



Summary – Organizational, management and control Model

Legislative Decree 231 of June 8, 2001 establishes in the Italian legal system a regime of administrative liability upon entities (such as companies), in relation to certain crimes committed or attempted by directors, employees and persons subject to the management or supervision of companies, in the interest or to the advantage of those companies; this liability of entities is completely independent from the criminal liability of the natural person who materially carried out the conduct.

The liability of companies is excluded if organizational, management and control models, i.e., Models 231, suitable for preventing the crimes themselves, have been adopted and effectively implemented prior to the commission of crimes.

In compliance with Legislative Decree 231 of June 8, 2001 and inspired by the guidelines provided by Confindustria for the drafting of Models 231, as well as in order to ensure conditions of fairness and transparency in the conduct of business of company activities, Elleci S.p.A. (the "**Company**") adopted its own Model 231 and established the Supervisory Board.

The purpose of the Organization, Management and Control Model (the "**Model**") is the construction of a structured and organic system of procedures and control activities aimed at preventing the crimes set forth in Legislative Decree 231/2001, through the identification of activities exposed to the risk of crime and their consequent proceduralization. Through the adoption of the Model, the Company aims to pursue the following main purposes:

- to establish the values of ethics and respect for legal compliance;
- to determine in the Recipients of the Model the awareness that they may incur, in the event of violation of the provisions set forth therein, in the commission of offenses punishable by criminal sanctions that may be imposed on them and administrative sanctions that may be imposed on the Company;
- to reiterate that such kind of unlawful conducts are strongly condemned by the Company, since the same (even in the event that the Company were apparently in a position to benefit from them) are in any case contrary not only to the provisions of the law, but also to the ethical principles to which the Company adheres in the exercise of its business;
- to enable the Company, thanks to a monitoring action on the areas of business activity considered at risk, to intervene promptly to prevent or counteract the commission of the crimes.

The Supervisory Board, consisting of three members appointed by the Board of Directors, has the task of supervising the effective functioning and compliance of Model 231 and ensuring that it is updated. The Supervisory Board of Elleci S.p.A. is composed of:

- Mr. Stefano Iucci (Chairman)
- Mr. Marco Tavani
- Mr. Costantino Iaboni



For these purposes, the Supervisory Board (as well as each of its members) is at the disposal of all employees, customers, suppliers, partners and in general of all so-called stakeholders who would like to forward reports or request information related to Model 231. In addition to any other form of contact, it is possible to interact with the Supervisory Board by writing to:

Supervisory Board
Elleci S.p.A.
Headquarters in LONGITUDINAL ROAD A 1258 - 04014
Z.I. MAZZOCCHIO - PONTINIA (LT)

Or by sending an e-mail to:
odv@elleci.it

Or, for employees, by filing a report in the spaces provided by the Company or through the dedicated online platform.