .

The Model *in question* performs a fundamental preventive function in relation to the possible commission of certain types of offences, following which the entity's administrative liability arises. All participants in the life of the company must comply with it in their respective roles and in the performance of their assigned tasks.

The Chair


Gigliola Arreghini