

CODE OF ETHICS.

Constituent element of the Organization, Management and Control Model pursuant to Legislative Decree
231/2001

SILVELOX GROUP S.P.A.


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Summary

The values of our business philosophy: specialization, made in Italy and innovation serving the customer 4

Code of Ethics and Model 231 5

The Recipients 6

Art. 1 - Protection of human rights 7

Art. 2 - Legality 7

Art. 3 - Transparency, fairness, integrity 7

Article 4 - Transparency of social documents and business continuity 8

Art. 5 - Qualitative Excellence 8

Art. 6 - Customer Relations 9

Art. 7 - Relations with suppliers 9

Art. 8 - Relations with the Public Administration and Certifying Bodies 10

Art. 9 - Centrality of human resources 11

Art. 10 - Equal opportunities and gender equality 12

Art. 11 - Corporate Assets 13

Art. 12 - *Know-how*, intellectual property, including that of third parties 13

Article 13 - Protection of competition and the market. 14

Article 14 - Separation of personal interests from corporate responsibilities 14

Article 15 - Confidentiality of personal data 15

Art. 16 - Environment and sustainability 15

Final Provisions 17

Supervision of the application of the Code of Ethics 17

Reporting violations 17

Penalty system 17

Adoption and amendments to the Code of Ethics 18

Whistleblowing 18

Conclusions 19

The values of our business philosophy: specialization, made in Italy and innovation in the service of the customer

Silvelox Group S.p.A. (the "Company") is a **Made in Italy company that has specialized** for more than 65 years in the production of armored doors, garage doors, entrance doors, swing doors and high-end architectural systems. Items that it produces in a sustainable, novel and original way both in standard but above all **highly customized** solutions, capable of meeting everyone's needs and ensuring maximum customer satisfaction.

It has always worked to ensure its customers an **optimal balance** between quality and price, for a functional and transparent shopping experience, creating tailor-made products that meet the demands of its buyers.

In its products Silvelox Group S.p.a. manages to combine the important care of the aesthetic aspect, the application of the most innovative burglar-proof technologies, soundproofing and, no less crucial, a strong attention to a current issue such as **energy saving**. An issue that the Trentino-based company has had at heart since its founding and one that promises to prove even more impactful in the near future.

On the strength of these values, the Company markets **the best products in the market**, offering them on clear terms and supporting the customer with qualified personnel, including in the after-sales phase.

Silvelox Group S.p.A. is a **reliable business partner**: it enhances the best in the industry, supporting customers in their choices with expertise and care, recognizing the specific needs of both the entrepreneur, in *business to business*, and the end consumer. It combines years of experience with a strong focus on **innovations to** ensure optimal solutions. The **R&D section** is one of the flagships of **Silvelox**, capable of combining change and tradition.

The document you are reading ("Code" or "Code of Ethics") intends to recognize and highlight the founding **values** of the **credibility** now acquired by the Company in the market, also with a view to reaffirming the roots that inspire the daily actions of all Silvelox Group S.p.A. personnel. These are binding principles, which include, but are not limited to, mere compliance with the laws and regulations in force, concerning - more broadly - fairness, transparency and integrity in the management of the company's business.

Code of Ethics and Model 231

Specialization, made in Italy and innovation along with constant attention to sustainability are cardinal points of Silvelox Group S.p.A.'s identity: they guide the company's actions in every significant choice.

Through the adoption and dissemination of the Code of Ethics, the Company intends to further clarify and strengthen the **operational force** of these meanings, declining them into relevant principles and rules of conduct both internally and in relations with third parties.

Today more than ever, therefore, Silvelox Group S.p.A. believes in and invests with conviction in an ethic marked by adherence to **high quality standards** and the promotion of its **corporate values**, for the protection of internal and external *stakeholders*.

In this horizon, the Company has decided to adopt **an Organization, Management and Control Model pursuant to Legislative Decree No. 231/2001** (hereinafter, "Model 231" or "Model") instrumental in mitigating the risk of commission of crimes.

This Code of Ethics, as the '**constitutional charter**' of corporate life, is an integral part of Model 231, representing the basis of inspiration and interpretative tool for all the safeguards provided by the Model itself.

To ensure the concrete implementation of the company's ethical vision, the principles and rules contained in this Code take on a **binding** character, to be understood as the duty of each Recipient (see below), to comply with the *standards of conduct* indicated. In order to supervise the observance of the Code of Ethics and, more broadly, of Model 231, Silvelox Group S.p.A. avails itself of the support of a Supervisory Board, which operates within the limits and with the functions provided for in Article 6 paragraph 1 letter b) of Legislative Decree No. 231/2001.

The Recipients

The principles and rules of the Code of Ethics apply to the following recipients:

- corporate bodies;
- Company personnel (both employees and external contractors);
- providers;
- customers;
- consultants and business partners;
- in general, all those with whom the Company comes into contact in the course of its business.

The **Administrative Body of Silvelox Group S.p.A.** and each **person in charge of the Company's business functions** is required to comply with the *standards* and corporate culture outlined in the Code of Ethics, promoting the assimilation of the same in the entire corporate context. This starts from the activity of defining the company's objectives and promoting corporate investments, as well as in the choice of business *partners*, as well as in the concrete implementation of projects and personnel management; more generally, these are relevant principles in the assumption of any management decision of the Company.

Similarly, **workers** are bound by the regulations defined with the Code of Ethics; the latter must, in particular, conform both the relationships occurring within the Company - thus strengthening cohesion and the spirit of mutual cooperation - and the relationships with third parties in contact with the Company (first and foremost, customers).

In order to promote *compliance* with the Code of Ethics and - in general - the ethical-organizational awareness of the Company, Silvelox Group S.p.A. provides for the **maximum dissemination of this document**, through the publication on the website, at the company notice boards, as well as through the conduct of training and awareness-raising activities.

The Code of Ethics is, in addition, brought to the attention of employees, business *partners* of the Company and anyone who has business dealings, at any level, with Silvelox Group S.p.A.

Principles and rules of conduct

Art. 1 - Protection of human rights

The Society respects and promotes human rights and fundamental freedoms in the firm belief that these principles are essential factors for genuine and sustainable development.

In particular, the Company supports, within its sphere of operations and influence, the protection of fundamental rights enshrined in the Universal Declaration of Human Rights (UN).

Art. 2 - Legality.

Silvelox Group S.p.A. operates by strictly adhering to the principle of legality, respecting the values Of the democratic order.

All Recipients are, therefore, required to comply with the principles and rules of the Constitution and laws of the Italian Republic, European Union regulations and directives, acts having the force of law (decree-laws and legislative decrees) and national regulations, as well as all internal *policies* and acts of self-regulation, including this Code of Ethics.

With this in mind, the Company cooperates in the prevention of acts contrary to the standards outlined above, committing itself not to provide any form of funding, direct or indirect, and not to favor, in any way, groups, associations or individuals that pursue illicit purposes or in any case not aligned with the values promoted by this Code of Ethics.

Art. 3 - Transparency, fairness, integrity

Transparency, fairness and integrity are fundamental principles that inspire the entire organization and every operational expression of Silvelox Group S.p.A. Recipients recognize them as indispensable *standards* of their actions, internally and in relations with third parties.

All conduct engaged in by the Recipients of the Code of Ethics, having relevance both internally and externally to the Company, must conform to the highest *standards* of **professional rigor, fairness, transparency** and **fair competition**, and any activity engaged in by top management, employees and collaborators in business dealings with third parties must comply with the rules of **fairness** and **good faith** derived from Articles 1175 and 1375 of the Civil Code.

Article 4 - Transparency of social documents and business continuity

The Company adopts, as fundamental values, the principles of **transparency, accuracy, truthfulness, and completeness** of any corporate document in which economic, asset, and/or financial elements are disclosed, in compliance with current regulations. Consequently, corporate resources involved in preparatory activities for the preparation of financial statements and corporate communications undertake to carry out their functions by adhering to the aforementioned principles.

Therefore, the Company condemns any conduct aimed at altering the transparency, fairness and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law, addressed to the public, shareholders, the board of auditors or the auditor. Therefore, in the event of a request for accounting information made by shareholders, the auditor and the Supervisory Board, in the exercise of their respective institutional functions, the personnel involved are required to respond promptly, **completely, accurately and transparently**. In this regard, it is also specified that the Company must comply with current taxation regulations in order to ensure **the proper determination and settlement of** taxes and is committed to promptly perform any tax compliance required by law, including in accordance with the practices of the Internal Revenue Service.

In addition, the Company also strives, including at the organizational level, to identify and prevent operational, financial or other risks that could undermine **business continuity**. Therefore, it is necessary that accounting records and the documents derived from them must be based on **genuine and exhaustive information** and must also be accompanied by appropriate **supporting documentation**, which is readily available and necessary to carry out checks and verifications. To this end, and with particular reference to financial flows, the Company's incoming and outgoing **payments** must always be authorized, as well as traced and recorded, and, more broadly, transactions of a financial nature must be carried out only by individuals with the relevant powers. Any omissions or misrepresentations of which workers become aware must be, without delay, **reported to the Supervisory Board**.

In the spirit of Article 2086 paragraph 2 of the Civil Code, the Company is committed to adopting an organizational, administrative and accounting structure appropriate to the nature and size of the business, including the timely detection of business crisis and loss of business continuity.

Art. 5 - Qualitative Excellence

All personnel of Silvelox Group S.p.A. must operate by pursuing the highest quality *standards*.

The Company aims to satisfy customers' needs to the best of its ability, right from the selection of raw materials and products to be marketed, and then accompanying - with care and expertise - the customer in making the optimal choice, finally assisting him or her in the after-sales phase as well. This is done by combining the strength of experience and attention to innovations in the industry.

Art. 6 - Customer Relations.

The Company is committed to satisfying its customers, both *business* and *consumer*, in accordance with high quality *standards* by conducting relations with high professionalism, helpfulness and fairness.

Specifically, in the context of relations with Customers, Recipients must develop and maintain positive and lasting relationships inspired by canons of cooperation and courtesy, transparency and integrity, with a view to qualifying the Company as a safe and reliable partner. This in particular by providing accurate, complete, truthful and timely information so as to enable the Customer to make an informed decision as well as by fulfilling all the commitments undertaken.

Silvelox Group S.p.A. personnel are also obliged to require Customers to observe the Company's ethical principles, complying with the provisions of the Code of Ethics.

Art. 7 - Relations with suppliers

Silvelox Group S.p.A. selects and maintains business relationships with suppliers capable of sharing the quality and ethical standards outlined in the Code.

The Company's suppliers must ensure their personnel working conditions based on respect for human rights, international Conventions and applicable laws. All forms of exploitation of child and nonchild labor are, therefore, strictly prohibited.

The Company's suppliers are also required to fully comply with legality and business fairness, with particular reference to regulations on free competition and the market, protecting intellectual property, and laws against money laundering and organized crime.

Should Silvelox Group S.p.A. become aware of a violation of the above standards, the Company will take immediate action to terminate any relationship between the said supplier and the Company.

In adherence to the principle of integrity, any giving and receiving of gifts/favors that could be construed as exceeding ordinary courtesy practices is prohibited in dealings with suppliers

Commercial or otherwise implicitly aimed at unduly acquiring favorable treatment for himself or the Company

Article 8 - Relations with the Public Administration and Certifying Bodies.

8.1 Public Administration

All relations with the Public Administration are inspired by the strictest compliance with the provisions of the law and company procedures, in deference to the principles of fairness, loyalty and transparency.

The Company's relations with individuals representing the Public Administration are managed by individuals authorized to do so, within the limits of their role and according to the powers provided for in the articles of association.

In the performance of these relationships, the Recipients of this Code must absolutely avoid conduct that could even only be interpreted as collusive in nature, or otherwise likely to undermine the principles listed above (by way of example, the offer - even indirectly - of money or benefits of any kind).

8.2 Law Enforcement and Judicial Authorities.

The Company ensures and promotes fair, transparent and cooperative behavior towards security and judicial police bodies and with the Judicial Authorities.

In the event of control or inspection procedures by public bodies/authorities, the personnel involved undertake to promptly carry out the instructions given, respecting each other's roles. The Company prohibits any kind of conduct that could affect the outcome of ongoing legal procedures.

It is forbidden to engage in any form of conditioning against anyone (employee, collaborator or third party) is called upon to make statements before the Judicial Authority.

8.3 Certifying bodies

Relations with Certifying Bodies should be developed in accordance with the principles of transparency and loyal cooperation.

In case of audits, Silvelox Group S.p.A. personnel are required to cooperate, respecting each other's roles. Any conduct aimed, even indirectly, at conditioning *auditing* and assessment activities is prohibited.

Art. 9 - Centrality of human resources

9.1 *Occupational safety and health*

Silvelox Group S.p.A., considering human resources as the most important asset of the company's assets, is committed to creating and maintaining safe working environments for every employee.

Specifically, the Company operates in strict compliance with current accident prevention regulations, adopting safety management systems focused on prevention, aiming to introduce

- at every level of the company-a strong culture of safety at work. To this end, the Company provides its employees with appropriate training and information to work under health and safety conditions and to implement the relevant culture.

Silvelox Group S.p.A. recognizes, as a strategic corporate objective, the continuous improvement of operating procedures, environments and staff working conditions.

Each Recipient of the Code of Ethics is called upon to personally contribute to the protection of health and safety, both their own and that of other people present in the workplace. This is first and foremost by committing themselves, with awareness and a sense of responsibility, to compliance with regulations and internal procedures adopted in this regard, first and foremost in implementation of Legislative Decree 81/2008.

9.2 *Enhancement and protection of personnel*

The Company offers personnel opportunities for training and growth, valuing and protecting individual human and professional characteristics, aware of the primary strategic importance of **human resources** in order to improve individual and corporate **skill assets**.

Silvelox Group S.p.A. promotes a comfortable, positive and rewarding work environment, marked by the principles of respect and dialogue, mutual understanding and cooperation, condemning all forms of abuse.

At the same time, the Company is committed to creating a work environment that fosters diversity and protects the mental and physical well-being of employees. To this end, among other things, the Company promotes corporate policies that foster equal opportunities throughout the entire employment path of the resource, starting from the *recruitment* process and then continuing in the HR processes of Onboarding, Job Rotations, Training and Career Development.

To this end, Silvelox Group S.p.A. in its evaluations-both in hiring and in personnel management-uses exclusively objective and meritocratic criteria based on objective skills, experience and abilities, trying to avoid prejudices, stereotypes or considerations based on the

gender. In this sense, Silvelox Group S.p.A. encourages an inclusive culture that values all people in the company equally.

In the spirit of Articles 35 ff. of the Constitution and in compliance with the basic *standards* set forth in Article 603-bis paragraph 3 of the Criminal Code, the Company and all Recipients recognize and protect the rights of workers, both in terms of assets and with respect to the personal sphere and in relation to union activities. They also undertake not to take advantage, even indirectly, of forced and/or child labor, as well as to prevent all forms of *mobbing*, abuse and exploitation of labor, whether direct or indirect.

9.3 **Personnel selection and management**

In the *recruiting* process, the Company excludes any form of discrimination based on criteria other than the objective criteria of **competence**, **professionalism** and **merit**, operating first and foremost through the evaluation of the candidate's *curriculum vitae*.

Any information and personal data acquired during the selection process is treated in deference to the Data Processing Regulations.

All employees are hired on a **regular basis in accordance with** current contract types. The systems for assigning positions and determining remuneration are calibrated to the **skills**, **abilities** and **commitment of** individuals, in consideration of the company's interest and the employees' growth prospects.

9.4 **Prohibition of discriminatory conduct**

The Company, cherishing **respect for diversity** in the work environment, strictly prohibits any behavior that represents a form of discrimination based on age, ethnic origin, nationality, gender, sexual orientation, ethical, religious, political and/or trade union beliefs.

Article 10 - Equal opportunity and gender equality.

Silvelox Group S.p.A. ensures equal opportunities in professional development and promotions, basing its evaluations on meritocratic criteria and professional skills and levels, while ensuring pay equity between men and women.

The Company ensures women's full and effective participation in the life of the company, including in positions of leadership and responsibility at all levels, consistent with the company's activities and employment demands from time to time.

Also in this respect, Silvelox Group S.p.A. is proud to present itself, in the eyes of its stakeholders, as a virtuous and attentive reality to the needs of our planet, with a view to full compliance with the objectives of the UN Agenda 2030 and in general with the policies of inclusiveness conducted by our country and the European Union.

Art. 11 - Corporate Assets

The Company provides its personnel with various company tools that are functional for the optimal performance of work. Those who use assets owned or in the Company's possession must guard them with the **utmost care**.

Employees and Co-workers are expected to use them responsibly and prudently, appropriately and relevantly with the company's objectives, if necessary inquiring with their supervisor about methods/limits of use.

In any case, it is strictly forbidden to make use of the endowed assets in ways and/or for purposes that are unlawful or not in line with the values of the Code of Ethics.

Article 12 - *Know-how*, intellectual property, including that of third parties

Silvelox Group S.p.A. is able to obtain high-level products thanks to the **know-how of excellence** acquired throughout its history, to which it combines the most advanced machinery. The internal structure of the company sees highly qualified professionals, according to the managerial idea on the one hand to offer a consolidated structure, on the other hand the utmost attention to innovation in continuous updating in the industry.

Know-how, information *assets*, and intellectual assets are extremely significant corporate assets, developed by the Company through significant investments of time and material resources.

Inserting itself into an industrial vision that respects the future of the next generation, Silvelox Group is proud of its **Research and Development** department, within which about 10 percent of its employees are employed.

These are employed in **five main areas**: the manufacture of products achieved for the significant portfolio of domestic and international items, the design of customized solutions,

innovation of industrial processes, research of materials in the sign of design, achievement of appropriate tests for the production department. The R&D section is one of the flagships of Silvelox, capable of combining innovation and tradition.

To protect these assets, the disclosure of confidential information of the Company is prohibited, subject to any

Written authorizations from the Administrative Body of Silvelox Group S.p.A..

The Recipients of this document must operate in full respect of **industrial and intellectual property rights** legitimately belonging to third parties, as well as in compliance with the requirements contained in laws, regulations and conventions placed to protect such rights.

In particular, the Company and all Recipients are committed to:

- Do not illicitly use *software* covered by the exclusive rights of third parties;
- Do not illicitly disseminate *copyrighted* materials/products;
- Do not use other people's trade secrets;
- Not imitate, tamper with trademarks, distinctive signs, patents in the ownership of third parties;
- in general, not to engage in conduct that may constitute usurpation of industrial property rights, alteration or counterfeiting of distinctive signs or patents, nor to market products made by usurping third-party rights or characterized by mendacious signs.

Article 13 - Protection of competition and the market.

The Company pursues its business success by recognizing and protecting **competition** as a stimulus for growth and improvement in the market, as well as in its own business.

Silvelox Group S.p.A. develops its *business* in accordance with the principles of **transparent, fair and loyal** competition, requiring all its collaborators to refrain from collusive behavior and from participating in transactions that may result in violations of the rules protecting competition in the market.

Article 14 - Separation of personal interests from corporate responsibilities.

Silvelox Group S.p.A. recognizes the right of personnel and collaborators to participate in *business* outside the scope of their work, provided that these are activities permitted by law and, in any case, compatible with the obligations contractually assumed with the Company.

Specifically, Company personnel undertake to avoid situations in which personal interests may, even potentially, conflict with the interests of Silvelox Group S.p.A. (e.g., providing assistance to a competing company).

Each person is required to report to his or her supervisor any situation in which he or she or, to the best of his or her knowledge, his or her relatives or relatives-in-law have economic and financial interests that conflict with the interests of the Company.

Article 15 - Confidentiality of personal data

Every resource of the Company, which, in the performance of its activities, acquires personal data is obliged to process them in compliance with EU Reg. 679/2016 ("GDPR") and national privacy legislation, as well as the relevant internal *policies*. In this perspective, it is allowed to acquire and process only personal data that are necessary and directly related to its functions, ensuring the relevance of the processing with the stated and pursued purposes.

Employees and contractors of the Company must exercise the utmost caution and care in the use of information that is not in the public domain and that arises from the performance of their duties.

Art. 16 - Environment and sustainability

Environmental protection is an imperative for the Company: the Company embraces an ecological perspective for the benefit of present and future generations; it guarantees and promotes strict compliance with current environmental regulations, interpreting them in light of the precautionary principle.

Over the years, the Company's focus on **sustainability** has led to an internal supply chain that sees a deep concern for the environment, starting with the sourcing of a valuable and renewable material such as **wood** solely from the FSC supply chain.

Silvelox Group's products are achieved with a view to enhancing production capacity and respecting the environment. For this reason, the company has adopted a **system of reusing waste materials** that fits into the context such as the **circular economy**, implementing a project to recover almost 100 percent of industrial waste, and where nothing is superfluous and everything can be reused. Silvelox Group manages in this way to reduce **waste to the maximum**, even more so since, in 2019, it invested in the purchase of a machine capable of recovering panel

REVIEW	DATA
0	01.09.2023
CE231	

insulating sectional doors. A machine capable of ensuring the production of polyurethane sheets that are then reused during the packaging stage.

The **valorization of all production stages**, including the management of industrial waste, is a source of pride for Silvelox Group, fitting into an industrial vision that respects the future of new generations.

The Society has also joined the project the "**Silvelox Forest**," through which new trees are planted to replace those felled by storm Vaia in October 2018 against the purchase of a wooden Silvelox garage door, going on to create a virtuous cycle of reforestation in the area of Valsugana heavily affected by the cloudburst.

Silvelox is, in addition, a partner of **Artesella**, a cultural association, which employs a qualified staff. Over the past 30 years, more than 300 artists have collaborated in the growth of Arte Sella, resulting in three exhibition itineraries studded with works of art in total harmony with the woodland setting.

The Company is also attentive to the proper management of waste, generated in the exercise of the company's activities, which is regularly disposed of, with differentiated methods depending on whether it is waste assimilated or not to urban waste, including through the use of third party companies, with appropriate and documented qualifications and authorizations on the subject.

In general, Silvelox Group S.p.A. is determined to be an active participant in processes for equitable and sustainable development, creating-with its own activity-value for all our *stakeholders*.

Final Provisions

Supervision of the application of the Code of Ethics

Silvelox Group S.p.A. identifies the **Supervisory Body**, appointed by resolution of the Board of Directors and in accordance with the provisions of Model 231, as the body responsible for verifying the concrete application of this Code of Ethics by all Recipients, within the scope of the provisions of Article 6 of Legislative Decree 231/2001.

It monitors the initiatives undertaken by the Company in order to disseminate knowledge and understanding of the Code; verifies the consistency between the behaviors concretely maintained by individuals and the principles, norms and *standards of* behavior provided for in this document; suggests any changes, updates and additions; receives and analyzes reports of violations of the Code; and makes proposals regarding the possible adoption of sanctions in cases of ascertained violation of the Code of Ethics (see below).

Reporting violations

Employees, collaborators, business partners and any other Recipients of the Supervisory Board who have questions about this Code or who feel they are reporting violations of laws, rules, regulations or this Code may contact their direct reports or send a report to the mailbox odv@silvelox.it.

Whistleblowers will be guaranteed against any form of retaliation, discrimination or penalization, and in all cases the confidentiality of the identity of the whistleblower will be ensured, without prejudice to legal obligations and the protection of the right of defense of the Company or the accused persons.

Penalty system

Compliance with the Code of Ethics is an integral part of the **contractual obligations of employees**, collaborators and, more generally, of all Recipients of the document.

Any violations render applicable sanction measures by the Company, modulated in

Relating to the "Circumstances of Fact," viz.

- (i) The severity of the offense;
- (ii) The repeated nature of the infringement, if any;
- (iii) The realization with malice or negligence,

as better specified in the Disciplinary System set forth in Silvelox Group S.p.A.'s Model 231.

The type of penalty applicable will vary depending on the relationship that exists between the Company and the individual

Who committed the offense (specifically, whether employee or third party).

As for employees, non-compliant behavior will be prosecuted through specific disciplinary measures defined according to the Circumstances of Fact, taking into account the regulations of the current labor contract.

With reference to collaborators, customers and suppliers, corrective measures of the relationship will be applied, and in the most serious cases, termination of the contract.

The *procedure* for the application of the aforementioned sanctions is completely unrelated to the opening, as well as the outcome, of any criminal proceedings hinged by the judicial authorities in relation to the facts that constitute a violation of the Code of Ethics.

Adoption and amendments to the Code of Ethics

This Code of Ethics has been adopted by the Company's Board of Directors.

In the event of regulatory changes or in the event of a change in business organization, this document will be adjusted as appropriate.

Whistleblowing

Our "open door" policy incentivizes every employee and collaborator of the Company to refer to their managers or contacts with questions or concerns and without fear of retaliation.

The Company guarantees the protection of persons who report, in good faith, violations of this Code, of Silvelox Group S.p.A.'s Model 231 and in general of national or European Union regulatory provisions that harm the public interest or the integrity of the Company itself, of which they have become aware in their work context.

To this end, in compliance with the provisions of Article 6, Paragraph 2 bis, of Legislative Decree No. 231 of 2001 and Legislative Decree No. 24/2023, the Company has implemented internal reporting channels, which whistleblowers can use in the following ways:

1) In written form, by:

- access the landing page www.silvelox.it and clicking on the button at the bottom of the page referred to precisely as "whistleblowing"; or
 - directly by sending an e-mail to the e-mail box **odv@silvelox.it**;
 - or by sending a letter in a sealed envelope to the attention of the Supervisory Board at the address:
-

Dott. Luca Rigotti

Via Torino 186

30172 Mestre - Venice;

-Orally, by requesting a face-to-face meeting at the request of the reporting person.

The Company ensures that the reporting channels are appropriate to ensure the confidentiality of the identity of the

reporter and the reporter.

No retaliation or discrimination, direct or indirect, may result in the person who has in good faith made a report.

The identity of the reporting person and any other information from which such identity may be inferred may not be disclosed without the express consent of the reporting person to persons other than those competent to receive the report.

Conclusions

The Code of Ethics is published on the web page of the Company's website www.silvelox.it; it is made available in hard copy at the Company's registered office and operating offices. It is disseminated through information and communication activities, to all Recipients and stakeholders.

The Board of Directors will ensure that the Code of Ethics is constantly updated.

Castelnuovo (TN), September 1, 2023