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## 0. INTRODUCTION

The ethical Code is a document that, starting from the presentation of values and behavioural rules to which VINSERVICE MICRO MATIC SRL intends to refer in the exercise of its activity, establishes the social and ethical responsibilities of "stakeholders" (Corporate bodies, Shareholders, Employees, Collaborators, Consultants, Suppliers, Customers, Public Administration, etc.) towards the Company and vice versa, both in terms of general principles and expected conduct.

The purpose of the code of ethics is to recommend, promote or prohibit certain behaviour in line with the company's vision.

The code of ethics is desired and adopted by VINSERVICE MICRO MATIC SRL, which promotes its dissemination and effective knowledge among all recipients.

## 1. SCOPE AND FIELD OF APPLICATION

VINSERVICE MICRO MATIC SRL (hereinafter referred to as the Company), intends to transform the knowledge and appreciation of the ethical values that animate it into a competitive advantage.

The purpose of the Code of Ethics is therefore to formalise and document all those ethical principles that the Company takes as reference in the development of the management processes in which its strategic mission is articulated.

This is to avoid that the addressees of the code of ethics, even when acting in good faith in the interest or for the benefit of the Company, violate principles or requirements that the Company defines as mandatory.

The Code of Ethics applies to all parties acting on behalf of the Company and/or with whom the Company has a collaborative relationship, namely:


- Staff (management and operating personnel);
- Contractors and external collaborators (including interns);
- Suppliers of goods and services (including consultants and freelancers);
- Stakeholders in general

These parties are required to know the content of the Code, to contribute to its implementation and to disseminate the principles developed therein, promoting compliance with it also by all those with whom they have relations (customers, suppliers, consultants, etc.).

The rules contained in the Code integrate the behaviour that the recipients are obliged to observe under the current laws, civil and criminal, and the obligations provided for by the collective bargaining.

The recipients of the Ethical Code are therefore called to inform their actions in compliance with the principles defined and stated by the Ethical Code itself, in the knowledge that the Company has established a disciplinary system to penalize non-compliance with these principles in the forms and methods permitted by current legal and contractual regulations

The implementation of Ethical Code is entrusted to the Company's management, as an observer of the correct application of the rules and operating procedures.

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## 2. REFERENCES

This document refers to the following requirements:

- DLgs 9 April 2008 n 81 "Implementation of art. 1 of the law 3 August 2007 n. 123 on health protection and safety at work" and s.m.i;
- Regulation (EU) 2016/679 on the protection of personal data
- D lgs 152 2006 of the Environmental Text

## 3. TERMS AND DEFINITIONS

The definition of terms used in this document is given below:

- **Organization:** a set of people and means, with defined responsibilities, authority and interrelationships;
- **Employees:** all employees of the Company;
- **Collaborators:** all those who act in the name of and/or on behalf of the Company on the basis of a mandate or other professional relationship;
- **Customers/users:** all those who, for different reasons, access the services provided by the Company, both natural and legal persons;
- **Suppliers:** generally contractual partners of the Company such as service providers, contractors, technicians, both natural persons and legal entities with which the Company has any form of contractually regulated collaboration;
- **CCNL:** employment contracts applied by the Company and related supplementary company contracts;
- **Politico:** formalised management guidance on specific areas or issues;
- **Procedure:** specified way of carrying out an activity or process
- **Organisational structure:** set of responsibilities, authorities and interrelationships between people.

## 4. GENERAL ETHICAL PRINCIPLES

The following are the general ethical principles that should inspire the behaviour and decisions of all the Company's operators in carrying out their assigned activities.

### Impartiality

In taking decisions involving the choice and management of relations with its employees, collaborators, the choice of suppliers, relations with the surrounding community, VINSERVICE MICRO MATIC SRL is committed to avoid any discriminatory practice based on sex, also understood as sexuality in general, the state of health, race, nationality, political opinions and religious beliefs of people.


### Honesty

Employees and collaborators of VINSERVICE MICRO MATIC SRL, in the performance of their typical activities, are required to diligently comply with the laws in force, the behavioural model, this Code and internal regulations. Conducts that may differ from the above canons are not justifiable, not even if undertaken in the alleged interest of VINSERVICE MICRO MATIC SRL, not being in any case effectively in its interest, nor in any way to its advantage.

### Conflicts of Interest

In the performance of any activity, VINSERVICE MICRO MATIC SRL employees and collaborators must avoid situations of conflict of interest, even if only apparent. This term means a situation in which a collaborator pursues an interest that is different from and in conflict with the Company's objectives, or takes a personal advantage of business opportunities of the company

### Confidentiality

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VINSERVICE MICRO MATIC SRL guarantees the confidentiality of the data in its possession and undertakes to process personal data in accordance with the legal regulations applicable in this area.

The employees and collaborators of VINSERVICE MICRO MATIC SRL are also obliged not to disclose confidential information for purposes not related to the performance of typical activities.

**Integrity of the person**

VINSERVICE MICRO MATIC SRL recognizes as a fundamental value the physical and moral integrity of all its employees: an essential value for the pursuit of the company's objectives.

For this reason, it is constantly committed to ensuring working conditions that respect the individual's dignity and a safe and healthy environment.

Therefore, no harassment or injury to the personality of employees and collaborators will be tolerated, nor any behaviour that circumvents the objectives of maximum safety and health of the places where the personnel operate, in any way, to VINSERVICE MICRO MATIC SRL

VINSERVICE MICRO MATIC SRL also does not accept child labour or any form of exploitation of the work of staff, forced labour and abuse.

**Value of partners, employees, collaborators and human resources**

VINSERVICE MICRO MATIC SRL considers its employees, collaborators and all human resources the primary asset of the entity, indispensable for its success, therefore it is committed to valorise them by taking care of their professional growth and development.

VINSERVICE MICRO MATIC SRL is also committed to the continuous training of its employees and collaborators, both technically and professionally, and in terms of safety in the performance of their duties.

**Quality of business**

VINSERVICE MICRO MATIC SRL puts the satisfaction of customers' expectations at the centre of its interests. It is therefore committed to providing its services with high quality, in accordance with the standards laid down by both national and international rules, and in accordance with the technical regulations of the sector and according to the quality standards internationally approved and implemented in the Company

**Responsibility towards society and the environment**

VINSERVICE MICRO MATIC SRL is committed to pursuing its objectives in full respect of the local community in which it operates. This applies to all activities, even if they are carried out outside the company's premises. VINSERVICE MICRO MATIC SRL considers the environment a primary asset available to the community; To this end, it undertakes to carry out a constant monitoring of the environmental impact of its activities and to adopt programmes aimed at a constant reduction in energy consumption.

VINSERVICE MICRO MATIC SRL always operates in full compliance with the applicable legislation on waste disposal and environmental management, It also promotes the training of its employees and collaborators in order to properly manage the environmental risks associated with each activity carried out. Also in this area, VINSERVICE MICRO MATIC SRL complies with the technical regulations and national/ internationally approved indications.


**Transparency and completeness of information**

VINSERVICE MICRO MATIC SRL is obliged to provide its interlocutors transparent, complete, clear and truthful information.

**Diligence and fairness in the performance of contractual relationships**

VINSERVICE MICRO MATIC SRL guarantees, in the execution of contracts and related activities, maximum diligence and correctness. It conforms, therefore, to the norms in force and always operates following the rules

VINSERVICE MICRO MATIC SRL shall refrain from any practices contrary to the rules of the market and free competition. It also undertakes to act fairly and transparently towards its customers, suppliers and competitors.

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## 5. CONDUCT CRITERIA

### 5.1 Regole di condotta relative ai rapporti con i soci, dipendenti e collaboratori

#### *Definition of Partners, Employees and Collaborators*

For the purposes of this Code, an employee is defined as a member and/or collaborator and/or worker, anyone who, beyond the legal qualification of the relationship, have a working relationship with VINSERVICE MICRO MATIC SRL aimed at achieving the purposes of the Company or participate in the life of the Company.

#### 5.1.1 Selection of personnel

The evaluations regarding the personnel to be hired are carried out on the basis of mutual expectations, as well as the actual needs of VINSERVICE MICROMATIC SRL taking into account the actual task to which the candidate is assigned.

Therefore, after evaluation of the job and function, the selection of staff is informed by the criterion of equal opportunities: the person responsible for the selection and all those who - In any capacity - cooperate in recruiting staff and make every effort to avoid any form of favouritism, nepotism or clientelism during the selection phases. VINSERVICE MICRO MATIC SRL undertakes to use the information requested for the sole purpose of evaluating, also from a psych attitudinal point of view, the professional profile of the candidate, always in full respect of the private sphere and the opinions of the same, and the legal provisions.

#### 5.1.2 Establishment of employment relationship

Employment is based on a regular contract of employment; no irregular work is tolerated.

When accepting the assignment, the employee must be properly informed about:

- type of function and tasks to be performed.
- Regulatory elements and remuneration, as provided for in the national collective labour agreement.
- Rules and procedures to avoid risks to health and safety of persons and the workplace, related to the functions to be performed

#### 5.1.3 Personnel management

In the execution of the employment contract, VINSERVICE MICRO MATIC SRL avoids any discriminatory practice towards employees.

Every decision regarding the employment relationship is informed by the criterion of correspondence between the profiles held by employees and the expectations of VINSERVICE MICRO MATIC SRL and meritocratic considerations.


VINSERVICE MICRO MATIC SRL also promotes flexibility in the organization of work that facilitates maternity and child care.

The evaluation of employees and co-workers is carried out with the involvement not only of the personnel management but also of the managers of the relevant functions.

#### 5.1.4 Staff development and training

VINSERVICE MICRO MATIC SRL is committed to fully employ and enhance all the professional skills present in the organization of the Company, being aware of the fundamental value of each employee of the structure.

VINSERVICE MICRO MATIC SRL is also committed to carry out training activities for the benefit of all employees in order to enhance their skills.

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### 5.1.5 Safety and health of employees

VINSERVICE MICRO MATIC SRL is committed to sensitize with specific actions the attention and awareness of employees in order to the risks about health and safety in the places where they carry out their work, Promoting responsible behaviour on their part.

The aim of VINSERVICE MICRO MATIC SRL is to protect the health and safety of employees in the workplace. To this end, the Company undertakes to carefully comply with all relevant regulations, always putting the safety and health of the places where work is carried out first.

The commitment to safety and health in the workplace is supported by constant training of staff and is verified by the Head of the Prevention and Protection System.

Reaffirming the awareness of the fundamental importance of the dignity and physical integrity of its employees, no violation of safety regulations and health and safety of workers is tolerable by VINSERVICE MICRO MATIC SRL

### 5.1.6 Protection of confidentiality

VINSERVICE MICRO MATIC SRL undertakes to adopt, for the protection of employees' privacy, rules aimed at specifying the information that the company may request from its employees and the related processing and storage procedures.

The above-mentioned rules prohibit, except in cases expressly provided for by law, the communication and dissemination of personal data without the prior consent of the person concerned, and provide criteria for control by each employee, Privacy Policy.

In any case, it is excluded any investigation on the private life, on the opinions of any nature and on the other individual expressions of the workers and of the personnel however attributable to VINSERVICE MICRO MATIC SRL

### 5.1.7 Integrity and protection of the person

The aim of VINSERVICE MICRO MATIC SRL is to protect the moral integrity and dignity of its employees.

Therefore, acts of psychological violence, discrimination and harm to the person (e.g. insults, threats, isolation or excessive intrusion, unjustified professional limitations) are not tolerated; nor are sexual harassment or behaviour that may disturb the sensitivity of the person (by way of example and not exhaustive, the exposure of images with explicit sexual references).

Any harassment or discrimination based on age, sex, sexuality, race, health status, political opinions, nationality, religion (etc...), may be reported to the Company which will verify the actual violation of the Code of Ethics.

### 5.1.8 Duties of employees


Managers and employees are obliged to comply with the obligations arising from the signing of the employment contract, as well as the rules provided for in the Code of Ethics.

Employees are also obliged to report any breach of the rules of conduct set out in this Code through the appropriate channels. VINSERVICE MICRO MATIC SRL has adopted a model for the prevention, management and control of the risks of committing crimes, within which is established an anonymous system for reporting suspects. The same tool may be used by each employee, in any capacity pertaining to VINSERVICE MICRO MATIC SRL, for reporting violations of the provisions contained in this Code of Ethics, which he has come to knowledge.

### 5.1.9 Conflict of Interest

Management and employees of VINSERVICE MICRO MATIC SRL are obliged to avoid those situations that may give rise to conflicts of interest and to refrain from taking personal advantage of known business opportunities in the performance of their duties.

Employees of VINSERVICE MICRO MATIC SRL are also required to inform their responsible person promptly of the existence, even if only potential, of a conflict of interest situation.

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This information obligation also applies to activities carried out by the Manager and employees outside working hours, if these are or may be in conflict of interest with VINSERVICE MICRO MATIC SRL.

#### **5.1.10 Use e of VINSERVICE MICRO MATIC SRL's Assets**

All members, employees and associates are required to use the Company's assets in a responsible and diligent manner, in accordance with operational procedures for their use, if any.

In particular, each person is obliged to use the assets entrusted to him with care and parsimony, and to avoid improper uses of common assets or from which, in any case, damage may result, or in any way contrary to the interest of the Company.

### **5.2 Code of Conduct Relating to customer relations**

#### **5.2.1 Transparency, fairness and impartiality**

*Definition of Customers.*

*Any person who uses the services of VINSERVICE MICRO MATIC SRL in any capacity is defined as a customer.*

*The Company undertakes not to arbitrarily discriminate against its customers. It always adopts the highest transparency criteria in its dealings with its customers.*

*Transparency and fairness of the activity.*

The contracts, communications and documents of VINSERVICE MICRO MATIC SRL are always:

- Formulated in language that is easy to understand for the people involved;
- Comply with the applicable standards and be guided by fairness;
- Complete and exhaustive.

#### **5.2.2 Behaviour of employees towards customers**

Managers and employees, in any capacity pertaining to VINSERVICE MICRO MATIC SRL, are required to adopt towards customers a style marked by the maximum availability and courtesy, with a view to a relationship of constant and effective collaboration. They are also required to have maximum transparency in their relations with customers, protecting, however, the interest (including economic) of VINSERVICE MICRO MATIC SRL

#### **5.2.3 Quality of services and customer satisfaction**

VINSERVICE MICRO MATIC SRL is committed to providing services that comply with high quality standards, as well as to carry out a periodic monitoring of customer expectations.

VINSERVICE MICRO MATIC SRL also undertakes to take into due consideration any suggestions and complaints from customers, related to its services, always protecting the interest (including economic) of the Company.

### **5.3 Code of Conduct with suppliers**


*Definition of Suppliers*

Suppliers are all those who, in various ways, provide goods, services, performances and resources necessary for the realization of activities, the provision of services and the sale of products, contributing to the achievement of the objectives of VINSERVICE MICRO MATIC SRL

#### **5.3.1 Criteria for the selection of suppliers**

In the choice of its suppliers, VINSERVICE MICRO MATIC SRL seeks the maximum competitive advantage, avoiding arbitrary discrimination in any case.

In this respect, the choice of suppliers should be based on objective and documentable criteria.

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The behaviour of VINSERVICE MICRO MATIC SRL is also based on maximum loyalty, fairness and transparency, both in the pre-contractual phase and in the contractual phase.

VINSERVICE MICRO MATIC SRL considers reference requirements, among others, in the choice of suppliers

- the quality and cost-effectiveness of the services,
- technical - professional suitability,
- respect for the environment,
- social commitment.

The acceptance of this Code by the supplier is one of the selection criteria and becomes an integral part of the contractual relationship.

In any case, if the suppliers, in the execution of contractual relationships with VINSERVICE MICRO MATIC SRL, do not comply with the rules of conduct contained in this Code, the Company reserves the right to take appropriate measures until the termination of the relationship or the exclusion of further opportunities for collaboration.

### **5.3.2 Integrity and independence in relations with suppliers**

VINSERVICE MICRO MATIC SRL is committed to constantly monitoring the relationships with suppliers.

Contractual relationships with suppliers must be as clear as possible, avoiding situations of dependence where possible.

### **5.3.3 Ethical aspects in supplies**

The objective of VINSERVICE MICRO MATIC SRL is to comply with the ethical rules of this Code.

For this reason, VINSERVICE MICRO MATIC SRL may require suppliers to meet certain ethical and social requirements (for example, the presence of an environmental management system).

### **5.3.4 Gifts and benefits to suppliers**

VINSERVICE MICRO MATIC SRL evita ogni forma di pagamento illecita a fornitori o loro rappresentanti e non elargisce benefici e/o regali intesi a ottenere speciali condizioni di favore. Respinge altresì benefici e/o regali dei fornitori intesi a ottenere condizioni di favore.

## **5.4 Code of conduct relating to relations with the territory: the environment, the community and institutions**

*Definition of communities, institutions and environment.*

The term "territory" identifies a given physical space with its natural, cultural and historical characteristics. It includes the notions of Communities and Institutions, for the purposes of this Code of Ethics.

However, the term community identifies the human settlement that insists on the territory, or the human community functionally and culturally connected to it.


Whereas institutions are the decision-makers who make possible the functioning of the community and other forms of social organization.

### **5.4.1 Respect for the environment**

VINSERVICE MICRO MATIC SRL works to ensure that its activities are fully respectful of the environment, as well as sustainable development compatible with the environmental health of the territory in which it operates.

This is also in the awareness that respect for the environment can represent a competitive advantage in an increasingly attentive market to quality and the behaviour of its operators.

For these reasons, VINSERVICE MICRO MATIC SRL undertakes to carry out a periodic activity of environmental data collection in order to be able to effectively control its activities.

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The company's actions are always carried out in full respect of the territory and environment in which the Company operates.

The adoption of certified environmental and quality management systems is promoted, as well as the strategy for the prevention of environmental risks. Therefore, specific environmental objectives and improvement programmes are defined, aimed at minimising significant environmental impacts.

VINSERVICE MICRO MATIC SRL is committed to providing the institutions with all the information necessary to understand any environmental risks related to the activity of VINSERVICE MICRO MATIC SRL.

VINSERVICE MICRO MATIC SRL promotes all activities of environmental awareness and training within its company and encourages the dissemination of eco-efficient technologies.

#### **5.4.2 Relations with institutions and the community**

VINSERVICE MICRO MATIC SRL may develop cooperation and communication relations with the institutions on:

- the regulatory and administrative activities related to the company's activities,
- the protection of the environment,
- Risk prevention.

The following rules apply to all activities and relationships, even temporary and occasional, between the Public Administration and VINSERVICE MICRO MATIC SRL

#### **5.4.3 Principles and rules of relations with institutions and communities.**

The directors, employees and collaborators of VINSERVICE MICRO MATIC SRL act towards the institutions with integrity and fairness.

In its relations with the regulatory authorities, the Company undertakes to provide all required information to the national and local authorities responsible for the control and regulation of services, in a complete, correct, appropriate and timely manner.

VINSERVICE MICRO MATIC SRL does not make any contribution of any kind to political parties and candidates for elections and refrain from any form of pressure towards public representatives that may benefit society

No behaviour shall be permitted or tolerated that is intended to defraud, corrupt or misappropriate the money and contributions received from the public administration; any action contrary to the rules and the principle of good faith and transparency carried out by VINSERVICE MICRO MATIC SRL personnel towards the public administration is to be considered forbidden, punishable and, in any case, contrary to the interest of the Company.

### **5.5 Code of conduct regarding relations with all other partners of the Company**

#### **5.5.1 Processing of information**

VINSERVICE MICRO MATIC SRL undertakes to use the information in full respect of the confidentiality and privacy of the data subjects, as well as the current regulations on the processing of personal data.


To do this, it applies and updates specific procedures aimed at protecting information.

#### **5.5.2 Gifts and other freebies**

VINSERVICE MICRO MATIC SRL does not admit any form of gifts, however called, exceeding, even only apparently, the normal commercial or courtesy relations, or in any case aimed at obtaining preferential treatment in relation to typical activities.

In particular, it is not allowed to offer or promise gifts or other benefits (e.g. the promise of a job, free participation in conferences - etc. -) to Italian or foreign public officials, auditors, mayors or their families, which may influence their impartiality, and, in any case, to obtain from them any favour.



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VINSERVICE MICRO MATIC SRL shall refrain from practices that conflict with legal regulations, commercial customs and ethical codes, where known, of companies or other public and private bodies with which it has relations.

Gifts to promote the image of the Company are permitted.

In any case, the gifts offered must be duly documented and approved by the function managers, so that appropriate verifications can be made.

### 5.5.3 Communication to stakeholders

VINSERVICE MICRO MATIC SRL recognizes and guarantees the right to information of all its stakeholders.

For this reason, the disclosure of false information or information that is intentionally incomplete or in any way biased is not permitted.

Any form of communication also complies with the applicable rules and appropriate professional standards.

Special attention is also paid to industrial secrets and the protection of trademarks and patents, with which the company enters - in any way - into contact

## 6. MANAGEMENT OF ETHICAL CODE

### 6.1 COMMUNICATION AND AWARENESS

#### *Communication*

The Company has planned a specific process for communicating the code of ethics to all company operators (employees and external collaborators)

The code of ethics is available at the Company for consultation by all stakeholders

#### *Awareness raising*

The Company ensures the continuous and systematic awareness of the operators concerning the correct application of the code of ethics itself. This is in order to develop, maintain and increase the awareness of company operators as to the unacceptability of any behaviour that violates the principles established by the code of ethics itself, even if it is in the interest or to the advantage of the Company.

### 6.2 IMPLEMENTATION

In order to ensure the proper implementation of the principles expressed in this Code of Ethics, the Company defines specific protocols for operational use in the form of policies, procedures, instructions, guidelines and regulations.

### 6.3 AUDIT

#### *Audit*

The company may plan specific audits to verify the correct application of the code of ethics.


#### **Monitoring**

The monitoring of compliance with the ethical Code is the responsibility of all company employees to the extent of their duties and activities.

### 6.4 Violations and penalties

#### *Segnalazioni di violazioni del codice etico*

The Company has a process to ensure that violations (even in hypothetical or potential form) of the principles expressed by the code of ethics are systematically and promptly brought to the attention of the appointed auditor.

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The appointed operator is responsible for investigating the validity of the breach report, hearing the reasons of the reporter and the person responsible for the reported breach

***Disciplinary measures in case of infringements***

The provisions contained in this Code of Ethics are an integral part of the contractual obligations assumed by employees, collaborators and suppliers. Violations of the principles set out in this Act affect the existing fiduciary relationship and lead to appropriate measures.

The provisions applied may consist of a simple recall or admonition, suspension without pay, demotion or in more serious cases dismissal. The implementation of the measures decided upon must always be preceded by a hearing of the person responsible, who shall have the opportunity to explain his or her behaviour. This shall be without prejudice to the initiation of any criminal proceedings, if the infringements constitute a criminal offence.

For employees, suppliers and consultants, the measures taken consist essentially of termination of the contract, carried out in a suitable manner.

In addition to the above, the Company reserves the right to take any legal action to obtain compensation for damages suffered by it as a result of the violation.

**6.5 IMPROVEMENT**

The Code of Ethics is subject to a continuous improvement cycle depending on

- of significant changes in the corporate, organisational, infrastructural structure of the Company.
- of significant variations in the reference regulatory framework.
- of changes in the corporate risk profile.
- the occurrence of incidents and non-compliance as a result of current and potential violations of the code of ethics itself.