

## CODE OF ETHICS

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## 1 introduction

On June 8, 2001, Legislative Decree No. 231 came into force. It introduces into Italian law the principle of responsibility of the bodies for offenses committed in their interest or for their benefit, however that of the employees or other subjects indicated in article 5 of the same decree, unless the body has a suitable organizational, management and control model has been adopted and effectively applied.

For the application of a model that complies with these legal provisions, the introduction and application of an ethical code of conduct must be met as a prerequisite, which defines the general principles for compliance that the corporation intends to follow in order to create an efficient control system for the corporation itself and guarantee their employees.

## 2 The Code of Ethics and its Purpose

In accordance with the provisions of GvD No. 231 brings GRONBACH its own code of ethics to apply, which is intended to prevent the risk of committing the crimes listed in the same decree. This Code of Ethics is an integral part of the vonGRONBACH adopted model, which among other things contains the general principles and rules of conduct to which the company ascribes a positive ethical value and to which all addressees of the code must adhere.

## 3 Target group of the code of ethics

This code is for the management, without exception all employees and for all who are directly or indirectly for GRONBACH work (employees of all kinds, consultants, suppliers, business partners) are binding. All addressees are therefore obliged to comply with the principles of the code of ethics or to ensure compliance with it within the scope of their responsibility: Under no circumstances does the presumption justify in the interests of GRONBACH to act, conduct contrary to what the document cites. Compliance with the norms of conduct of the code of ethics is an essential part of the contractual obligations of the employees of GRONBACH according to Art. 2104ff. of the Civil Code. Violation of the provisions of the Code of Ethics also damages that GRONBACH existing relationship of trust and can lead to disciplinary and compensation measures, without prejudice to the obligation for employees to respect the labor law, the collective agreement and the company rules.

## 4th Dissemination and training on the code of ethics

GRONBACH ensures the internal and external dissemination of the code of ethics through:

- Delivery to all employees;
- Made available to employees on the company server;
- Notice in a place accessible to all;
- Provision to third parties and other contact persons on the GRONBACH-Website.

The supervisory body of GRONBACH promotes and plans regular training initiatives on the principles of this code. In contracts with third parties, the organization communicates and requires compliance with the code of ethics for suppliers, tender participants and service providers who carry out activities for the company in the company or externally on its behalf. The preparation of what this paragraph provides is the responsibility of the General Management of GRONBACH.

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### 5 Structure of the code of ethics

This Code is divided into three sections:

- In the first, the general ethical principles are given, which are the core values GRONBACH indicate which one is guided by in the activities;
- in the second, the rules of conduct for the target groups are given;
- the third regulates the application mechanisms that outline the control system for the correct application of the code of ethics and its continuous improvement.

The Code of Ethics can be approved by the management of GRONBACH, also on the basis of suggestions and advice from the supervisory body, modified and supplemented.

#### 5.1 Underlying Principles

The principles listed below represent the fundamental values that the addressees must adhere to when pursuing the company's mandate and when carrying out business activities.

In no case justifies the belief in favor of GRONBACH to act, behaviors that contrast with the principles of this Code, which must be given primary and absolute value.

##### 5.1.1 Responsibility and legal compliance

GRONBACH has as a binding principle compliance with the laws, regulations and ordinances applicable in Italy and in all countries in which the company could possibly operate, as well as the democratic order established there.

The addressees are encouraged to do so in Italy and in the other countries in which GRONBACH should act to comply with applicable legislation. Under no circumstances is it permissible to prejudice the interests of GRONBACH prosecute or implement in violation of any law. This principle must apply both to the activities carried out on Italian territory and to relations with international actors.

##### 5.1.2 Fairness

The principle of fairness includes respect for the rights of everyone in the activities of GRONBACH involved subjects.

In particular, the addressees must act correctly in order to avoid states of conflicts of interest, ie all situations in which the pursuit of their own interests is in the interests of GRONBACH opposes. Furthermore, situations are to be avoided in which an employee, a member of the management or other addressees can derive an unjustified advantage or benefit from known opportunities during and due to the performance of the business activities of his company.

##### 5.1.3 Impartiality

GRONBACH rejects any principle of discrimination based on gender, nationality, religion, personal and political views, age, health and economic conditions of its counterparts, including its suppliers. Anyone who believes they have been discriminated against can report the incident to the supervisory body, which will investigate an actual breach of the code of ethics.

##### 5.1.4 Sincerity

The addressees must be aware of the ethical importance of their actions and must not pursue any personal or business gain by violating the applicable laws and regulations of this code.

When formulating contractual agreements with customers, it must be ensured that the clauses are formulated in a clear and understandable manner in order to ensure that ethical parity is maintained between the parties.

##### 5.1.5 Integrity

GRONBACH does not approve or justify any acts of violence or threats aimed at conduct contrary to applicable law or the Code of Ethics.

##### 5.1.6 Transparency

The principle of transparency is based on the authenticity, thoroughness and completeness of information both outside and inside GRONBACH. In accordance with the principle of transparency, all operations and transactions must be properly recorded, approved, verifiable, lawful, coherent and congruent.

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All actions and operations must be properly registered and it must be possible to review the decision-making, authorization and execution process. Every process must be based on suitable documentation, which makes it possible to carry out controls at any time, which prove the characteristics and motives of the person who gave the authorization, carried out, documented and checked the process in question.

GRONBACH uses objective and transparent criteria when selecting suppliers. This selection must be made in compliance with the applicable regulations and internal processes on the basis of objective assessment of competitiveness, quality and the economic conditions granted.

The supplier will also be selected taking into account their ability to ensure:

- compliance with the code of ethics;

- the introduction of suitable in-house quality assurance systems, if provided;

- Compliance with labor law, including those relating to child and women's labor, the health and safety of workers, trade union, association and representation rights.

GRONBACH has a supplier selection process aimed at ensuring maximum transparency in the evaluation process and supplier selection.

### 5.1.7 Efficiency

On the occasion of every business activity, the economic efficiency of the management and use of the operating resources must be striven for while adhering to the most progressive quality standards. GRONBACH is also committed to preserving and protecting company resources and business assets and capital, and managing assets and monetary assets in such a way that all necessary precautions are taken to ensure full compliance with applicable laws and regulations.

### 5.1.8 Fair competition

GRONBACH recognizes the value of competition if it is based on the principles of fairness, fair competition and transparency towards market participants and undertakes not to unduly damage the image of competitors and their services / products.

### 5.1.9 Data protection

GRONBACH undertakes to protect the privacy of the addressees in accordance with the standards in force in order to avoid the transfer or disclosure of personal data in the absence of the consent of the data subject.

The acquisition, processing and storage of personal information and data from employees and other persons whose data GRONBACH has at its disposal are carried out in accordance with procedures that are intended to prevent unauthorized persons or unauthorized bodies from gaining knowledge of it: this procedure corresponds to the applicable Regulations.

### 5.1.10 Service-oriented attitude

The addressees must align their behavior within the scope of their respective competencies and responsibilities with the pursuit of the company's mission, which aims to offer the customer a service with the best quality standard.

### 5.1.11 Value of human resources

Personnel is recognized as an essential and indispensable factor in corporate development.

GRONBACH guarantees the growth and professional development of its employees in order to expand the repertoire of skills in their possession, in accordance with the current legislation on the rights of the individual, with special attention to the moral and physical integrity of the staff.

GRONBACH undertakes not to support any form of patronage or favoritism and not to enter into any working relationship with persons who are involved in acts of terrorism.

The staff is recruited on the basis of regular employment contracts, and unlawful forms of work will not be tolerated; the applicant is informed of all the characteristics that make up the employment relationship.

The recognition of wage increases or other incentives and the access to higher-level functions and tasks (advancement) are bound to the individual merits of the employees beyond the norms prescribed by law and the collective agreement, which also includes the ability to organizational behavior and competencies on the basis of the Include the ethical reference principles set out in this Code.

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GRONBACH has also been paying more attention to the needs of its employees in terms of work and family since November 2015, through voluntary certification as part of a corresponding administrative system.

### 5.1.12 Community relations and environmental protection

GRONBACH recognizes that environmental protection is of fundamental importance for ensuring a coherent and balanced development of growth.

The company is consequently committed to protecting the environment and contributing to the sustainable development of the territory, including through the use of available technologies and constant monitoring of operating processes, as well as by finding solutions with a lower environmental and energy impact.

All activities of GRONBACH are carried out in accordance with environmental regulations; the pursuit of taking advantage for GRONBACH is always unjustified if this leads to willful or negligent violations of environmental regulations.

### 5.1.13 Relations with local authorities and public institutions

GRONBACH aims to achieve the greatest possible integrity and fairness in relationships, including contractual, with public institutions and, in general, with public administration, including in relation to the application or management of public funds, in order to ensure maximum clarity in institutional relationships.

The relationships with institutional contact persons are kept exclusively with the persons assigned to the matter.

if GRONBACH appoints a consultant or a so-called third party to represent the company vis-à-vis the public administration, he must comply with the guidelines applicable to staff; beyond that may GRONBACH in connection with the public administration are not represented by a consultant or a third party if - even if only potentially - there are conflicts of interest.

### 5.1.14 Relationships with associations, trade union organizations and political parties

GRONBACH does not contribute, directly or indirectly, to the funding of political parties, movements, committees, political and trade union organizations or their representatives or candidates; Furthermore, the company does not finance associations, nor does it sponsor events or congresses for the purpose of political propaganda.

GRONBACH may award contributions to subjects with social, moral, scientific, recreational, and cultural purposes.

### 5.1.15 Relations with international actors

GRONBACH undertakes to ensure that all its relationships, including those relating to trade with internationally operating entities, are carried out in full compliance with applicable laws and regulations in order to avert the risk of international crime.

To this end, one undertakes to take all necessary precautions to ensure the reliability of these actors, the legitimate origin of the capital and the funds used by them within the framework of having GRONBACH entertaining relationships, to consider.

Within the scope of its own possibilities, GRONBACH also undertakes to cooperate with the authorities, including foreign ones, who should request information or carry out investigations into the relationships maintained between the company and international actors.

### 5.1.16 Rejection of all forms of terrorism

GRONBACH rejects any form of terrorism; To this end, one undertakes not to establish any business or commercial relationships with natural or legal persons who are involved in acts of terrorism, to finance or promote their activities.

### 5.1.17 Protection of the individual

GRONBACH recognizes the need to protect individual freedom in all its forms and rejects any expression of violence, especially if it is aimed at restricting personal freedom, as well as any form of prostitution or child pornography.

GRONBACH undertakes to promote the sharing of these same principles within the framework of its activities and among the addressees.

### 5.1.18 Protection of health and occupational safety

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GRONBACH pursues the goal of ensuring health and safety in the workplace with the greatest commitment. GRONBACH pursues this goal through certification by an external body of the occupational health and safety management system in accordance with the applicable international regulations.

To this end, the most appropriate measures are taken to avoid risks in connection with the conduct of business activities and - where this is not possible - an appropriate assessment of the existing risks is carried out with the aim of combating them directly at the source and ensure that they are eliminated or - where this is not possible - how to deal with them.

Commits to health and safety at work GRONBACH proceed as follows:

- taking into account the state of the art of technology;
- by replacing what is dangerous with something that is not or less dangerous;
- with adequate planning of preventive measures;
- by prioritizing collective protections over individual protections;
- by means of appropriate instructions to the staff.

These principles are supported by GRONBACH Used for identifying and applying the measures required to protect the health and safety of workers, including measures to prevent occupational risks, to provide information and training, and to provide the necessary organization and resources.

The addressees must adhere to these principles, especially when decisions or choices have to be made or when they are subsequently implemented.

### 5.1.19 Maintaining transparency in trading transactions (anti-money laundering)

GRONBACH pursues the greatest possible transparency in commercial transactions as a principle in order to counteract the phenomena of money laundering and stolen goods; Compliance with the principles of correctness, transparency and good faith in relations with all contractual partners must be guaranteed.

## 5.2 Principles and rules of conduct

### 5.2.1 Principles and rules of conduct for corporate bodies

The corporate bodies, aware of their responsibility, must comply with the law, applicable norms and statutes, and also comply with the provisions of the model and the code of ethics that are part of them. Its members are required to:

- to behave with public institutions, private individuals, business associations, political forces and with every other national and international actor that is based on autonomy, independence and fairness,
- to display behavior that is based on integrity, loyalty and a sense of responsibility towards society;

- to ensure constant and competent participation in the meetings and activities of the company's bodies;
- Conflicts of interest or incompatibility of functions, tasks or positions outside and inside GRONBACH to evaluate and to refrain from actions in the context of conflict situations in the context of one's own work;

- not to hinder the control or auditing activities of the members, of the other corporate bodies, including the supervisory body, or the auditing company;

- To treat discreetly information obtained by their function, avoiding that they use their position to gain personal - both direct and indirect - advantages. Every act of communication to the outside world must be carried out in compliance with the law and the confidentiality of the information, which is confidential and subject to professional secrecy, must be preserved;

- To comply with the rules of conduct prescribed for the personnel by the following paragraph within the scope of their competencies and responsibilities.

### 5.2.2 Principles and rules of conduct for staff

The staff must both in their internal relationships and with external contacts of GRONBACH the applicable Regulations and the Principles of Model and present Code of Ethics retain.

Regarding the model, it is prescribed:

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avoiding the implementation, justification and participation in the implementation of behavior that could constitute a criminal offense within the meaning of the decree;

to cooperate with the supervisory body in carrying out the verification and monitoring activities and to provide the information, data and information requested;

to send the necessary notifications to the supervisory body;

report any irregularities or violations of the model or the code of ethics to the supervisory body.

The staff can contact the supervisory body verbally and in writing at any time to request clarifications or information on the following:

to interpret the code of ethics or the model;

on the legitimacy of a certain conduct or behavior, its appropriateness and compliance with the model or the code of ethics.

In addition to the general regulations mentioned above, the staff must adhere to the principles and rules of conduct listed below, which concern issues that are of particular relevance from an ethical point of view as well as for certain areas of business activity.

#### 5.2.3 Conflict of Interest

Personnel must avoid taking or promoting actions that result in a conflict of interest, whether actual or potential GRONBACH and avoid activities that impair the ability to make impartial decisions in the best interests of the company and in full compliance with the rules of this Code.

The personnel must not have any financial interests in a supplier, a competing company or a customer and must not engage in activities that could give rise to a conflict of interest. If it finds itself in a conflict of interest, even a potential one, it must report that fact to the Directorate-General and the Board of Directors and refrain from taking any action.

#### 5.2.4 Relations with public authorities

Relationships with persons who are considered public officials or civil servants must be maintained in full compliance with applicable laws and standards, as well as the model and code of ethics, in order to ensure the absolute legality of the operation of GRONBACH to guarantee.

Prohibited within the limits listed below GRONBACH to accept, offer or promise money, gifts, goods, services, benefits or favors in relationships with public officials or civil servants (also in relation to employment opportunities or activities that are directly or indirectly attributable to the employee) to influence their decisions with regard to more favorable treatment or improper services or for any other purpose, including the performance of official acts.

If connected to the above-mentioned relationships, any requests for or offers of money, gifts (with the exception of those of modest value), favors of any kind made or received by the staff must be brought to the attention of the General Management and the supervisory body without delay.

Gifts and courtesy gestures to public officials, civil servants or public employees are only permitted if they are of modest value, in no way affect the integrity and independence of the parties and cannot be construed as an instrument for improperly obtaining advantage.

In any case, during a negotiation or any other relationship with the public administration, staff must refrain from directly or indirectly taking any action aimed at:

To make proposals to employees of the public administration, their relatives or relatives about employment or business opportunities that could result in personal advantages or those for others;

solicits or receives confidential information that could compromise the integrity or reputation of one or both parties.

In the case of investigations, inspections or at the request of authorities, the staff must ensure appropriate cooperation.

#### 5.2.5 Relationships with customers and suppliers

The personnel must design their relationships with customers and suppliers to the utmost correctness and transparency in accordance with the applicable laws and standards, the model and the code of ethics as well as internal procedures, in particular customer relationships, trade relationships and those relating to the choice of supplier.



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These rules of conduct are valid and must be observed, also with regard to relations with international actors.

### 5.2.6 Participation in the competition

When participating in tenders, the following is required:

- act in accordance with the principles of correctness, transparency and good faith;
- assess the congruence and feasibility of performing the requested services during the review phase of the tender;

Provision of all data, information and requested information that are requested when selecting the participants and are relevant for the award of the contract;

In the case of public tenders, maintain clear and correct relationships with the commissioned public officials and avoid any behavior that could impair the freedom of judgment of the officials in charge.

If the contract is awarded, it is necessary in the relationship with the client to ensure clear and correct negotiation and trading relationships and the careful fulfillment of contractual obligations.

### 5.2.7 Obligation to continue training

When performing the activity on behalf of GRONBACH the staff is obliged to always display a high level of professionalism. In addition, the staff is constantly trained in relation to the specific area of responsibility.

### 5.2.8 Confidentiality

Even after termination of the employment relationship, the staff undertakes to treat the data, information and information they come into possession of with absolute confidentiality, to prevent their dissemination or to use it for their own speculative purposes or those of third parties: Confidential information in the field of activity GRONBACH can only be made known to those who need to know them for professional reasons.

### 5.2.9 Care in handling operational goods

The personnel must protect and safeguard the company values and assets entrusted to them and protect the assets of GRONBACH while avoiding situations that could compromise the integrity and safety of that asset. In any case, the staff must avoid misusing the resources, assets or materials of GRONBACH for personal purposes or using them inappropriately.

### 5.2.10 Balance sheets and other social documents

Personnel must pay special attention to the preparation of the financial statements and other company documents. In this context, it is necessary to ensure the following:

- adequate cooperation with the bodies responsible for the production of company documents;
- the completeness, clarity and accuracy of the data and information provided;
- compliance with the principles for the preparation of accounting documents.

### 5.2.11 Environment

When it comes to environmental issues, the staff of GRONBACH in particular:

- to contribute, together with the company's management, to the fulfillment of the commitments made to protect the environment;
- observe the instructions and instructions of the company management for the preservation and protection of the environment;
- immediately report possible risks to the environment of which it should become aware in the course of its activities;

do not cause possible environmental pollution through their own deliberate actions;

Maintenance and preservation of the functionality of the machines and devices that are used in the performance of his activities, with special consideration of energy consumption and pollution of the environment.

### 5.2.12 Health and safety at work

With regard to health and safety at work, the staff of GRONBACH in particular:

- Take care of your own health and safety of other people in the workplace affected by your actions or omissions, in accordance with training, instructions and resources provided by your employer;



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contribute, together with the employer, managers and supervisors, to the fulfillment of the obligations for the protection of health and safety at work;

Follow the instructions and instructions of the employer, managers and supervisors for the purpose of collective and individual protection;

properly use the work equipment, means of transport, safety and protective devices made available to him;

Immediately notify the employer, the manager or the superiors of the deficiencies in the means, equipment and devices as well as all possible dangerous states of which they become aware, in the event of urgency, immediate action within the scope of their own abilities and possibilities to resolve situations of high and high level eliminate or reduce immediate danger by notifying the employee's safety officer;

Do not remove or modify the safety, signaling and control devices without authorization;

take care of the individual protective equipment made available to him without changing it on his own initiative and reporting any defects or malfunctions to the employer, manager or supervisor;

do not carry out actions or maneuvers on their own initiative which do not fall under their responsibility or which could endanger their own safety and that of other workers;

take part in education and training programs organized by the employer;

undergo the health checks required by applicable legislation or otherwise ordered by the competent doctor.

#### 5.2.13 Anti-money laundering / receiving stolen goods

The staff uses the appropriate means and precautions to ensure the transparency and correctness of the trading transactions. In particular, it is imperative that

to any service companies or physical persons who have the economic / financial interests of GRONBACH represented, transferred services are stipulated in writing, specifying the content and the agreed economic conditions;

the competent services ensure the control of the regularity of payments vis-à-vis all counterparties, including by checking the correspondence between the subject of the order and the person receiving the money;

it fulfills the set and required requirements, which serve the purpose of selecting those who offer the goods or services that GRONBACH intends to acquire;

the criteria for evaluating tenders are established;

With regard to the commercial / professional reliability of suppliers and partners, all necessary information is requested and received;

Maximum transparency is guaranteed when contracts for the realization of investments are concluded

#### 5.2.14 Use of the information systems

In the performance of their professional activities, employees must use IT and telematics tools and services that comply with the applicable regulations (in particular in the area of computer crime, IT security, data protection and copyright) and with internal procedures. In particular, the staff is prohibited from:

unauthorized access to an IT or telematics system;

the unauthorized possession and distribution of access codes to computer or telecommunications systems;

the distribution of equipment, devices or computer programs designed to damage or disrupt an IT or telematics system;

the monitoring, obstruction or unlawful interruption of IT or telematics communication;

the damage to information, data and computer programs as well as IT or telematics systems.

Personnel are prohibited from uploading borrowed or unauthorized software to company systems and from making unauthorized copies of licensed programs for their own use, operational use or those by third parties. The staff must take care of GRONBACH Use the provided computers and IT tools exclusively for business purposes. Consequently, the company reserves the right to check the contents of the computers and the correct use of IT tools in accordance with the applicable laws. In addition, the staff is obliged not to send threatening or abusive e-mails and to refrain from using inappropriate linguistic expressions and inappropriate language use.

#### 5.2.15 Principles and norms of conduct for third parties

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This code of ethics and the model also apply to third parties in addition to the company bodies and staff, whereby third parties mean subjects outside the company who are directly or indirectly responsible for GRONBACH are active (e.g. representatives, employees of any kind, consultants, suppliers, business partners). Third-party users are obliged to comply with the provisions of the model and this code. In the presence of a formal position of non-compliance by third parties with this Code of Ethics GRONBACH do not enter into or continue a relationship with the third party. For contractual relationships that already exist at the time the Code of Ethics comes into force, GRONBACH communicate the content.

### 5.2.16 Duty to notify the supervisory body

The addressees are obliged to notify the supervisory body immediately if they are aware of - even potential violations in the course of the activities of GRONBACH against legal norms and regulations, the model, the code of ethics or internal procedures. Notifications to the supervisory body can be made by e-mail or by post to the following addresses:

[organismodivigilanza-laag@gronbach.com](mailto:organismodivigilanza-laag@gronbach.com)

In any event, the supervisory body shall endeavor to ensure that the person making the communication, if identified or identifiable, will not be subject to retaliation, discrimination or disadvantage and confidentiality must therefore be ensured (with the exception of any legal requirements).

## 5.3 Application and control of compliance with the code of ethics

### 5.3.1 Tasks of the supervisory body

The control of the implementation of and compliance with the model and the code of ethics are entrusted to the supervisory body in accordance with the "Regulations of the supervisory body" procedure.

### 5.3.2 Violations of the Code of Ethics and related sanctions

As for the types of violations of the Model and the Code of Ethics, as well as the applicable sanctions and the procedure for contesting the violations and imposing penalties, the GRONBACH applied "disciplinary system", which is an integral part of the model.

In short, the disciplinary system defines:

- the subjects concerned;
- the nature of the relevant violations;
- the penalties that can be applied by society according to the severity of the offense;
- the procedure for challenging violations and imposing sanctions.

### 5.3.3 Reporting any violations of the Code of Ethics

If a subject subject to the Model or this Code of Ethics learns of facts or circumstances that could represent a risk of violation of the same, he must report this immediately to the controlling body. GRONBACH has activated the corresponding communication channels in order to facilitate reports to the supervisory body. The controlling body guarantees the confidentiality of the information it should come into possession of and at the same time the protection of the reporter Staff.

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## 6th Creation and versions

index	date	who	Paragrafen	description of the change	
A.	03/27/2018	sa, ep	All	New edition of the 2014 version of the Code of Ethics	
B.	05/05/2021	spa	All	Update of the document	
No. and output index		created		checked and approved	scope of application
		sa		ep	Gronbach
Code of Ethics - a		03/26/2018		03/27/2018	