Electrolux Appliances S.p.A.

MANAGEMENT AND CONTROL ORGANISATION MODEL

pursuant to Italian Legislative Decree 8 June 2001, no. 231
«Discipline of the administrative responsibility of legal persons, companies and associations even without legal personality»

Electrolux Group

CONTENTS

DOCUMENT REVISION

The adoption of the Organisational Model and its subsequent updates are the responsibility of the Company's Board of Directors.

Below are summarised the activities of revision, integration and updating of the Model, in relation to the adaptation needs that have arisen for it over time, implemented by the Company.

The Company will promptly disseminate the latest version of the Model approved by the Board of Directors.

REVISION TABLE

Edition	Board of Directors approval date	Activity
1	02 July 2004	Adoption of the Management and Control Organisation Model.
2	16 October 2007	Update of the organisation, management and control model in the context of the legislative changes issued.
3	03 November 2008	Update of the management and control organisation model, in the general and special parts in the context of the legislative innovations issued, and of the control and integration of prevention protocols.
4	29 March 2010	Revision and update of the organisation, management and control model with particular reference to the special part in the context of the legislative changes issued.
5	20 October 2011	Revision and update of the general and of the special part of the organisation, management and control model for the inclusion of a new risk area relating to environmental crimes.
6	29 October 2012	Revision and update of the general and of the special part of the organisation, management and control model for the inclusion of a new risk area relating to the crime concerning foreign workers without a residence permit.

7	11 December 2013	Revision and update of the general and of the special part of the organisation, management and control model for inclusion of the crimes covered by Law 190/2012 relating to undue inducement to give or promise benefits and corruption between private individuals
8	07 April 2017	Complete revision of the Model following updating of the risk analysis.
9	12 December 2018	Revision of the Model for the introduction of the so-called whistleblowing regulation (ref. L.179/2017)
10	16 December 2021	Revision and update of the general and of the special part of the organisation, management and control model for the introduction of new types of predicate crime and in particular of tax crimes and of the types of crime introduced by Italian Legislative Decree 75/2020.
11	01 December 2022	Revision and update of the general part and of the special part of the Management and Control Organisation Model in terms of structure and logic, also following update of the risk analysis.
12	28 November 2023	Revision of the general part of the Model following the entry into force of Italian Legislative Decree 24/2023.
13	12 May 2025	Revision and update of the general and special parts of the Organization, Management, and Control Model following organizational changes and the inclusion of the following types of offenses: • Introduction to Art. 25-ter "Corporate Crimes", new letter "s-ter", of the crime of false or omitted declarations for the issuance of the preliminary certificate; • Amendments – following the Law of 14.07.23 No. 93 (Art. 3 – Measures to combat cinematographic, audiovisual, or editorial piracy) – to the crime referred to in Art. 171-ter of Law 633/41, mentioned in Art. 25-novies of Legislative Decree 231/2001; • Introduction of Arts. 25-septiesdecies ("Crimes against cultural heritage") and 25-duodevicies ("Laundering of cultural assets and devastation

	and looting of cultural and landscape assets") of the Decree; • Introduction of the crime of "fraudulent transfer of values", introduced in Art. 25-octies.1 of the Decree (regarding Crimes related to payment instruments other than cash); • Expansion of the scope of application of the crime of "sale of industrial products with false marks" referred to in Art. 25-bis.1 of the Decree.

DEFINITIONS

Sensitive Activity or **risk area**: activities and/or areas of the company in which there may be prerequisites and/or potential opportunities for the committing of a crime

CCNL: National Collective Labour Agreement.

Code of Conduct: the Code of Conduct adopted by the Electrolux Group and related updates available on the website www.electrolux.com and on the corporate *Intranet* https://electrolux.sharepoint.com/Pages/StartPage.aspx in the *Policies & Guidelines* section

Decree or **Legislative Decree 231/2001**: Italian Legislative Decree 8 June 2001, no. 231 («*Discipline of the administrative responsibility of legal persons, companies and associations even without legal personality*») and subsequent amendments and additions

Recipients: the subjects indicated in Paragraph 2.3 of this Model

Electrolux Control System (hereinafter also "**ECS**"): it is the system developed by the Electrolux Group to ensure a precise and reliable reporting system as well as to guarantee that the preparation of the financial statements takes place in compliance with the laws, regulations and with the generally adopted accounting principles.

Institutions: legal persons, companies and other associative structures even without legal personality

Group (also below **"Electrolux Group"**): the Parent Company and the companies belonging to the Electrolux Group

Confindustria Guidelines (hereinafter also "**Guidelines**"): the Guidelines for the construction of organisation, management and control models pursuant to Italian Legislative Decree 231/2001 approved by Confindustria on 7 March 2002 and updated in March 2014 and subsequently in June 2021, available on the website www.confindustria.it

Management and control organisation model or **Model(s).** (hereinafter also "**Organisational model**" or "**Model**"): the organisation, management and control model envisaged by art. 6 of Italian Legislative Decree 231/2001, available on the egate company Intranet https://electrolux.sharepoint.com/sites/italia/SitePages/Modelli-di-Organizzazione,-Gestione-e-Controllo.aspx

Management Body: Board of Directors of Electrolux Appliances S.p.A.

Supervisory body (hereinafter also "**SB**" or "**Body**"): the body envisaged by art. 6 of Italian Legislative Decree 231/2001 responsible for supervising the functioning and observance of the Model and for its updating

Partner: the counterparties with which the Company enters into some form of contractually regulated collaboration (e.g. temporary business association, *joint ventures*, consortia, licence, agency, concession, collaboration in general)

Personnel: all employees of the Company including those with management, administration, direction and control functions of the Company itself, as well as all non-employees identified by the *Guidelines for the use of the institution's resources* as 'work users', such as, by way of example, temporary workers, interns, etc.

Suppliers: suppliers of goods and services (excluding consultancy), which the Company uses in the context of Sensitive Activities.

Protocols: documents that compose the Special Part and contain the regulation of Sensitive Activities, the control measures, aimed at or in any case suitable for reducing the risk of committing of the crimes envisaged by the Decree;

Power of attorney: unilateral act with which the company attributes powers of representation towards third parties.

Procedures: procedures, policies, organisational provisions, service orders and all other provisions, instructions and acts of the Company.

Reports: communications made by the Reporting Party, in an open or anonymous manner, in written or verbal form or in person, through one of the envisaged reporting channels, as detailed in chap.4.

Company (hereinafter also "**Electrolux**" or "**Body**"): Electrolux Appliances S.p.A.;

Parent Company: Electrolux AB.

ABBREVIATIONS

c.c.: Criminal Code

c.c.: Civil Code

c.p.c.: Criminal Procedure Code

BoD: Board of Directors

P.A.: Public administration

sma: subsequent modifications and additions

DOCUMENT STRUCTURE

Italian Legislative Decree 8 June 2001 no. 231 introduced, for the first time in our legal system, the administrative liability of legal persons, companies and other associative structures, even without legal personality (the so-called "Entities"), as a consequence of the committing of certain crimes by "Senior Management" or by "Subordinate" Persons, provided that such offences are committed *in the interest* or *benefit* of the organisation itself.

Failure to comply with this regulation may result in the application of serious financial and disqualifying sanctions for the Entity, such as the suspension or revocation of licences and concessions, the prohibition on contracting with the Public Administration, etc. However, if the management body of the Entity proves that it has adopted and effectively implemented, before the committing of the crime, an organisation, management and control model suitable for preventing crimes of the type that occurred, the Entity is not liable for administrative liability, regardless of the recognition of the criminal and/or administrative responsibility of the person who committed the crime.

The Company, also referring to the Confindustria Guidelines as well as to the *best international practices of* internal control[1], has drawn up this Model.

The Model consists of the following Parts:

General Part: describes the main contents of the Decree and the essential components of the Model adopted by the Company, with particular reference to the Supervisory Body, staff training and dissemination of the Model, the disciplinary system and the measures to be adopted in case of failure to comply with the provisions of the Decree.

Special Part *[for internal use]*: consists of Protocols that contain the regulation of Sensitive Activities and report the control measures aimed at or in any case suitable for reducing the risk of committing the crimes envisaged by the Decree. These control measures are implemented in the company Operating Procedures and Instructions.

Each Recipient of the Model (see paragraph 2.3) is required to know and observe the principles and rules of the Model.

The Company will make known the purposes and contents of the Model through the means and forms it deems most appropriate.

The Model is published on the company *Intranet* at the address: https://electrolux.sharepoint.com/sites/italia/SitePages/Modelli-di-associazione,-gestione-e-controllo.aspx and on the website www.electrolux.it.

In addition to what is established below, the following documents, annexed to this document, constitute an integral part of this Model:

1. **Sensitive activities/protocols/crimes matrix**
2. **Code of Conduct**
3. ***Policies & Guidelines* of the Electrolux Group**
4. **Internal regulations for employees**

1 An essential contribution comes from the U.S. "*Federal Sentencing Guidelines*", from which the experience of "*Compliance Programs*" was established. The "*Compliance Programs*", in turn, have implemented and reworked the notion and structure of the internal control system present in the "*COSO Report*". The latter is considered, in the *position paper* on the Decree issued by the A.I.I.A. (Italian *Internal Auditors* Association), together with *Sarbanes Oxley*, as the most authoritative international reference on internal control issues.

5. **Rules, procedures and disciplinary sanctions for company personnel (so-called 'Disciplinary Code')**
6. **All other provisions, internal provisions, acts and operational procedures adopted by the Company which constitute implementation of the contents of the Model and the documents indicated in the previous points.**

ORGANISATION, MANAGEMENT AND CONTROL MODEL

GENERAL PART

1. ITALIAN LEGISLATIVE DECREE 8 JUNE 2001, NO. 231

1.1 INTRODUCTION

Italian Legislative Decree 8 June 2001 no. 231, bearing the "*Discipline of the administrative responsibility of legal persons, companies and other associative structures, even without legal personality (the "Entities"),* (hereinafter 'Decree'), introduced into Italian law a system of administrative liability for 'Entities' for crimes committed - in their interest or to their advantage - by individuals in senior positions and/or subordinates to the management or supervision of the latter (so-called "Qualified Subjects")

The liability introduced by the Decree is autonomous and distinct from that which regulates the criminal and administrative liability of natural persons.

The Decree identifies, exhaustively, the types of crime (so-called "predicate crimes") which, if committed by 'Qualified Subjects', may result in the administrative liability of the Organisation within which the afore-mentioned subjects operate.

Any assessment of the liability/liabilities envisaged by the Decree on the part of the Entity entails the application of pecuniary sanctions together with confiscation of the price and/or profit of the crime and, possibly, disqualifying sanctions (suspension or revocation of authorisations, licences or concessions; exclusion from concessions, financing, contributions or subsidies).

The recipients of the Decree are:

- companies with legal personality (including those that perform a public service and those controlled by public administrations);
- entities with legal personality;
- companies and associations with or without legal personality.

However, the following are excluded from application of the Decree: the State; territorial public bodies, other economic public bodies and other bodies that perform important functions.

1.2 THE CONSTITUENT ELEMENTS OF THE INSTITUTION'S ADMINISTRATIVE RESPONSIBILITY

The Decree provides that the Entity is only liable if two conditions are met:

i. <u>Subjective assumption</u>

The crime must be committed by **Qualified Individuals**':

a) **subjects in a senior position** who hold representation, administration or management functions of the organisation or of one of its organisational units with financial and functional autonomy (e.g. directors, general managers, plant managers, etc.) *that is to say* natural persons who exercise, even de facto, management and control of the Entity;

b) **subjects subordinate** to the management or supervision of subjects "in senior positions".

ii. <u>Objective presupposition</u>

The crime must be committed by 'Qualified Persons' **in the interest or to the advantage of the organisation**.

The **interest** coincides with the volitional element of the subject who exercises the conduct relevant for the purposes of the Decree, who must have acted with the intention (for intentional crimes) or the awareness (for negligent crimes) of realising a profit/benefit not only for themselves (or for third parties) but also for the organisation.

The **advantage** consists of the complex of profits/benefits, especially of a financial nature, deriving from the committing of the crime by the 'qualified subject'.

In the event that the cited Subject acted to pursue an exclusively own interest (or that of third parties), the Organisation is not responsible.

Otherwise, the liability of the Entity exists - but the pecuniary sanctions are reduced by half - where the fact has resulted in an interest of the Entity but the Entity itself **did not derive an advantage from it or obtained a minimal advantage from it.**

In cases where, however, 'suitable and direct' acts take place to commit the crime, but the event, however, does not occur (so-called 'attempted crime' event[1]) the pecuniary and disqualification sanctions are reduced by a third to a half.

Again in the context of the 'attempt' mentioned above, the organisation cannot be sanctioned where **«*it voluntarily prevents completion of the action or the fruition of the event*»**.

Finally, the Decree establishes that the responsibility of the Entity is of an 'autonomous' type and, therefore, exists even where the perpetrator of the crime has not been identified or is not attributable or even in the case of extinction of the crime for reasons other than amnesty (e.g. death of the criminal before sentencing *pursuant to* art. 150 of the C.C., prescription *pursuant to* art. 157 C.C., etc.).

1.3 I RELEVANT CRIMES (SO-CALLED "PREDICATE CRIMES")

The Entity's liability exists where one or more of the crimes (Predicate Crimes) strictly listed by the Decree and subsequent amendments belonging to the following categories are committed:

1. **Crimes against the Public Administration** (arts. 24 and 25 of the Decree*);*
2. **Computer crimes and illicit data processing** (art. 24 *bis* of the Decree);
3. **Organised crime offences** (art. 24 *ter* of the Decree);
4. **Counterfeiting of coins, public credit cards, revenue stamps and identification instruments or signs** (art. 25 *bis* of the Decree);
5. **Crimes against industry and commerce** (art. 25 *bis*-1, Decree);
6. **Corporate crimes** (art. 25 *ter*, Decree);
7. **Crimes with the aim of terrorism or subversion of the democratic order** (art. 25 *quater* of the Decree);
8. **Practices of mutilation of female genital organs** (art. 25 *quater*-1 of the Decree);
9. **Crimes against the individual personality** (art. 25 *quinquies* of the Decree);
10. **Market abuse** (art. 25 *sexies* of the Decree);

[1] Art. 56 of the criminal code entitled 'Attempted crime', reads as follows: «Whoever performs suitable actions aimed unequivocally at committing a crime is liable for an attempted crime, if the action is not performed or the event does not occur [...]».

11. **Manslaughter or serious or very serious injuries committed in breach of the regulations on the protection of health and safety at work** (art. 25 *septies* of the Decree);
12. **Receiving, laundering and using money, goods or benefits of illicit origin, as well as self-laundering (**art. 25 *octies* of the Decree);
13. **Crimes relating to payment instruments other than cash and fraudulent transfer of values** (art. 25-*octies*1 of the Decree);
14. **Crimes relating to infringement of copyright** (art. 25 *novies* of the Decree);
15. **Inducement not to make statements or to make false statements to the Judicial Authority** (art. 25 *decies* of the Decree);
16. **Environmental liability** (art. 25 *undecies* of the Decree*);*
17. **Employment of third-country nationals whose residence is illegal** (art. 25 *duodecies*, of the Decree);
18. **Racism and xenophobia** (art. 25 *terdecies*, of the Decree);
19. **Fraud in sporting competitions, abusive betting and gambling using prohibited devices** (art. 25 *quaterdecies*, of the Decree);
20. **Fiscal crimes** (art. 25 *quinquesdecies*, of the Decree);
21. **Smuggling (**art*. 25 sexiesdecies of the Decree*);
22. **Crimes against cultural heritage** (art. 25 *septiesdecies*, of the Decree);
23. **Laundering of cultural assets and devastation and looting of cultural and landscape assets** (art. 25 *duodevicies*, of the Decree);
24. **Transnational crimes *pursuant to* art. 19, Law. 16 March 2006, no. 146;**
25. **Liability of entities for administrative offences resulting from crime *pursuant to* art. 12, Law 9/2013** (they constitute a prerequisite for entities operating in the virgin olive oil supply chain).

The Organisation is also liable in the event that the Predicate Crime(s) is/are **committed abroad**, provided that: a) the organisation has its 'head office' (i.e. registered office) in Italy; b) proceedings are not already underway against the Entity in the country in which the crime was committed; c) there is a request from the Minister of Justice if required by law.

1.4. THE SANCTIONS

Below are the sanctions expected of the Entity in the event of a finding of administrative responsibility pursuant to the Decree:

- **Financial penalty**

It is applicable to all types of Predicate Crimes and is determined on the basis of 'quotas', from a minimum of one hundred to a maximum of one thousand, each with a value of between a minimum of Euro 258.23 and a maximum of Euro 1,549.37[2].

[2] This does not apply to the corporate crimes referred to in art. *25ter*, whose pecuniary sanctions are doubled based on the provisions of the art. 39, para. 5 Law 28 December 2005, no. 262.

The criteria on which the Judge bases the determination of *number of quotas* applicable are: the severity of the event; the degree of responsibility of the Entity and the activity conducted by the same to eliminate or mitigate the consequences of the fact and to prevent the committing of further crimes. *The amount* of the quota, however, is set on the basis of the economic and financial conditions of the Entity and this is in order to ensure the effectiveness of the sanction.

The **financial penalty is reduced by one third to one half** if, before the opening statement of the trial of the first instance trial:

- the Entity has fully compensated the damage and eliminated the harmful or dangerous consequences of the crime or has, in any case, effectively acted in this sense;
- a Model suitable for preventing crimes of the type that occurred has been adopted or made operational.

- **Disqualification sanctions**

These are particularly distressing sanctions as they affect the specific activity being performed by the organisation.

They are applied in addition to the financial penalty, exclusively for certain types of crime and *only if* the organisation has obtained a 'significant profit' from the crime and 'the committing of the crime was determined or facilitated by serious organisational deficiencies' or there is a recurrence of the crimes[3].

The disqualification sanctions have a duration of between three months and two years, are applicable jointly and may consist of:

1. a disqualification from performing the activity;
2. suspension or revocation of authorisations, licences or of concessions functional to the committing of the offence;
3. a prohibition on contracting with the Public Administration;
4. exclusion from benefits, financing, contributions, subsidies and possible revocation of those already granted;
5. prohibition on the advertising of goods or services.

As with pecuniary sanctions, the Judge - when deciding on application - takes into account the severity of the event, the degree of responsibility of the Organisation and any activity performed by the Organisation itself to eliminate the consequences of the event and to prevent the committing of further offences.

Furthermore, in the event that the interruption of the activity could result in «*significant repercussions on employment*», due to the «*size and economic conditions of the territory*» within which the Entity is located, the Judge may order - in place of the disqualification measure, provided that the same is not definitively ordered - continuation of the activity by a **Judicial commissioner** for a period equal to the duration of the disqualification sentence that would have been applied.

- **Publication of the conviction sentence**

[3] There is a repetition of the crime "when the Entity, already definitively convicted at least once for an offence [...], commits another in the five years following the definitive conviction" (art. 20, Decree).

In cases of application of a disqualification measure, the Judge may establish that the conviction sentence be published, with costs payable by the condemned organisation, in the municipality where the organisation has its main headquarters, as well as in the other places referred to in art. 36 C.C.[4].

- **Confiscation**

Confiscation of the price or profit of the crime is always ordered against the Entity convicted pursuant to the Decree, except for the part that can be returned to the injured party and without prejudice to any rights acquired by third parties in good faith.

Where it is not possible to proceed directly with confiscation of the price or profit deriving from the crime, the same may have as its object «*sums of money, goods or other benefits of value that is equivalent to the price or profit of the crime*».

1.5. EXEMPTION FROM ADMINISTRATIVE LIABILITY: *THE ORGANISATION, MANAGEMENT AND CONTROL MODEL*

The Decree provides, in favour of the Entity, a mechanism of exemption from liability if the Judge ascertains that the Entity has adopted an «***Organisation and Management Model suitable for preventing crimes of the type that occurred***» and that the Qualified Subjects have committed the ascertained facts by fraudulently evading the afore-mentioned Model.

This exemption applies if the organisation demonstrates that it has adopted and effectively implemented **organizational measures and systems** that are effectively suitable for preventing the committing of the crimes identified by the Decree. The organisation is not liable for the crime if it proves:

a) it has adopted and effectively implemented, through the management body (i.e. the Board of Directors), before committing of the crime, an «**Organisation and management model**» suitable for preventing crimes of the type that occurred;

b) it has entrusted to an «**internal organism**» (appointed by the Board of Directors), equipped with autonomous powers of initiative and control, the task of supervising the functioning and observance of the Model, as well as ensuring that they are updated;

c) that the persons who committed the crime acted by fraudulently evading the afore-mentioned Model;

d) that there was no omitted or insufficient supervision by the internal body referred to in the previous letter. b).

The Decree also establishes the minimum contents of the organisation, management and control model, which must[5]:

1. identify activities/**risk areas** of committing of the crimes provided for by the Decree;
2. prepare specific **protocols** in order to "*plan the training and implementation of the Institution's decisions in relation to the crimes to be prevented*»;

[4] Art. 36 C.C., establishes that: "The conviction […] is published by posting in the municipality where it was pronounced, in the one where the crime was committed, and in the one where the convicted subject had their last residence [as well as] on the website of the Ministry of Justice». The duration of publication on the website is established by the Judge as not exceeding thirty days. Otherwise, the duration is fifteen days.

[5] Article 6, para. 2 of the Decree.

3. provide **financial resources** management methods suitable to prevent the committing of such crimes;
4. prescribe **information obligations** towards the internal body responsible for monitoring the functioning and compliance with the Model;
5. define a **disciplinary system** suitable to sanction failure to comply with the measures indicated in the Model.

2. THE COMPANY ORGANISATION, MANAGEMENT AND CONTROL MODEL

Premise

The Company has updated its Model, also making use of the indications contained in the 'Guidelines' drawn up by Confindustria (last revision June 2021)[6].

The company, however, proceeded in the awareness that the afore-mentioned 'Guidelines', although constituting a *best practice*, have a general and abstract nature and do not exempt the Company from creating a Model adhering to the specific corporate and organisational reality.

2.1 DESCRIPTION OF THE COMPANY

Electrolux Appliances S.p.A. was incorporated on July 6, 1987 by a deed drawn up by Notary F. Simoncini (rep. no. 13614.).

The Company, having tax code and registration number with the Pordenone Business Register No. 001094820931 has its registered office in Porcia (PN), Corso Lino Zanussi, No. 24 and a local unit in Assago (MI) Via del Mulino No. 1.

The Company carries on the business of marketing, distribution, supply and sale in Italy and abroad as well as after-sales service of electrical, household, electronic and gas equipment and small household appliances for domestic use.

The Company is part of the Electrolux Group, listed on the Stockholm market.

2.2 THE PURPOSES AND PRINCIPLES OF THE MODEL

The purpose of this Model is the identification of a system of rules, procedures and controls aimed at preventing and/or reducing the committing of 'predicate crimes'. The Model aims to:

- Disseminate a business culture based on the principles of legality and control.
- Determine full awareness among all Recipients of the fact that breaching of the provisions contained in the Model and in the control systems connected to it can result in liability and sanctions for the Company as well as personal ones.
- Identify measures aimed at preventing and/or counteracting the committing of 'predicate crimes' promptly and effectively through the definition of specific protocols intended to

[6] The Electrolux Group in Italy (of which Electrolux Appliances S.p.A. is part) operates in the industrial - metalworking sector and is a member of the General Confederation of Italian Industry (Confindustria).

plan the formation and implementation of the organisation's decisions in relation to the crimes to be prevented.

- Identify effective control procedures, based on the principle of prevention.

2.3 RECIPIENTS OF MODEL

The following are recipients and are therefore required to comply with the Model:

A. The members of the Board of Directors and the Board of Statutory Auditors.

B. The Company's employees even when seconded to other Italian and foreign offices within the Electrolux Group.

C. All other subjects - as well as their employees or collaborators - who perform activities and/or who provide goods or services to the Company (auditors, consultants, agents, distributors, suppliers, *partners*, etc.).

2.4 THE CONTENTS OF THE MODEL

2.4.1 THE EXISTING PREVENTIVE CONTROL SYSTEM

The Company took into account, in the development of the Model, the *policies*, procedures and other existing control systems, where deemed suitable to also be used as prevention measures for predicate crimes, including:

- the Code of Conduct
- the Group *Policies & Guidelines*
- the internal control system (so-called *Electrolux Control System* – ECS)
- the financial flow management system
- the system of written powers consistent with the company organisation charts and with the functions performed by the employees
- the current procedures relating to each process at risk
- communications to staff and training of the same
- the Internal Regulations for employees
- the Disciplinary Code, consistent with the sanctioning/disciplinary system provided for by the CCNL for the Metalworking Industry
- staff instruction and training.

2.4.2 CONSTRUCTION OF THE MODEL

For the purposes of preparing this document, consistently with the provisions of the Decree, with the Confindustria Guidelines for the construction of organisation, management and control models pursuant to Italian Legislative Decree 231/2001 and with the indications deducible from the jurisprudence, the Company performed a preventive activity of complete updating of the previous *control and risk self assessment*.

The activities of *control and risk self assessment* were conducted and coordinated by a Project Team consisting of external consultants and saw the direct involvement of the Company's Management.

In particular, these activities were divided into the following phases:

- acquisition and analysis of documentation relevant for the purposes of governance and the company's internal control system (e.g. organisational charts, codes of conduct, structure of delegations and powers of attorney, internal procedures, reports and minutes);
- preliminary identification of the Sensitive Activities falling within the competence of the various organisational structures involved, with particular reference to those most affected by the scope of Italian Legislative Decree 231/2001, also considering the identification of potential new crime risks;
- identification of *key officers* to be involved in interviews;
- conducting targeted interviews:
  - the identification/confirmation of Sensitive Activities, the operational methods for conducting them and the subjects involved;
  - identification of the potential (inherent) risks of committing the predicate crimes attributable to the individual Sensitive Activities;
  - the analysis and evaluation of the safeguards/control systems in place to mitigate the above risks and identification of possible areas for improvement;
- sharing with Management of evidence that comes to light and ensuring it is documented in a summary report ("*Control & risk self assessment pursuant to Italian Legislative Decree 231/2001*") which constitutes an integral part of this document.

This activity led to the identification of adequate safeguards to be implemented in the control system in order to make it suitable to reduce the risk of crimes being committed, as well as effective implementation of the afore-mentioned safeguards in the control system by individual *key officer* involved on a case by case basis.

The Model must always be promptly modified or integrated, exclusively by resolution of the Board of Directors, in the event that:

- significant changes have occurred in the relevant legislation (e.g.: introduction of new predicate crimes into the Decree), as well as in the organisation or activity of the Company;
- breaches or circumventions of the provisions contained therein have been found, which have demonstrated their ineffectiveness for the purposes of preventing crimes.

Changes to the Procedures are made by the Managers of the Functions involved.

2.5 THE EXISTING PREVENTIVE CONTROL SYSTEM

This System, whose implementation is essential in order to guarantee the effectiveness of the Model, constituting an integral part of it, is composed as follows:

2.5.1 THE CODE OF CONDUCT

It contains the values and principles of conduct with which the Company, together with all the Recipients of the Model, intends to align its activities both internally and externally.

The Code expresses the orientation of the Company, as well as of the entire Electrolux Group, in terms of principles and behaviours to be adopted within specific areas or processes.

The text of the Code of Conduct is easily consultable both on the internal portal called '*E-Gate*' (see https://electrolux.sharepoint.com/Pages/StartPage.aspx in the Policies & Guidelines section), and on the *website* of the group.

Regarding the Company's employees, specific reminders to respect the principles contained in the Code of Conduct are contained in the Company Regulations posted on all the company noticeboards. Breaching of the principles contained in the Code of Conduct entails the application of the sanctions indicated in the Disciplinary Code (also posted on the company noticeboards).

Regarding, however, those who are not employees of the Company, the so-called 'Clause 231' is inserted in every contract which, after having reminded the contractor to comply with the Model and the Code of Conduct, reiterates that the breaching of one or both constitutes a serious breach and reason for termination of the contract (pursuant to art. 1456 of the Italian Civil Code).

2.5.2. GROUP POLICIES & GUIDELINES

The Electrolux Group has adopted a series of *Policies & Guidelines* to which the Company is also subject relating to various areas and processes.

As of the date of publication of this Model update, the *Policies & Guidelines* adopted are the following: Group Anti-Corruption Policy; Guidelines for Gifts and Events; Group antitrust Policy; General antitrust guidelines; Group Directive on Internal Investigation; Guidelines on Information Exchanges with Competitors; Down Raid Manual; Antitrust D2C Guidelines; Group Brand Policy; Group Conflicts of Interest Policy; Group Data Protection Policy; Group Data Protection Directive; Group AI & Data Governance Policy; Group Data Security Incident Process; Group Directive on Information Classification; Group Environmental Policy; Group Indirect Tax Directive; Group Credit Directive; Group Delegation of Authority Directive; Group Finance Policy; Group Tax Directive; Group Tax Appendix A on Tax Audit Procedures, Group Transfer Pricing Directive; Group Transfer Pricing Directive Appendix A on Tax Audit Procedures; Group Treasury Directive; Group Directive on Human Rights; Group Information Policy; Group Insider Policy; Instructions issued under the Group Insider Policy; Group Intellectual Property Policy; Group Policy on Cyber Risk and Cyber Security; Group Directive on Cyber Security; Group Directive on Cyber Risk; Group Directive on Compliance for Cyber Risk and Cyber Security; Group Compensation Directive; Group Directive on Company cars; Group Directive on International Assignments; Group Global Recruitment Directive; Group Grandparent Principle Directive; Group Pension and Other Benefits Directive; Group People Policy; Group Purchasing Policy; Group Purchasing Directive; Supplier Workplace Standard; Group Quality Policy; Group Directive on Risk Management; Group Global Travel Directive; Group Workplace Policy; Group Workplace Directive; Remote Working Guidelines.

The Company has also adopted the "Management of the Whistleblowing" procedure in order to regulate the Whistleblowing System in compliance with Italian Legislative Decree 24/2023.

The *Policies & Guidelines* can be consulted on the company Intranet at the following address: https://electrolux,omniacloud.net/_/app/_/about-electrolux/policies-directive-guidelines.

The application of *Policies* & Guidelines by the Company is guaranteed by the presence, at central level, of an internal *audit* function the *Electrolux Group Internal Audit* (GIA) and of the ECS internal control system (see § 2.5.4).

2.5.3. POWER OF ATTORNEY SYSTEM

The Company uses an *organisational* system that is structured in such a way as to provide formal evidence of the hierarchical lines of dependence and the distribution of the areas/functions of responsibility attributed to its employees.

The organisational scheme finds its typical expression in the system of *attribution and management of powers* which is aimed at formally authorising specific subjects to act in the name and on behalf of the Company, also with the provision of maximum spending limits.

Both the organisational system and, consequently, the authorisation system are based on the general principle of 'segregation of functions' which is aimed at avoiding the mixing of potentially incompatible roles and/or the occurrence of excessive concentrations of responsibilities and powers in the hands of one single (or a few) subject.

Added to this is the fact that the Company, to promote verification/control mechanisms and to avoid concentrations of power, has structured the system of attribution of the powers themselves by providing - for all documents that bind the Company towards third parties - the obligation of the so-called 'double signature' (i.e. signature by two subjects equally empowered for the same deed/document).

Furthermore, if considered in the context of decision-making processes, these systems ensure that:

- the exercise of powers is performed by subjects with organisational and management responsibilities congruent with the importance and/or criticality of certain operations;
- the powers and responsibilities are clearly defined, consistent with each other and known within the company organisation;
- the Company is validly committed to third parties (customers, suppliers, banks, public administrations, etc. ...) by a specific and limited number of subjects with internal powers of attorney/authorisations.

The power attribution system is set up as follows.

1. POWERS OF THE DIRECTORS

The Board of Directors can delegate its powers to some of its members, determining their content, limits and methods of exercise.

The minutes of the Board of Directors granting these powers are filed with the Chamber of Commerce to make their contents known to third parties.

2. NOTARIAL POWERS OF ATTORNEY AND INTERNAL AUTHORISATIONS

The powers granted to the members of the Board of Directors can be sub-delegated by them to a person (their own employee, employee of another Group company or third party) by means of a notarial power of attorney and/or internal authorisation.

The granting of notarial powers of attorney and internal authorisations, as well as updating of the same, takes place according to a consolidated practice which has been formalised in a specific **"Management of Delegations and Powers of Attorney" procedure.**

The *HR Service Italy* office promptly communicates to the *Corporate Affairs* Office any organisational change (resignations, dismissals, change of duties) in such a way that there is alignment between the activity actually performed by the individuals who operate on behalf of the Company, their corporate functions/qualifications and the powers granted by the Company.

Finally, Powers of Attorney and Internal Authorisations are archived electronically in a company *Database* that is kept constantly updated.

The paper-based archive is, however, kept and managed by the *Corporate Affairs* Office.

2.5.4. INTERNAL CONTROL SYSTEM (ECS)

The Company has implemented the Internal Control System *Electrolux Control System'* (ECS) provided by the Electrolux Group.

This system was developed to ensure an accurate and reliable *Reporting* system as well as to ensure that the preparation of the financial statements occurs in compliance with the laws, regulations and generally adopted accounting principles.

The internal controls however include broader rules of conduct that define the general principles on which the company is based.

ECS is structured according to the internal control scheme dictated by the *Committee of Sponsoring Organisations of the Treadway Commission*' (COSO), whose pillars are:

a) Control Environment;

b) Risk Assessment;

c) Control Activity;

d) Test Activities;

e) Communication.

a) *Control Environment*

It consists of the set of *Policies*, Procedures, Regulations and Codes adopted within the organisational structure of the Electrolux Group which, as seen, attributes clear responsibilities and powers that are adequately segregated from each other.

The limits of responsibilities and powers are defined in the instructions for the '*Delegation of Authority*', in the Manuals, *Policies*, Procedures and Codes (including the Code of Conduct, the Anti-corruption and money laundering *Policy*, the *Policies* for information, finance and credit).

Together with the external laws and regulations, these internal guidelines form the so-called *Control Environment*; all Electrolux employees are held responsible for complying with it and all Group units must maintain adequate internal controls according to a defined methodology.

b) *Risk Assessment*

It is the activity that identifies the main risks that are potentially connected to financial reporting activities performed in an incomplete and imprecise manner (including, for example, the risk of loss or misappropriation).

c) Control Activity

The Control Activity has the aim of mitigating the identified risks and of ensuring reliable and efficient *reporting* processes. The control activity includes both general and detailed controls with the aim of preventing, identifying and correcting errors and/or irregularities.

The ECS Program involves performing the following checks:

1. '*Entity Wide Controls'*

   They ensure and strengthen the "Control Environment"; in particular, every year a questionnaire asks Electrolux Management for confirmation and documentation to

support checks on compliance with the main Group policies, accounting rules, delegations and powers.

2. *'Manual and Application Controls'*

   It is aimed at ensuring that crucial risks related to reporting in business processes are adequately monitored and verified.

   Examples of important controls are those relating to the verification of accounting records, checks on access to systems and verification of segregation of activities, etc.

3. *IT General Controls'*

   It is aimed at ensuring the security of the IT environment for the applications used.

   Examples of important controls are those relating to the administration of *'Users'*, production environment and the *back-up* of procedures.

d) *Test* Activity

The test activity on controls is performed in order to ensure that risks are effectively and correctly mitigated.

Coordination and planning of the ECS activity are performed by *Electrolux Group Internal Audit* (GIA) which represents the internal audit function of the Electrolux Group.

The control documentation is updated annually in order to guarantee the adequacy and completeness of the controls themselves in the context of operational/organisational changes.

This documentation includes: the description of the control activity (detailing who performs the control); the activity performed to finalise the control and its frequency.

The responsibility for performing the checks lies with each individual *Reporting Unit*.

The GIA, in addition to drafting the *test plan*, independently performs a number of selected tests.

Checks that fail must be repeated after corrective actions have been implemented to the process.

The test results are kept in a Lotus notes database.

e) Communication

The results of the EWC questionnaire and the test results are communicated to Management and are presented to external auditors and to internal auditors. The external auditors acquire the documentation and determine to what extent they can rely on the activity performed within the Group via ECS and the GIA for the purpose of the Group Audit and of the Financial Statement Audit.

In case of failed tests, external auditors require corrective actions. External auditors can independently perform certain checks and/or request documentation to support the tests already performed to verify the activity carried out.

2.5.5 INFORMATION SYSTEMS

The Company uses procedures, both 'manual' and IT-based, which establish a series of 'control points to verify, within the individual processes: the purposes of the actions; the authorisation, recording and verification cycles of individual operations/activities; the approval

and signature methods (i.e. respect for the assigned powers); separation of the different functions involved and of the tasks assigned within them.

These systems are periodically updated in relation to changes in company procedures, operational practices and also in the organisational system and are managed in such a way as to allow maintaining of the integrity of operations, the availability and, at the same time, the confidentiality of company information, thus as also required by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, relating to the protection of natural persons with regard to the processing of personal data, as well as the free movement of such data (also "GDPR") and by Italian Legislative Decree no. 196/2003 and subsequent amendments (so-called 'Personal data protection code').

Administrative and management information systems are interrelated and sequential. They provide for the presence of security mechanisms that guarantee protection-access to the Company's data and assets.

The Company has also adopted a Policy and Regulations on the use of information and electronic tools containing provisions on the methods of use of electronic and telematic tools that are used to perform work as well as on the methods of performing any checks on their usage. These documents, whose recipients are all the Recipients of the Model (referred to in § 2.3.), are integrated and coordinated with the legal regulations, internal regulations and specific guarantee provisions established by the individual structures/offices/operating units.

2.5.6 MANAGEMENT OF FINANCIAL FLOWS

The management of financial flows represents a particularly delicate area in the context of processes identified as more critical as they involve sensitive activities or those of an atypical or non-recurring nature.

The general principles to which the actions of all subjects in this area must refer are:

- subjective separation between those who: i) take or implement decisions, ii) must provide accounting evidence of the operations performed and iii) are required to perform the controls imposed by law and by the company procedures;
- choice of contractual counterparties (e.g. suppliers, consultants, agents, etc.) to be made based on principles of reliability, quality, transparency and cost-effectiveness;
- monitoring of the services performed by the contractual counterparties in favour of the Company; in the event of behaviour that does not comply with the corporate ethical principles and/or in breach of the principles contained in this Model, the Company must request termination of the relationship;
- setting limits on the autonomous commitment and use of financial resources, consistent with the roles, responsibilities and powers assigned to the subjects;
- operations that involve the use or employment of economic or financial resources must have an express reason and be documented and recorded in accordance with the principles of accounting correctness; the approval decision-making process must always be verifiable;
- no payment can be made in cash or in kind;

- in the use of its financial resources, the Company uses exclusively financial and banking intermediaries subject to transparency and correctness rules compliant with the European Union regulations.

The Company provides for the external audit and certification of its financial statements.

2.5.7 DOCUMENTATION MANAGEMENT

All documentation, regardless of the medium used (paper and/or IT), is managed in a manner that is capable of guaranteeing safe recording, archiving and possible updating.

2.6 DIFFUSION OF THE MODEL

This Model was initially adopted by the Board of Directors with a resolution dated 2 July 2004 and is periodically updated following significant organisational changes as well as legislative changes which have, over the years, introduced new types of crime.

In order to guarantee the effectiveness of the Model, the Company ensures its dissemination through information and training activities for both its own staff and for third parties.

2.6.1 STAFF TRAINING

Adequate and constant informing and training of employees on the contents of the Model is an essential element for its effective and efficient implementation

The Company, therefore, promotes knowledge and dissemination of the Model upon first hiring (through the provision of a 'booklet' containing the references of the *Policies* & *Guidelines* and Company Regulations) as well as in the continuity of the employment relationship even in the event of revisions to the Model.

Employees are therefore put in a position to have full knowledge of the principles and objectives contained in the Model and of the methods through which the Company intends to pursue them.

The 'Personnel Management' function, in cooperation with the Supervisory Body, oversees and manages dissemination of the Model as well as the training of personnel.

HR Management shares with the Supervisory Body a training plan that is consistent with the training needs of recipients, through the formulation of ad hoc training courses.

In particular, the dissemination and training activity of the Model includes:

a) for all staff

- notices, sent via e-mail and/or posted on the noticeboard relating to any revisions to the Model;
- publication of the Model on the egate company Intranet page, Organisation, Management and Control Models (sharepoint.com) and its posting on company noticeboards;
- the provision to new hires of an information note relating to the adoption of the Model and the obligation for staff to comply with it;
- the reference to the principles of the Model within the Company Regulations and the Disciplinary Code;

- training courses performed with *e-learning* methods aimed at illustrating the key operating principles of the Model.

b) for personnel holding specific management functions/processes within the Company and/or representing the organisation, in addition to the training activities described in point a):

- a 'special part', dedicated to in-depth analysis of the types of crimes relevant for the recipients of the training (e.g. module dedicated to analysis of the crimes of 'manslaughter and serious or very serious negligent injury' for those who hold the role of Work Employer, supervisors, Head of Prevention and Protection Service and Prevention and Protection Service Officer).

The recipients of this training, as managers of the various company units involved, are asked to transmit the knowledge acquired within their area of responsibility.

2.6.2 CONTRACTUAL CLAUSES FOR 'OTHER SUBJECTS'

The Company promotes - also through the preparation of specific contractual clauses - compliance with the Model by the Recipients of the Model such as suppliers, consultants, etc.

Each of the afore-mentioned subject is therefore contractually obliged to respect the principles of the Model.

2.7 THE DISCIPLINARY/SANCTIONING SYSTEM

One of the essential elements to give exemptive effectiveness to the Model is that it is accompanied by a *disciplinary system suitable to sanction failure to comply with the measures indicated in the Model*' [art. 6, para. 2 lett. *e)* of the Decree and art. 7, para. 4, letter. *b)* of the Decree].

The existence of an adequate and effective disciplinary system is, therefore, an essential condition to ensure effectiveness and efficiency of the Model.

The disciplinary system has a purely internal function and operates regardless of the possible establishment of criminal proceedings for the 'relevant crime' possibly committed. Application of the sanctioning measures established in the Disciplinary System does not replace any further sanctions of another nature (criminal, administrative, civil) that may be applied in individual cases.

The investigation of infringements can also be initiated on the impulse of the Supervisory Body which has, during its control and supervision activity, detected a possible breach of the Model or of the Code of Conduct.

The holders of sanctioning power are specified in the following paragraphs.

The disciplinary/sanctioning system is based on the principles of typicality, immediacy and proportionality.

The disciplinary/sanctioning system, although based on the same preventive function and on the same principles of graduality and publicity of sanctions, differs - depending on the recipients - in terms of applicable discipline and structure.

The Company's disciplinary system may also be applied in the event of breaches of the provisions of the Model relating to reports of breaches (so-called whistleblowing) as regulated in para. 2.7.5.

2.7.1. MEASURES AGAINST *EMPLOYEES AND EMPLOYEES WITH REPRESENTATIVE/SENIOR MANAGEMENT FUNCTIONS*

Employed workers, including managers, who breach the principles of the Model are subject to the typical disciplinary power referred to in art. 2106 of the Italian Civil Code and in art. 7 of Law no. 300/1970 (so-called Workers' Statute).

The Company has approved a document called '*Rules, procedures and disciplinary sanctions for company personnel*' (so-called 'Disciplinary Code') which, in application of art. 7 of the Workers' Statute, reports the full text of the rules, procedures and disciplinary sanctions provided for by the national collective labour agreement and recalls the main duties of the employee.

This document - which in compliance with the legal principle of publicity, is posted on all company noticeboards - reminds the employee that they are required to be diligent and obedient, to respect the Company Regulations posted on the noticeboard as well as all the other rules, behavioural practices and guidelines in force in the company and in any way brought to the attention of the same.

The Disciplinary Code reiterates that the worker is required to comply with the Code of Conduct and with the Model issued pursuant to Italian Legislative Decree 231/2001 which express the Company's orientation in terms of correct behaviour at work and within specific areas or processes.

Finally, the Disciplinary Code establishes that breaching of the Company Regulations, of the rules and practices of conduct as well as of the Code of Conduct and of the Model referred to above will result in application of the 'typical' disciplinary measures: verbal warning; written warning; a fine not exceeding three hours' pay; suspension from work and pay for up to a maximum of three hours; dismissal with or without notice.

The sanctions are applied according to the legal principle of proportionality in order to guarantee their validity and repeat behaviour is taken into account within the limit of two years from the committing of the offence.

The holder of disciplinary power is the Human Resources Department which can initiate the disciplinary procedure referred to in art. 7 of the Workers' Statute and referred to in the CCNLM – on the initiative of anyone who becomes aware of the relevant facts liable to disciplinary action.

2.7.2 MEASURES AGAINST *'THIRD PARTY RECIPIENTS'*

The Company has provided that the specific clauses included in the letters of appointment and/or in the contractual agreements apply to individuals who are not linked to the Company by an employment relationship, according to which failure to comply with the principles of the Model and/or the referral to trial and/or conviction for one of the crimes provided for by Italian Legislative Decree 231/2001, constitutes a serious breach of contract and is cause for termination of the contract *pursuant to* art. 1456 of the Italian Civil Code and compensation for any damage caused to the Company.

Furthermore, through the SB, the Company warns those who deviate from the principles of the Model.

In the event that Breaches of the Model are committed by temporary workers or by workers under contracts for the procurement of works or services, or by a seconded worker, the Company will promptly inform the supplier or the contractor or the seconding party for the

possible adoption by them of sanctioning measures against their employees and/or collaborators.

Any consequences (of a resolution and/or compensatory nature) deriving from breaches committed by employees and/or collaborators of the 'Third Party Recipients' will be charged by the Company to the latter.

2.7.3 MEASURES AGAINST MEMBERS OF THE CORPORATE BODIES

A. MEASURES AGAINST MEMBERS OF THE BOARD OF DIRECTORS (DIRECTORS)

If one or more Directors of the Board of Directors breach the provisions contained in the Model, the Board of Directors will perform all the investigative activities necessary to ascertain the alleged breach.

Subsequently, it will send the interested party and the Board of Statutory Auditors a report indicating:

a. the disputed conduct and the related supporting elements, as well as the breached provisions of the Model;

b. the alleged perpetrator of the Breach;

c. the sanction that is intended to be applied.

Subsequently, the Board of Directors will summon the interested party in order to listen to any justifications.

The Board of Directors - if it does not believe it can accept the defences presented - will proceed according to a criterion of proportionality to apply one of the following sanctions:

- warning against continuing to engage in conduct contrary to the provisions of the Model;
- temporary suspension from office;
- dismissal from office.

If the sanction of dismissal from office is applied to a member of the Board of Statutory Auditors, art. 2400, para. 2 of the Italian Civil Code will apply.

In the event of a Breach committed by a director who is also an employee of the Company, the same will also be sanctioned pursuant to the provisions of the previous § 2.7.1. (i.e. disciplinary system for employees), where the conditions exist.

In cases deemed serious, the Board of Directors, having consulted the Board of Auditors, will convene the Shareholders' Meeting for the consequent resolution.

B. MEASURES TOWARDS THE BOARD OF STATUTORY AUDITORS

If one or more members of the Board of Auditors breach the provisions contained in the Model, the Board of Directors will perform all the investigative activities necessary to ascertain the alleged breach.

Subsequently, it will send the interested party and the other members of the Board of Statutory Auditors a report indicating:

a. the disputed conduct and the related supporting elements, as well as the breached provisions of the Model;

b. the alleged perpetrator of the Breach;

c. the sanction that is intended to be applied.

Subsequently, the Board of Directors will summon the interested party in order to listen to any justifications.

The Board of Directors - if it does not believe it can accept the defences presented - will proceed according to a criterion of proportionality to apply one of the following sanctions:

- warning against continuing to engage in conduct contrary to the provisions of the Model;
- temporary suspension from office;
- dismissal from office.

In cases deemed serious, the Board of Directors convenes the Shareholders' Meeting to provide appropriate information.

2.7.4 MEASURES TOWARDS THE SB

The Board of Directors, if one or more members of the Supervisory Body breach the provisions contained in the Model, will immediately revoke the office.

The Company has the right to apply disciplinary sanctions related to the type of contract that exist with the interested party (employment or assignment) as well as to propose any compensation actions.

2.7.5 DISCIPLINARY SYSTEM FOR BREACHES OF THE REPORTING SYSTEM

The Company adopts this Disciplinary System for breaches of the reporting system, pursuant to art. 6, para. 2, Italian Legislative Decree 231/2001 and art. 21, para. 2, of the Whistleblowing Decree, providing disciplinary sanctions for the following categories of sanctionable infringements:

(**I**) Retaliation Commission;

(**II**) Obstacle to the submission of reports;

(**III**) Breach of the confidentiality obligation of the identity of Reporters, of the Reported Persons, of the persons mentioned in the Report and of the Facilitators, as well as of the content of the Reports and of the related documentation;

(**IV**) Failure to verify and analyse the Reports received;

(**V**) Unfounded reports, complaints or disclosures proven to have been made with intent and gross negligence;

(**VI**) The adoption of procedures that do not comply with those referred to in articles 4 and 5 of the Whistleblowing Decree.

The sanctions specified in the previous paragraphs will be applicable to these categories of disciplinary infringements, depending on the nature of the relationship with the Company and according to a general criterion of progressive correspondence between the category of infringements and the type of sanction.

Within this general systematic criterion, the sanction applied in practice must take into specific consideration, on a case by case basis, aggravating or mitigating, according to the principle of proportionality, the gravity of the objective case; the type and intensity of the subjective element (malice or negligence, serious, medium or slight); the fact of whether the infringement remained attempted or was actually completed; any harmful consequences caused, any active

repentance; the use of precedents attributable to the afore-mentioned disciplinary categories, even where they do not constitute the details of the repeat offence; the degree of diligence and trust required based on the author's duties and/or professional qualification and/or corporate role; and any other concrete circumstance otherwise relevant for the purposes of gradation of the sanction among those abstractly applicable.

In any case, disciplinary sanctions will be applied independently:

- whether or not damages are determined as a consequence of the corresponding disciplinary infractions being committed;
- the failure by ANAC to apply the administrative pecuniary sanctions provided for the same hypotheses by art. 21, para. 1, of the Whistleblowing Decree.

Instead, unless other particularities of the specific case are highlighted, the following will be considered a significant aggravating factor:

- the circumstance that the infringement led to the application to the Company of a pecuniary administrative sanction pursuant to art. 21, para. 1, of the Whistleblowing Decree;
- committing of the infringement by the Reporting Manager;
- the fact that the breach of confidentiality has led to sanctions by the Guarantor Authority for the protection of personal data.

Finally, in cases of unfounded reports, complaints or disclosures which are proven to have been made with malice or gross negligence, the determination of damage for the Company will be considered the maximum aggravating factor. Furthermore, in such cases, the Company reserves the right to request the consequent compensation from the person responsible.

Disciplinary sanctions will be applied in compliance with art. 7 of Law 20 May 1970, no. 300 and with the relevant provisions of the CCNLM, upon completion of the dispute procedure and receipt of the justifications, where the latter are not found to be well founded or sufficient for exemption purposes.

Where those responsible for the afore-mentioned infringements are seconded or temporary workers, the exercise of disciplinary power against them will take place in the forms and with the distribution of employer skills specific to the corresponding employment relationship.

3. THE SUPERVISORY BODY (“SB”)

Art. 6, para. 1, letter. *b)* provides, in order to benefit from the mechanism of exemption from liability, assignment of the supervisory activity regarding the functioning and observance of the Model as well as its updating to an «*body of the organisation with autonomous powers of initiative and control*": the so-called Supervisory body.

In the absence of a specific description by the Decree, the characteristics of the SB and of its members were evaluated in the context of what is indicated in the Confindustria Guidelines.

3.1 COMPOSITION AND OPERATION OF THE SUPERVISORY BODY

The Company's SB is a collegial body consisting of two to three internal members determined by the Board of Directors (hereinafter also "BoD") and of an external President.

To regulate its functioning, the SB adopts its own internal regulations which in no case may be in conflict with the provisions contained in this Model adopted by the Company.

3.2 Supervisory Body Requirements

Below are the main requirements that the SB must possess in order to correctly orient its activity and to pursue the exempting purpose referred to in the Decree.

Firstly, the action of the SB (which must be considered as a whole and not with reference to individual components) must be characterised by **autonomy and functional independence**, that is free from any form of interference and/or conditioning by any other function of the Company and, in particular, by the so-called 'ruling body'.

The Company - also accepting the prevailing orientations on this point - has placed the Supervisory Body in a 'hierarchical' position such as to allow it to 'report' directly to the Board of Directors and, therefore, to reduce the risk of interference.

The second element that must characterise the SB is **professionalism**. Its members, therefore, must be equipped with technical-professional skills suitable to perform the verification activities on the functioning and observance of the Model that have been delegated to them.

The SB possesses internal technical-professional skills that are adequate to effectively perform the functions assigned to it and has the right to use, for the purposes of performing its duties and with budget autonomy, consultants and personnel, including internal ones, equipped with the specific professional skills required.

The last element consists of **continuity of action. T**he SB must therefore perform its typical activity with consistency and capillarity.

Continuity of action is guaranteed by the fact that the SB operates permanently at the Company to perform the task assigned to it and that its members have an effective and in-depth knowledge of the company processes, being able to have immediate knowledge of any critical issues.

3.3 Appointment of the Supervisory Body, causes of termination and duration of the office

The members of the SB are appointed by the Board of Directors and remain in office until the first meeting of the new Board of Directors, which will arrange for renewal or modification of the positions themselves. The members of the SB can be re-elected. Upon appointment of the SB, the Board of Directors appoints the external member as Chairperson of the same and determines the compensation due to the latter and to the other members of the SB, and the financial resources to be attributed to the SB for the performance of its tasks.

Anyone who finds themselves in one of the following situations cannot be appointed as a member of the SB and, if appointed, they must resign:

- marital, kinship or affinity relationship within the 4th degree, of cohabitation in *more uxorio*, or of relationships with persons who fall within the emotional sphere, with: (a) members of the Board of Directors, (b) persons who hold representation, administration or management functions of the Company or of one of its organisational structures with financial and functional autonomy, (c) persons who exercise, even de facto, management and control of the Company, the Company's auditors and the auditing firm as well as the other subjects indicated by law;
- conflicts of interest, even potential, with the Company or with parent and subsidiary companies, which compromise their independence;

- ownership, direct or indirect, of shareholdings of such a size as to allow it to exercise significant influence on the Company or on parent and subsidiary companies;
- directly or indirectly maintaining, with the exclusion of permanent employment relationships, economic relationships and/or contractual relationships, whether for consideration or free of charge, with the Company, with parent and subsidiary companies and/or with the respective directors, of such importance as to compromise their independence;
- public employment relationship with central or local public administrations in the three years preceding the appointment as member of the SB;
- conviction, even if not final, or application of the penalty upon request (so-called "plea bargaining"), in Italy or abroad, for breaches relevant to the administrative liability of entities pursuant to Italian Legislative Decree 231/2001;
- prohibition, incapacitation, bankruptcy or conviction, even if not final, or a "plea bargaining" sentence resulting in disqualification, even temporary, from public offices, or temporary prohibition from holding managerial offices of legal persons and businesses.

Should one of the above-mentioned reasons for replacement or integration or ineligibility and/or forfeiture arise for a member, they must immediately notify the other members of the SB and will automatically lapse from office. The SB communicates the news to the Chairperson of the Board of Directors for the formulation of the replacement proposal to the Board of Directors itself.

In addition, the following constitute further causes for termination of office:

- the waiver, to be sent to the Board of Directors and to the other members of the Supervisory Body, by written and motivated communication, at least one month before the date on which the waiver will take effect;
- death or subsequent incapacity or impossibility to perform the role;
- termination, for any reason or cause, of the role held in the Company or in associated companies by internal members of the Supervisory Body.

The Board of Directors may revoke, by board resolution, having heard the opinion of the Board of Statutory Auditors, the members of the Body at any time but only for just cause and can also call for, with a reasoned deed, suspension of the functions and/or powers of the Body and the appointment of an *interim* or the revocation of powers.

The following constitute just cause for revocation of members:

- the verification of a serious failure by the SB in performing its duties;
- failure to communicate to the Board of Directors of a conflict of interest, even potential, which prevents maintaining of the role of member of the Body itself;
- the sentence of conviction of the Company, which has become final, or a plea bargaining sentence, where the documents show non- or insufficient supervision by the SB;
- the breach of confidentiality obligations regarding news and information acquired in the exercise of the SB's functions;
- a conviction, even if not final, or application of the penalty upon request (so-called "plea bargaining"), in Italy or abroad, for breaches relevant to the administrative liability of entities pursuant to Italian Legislative Decree 231/2001;

- a conviction, even if not final, or a "plea bargaining" sentence involving disqualification, even temporary, from public offices, or temporary disqualification from holding management offices of legal entities and companies;
- for the member linked to the Company by an employment relationship, the initiation of disciplinary proceedings for actions which could lead to the sanction of dismissal.

If the revocation occurs without just cause, the revoked member will have the right to request to be immediately reinstated in office.

In the event of resignation, subsequent incapacity, death, revocation or forfeiture of the President of the SB, the eldest member will take over until replaced by the Board of Directors.

If a member of the Supervisory Body leaves office, the Board of Directors must promptly replace the departed member upon confirmation of the remaining composition of the Body. The newly appointed member is invalidated together with the other members of the Supervisory Body.

3.4 FUNCTIONS AND POWERS OF THE SB

As mentioned, the Decree gives the SB the '*task of supervising the functioning and observance of the models [and] of ensuring their updating*'.

In detail, therefore, the SB must:

- constantly monitor the exemption effectiveness of the Model, both in terms of adequacy of the principles, rules and procedures contained therein, and in terms of compliance with the same by its Recipients;
- promptly identify the need to update the Model, following changes in the company structure and organisation, in the reference regulatory framework or other significant events;
- update the Board of Directors every six months on the outcome of the verification and control activities performed
- promptly inform the Board of Directors where critical issues or problems emerge that require its intervention (see § 3.5. in more detail).

In order to achieve the objectives described above, the SB:

1. plans and performs periodically **checks** 'in the field' aimed at ascertaining the concrete efficiency and effectiveness of the Model (so-called *Audits*) and of its Protocols, with reference to the various company functions and processes;
2. where the need is identified, it proposes to the relevant business units **integration and modifying of the afore-mentioned Protocols** so that they adequately regulate the performing of 'sensitive' activities;
3. in case of detected discrepancies, it identifies and prescribes the **corrective actions** to be undertaken, verifying - subsequently - that the Business Units involved have complied and reporting to the Board of Directors any remaining critical issues and discrepancies;
4. identifies and starts, with the support of the competent company functions, periodic information obligations (so-called information flows) on the part of the company functions that operate in the Sensitive Activities Area;

5. checks periodically **the completeness and correctness of the mapping of Sensitive Activities** and, if necessary, ensures their adaptation.
6. checks, even on a sample basis, **the existence and regular keeping of documentation** (i.e. contracts, accounting records, written procedures, agreements, etc.) requested in accordance with the provisions of the individual special parts of the Model;
7. identifies and monitors the implementation of periodic initiatives necessary for **dissemination and knowledge of the Model** and identifies the contents of the **training of** staff and of all those who operate on behalf of the Company;
8. verifies that t**he existing system of authorisation and signature powers is consistent** with the existing organisational and management responsibilities and proposes, where necessary, their updating and/or modification;

In order to be able to perform its activities effectively and without constraints, the SB has the power to:

a. access the Company's premises at any time and without notice;
b. make use of all the Company's facilities under its own supervision and responsibility;
c. access any corporate document and/or information relevant to the performance of its functions (i.e. minutes of the Board of Directors and of the Board of Statutory Auditors, results of inspections by third-party bodies or the Group Internal Audit; contracts, etc.);
d. make use of the help and support of the Company's employees as well as use external consultants of proven professionalism in cases where this is necessary;
e. delegate particularly complex technical tasks to the subjects referred to in the previous point, with the obligation to report accordingly;
f. request evidence of the *audit* activities of the Parent Company performed at the Company;
g. ensure that the managers of the company structures promptly provide the information, data and/or news requested from them;
h. proceed with direct hearings with the staff, directors and members of the Board of Statutory Auditors of the Company who can provide information and can also request information from the auditing firm and from third parties who provide consultancy or services to the Company (i.e. consultants, commercial *partners*, etc.);
i. give impetus to disciplinary/sanctioning procedures or liability actions, reporting the breaches found to the offices or to company representatives;
j. follow the progress of the procedures initiated, verifying the outcomes in order to plan the subsequent activity.

All activities performed by the SB (i.e. *audits*, exploratory interviews, etc.), with the exception of those having merely internal relevance, are the subject of timely minutes.

The SB archives in a specific archive (IT and paper-based) for a period of 10 (ten) years the minutes of every meeting held, reports received, information *reports* sent and the results of the investigation and verification activity performed.

This archive is confidential and can only be accessed by members of the SB itself, by the Board of Directors and by the Board of Statutory Auditors and by any other subjects only if

previously and formally delegated and authorised in writing by the SB itself. The same confidentiality treatment applies to SB data contained on IT media.

Lastly, to guarantee the principle of autonomy and independence, the SB must have *budget* and spending autonomy to be able to perform activities functional to the pursuit of its own objectives.

Consequently, the Board of Directors is called upon to approve every year - upon proposal of the Supervisory Body itself - an adequate allocation of financial resources.

In exceptional and urgent cases, however, the SB may commit resources that exceed its spending powers, with authorisation from the *Country Holding* Officer. This exceptional use of resources will subsequently be reported to the Board of Directors in a written report.

3.5 Reporting by the Supervisory Body to the Board of Directors

Regarding the activity of *reporting* towards the corporate bodies, the SB is required to report, **on an ongoing basis**, to the Board of Directors regarding the implementation of the Model within the Company.

The SB transmits **every six months** to the Board of Directors a written report on the implementation of the Model in the Company containing, for the reference period:

1. the activity perform, especially that of verification;
2. the critical issues and problems that emerged both in terms of relevant behaviours/internal issues and in terms of the effectiveness of the Model and the related intervention proposals;
3. the reporting of any changes in the regulatory framework and/or company structure, which require an update of the Model;
4. the activities which could not be performed and the reasons for non-execution;
5. the sanctions applied by the Company following breaches of the Model;

The SB also annually submits to the Board of Directors a 'Supervision Plan' (hereinafter the 'Plan'), in which the areas of intervention as well as the verification activities to be performed and the related expenditure forecast are identified and specified.

This Plan may be subject to modification during the year, but the Supervisory Body is required to notify the Board of Directors of the reasons that led to the correction.

On the basis of the Plan, the SB will prepare a calendar of activities, identifying the time intervals for performing of the 'audit' activities and the time interval for sending and receiving information flows.

Outside of the activities envisaged in the Plan, the SB has the right to perform further and specific verification initiatives without notice (so-called unscheduled audits, especially following reports received.

Finally, the SB communicates **promptly** to the Board of Directors any problems detected in the context of the supervisory activity performed also in order to obtain from the Board of Directors, where necessary, the adoption of urgent measures.

In particular, the SB reports on:

1. any breach of the Model that has occurred which has led to urgent critical issues to be analysed;

2. organisational and/or procedural deficiencies that have occurred which, if not remedied, lead to an increase in risk to unacceptable levels as assessed by the Supervisory Body on the basis of the pre-existing structure;
3. regulatory changes that are particularly relevant for the implementation and effectiveness of the Model;
4. failure to collaborate on the part of company structures (in particular, refusal to provide the SB with requested documentation or data, or obstacle to its activity);
5. the provisions and/or reports of crime coming from judicial police bodies or from any other authority, from which it is clear that investigations have been conducted against the Recipients referred to in point 2.3 or also against unknown persons for the crimes referred to in the Decree;
6. the conduct and outcome of the afore-mentioned proceedings.

The SB, in turn, can be convened at any time by the Board of Directors and/or by the Board of Statutory Auditors.

3.6 INFORMATION OBLIGATIONS OF THE SUPERVISORY BODY

Art. 6, para. 2 letter b) of the Decree establishes that '*information obligations towards the SB*' must be envisaged.

This obligation is to be considered, in general, functional to periodically verify the results of control procedures implemented by the individual company functions involved or to detect anomalies or atypicalities.

The Company's Supervisory Body is the recipient of the following two types of 'information flows' (hereinafter jointly also referred to as "Information Flows"):

A) Periodic information flows

They are specifically considered in the special part of the Model (to which reference is made for specific contents) and are as follows:

- Sending of the Semi-Annual Reports on environment, health and safety, by Employers.
- Sending of Audit Reports for audits performed by other Control Bodies (i.e. DNV, CSC, CSQ) relevant for prevention purposes.
- Monthly sending by the competent Human Resources Department (*HRBPs* and *HR Specialist* of the Site), disciplinary complaints and any measures taken against employees.
- Six-monthly sending of information relating to the request, obtaining and use of contributions, subsidies, financing or guarantees granted by public entities in the reference period.
- Sending of reports regarding participation in tenders/tender notices relating to training activities financed by external bodies and related reporting.
- Six-monthly sending of final reports relating to information, training and learning verification activities regarding the Model addressed to its Recipients.
- Six-monthly sending of the list of sponsorships and donations made.
- Six-monthly sending of the situation of tax and customs disputes, including proceedings before tax commissions.

This information must be provided to the Supervisory Body by the Managers of the company functions according to their area of competence,

B) 'Event-based' information flows

The Supervisory Body must receive any (if any) other information relating to the implementation of the Model, especially where it is believed that certain events may result in liability for the Company itself pursuant to the Decree. By way of example, the following can be identified:

- the provisions and/or information coming from the judicial authority or from any other authority (i.e. administrative, accounting, financial, etc.), from which it is clear that investigations have been started and/or performed - even against unknown persons - for the crimes or administrative offences referred to in the Decree;
- requests for legal assistance sent by employees in the event of legal proceedings being initiated against them for the crimes envisaged by the Decree;
- any deficiencies in the current procedures and/or justified indications of the need for changes to the Model or the Protocols;
- news of the start of operations of particular importance or with risk profiles such as to lead to the recognition of a reasonable danger of the committing of crimes.
- the results of control activities performed within other company functions from which facts, acts, events or omissions with critical profiles with respect to compliance with the provisions of the Decree have emerged;
- notifications of requests for disbursements and/or the use of public funding.

The transmission of information is required within 5 working days from the date on which the event/fact occurred.

The regulation of Information Flows towards the SB in terms of frequency, transmission methods and responsibility for the transmission of the same are regulated in detail in a specific Procedure (“Management of the information flow system towards the Supervisory Body”) approved by the Corporate Director, effectively disseminated according to the methods established by the Procedure itself.

The SB, within the scope of its autonomous powers of initiative and control, in application of the provisions of the Model, can identify further information flows in order to acquire other information of its own interest, identifying the content, level of detail and frequency of the information and then requesting activation from the competent company functions and suggesting integration of the Procedure in question.

The Information Flows must be sent to the *e-ma*il address odv231.electrolux-italia@electrolux.com or addressed to: 'Supervisory Body', c/o Electrolux Appliances S.p.A., Corso Lino Zanussi n. 24 – 33080 Porcia PN.

4. REPORTS OF OFFENCES OR OF BREACHES OF THE MODEL

4.1 GENERAL PRINCIPLES

The Company is aware of the fact that, in order to encourage the reporting of offences or breaches of the Model, it is necessary to create an *ad hoc* system of management of the same which protects through suitable technical and organisational measures the confidentiality of the

identity of the reporting person, of the person involved and of the person mentioned in the report, as well as of the content of the report and of the related documentation and that it is entrusted to an autonomous and specifically trained person.

The Company has therefore equipped itself, in compliance with the applicable legislation[7]with specific reporting channels, also defining, in a specific Procedure called "Management of the Whistleblowing System" (hereinafter « **Whistleblowing System**»), to be understood as fully referenced in the Model and which constitutes an integral part thereof, the operating methods and responsibilities for the receipt, evaluation, management and closure of reports.

4.2 REPORTING SYSTEM

Pursuant to art. 6, paragraph 2-bis Italian Legislative Decree 231/2001, as amended by Italian Legislative Decree 24/2023, the Company has established the internal reporting channels (hereinafter the «**Channels**») referred to in art. 4 of the afore-mentioned decree (hereinafter the «**Whistleblowing Decree**»), entrusting its management to a specific person appointed pursuant to the afore-mentioned art. 4, paragraph 2 (hereinafter the «**Whistleblowing Manager**»).

The Whistleblowing Manager has been identified in a body external to the Company, appointed by the Company's Board of Directors as a reporting manager pursuant to Article 4 of Legislative Decree March 24, 2023, as an autonomous and specifically trained individual..

In particular, the Channels allow the persons expressly indicated by the Whistleblowing Decree and by the Whistleblowing Procedure (by way of example: employees, collaborators, shareholders, consultants etc., hereinafter the "**Whistleblowers**"), to present, to protect the integrity of the Company, reports relating to unlawful conduct relevant pursuant to Italian Legislative Decree 231/2001 or breaches of the Model, as well as relating to breaches of European Union law and of national transposition legislation referred to in the Whistleblowing Decree[8], all learned within an own working context (hereinafter the "**Reports**"):

- in written form – through the digital platform called “Electrolux Group Speakup Line” (hereinafter also “Platform”) available at the following link https://electrolux.speakup.report/en-GB/electroluxgroupspeakupline/home, monitored by adequate security measures (in particular with the use of encryption tools) to protect the confidentiality of the identity of the Reporters, of the Reported persons, of the persons mentioned in the Report, as well as of the content of the Reports and of the related documentation[9];
- by confidential letter, sent to the Reporting Manager of Electrolux Appliances S.p.A. at the central post office located in “Corso Lino Zanussi, 24 – 33080 Porcia (PN)”, adding the wording “Confidential”;
- in verbal form – via dedicated telephone number 800 147 69 (after the message dial the number 112733), also protected by privacy protection measures;

[7] Reference is to Italian Legislative Decree. 24/2023, on “Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law and containing provisions concerning the protection of persons reporting breaches of national regulatory provisions".
[8] Reference is to art. 2, paragraph 1, letter. a), nos. 3), 4), 5) and 6) of Italian Legislative Decree. 24/2023.
[9] In compliance with the articles. 4, para. 1 and 12 of Italian Legislative Decree 24/2023 and of the corresponding provisions of the ANAC Guidelines (Resolution no. 311 of 12 July 2023).

- through direct meeting with the Whistleblowing Manager, with a request sent via one of the internal channels mentioned.

All information relating to the identification of the Whistleblowers and of the reportable breaches, the Channels and the methods for accessing them, the conditions for making internal and external Reports and the Report management process, are specified in the Whistleblowing Procedure, published on the company's website. It is also posted at company offices and is in any case accessible to potential Whistleblowers.

4.3 REPORTS OF UNLAWFUL CONDUCT RELEVANT PURSUANT TO ITALIAN LEGISLATIVE DECREE 231/2001 OR MODEL BREACHES

If the Report is relevant for the purposes of Italian Legislative Decree 231/2001 - integrating the same into a breach of the Model, which includes the Code of Conduct and/or one of the crimes provided for in Italian Legislative Decree 231/2001 – the Supervisory Body must:

- be promptly informed and involved in the Whistleblowing Management process by the Whistleblowing Manager;
- preliminarily approve the program of internal checks and investigations relating to the Whistleblowing Manager's Report;
- be kept constantly updated on the progress of the checks and investigations by the Whistleblowing Manager and may ask them, at any time, for modifications or additions to the Program of internal checks and investigations relating to the Report or information or news or further verification and investigation activities on the Report;
- promptly receive the Report from the Whistleblowing Manager on the checks and investigations performed and on the conclusions reached, on the basis of which the Supervisory Body will proceed to formalise its conclusions and requests;
- report to senior management the results of the assessments of only the Reports regarding unlawful conduct relevant pursuant to Italian Legislative Decree 231/2001 and breaches of the Model, which includes the Code of Conduct.

If the Report concerns conduct that does not comply with the Code of Conduct which does not constitute breaches of the general and specific prevention protocols contained in the Special Parts of the Model or significant offences pursuant to Italian Legislative Decree 231/2001, the Supervisory Body may delegate management of the Report to the Whistleblowing Manager.

On a quarterly basis, the Whistleblowing Manager will send the Supervisory Body a list of only the Whistleblowing Reports received in the relevant period and not considered to concern significant illicit conduct pursuant to Italian Legislative Decree 231/2001 and breaches of the Model, which includes the Code of Conduct, in order to place the Supervisory Body in a position to also be able to independently evaluate the possible implications for the purposes of the Model of all the Reports received by the Whistleblowing Manager.

4.4 PROHIBITION OF RETALIATION

Furthermore, the Company, in guaranteeing Whistleblowers the right to make Reports - moreover only under the conditions provided for in the Whistleblowing Decree and in the Whistleblowing Procedure - strictly prohibits any retaliation against the Whistleblowers themselves.

Retaliation means any behaviour, action or omission, even if only attempted or threatened, performed as a result of a Report (or a complaint to the judicial authority or public disclosure) which causes or may cause the Whistleblower, directly or indirect, unjust damage.

By way of example, reference is made to the cases of art. 17, para. 4, of Italian Legislative Decree and to the specifications of the Whistleblowing Procedure.

This protection also applies:

- to the subjects who assist the Whistleblowers in the reporting process ("facilitators");
- to persons from the same working context as the Whistleblower and who are linked to them by a stable emotional or kinship bond within the fourth degree;
- to the Whistleblower's work colleagues, who operate in the same work context as the Whistleblower and who have a usual and current relationship with the Reporter;
- to entities owned by the Whistleblower or for which they work, as well as to entities that operate in the same working context as the Whistleblower.

5. INTRODUCTION TO THE SPECIAL PART

As already highlighted in paragraph 2.4.2, pursuant to the provisions of art. 6, paragraph 1, letter. *a)* of the Decree, the Company proceeded to identify the Sensitive Activities (*Control and Risk Self Assessment*).

The Company has consequently identified and effectively implemented adequate safeguards in the control system in order to make it suitable to reduce the risk of crimes being committed.

In particular, the Protocols constituting the Special Part of the Model contain:
- the Sensitive Activities with reference to each of the crime categories identified as relevant for the Company;
- for each Sensitive Activity, the control measures in place, aimed at or in any case suitable to reduce the risk of committing of the predicate crimes. These control measures are contained and implemented in the Procedures and by other components of the internal control system.

A "Sensitive activities/protocols/crimes matrix" was also developed to facilitate the association between each of the sensitive activities, the protocols governing them and the crimes abstractly relevant to such activities.

The Protocols are as follows:

- Protocol 01 *"Relations with the Public Administration, including inspection visits"*
- Protocol 02 *"Dispute management"*
- Protocol 03 *"Human resources management, including expense reports and related reimbursements"*
- Protocol 04 *"Procurement of goods and services, including the management of consultancy and professional services and procurement"*
- Protocol 05 *"Management of relationships with certification bodies"*

- Protocol 06 "Management of marketing, communication, promotional events, gifts, donations, liberal handouts and sponsorships"
- Protocol 07 "Management of financial resources"
- Protocol 08 "Management of B2B sales activities and B2C and e-commerce business development, including the relationship with agents and distributors"
- Protocol 09 "Management of intercompany relations"
- Protocol 10 "Management of financial statements (accounting capital operations), relations with shareholders, the Board of Statutory Auditors and auditors, and taxation"
- Protocol 11 "Management of information systems"
- Protocol 12 "Management of Health and Safety in the Workplace"

6. RELEVANT PREDICATE OFFENCES FOR THE COMPANY

In consideration of the structure and of the activities performed by the Company, through the activity of *Control and Risk Self Assessment*, the Company itself has identified the following categories of relevant predicate offences:

1. **Crimes against the Public Administration** (arts. 24 and 25 of the Decree*)*
2. **Computer crimes and illicit data processing** (art. 24 *bis* of the Decree)
3. **Organised crime offences**(art. 24 *ter* of the Decree)
4. **Counterfeiting of coins, of public credit cards, revenue stamps and identification instruments or signs** (art. 25 *bis* of the Decree)
5. **Crimes against industry and commerce** (art. 25 *bis*-1, Decree)
6. **Corporate crimes** (art. 25 *ter*, Decree);
7. **Crimes against the individual personality** (art. 25 *quinquies* of the Decree);
8. **Manslaughter or serious or very serious injuries committed in breach of the regulations on the protection of health and safety at work** (art. 25 *septies* of the Decree);
9. **Receiving, laundering and using money, goods or benefits of illicit origin, as well as self-laundering (**art. 25 *octies* of the Decree);
10. **Crimes related to non-cash payment instruments** (Article 25-octies1 of the Decree);
11. **Copyright infringement crimes** (art. 25 novies of the Decree).
12. **Inducement not to make statements or to make false statements to the Judicial Authority** (art. 25 *decies* of the Decree)
13. **Employment of third-country nationals whose residence is illegal** (art. 25 *duodecies*, of the Decree)
14. **Fiscal crimes** (art. 25 *quinquesdecies*, of the Decree)
15. **Crimes against cultural heritage and laundering of cultural assets and devastation and looting of cultural and landscape assets** (Arts. 25-septiesdecies and 25 duodevicies of the Decree).

7. GENERAL CONTROL DEVICES

In the management of all Sensitive Activities, in addition to the provisions of the Code of Conduct, the following control measures are applied:

- it is forbidden to exercise behaviours:
  - such as to integrate the types of crime considered above;
  - which, although they are such as not to constitute in themselves a type of crime falling within those considered above, could potentially become so;
  - in any case, not in line or not compliant with the principles and provisions contained in the Model, in the Code of Conduct;
- the management of Sensitive Activities must take place exclusively by the competent company functions;
- the Company's employees must strictly comply with, and respect, any limits set out in the organisational delegations or powers of attorney granted by the Company itself;
- Company employees are required to comply with the company procedures applicable to Sensitive Activities, appropriately updated and disseminated within the organisation.