



**O.Z. S.p.A.**

# **Ethical Code**

**Approved on June 11, 2013**

**Rev. 001 of 28/03/2023**

## PREMISE

Creating excellent products for customising cars and motorbikes by keeping promises such as: Italian taste, racing tradition, certified quality.

This is the *mission* of OZ S.p.A. (hereinafter also “OZ” o “Group leader”), the leading Italian company in the world of production and design of high-performance and high-quality alloy wheels for cars and motorcycles, which guarantees safety, excellence, innovation and speed.

OZ and the various companies controlled by it pursuant to art. 2359, paragraphs 1 and 2, cod. civ., (hereinafter the "Group") operate in a variety of countries, with institutional, economic, political, social and cultural contexts that are different from each other and in continuous and rapid evolution.

Therefore, in the pursuit of its mission, OZ believes that the Group's activities must be carried out in compliance with the law, in a framework of fair competition, with honesty, integrity, correctness and good faith, respecting the legitimate interests of customers, employees, business and financial partners and the communities in which the Group operates. To this end, OZ asks all those who work in and for the Group, without distinction or exception, to undertake to observe and enforce these principles within the scope of their functions and responsibilities.

It is for this reason that this Ethical Code (hereinafter also referred to as the 'Code') has been adopted, containing the principles and rules whose observance by its Recipients (as identified in point 1.1 below) is of fundamental importance for the good functioning, reliability and reputation of the Group.

The Code has also been adopted by OZ pursuant to and for the purposes of Legislative Decree 231/2001 (hereinafter the 'Decree') and forms an integral part of the Organisation and Management Model of the entire Group.

The Group carefully supervises the observance of the Code, providing adequate information, prevention and control tools and ensuring the transparency of the operations and behaviours implemented, intervening, if necessary, with corrective actions and appropriate sanctions.

The Group ensures the widest dissemination of the Code to all Recipients and to the general public, including by posting it on the OZ website [www.ozracing.com](http://www.ozracing.com).

## 1. GENERAL PRINCIPLES

Adoption, Effectiveness and Amendments

This Ethical Code was adopted by the Board of Directors of OZ S.p.A. on 11 June 2013 with immediate effect from that date.

Any update, amendment or revision to this Ethical Code must be approved by the OZ Board of Directors.

Each Group Company shall, by means of a specific resolution of the Board of Directors, acknowledge the adoption of this Code and its approval, with any necessary adjustments to the regulations applicable from time to time.

**Area of application and Addressees of the Code**

The Code applies to all Group companies in Italy and abroad and is, therefore, binding for all the following Addressees, without prejudice to the legal provisions individually applicable to individual subsidiaries:

- a) the directors and members of the corporate bodies of all Group companies;
- b) the general manager as well as any other person in an apical position, by which is meant any person who has functions of representation, administration or management or exercises, even de facto, the management and control of the company or one of its units or divisions (the "Company Representatives");
- c) all employees of Group companies, including temporary or part-time workers and workers treated as such (the 'Employees');
- d) all those who, directly or indirectly, permanently or temporarily, establish relations and relationships with the Group, or, in any case, work to pursue its objectives, in all the countries in which the Group operates;

e) all those who, permanently or temporarily, provide goods and/or services in any form to the companies of the Group (the 'Suppliers').

All Addressees are required to be familiar with the Code, to comply with its provisions both in their relations with each other (so-called internal relations) and in their relations with third parties (so-called external relations), to actively contribute to its implementation and to report any shortcomings and/or violations, whether actual or presumed, to their direct supervisor of function and/or service and/or to the Guarantor of the Code, as defined in point 1.5 below.

In particular, it is the responsibility of Company Representatives to give concrete expression to the values and principles contained in the Code, taking responsibility internally and externally and strengthening trust, cohesion and group spirit.

#### **Commitments of OZ**

OZ ensures, also through the designation of specific internal functions:

- the widest possible spreading of the Code among Group companies and its effective application by the latter, also by including specific clauses in their contracts establishing the obligation to comply with its provisions;
- carrying out checks on any reports of violations of the rules of the Code and, in the event of an established violation, implementing appropriate sanctions.

**Employees' Obligations**

Employees are required to know and respect the precepts contained in the Code and the reference standards governing the activities carried out within the scope of their functions.

**Obligations of heads of company units and functions**

Every Head of a corporate Unit or Function (by which is meant any person who exercises, even de facto, the management and/or control of a corporate Unit or Division) is obliged to:

- to conform its conduct to the principles laid down in this Code and the reference procedures, and to demand compliance therewith by Employees and Collaborators subject to its direction, coordination or control, and to take the necessary measures to prevent violations of this Code;
- promptly report to the Guarantor of the Code its findings as well as any information reported to it by its collaborators regarding potential or actual violations of this Code by any Employee or Collaborator.

**Reference bodies for Code application**

Reference Bodies for the application of the Code are:

- the Guarantor of the Code who, identified as the Supervisory Body of OZ pursuant to the Decree, has the task of examining reports of possible violations of the Code, promoting the most appropriate checks, reporting on the matter to the competent corporate bodies and to the Human Resources Department, in order to adopt the necessary corrective measures. The Supervisor is also the point of reference for interpretations of relevant aspects of the Code;
- the Human Resources Director of the various Group companies, with the task of promoting awareness of the Code and taking - in coordination with the Code Guarantor - the appropriate sanctions in the event of violations of the Code.

**Cogency and contractual value of the Code**

Compliance with the rules of the Code shall be considered an essential part of the obligations of Employees, also pursuant to and for the purposes of Article 2104 of the Civil Code.

A violation of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, including compensation for damages caused by the violation itself.

For Addressees who are not employees, compliance with the Code is a prerequisite for the continuation of the existing professional or collaborative relationship with the Group.

**Validity of the Code towards third parties**

All Addressees, by reason of their competences, in their relations with external parties, must adequately inform the latter about the commitments and obligations imposed by the Code and require them to comply with the obligations that directly concern their activity, taking all appropriate initiatives in the event of failure by third parties to comply with the Code's rules

## 2. RULES OF CONDUCT: GENERAL PRINCIPLES

### **Compliance with the law in general**

The Group conducts its business with honesty and integrity, operating in compliance with current laws, professional ethics and internal regulations. In no case may the conviction of acting to the advantage or in the interest of the Company justify, not even in part, the adoption of behaviours in contrast with this principle.

### **Professionalism and quality of services offered**

The Group is committed to gearing its activities to the highest standards of competence and professionalism and to the full satisfaction of its customers, considering its customers' comments on the company's products and services as a useful assessment tool for improving the quality of its offer.

### **Competition and Competitiveness**

The Group maintains that free and fair competition is essential for the wellbeing of itself, its customers and suppliers, and is committed to exercising free and fair competition in the market and in compliance with the applicable regulations. Consequently, the Group requires all the addressees of the Ethical Code to refrain from practices and conduct that may represent a violation of the applicable antitrust and non-competition provisions, and from being involved, either personally or through third parties, in initiatives or contacts between competitors that may appear as violations of the regulations protecting free competition and the market.

### **Transparency and fairness**

The Group is committed to adopting the utmost transparency in acting, communicating and informing, so as to guarantee reliability towards all subjects, internal and external, with whom the Company has relations/relationships. All employees and collaborators of the Company are therefore required to provide clear, complete, comprehensible and accurate information, so that the Company's interlocutors (customers, suppliers,

**Accounting and financial  
transparency**

representatives of the Public Administration, etc.) are always able to make autonomous and conscious decisions.

The Group undertakes to represent every fact concerning corporate management correctly and promptly in its accounts on the basis of truthful, accurate, complete and verifiable information.

Therefore, every operation and transaction must be correctly executed, recorded, authorised, verifiable, legitimate, consistent and appropriate. Each action and/or transaction must therefore be properly recorded in the accounting system and meet the criteria indicated by law and by the applicable accounting standards.

Therefore, every operation and transaction must be correctly performed, recorded, authorised, verifiable, legitimate, consistent and congruous. Each action and/or operation must therefore have a specific, adequate registration in the accounting system and meet the criteria indicated by the law and by the applicable accounting standards.

The Group's financial and accounting information must under no circumstances be subject to incomplete, erroneous or fraudulent treatment.

In order for the accounts to meet the requirements of truthfulness, completeness and transparency of the data recorded, each operation must be justified and supported by appropriate documentation, so that checks can be carried out at any time to establish the reasons for it and to identify the person who controlled, authorised, performed, recorded and verified the operation.

For the purpose of arriving at the preparation of the annual financial statements and in order to ensure a clear and truthful representation of the economic, asset and financial situation, its genesis must take place in accordance with the

principles of truthfulness, completeness and transparency as defined by the accounting standards, while respecting the autonomy of the specific areas of activity and responsibility.

### **Conflict of interests**

OZ is committed to ensuring that all business decisions and choices made by and on behalf of the Group correspond to its best interests.

Addressees shall avoid situations and/or activities that may lead to conflicts of interest with those of the Group or that may interfere with their ability to make impartial decisions, immediately informing their superior and/or the Guarantor of the Code, and refraining from any activity related to the situation that is the source of the conflict, should they find themselves in a situation of conflict, even potential, merely presumed or future, with the interests of the Group.

In relations between the Group and third parties, the Addressees must act according to ethical and legal rules, with an explicit prohibition of resorting to illegitimate favouritism, collusive practices, corruption or solicitation of personal advantages for themselves or others.

The rules on the conflict of interest of the members of the corporate bodies pursuant to the law remain unaffected.

### **Impartiality and non-discrimination**

The Group undertakes to avoid any discrimination on the basis of age, gender, sexuality, state of health, race, nationality, political opinions, religious beliefs or other personal or social conditions of its interlocutors. This commitment is undertaken towards all subjects, both natural and legal persons, who interact with the Company for various reasons and applies to every aspect of the Company's decisions (such as, by way of example: the choice of customers, relations with shareholders, personnel management, work organisation, the selection and

management of suppliers, relations with the surrounding community and the institutions representing it).

Furthermore, the Group condemns and expressly forbids its employees and collaborators from any conduct of propaganda of ideas based on racial or ethnic hatred, incitement to discrimination, violence on ethnic, national or religious grounds, participation in or assistance to organisations or groups whose aims include incitement to discrimination or violence on racial, ethnic, national or religious grounds.

**Human resource value and integrity**

The Group protects and promotes the value of human resources, providing them with appropriate training, professional updating and development tools. Furthermore, the physical and moral integrity of its employees, collaborators and consultants is guaranteed, in working conditions that respect individual dignity, in safe and healthy workplaces.

**Protection of personal data**

The Group is committed to ensuring the protection, safeguarding and confidentiality of personal data collected as a Data Controller pursuant to Article 4 of EU Regulation No. 679/2016 ("GDPR"). All personal data collected by the Company are processed in compliance with the provisions of the GDPR and other privacy regulations. In particular, the processing of personal data by the companies of the Group is carried out according to principles of transparency towards the subjects to whom the data refer, lawfulness and correctness of the processing, relevance of the processing to the declared and pursued purposes, and guarantee of security of the processed data.

### **3. RULES OF CONDUCT IN THE MANAGEMENT OF THE EMPLOYMENT RELATIONSHIP**

**Staff selection and recruitment** The Group is committed to promoting respect for the principles of equality and equal opportunities in personnel selection and recruitment activities, rejecting any form of favouritism, nepotism or patronage.

To this end, it ensures that candidates are assessed on the basis of objective and transparent criteria and is also committed to ensuring the traceability of the recruitment process through the accurate archiving of all relevant documentation.

In regulating labour relations with its employees, the Company refers to the content of the National Category Contracts, which it formalises with regular employment contracts. Any form of employment that does not provide for a regular contract is forbidden.

**Personnel management and  
evaluation**

Human resources are an indispensable element for the company's existence. The dedication and professionalism of employees are decisive values and conditions for its success.

The Group is committed to developing the skills and competencies of each Employee and guarantees them the same opportunities for professional growth, ensuring that everyone is treated fairly, based on criteria of merit, ability and individual potential that are strictly professional, so as to ensure a climate of mutual respect for the dignity, reputation and freedom of thought of each individual.

**Health and Safety in the  
Workplace**

OZ, in compliance with the provisions of the law on workers' health and safety, and in implementation of the provisions of the Organisational Model, guarantees its employees working conditions that protect their psycho-physical integrity and healthy and safe workplaces and undertakes to implement

internal policies that guarantee constant monitoring of compliance with health and safety regulations.

The Company also undertakes to manage, in compliance with the law, the risk of interference associated with the management of tender or works or supply contracts, as well as the risks arising from the management of temporary or mobile construction sites.

Employees must scrupulously comply with the instructions that the Company provides them with regard to safety and hygiene at work, thus avoiding creating dangerous situations for themselves or for other workers and consultants.

**General provisions of conduct  
for employees**

In order to ensure full compliance with this Ethical Code, the Company's employees must comply with the following principles of conduct:

- must avoid any situation or activity that could lead to conflicts of interest with the Company or that could interfere with the ability to make impartial decisions in the best interests of the Company;
- the information acquired in the performance of the assigned activities must remain strictly confidential and appropriately protected and may not be used, communicated or disclosed, either within or outside the Company, except in compliance with the regulations in force and company procedures;
- employees and/or consultants of the Company must respect and safeguard the Company's property and prevent fraudulent or improper use thereof. The use of company tools by employees and/or consultants must take place in full compliance with the relevant company policies;

- employees and/or consultants of the Company, in connection with the use of computer workstations and computer systems, must refrain from searching, viewing, downloading, collecting, transferring, selling or carrying out any other operation relating to any material that may be considered among those forbidden under the laws in force;

- it is absolutely forbidden to solicit or accept, for oneself or for others, recommendations, favourable treatment, gifts or other benefits from persons with whom one enters into relations, especially if they belong to the Public Administration, which may be or even appear to influence one's independence of judgement or impartiality. If the employee receives gifts or other benefits of a value exceeding € 100.00 (one hundred/00 euros), he/she must inform his/her immediate superior in order to assess whether to return them or take any other appropriate action;

- each employee is obliged to report to his or her direct superior any instructions received that conflict with the law, with the employment contracts, with the Organisational Model or this Code. If the order deemed unlawful is given by said superior, the report must be addressed to the Supervisory Board.

- If the order deemed illegitimate is given by said superior, the report must be addressed to the Supervisory Body.

#### 4. RULES OF CONDUCT IN MANAGING RELATIONS WITH THIRD PARTIES

##### **Shareholders**

The Group adopts a corporate governance system that complies with legal and regulatory requirements, but also aligns with self-regulatory codes and national and international best practices.

The Group maintains a constant dialogue with its shareholders, respecting, in particular, the laws and regulations that provide for equal access to company information for every investor or potential investor.

##### **Public Administration and other Authorities and Institutions**

The Group undertakes to conduct itself with the utmost transparency, clarity, fairness and impartiality, so as not to lead to biased, false, ambiguous or misleading interpretations, any public or judicial institutional subject (hereinafter also referred to as 'Institutions') with which it has relations in various capacities.

All relations with institutions, whether Italian or foreign, for negotiations or other contacts of any kind instrumental to the company's business, including payments and/or disbursements of money of any other kind, shall be managed solely by those formally appointed for this purpose by the Group or the individual companies comprising it.

The Group condemns any conduct of the Addressees consisting in promising or offering directly or indirectly, even through an intermediary, money or other benefits to Institutions, their appointees, public officials and/or persons in charge of public services, whether Italian or foreign, in order to obtain more favourable treatment, satisfy an interest or procure an advantage to the Group, or to the individual companies that are part of it, in relation to any relationship entertained with the

Institutions, Italian or foreign, except in the case of gifts or other utilities of modest value and, in any case, falling within legitimate uses or customs.

It is in any case forbidden to establish employment relationships (including professional appointments of any kind) or economic activities between the Group, its subsidiaries and the Recipients of the Code in general, on the one hand, and employees or former employees of Italian or foreign institutions, or their relatives up to the second degree of kinship, who participate or have participated personally and actively in institutional activities or proceedings, including inspection, control or justice and business negotiations, or have in any way endorsed requests or petitions of the Group and/or its subsidiaries, on the other hand.

The Group prohibits the Recipients from any conduct aimed at obtaining, from the State, the European Union or any other public body, any type of contribution, financing, subsidised loan or other disbursement of the same type, by means of altered or falsified declarations and/or documents, or by means of omitted information or, more generally, by means of artifices or deception, including those carried out by means of a computer or telematic system, aimed at misleading the disbursing body, as well as the use of these revenues for purposes other than those for which they were granted.

Addressees who will be subject, also in a personal capacity, for facts connected with the employment relationship, to investigations or receive subpoenas, and/or those who will be notified of other judicial measures must promptly inform the Supervisory Board of

the Parent Company OZ or, if appointed, that of the subsidiary company concerned.

The Group is committed to full and scrupulous compliance with the rules dictated by the Supervisory Authorities and control bodies such as the Bank of Italy and the AGCM, as well as to imbuing its relations with the aforesaid bodies with the utmost cooperation, in full respect of their institutional role, undertaking to promptly implement their prescriptions.

#### **Parties, Trade Unions and Associations**

Relations with political parties, trade unions and other interest-bearing associations shall be maintained by the Company Representatives authorised to do so, or by the persons delegated by them, in compliance with the provisions of this Code, as well as with the articles of association and special laws, having particular regard to the principles of impartiality and independence. Apart from these cases, any other such relationship involving the Recipients shall be entirely, personal, independent and not binding in any way for the Group.

#### **Mass Media**

The management of relations between the Group and the mass media is the sole responsibility of the specifically designated corporate functions, consistent with the communication policy and tools defined by the corporate bodies, as well as with the laws, rules and practices of professional conduct.

Information to the outside world is inspired by criteria of truthfulness and transparency. It is absolutely forbidden to disseminate false information.

#### **Market**

Pursuant to the provisions of the law in force in Italy, OZ undertakes to correctly manage privileged information concerning the Group and, in particular, to prevent the

communication of information to the outside world from being selective, untimely, incomplete or inadequate, and in any case in violation of the law.

**Relations between private parts**

The Addressees of this Ethical Code are prohibited from

- make cash donations or grant other advantages of any kind (promises of employment, use of company assets, etc.) to members (senior or subordinate) of other private companies aimed at obtaining any advantage for the Group;
- perform services or grant benefits of any kind in favour of customer representatives and/or consultants who are not adequately justified in the context of the relationship established with them;
- recognise fees or other advantages of any kind in favour of external consultants/collaborators that are not adequately justified in relation to the type of assignment to be performed and to local practices;
- make donations of money or recognise other benefits in favour of its suppliers, which are not adequately justified in the context of the relationship established with them or which may lead to securing an undue advantage for the Company;
- receive advantages of any kind, exceeding normal business or courtesy practices, or in any case aimed at acquiring undue favourable treatment in the conduct of any business activity, in exchange for the payment of money or benefits of any kind.

## **Customers**

For OZ S.p.a., the customer represents a value to be protected as an indispensable asset for the pursuit of its business.

Relations with customers must be characterised by maximum availability, respect and courtesy, with a view to a collaborative and highly professional relationship.

OZ S.p.a. protects the privacy of its customers in accordance with the regulations in force, undertaking not to communicate or otherwise disseminate, without prejudice to legal obligations, the relevant personal, economic and consumer data.

Contractual models proposed to customers and communications addressed to them must be:

- clear and simple, formulated in a language as close as possible to that normally used by the interlocutors;
- respectful of and in conformity with the provisions of the regulations in force;
- complete, so that no element relevant to the customer's decision is overlooked.

The Company is committed to ensuring adequate quality standards of the services offered on the basis of predefined levels and to periodically monitoring perceived quality.

## **Suppliers**

In its relations with suppliers, OZ S.p.a. is inspired by the principles of legality, loyalty, correctness and transparency and establishes highly professional and mutually collaborative relations with them.

Every purchase made must be conducted with confidentiality, diligence, professionalism, efficiency and objectivity of judgement, by qualified personnel who take responsibility for own assessments and judgements, ensuring compliance with all relevant regulatory provisions in the purchase activities.

The value of the products or services acquired must be related to their market quotation.

Any exceptions must be adequately justified.

The signing of contracts or other commitments must take place in compliance with the provisions of this Ethical Code concerning the prevention of conflicts of interest and transparency.

Accordingly, the Addressees:

- are bound to respect the principles of impartiality and independence in the exercise of the tasks and functions entrusted to them, operating on the basis of the adoption of objective and documentable commercial criteria;
- may not assume any personal obligations towards suppliers;
- must maintain relations and conduct negotiations with suppliers in such a way as to communicate company policy to them and create a sound basis for correct mutually convenient relations of appropriate duration in the interests of both parties;
- are strictly obliged to report to the Company Management without delay any attempt or case of alteration of normal business relations;

- must not offer goods or services, in particular in the form of gifts, in order to obtain confidential information or direct or indirect benefits relevant to themselves or the company;
- must not accept goods or services from external or internal parties in exchange for the release of confidential information or for the drafting or signing of agreements aimed at favouring such parties.

## 5. FURTHER RULES OF CONDUCT IN CORPORATE ACTIVITIES

### **Information systems management, confidentiality of information and privacy**

OZ S.p.a. condemns any behaviour consisting of altering the functioning of a computer or telematic system or of accessing data, information or programmes contained therein without the right to do so, with the aim of procuring the Group an unfair profit to the detriment of the State and/or third parties.

The Group is committed to ensuring that all confidential information acquired in the course of its normal business activities is handled in compliance with all relevant laws in force in all countries in which it operates, and with existing best practices for protecting the confidentiality of information and the handling of sensitive data.

It is also forbidden to:

- install, download and/or use computer programs and tools to alter, falsely certify, suppress, destroy and/or conceal public or private computer documents;
- install, download and/or use computer programs and tools that allow unauthorised access to computer or telematic systems protected by security measures or that allow (unauthorised) access to such systems, in breach of the measures put in place by the owner of the data or programmes intended to be kept or maintained confidential;
- find, disseminate, share and/or communicate passwords, access keys, or other means to enable the conduct referred to in the preceding two points;
- use, retrieve, disseminate, share and/or communicate about the methods of using computer equipment, devices or IT programs intended to damage or

interrupt an IT or telematic system;

- use, retrieve, disseminate, install, download, share and/or communicate the methods of use of equipment, devices or IT programs aimed at unlawfully intercepting, preventing or interrupting IT or telematic communications, even if between several systems;
- destroy, deteriorate, delete, make totally or partially unusable, alter or suppress data or computer programs of others or seriously obstructing their operation;
- use, install, download and/or communicate computer techniques, programs or tools that allow to modify the server field or any other information relating to it or that allow to hide the sender's identity or to change the settings of the IT tools provided by the Company;
- use file sharing software, unless authorised in advance by the Company.

All Addressees are also required to:

- comply with company information protection policies and data protection requirements;
- correctly use and protect access credentials to the company's systems and network;
- store sensitive, proprietary or confidential information in protected files on secured company servers, in line with internal regulations;
- protect all electronic devices used in the performance of activities on behalf of the company.

**Tools, signs of recognition and  
copyright protection**

OZ S.p.a. safeguards intellectual property rights, including copyrights, patents, trademarks and identifying marks, by

adhering to the policies and procedures laid down for their protection and also respecting the intellectual property of others in all Group activities.

OZ S.p.a. prohibits any conduct aimed at causing the loss, theft, unauthorised disclosure or misuse of its own or others' intellectual property or confidential information. To this end, the Group undertakes to activate all the preventive and subsequent control methods necessary for this purpose, guaranteeing compliance with the regulations on copyrights, as well as on the protection of identification marks, such as trademarks and patents.

**Activities aimed at receiving stolen goods, money laundering, use of money, goods or benefits of unlawful origin and self-laundering**

OZ S.p.a. conducts its business in full compliance with current anti-money laundering regulations and the provisions issued by the competent Authorities.

In compliance with applicable regulations, the Group undertakes to avoid carrying out transactions that are suspicious from the point of view of fairness and transparency, and to check available information on customers, suppliers and consultants/external collaborators in advance, in order to verify the respectability and legitimacy of their activities.

All Addressees undertake to operate in such a way as to avoid any implication in operations even potentially conducive for promoting the laundering of money from illegal or criminal activities.

Each Addressee who carries out, on behalf of the Company, operations and/or transactions involving sums of money, goods or other economically valuable utilities must act upon authorisation and provide on request all valid evidence for its verification at all times.

The monitoring of the financial flow from Group companies and/or third parties and aimed at the investments necessary for carrying out the company activity and/or on the occasion of capital increases by shareholders, is a mandatory measure, in order to ensure a correct identification of the source of origin of the supply.

Collections and payments must absolutely be made by bank orders and/or bank cheques issued with a non-transferability clause.

Collections and payments must strictly be made through bank orders and/or bank checks issued with the non-transferability clause.

There is also the obligation on all Addressees to:

- not accept money where there is even the slightest doubt of its illicit/uncertain origin;
- not accept goods and/or services and/or other benefits for which there is no properly authorised order/contract;
- not to make or accept cash payments exceeding EUR 1,000.00 (for this purpose, payments made in several instalments of a smaller amount but concerning the same supply and in total exceeding EUR 1,000.00 are also relevant).

Finally, personnel working on behalf of the Company are obliged:

- verify as far as possible in advance the information available on users, counterparties, partners, suppliers, and consultants, in order to evaluate their reputation and the legitimacy of their activities before entering into any

relationship with them that involves obtaining goods or sums of money;

- to operate in such a way as to avoid the establishment of any relationship, if there is even the slightest doubt, aimed at favouring the laundering of money deriving from unlawful or criminal activities, by acting in full compliance with primary and secondary anti-money laundering legislation and with the internal control procedures established for that purpose.

**Transnational activities and protection against organised crime**

The Group condemns any conduct, whether on the national or transnational territory, by persons playing an apical or subordinate role, which may even only indirectly facilitate the commission of criminal offences such as criminal conspiracy, mafia-type conspiracy and obstruction of justice.

The Group undertakes to activate all the preventive and subsequent control methods necessary for this purpose (verifiability, traceability, monitoring, segregation of duties, etc.), in order not to enter into relations with persons belonging to such associations.

The Group also undertakes to control any form of internal association in order to prevent the occurrence of associative phenomena of internal nature aimed at engaging in unlawful conduct and using company means, resources and corporate assets for such purposes.

Business relations must be maintained exclusively with customers, collaborators, partners and suppliers of trustworthy reputation, who carry out lawful commercial activities and whose proceeds derive from lawful sources. To this end, all Addressees must take steps to ensure the correct identification of customers and the adequate

selection and evaluation of suppliers or partners with whom to collaborate.

All the necessary control tools are adopted so that decision-making centres act and deliberate according to codified rules and keep track of their actions (i.e. meeting minutes, reporting mechanisms, etc.).

**Protecting and safeguarding  
the environment**

The environment is important to OZ and its subsidiaries. That is why the Group takes all appropriate measures to limit the environmental impact of its activities, in line with applicable regulations and widespread best business practices. It also undertakes to put in place measures to make all Addressees aware of and respect for the environment and to operate in full compliance with the relevant legislation in force, in all the communities, Italian or foreign, in which it is present.

In particular, the Group is committed to ensuring that the projects, production processes, methodologies and materials it uses take into account the development of scientific research and the best experiences in environmental matters, in order to respect territorial balance, prevent pollution and protect the environment and landscape.