

CODE OF ETHICS

pursuant to Legislative Decree 8 June 2001, n. 231

property of:



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1. INTRODUCTION

a. OBJECTIVES

3R Energia recognizes the importance of operating in a context of responsibility and moral integrity, aware of the crucial role it plays in promoting sustainability and innovation. Our mission is aligned with the strategic objectives set by current regulations, which aim to ensure a solid and sustainable economic future.

Our work is based on ethical principles and a commitment to respecting the rights and expectations of stakeholders, including collaborators, customers and local communities. Through responsible business practices, we intend not only to optimize economic results, but also to generate social and environmental value.

In this context, 3R Energia S.r.l. proposes itself as a proactive player in the adoption of advanced technologies and in the promotion of initiatives that favor a transition to a circular economy, capable of responding to contemporary challenges in terms of environmental sustainability and social development.

Our commitment translates into concrete actions aimed at improving collective well-being and promoting social cohesion, aware that business success cannot ignore the progress of the communities in which we operate. With this spirit, 3R Energia S.r.l. aims to be a reference model in CSR, contributing to building a prosperous and shared future for all.

b. RECIPIENT AND SCOPE OF APPLICATION

This Code of Ethics is addressed to the directors, auditors, managers and employees of 3R Energia S.r.l. Furthermore, it extends to all those who, in any form, permanently or temporarily, maintain relations with the company. It is essential that each person involved, within the scope of their functions and responsibilities, reads and respects the principles and rules contained in the Code. These provisions aim to guarantee ethical and professional behavior in all activities related to 3R Energia S.r.l., thus contributing to a corporate culture of integrity.

The recipients of this Code must scrupulously observe the laws and regulations in force in the various geographical contexts in which 3R Energia S.r.l. operates. It is essential that everyone bases their behavior on the established principles, considering their function and the level of responsibility assigned. Furthermore, in-depth knowledge of the applicable company procedures is essential, in order to guarantee compliance and integrity within the organization.

3R Energia S.r.l. firmly believes in respecting the law and, for this reason, in no case can the pursuit of business interests justify conduct contrary to the laws in force and the rules reported herein. This Code of Ethics is valid in Italy and abroad.

c. ADJUSTMENTS

The Code may be modified and integrated at any time by an act of the Sole Director, also based on suggestions and indications from the Supervisory Body.

2. RULES OF CONDUCT

The Ethical Principles of 3R Energia S.r.l. are expressed in rules of conduct that each recipient of the Code must know and adhere to.

a. PRINCIPLE OF LEGALITY

3R Energia S.r.l. considers compliance with current laws and regulations as a fundamental principle of its operations, regardless of the geographical context in which it operates in. Therefore, the company requires all its directors, managers, employees and collaborators to strictly comply with these rules. This commitment extends to anyone who performs representative functions, even de facto, thus ensuring an ethical work environment that complies with legal requirements.

b. RELATIONS WITH THE MARKET

3R Energia S.r.l. actively promotes and supports free and fair competition, committing to obtain competitive results that enhance capacity, experience and efficiency. It is imperative that the company and its collaborators adopt correct behaviors, both in interactions with public and private Clients and in relations with Partners and Suppliers/Subcontractors, always respecting the principles of integrity and transparency that guide our corporate actions.

Any action aimed at altering the conditions of correct competition is contrary to the company's corporate policy and is prohibited to any person who acts for it.

In no case can the pursuit of the company's interest justify conduct by the company's top management, employees or collaborators that is not compliant with the laws in force and in compliance with the rules of this Code.

In all external communications, information regarding the company and its activities must be truthful, clear and verifiable.

c. RELATIONS WITH THE PUBLIC ADMINISTRATION

Energia S.r.l. bases its conduct on not inducing the Italian Public Administration and/or the country in which it operates from time to time, including the European Union, to violate the principles of impartiality to which it is bound.

To this end, it condemns any behavior carried out to illegitimately influence the decisions of public officials or public service representatives who operate on behalf of the Public Administration.

In particular, relations with public employees must comply with the principles and provisions set out in Presidential Decree no. 62 of 16 April 2013 - Code of Conduct for Public Employees.

No form of gift with a value exceeding 150 euros or that may even appear to be aimed at acquiring preferential treatment is permitted.

In the context of public administrations, it is essential to guarantee the integrity and impartiality of officials and employees. Therefore, it is expressly forbidden to establish personal relations of favor that may influence the outcome of public decisions.

Furthermore, the offer of goods or advantages, whether direct or indirect, to public representatives or employees is strictly prohibited, in order to avoid any form of corruption or conflict of interest that could compromise the transparency of administrative action.

It is strictly forbidden to unjustly obtain contributions, financing or disbursements to the detriment of the Italian Public Administration or the country in which the company operates in, including the European Union, through false or misleading documents, or through omissions of due information. Furthermore, contributions, subsidies and financing obtained legitimately must be used exclusively for the purposes for which they were granted, thus ensuring transparency and correctness in the use of public resources.

d. RELATIONS WITH PUBLIC AND PRIVATE CLIENTS

3R Energia S.r.l. bases its activity on the criterion of quality, understood essentially as the objective of full customer satisfaction.

In relations with customers and clients, the company ensures correctness and clarity in commercial negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfillment.

In participating in tenders, the company carefully evaluates the appropriateness and feasibility of the requested services, with particular attention to technical and economic conditions, safety and environmental aspects, promptly reporting any anomalies where possible.

The formulation of the offers will be such as to allow compliance with adequate quality standards, appropriate levels of remuneration for employees and appropriate safety and environmental protection measures.

3R Energia S.r.l. resorts to litigation only when its legitimate claims do not find due satisfaction in the interlocutor.

In conducting any negotiation, situations must always be avoided in which the parties involved in the transactions are or may appear to be in conflict of interest.

e. RELATIONS WITH PARTNERS, SUPPLIERS AND SUBCONTRACTORS

The company's relations with all interlocutors, whether public or private, must always be conducted in compliance with the law and the principles of correctness, transparency and verifiability.

3R Energia S.r.l. selects its partners, suppliers, contractors and subcontractors also based on their ability to operate in compliance with current legislation and to comply with the provisions of this Code.

The relations established with the company's suppliers, including financial and consultancy contracts, are governed by these rules and are subject to constant and careful monitoring by the company, in order to ensure their correct application.

f. RELATIONS WITH EMPLOYEES AND COLLABORATORS

3R Energia S.r.l. recognizes the centrality of human resources, as the main success factor of every company, in a framework of mutual loyalty and trust between employer and employees. All personnel are hired by the company with a regular employment contract.

The employment relation is carried out in compliance with the collective bargaining regulations of the sector and the applicable social security, tax and insurance regulations.

3R Energia S.r.l. promotes the continuous improvement of the professionalism of its employees, also through the implementation of training initiatives.

3R Energia S.r.l. condemns any behavior that is harmful to the individual and any form of discrimination, including those based on gender, religion, sexual orientation, disability, racism and xenophobia.

3R Energia S.r.l. is committed to respecting the privacy of employees and collaborators through methods of processing and storing personal and sensitive data that comply with current legislation.

3R Energia S.r.l. undertakes to protect against any act of retaliation or discrimination, direct or indirect, against those who report crimes or irregularities (whistleblower) of which they have become aware in the context of their employment relationship.

g. ENVIRONMENTAL CONDUCT

3R Energia S.r.l. is committed to operating in compliance with current environmental legislation, promoting production activities that safeguard the environment.

In designing construction projects, the company carries out all necessary investigations to assess possible environmental risks and adopt effective preventive measures.

It is essential for 3R Energia to spread a culture oriented towards environmental protection, correct waste management and pollution prevention among all collaborators and subcontractors. Through training initiatives, the aim is to develop awareness of environmental risks and promote responsible behavior, thus contributing to a sustainable future for all.

h. CONDUCT FOR THE PROTECTION OF CULTURAL HERITAGE

The company's production activities are managed in compliance with current legislation on the protection of cultural and landscape heritage, with the aim of safeguarding it in all environments in which such activities are carried out, including temporary or mobile construction sites.

i. CONDUCT ON HEALTH AND SAFETY IN THE WORKPLACE

3R Energia S.r.l. is firmly committed to ensuring the physical and moral integrity of its collaborators, ensuring working conditions that respect individual dignity and promote safe and healthy environments. We strictly comply with current legislation on risk analysis and accident prevention, extending these principles to temporary and mobile construction sites.

Our activities are carried out following technical, organizational and economic standards that ensure effective accident prevention. Furthermore, we are committed to promoting a solid safety culture among collaborators and subcontractors, developing awareness of risks and encouraging responsible behavior in every work situation.

j. COUNTERING TERRORISM AND CRIME

3R Energia S.r.l. deeply believes in democratic values and condemns any activity that may have the purpose of terrorism or subversion of the democratic order. To this end, its directors, members, employees and collaborators are required to respect and apply Italian and EU anti-terrorism laws, with an invitation to report to the competent Authority any situation that may constitute a crime of this nature.

3R Energia S.r.l. condemns any form of criminal association, both nationally and internationally, and undertakes not to establish any relationship with individuals involved in criminal associations and not to finance or facilitate their activities.

Its directors, employees and collaborators are expressly prohibited from engaging in, even through a third party, any behavior that may constitute or be connected to forms of criminal organization, criminal associations, mafia-type associations, associations aimed at illegal immigration or the exploitation of irregular labor (gang masters), both nationally and internationally.

3R Energia S.r.l. does not provide funding, contributions, advantages or other benefits, direct or indirect, to political parties, individual candidates, movements, committees, associations, organizations and Public Administrations or to workers' trade unions, nor to their representatives, both in Italy and abroad, except in compliance with applicable legislation, in full transparency and in compliance with applicable internal company procedures.

k. CORRECT ACCOUNTING AND TAX MANAGEMENT

Correctness in relations with the Public Administration is a fundamental principle that involves the truthfulness of accounting records and the rigorous fulfillment of all tax and contribution obligations. It is essential to ensure full compliance with the law and observance of the principles of transparency, truthfulness and correctness in every document containing economic, patrimonial and financial elements.

Employees and collaborators involved in the preparation of the budget and in the drafting of accounting documents are required to provide maximum cooperation, ensuring completeness and clarity of the information, as well as the accuracy of the data processed.

Accounting records must be recorded accurately, following current regulations and generally accepted accounting principles, as well as the internal procedures established to guarantee the regularity of accounting activities. Recording transactions based on imprecise or incomplete information is absolutely prohibited. Finally, the company must scrupulously fulfill all tax and contribution obligations required by law.

3. IMPLEMENTATION METHODS

a. PREVENTION

The company, in compliance with current legislation and with a view to effective planning, undertakes to implement organizational measures to prevent illicit behavior.

Through a well-structured system of delegations, tasks are assigned exclusively to individuals with proven competence.

To ensure compliance with the laws and principles of this Code, organizational models that include operational protocols are adopted. These tools are designed to monitor and manage activities, ensuring the timely identification and elimination of risk situations, to protect corporate integrity.

b. INSPECTION

3R Energia S.r.l. adopts specific methods of monitoring the compliance of the behavior of anyone acting for the company or within it with the provisions of current legislation and the rules of conduct of this Code.

c. WHISTLEBLOWING

A whistleblower is someone who, having become aware of an offence or irregularity in the workplace, during the performance of their duties, decides to report it to the company. Whistleblowing is the activity of regulating procedures aimed at encouraging and protecting such reports.

Law 179/2017 amended art. 6 of Legislative Decree 231/2001, making the protection of whistleblowing one of the fundamental requirements that the Organization and Management Model must possess in order to be considered exempt from liability of the entity.

Furthermore, Legislative Decree 10 March 2023, no. 24, 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 on the protection of persons reporting breaches of national regulatory provisions, is in force.

The same Law 179/2017 also provides other measures to protect the whistleblower:

- retaliatory or discriminatory dismissal of the reporting party is null and void,
- the adoption of discriminatory measures can be reported to the National Labor Inspectorate.

In summary, 3R Energia S.r.l. complies with specific requirements:

- the confidentiality of the reporting party is guaranteed in all phases of the management of the report,
- there is a ban on retaliatory or discriminatory acts, direct or indirect, for reasons connected, directly or indirectly, to the report,

the sanctioning system provides specific sanctions against those who violate the measures to protect the reporting party,

The Organization and Management Model regulates whistleblowing, identifying the company entity responsible for receiving and managing the reports (Report Management Manager) and providing two reporting methodologies:

- by sending a paper communication in a sealed envelope to the address 3R Energia S.r.l. – Via Aldo Moro,28 – 25043 Breno (BS), with the recipient being the Reporting Manager,
- orally directly to the Reporting Manager.

The Reporting Manager provides confidential communication to the non-anonymous reporter regarding the handling and outcome of the report. At the end of its investigations, if the outcome is negative, the Reporting Manager will report to the management body the name of the person who has made manifestly unfounded reports with intent or gross negligence, for the purposes of applying the sanctions provided for by the Company's disciplinary system.

d. SANCTIONS

Employees' compliance with the provisions of the Code is an essential element of contractual obligations pursuant to art. 2104 of the Italian Civil Code.

Violation of these provisions may result in failure to fulfill the primary obligations of the employment relationship or constitute a disciplinary offence, with all the related legal consequences.

Similarly, violation of the provisions by directors, auditors or members of the Supervisory Body may justify the revocation of their mandate. Furthermore, for suppliers, contractors and collaborators, such violation may constitute grounds for early termination of the existing contract.

Breno (BS), 28/11/2024

SOLE DIRECTOR

(dott. Riccardo Ducoli)

A handwritten signature in black ink, appearing to read 'Riccardo Ducoli', is written over a horizontal line.