

**To Our Valued Clients/Customers,  
Clients/Customers, To Our Valued Suppliers,  
To Our Partner Companies**

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To Our Valued Suppliers,  
To Our Partner Companies**

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

**CAP ARREGHINI** has always conducted its business in accordance with standards of conduct characterised by the utmost transparency and the strictest compliance with rules, laws and regulations, with a view to the 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 regarding the aforementioned conduct in the adopted Organisational Model, which sets out the rules of conduct to be followed, including for the purpose of preventing the offences referred to in Legislative Decree 231/2001; This document is available to anyone on the company's website and is also applicable to the relationships Cap Arreghini maintains 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 corporate policy through the adoption of a Code of Ethics.

That said, with a view to continuous improvement and in compliance with the requirements laid down by Legislative Decree 231/2001, we hereby announce that the company's Board of Directors, at its meeting on 13 December 2023, **resolved to adopt the Organisational, Management and Control Model and the Code of Ethics pursuant to Legislative Decree 231/2001, whilst also appointing the Supervisory Body.** At the same time as adopting the Model, the company has introduced a *whistleblowing* scheme in accordance with the provisions of Directive (EU) 2019/1937 (the so-called Whistleblowing Directive) and the subsequent Legislative Decree No. 24/2023.

The following email address has been set up to enable direct and confidential communication with the Supervisory Body: [maltese@brusafiera12.it](mailto:maltese@brusafiera12.it)

The Code *in question* plays a fundamental preventive role in relation to the possible commission of certain types of offences which give rise to the entity's administrative liability.

All those involved in the company's operations must comply with this Model in their respective roles and in the performance of their assigned duties.

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

**CAP ARREGHINI** has always conducted its business activities in accordance with standards of conduct characterised by the utmost transparency and strict compliance with rules, laws and regulations, with a view to the continuous improvement of processes and procedures.

Those involved in the day-to-day running of the company, whether internal or external, have a clear point of reference in the Organisational Model adopted by the company, which sets out the rules of conduct to be followed, including for the prevention of offences under Legislative Decree 231/2001. This document is available to everyone on the company's website and is also applicable in the context of Cap Arreghini's dealings with external parties.

Alongside the adoption of the Organisational Model, the company has codified the principles of conduct that have always characterised its policy by adopting a Code of Ethics.

Therefore, with a view to continuous improvement and in compliance with the requirements of Legislative Decree 231/2001, we wish to inform you that the Board of Directors, at its meeting held on 13 December 2023, **resolved to adopt the Organisational, Management and Control Model and the Code of Ethics pursuant to Legislative Decree 231/2001, and also appointed the Supervisory Body.**

At the same time as adopting the Model, the company introduced a whistleblowing system in accordance with the provisions of Directive (EU) 2019/1937 (the so-called Whistleblowing Directive) and the subsequent Legislative Decree No. 24/2023.

To communicate directly and confidentially with the Supervisory Body, the following email address has been set up: [maltese@brusafiera12.it](mailto:maltese@brusafiera12.it)

This Code plays a fundamental preventive role in relation to the possible commission of certain types of offences that give rise to the entity's administrative liability.

All those involved in the company's operations must comply with this Code in their conduct, in accordance with their respective roles and the performance of their assigned tasks.

The Chair



The Chair

