

**ORGANIZATION, MANAGEMENT
AND CONTROL MODEL
EX D.LGS. 231/2001
of
DoveVivo S.p.A.
(abstract)**

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History of the Model 231

REVISION	DATE	DESCRIPTION OF THE MAIN CHANGES
1	November 2019	First issue
2	June 2020	Update on tax crimes
3	October 2020	Update of new crimes: art.24, 24 bis, 25, 25 quinquiesdecies, 25 sexiesdecies (amendments to the Cybersecurity Decree and Legislative Decree 75/2020)
4	December 2023	Update of the new procedure for reporting wrongdoing and new offences
5	January 2025	Offences update: art. 24 bis, art. 25, art. 25 octies-1, art. 25 novies, art. 25 sexiesdecies, art. 25 septiesdecies, 25 duodevices, organisation and measures to contain the risk of crime

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1. Legislative Decree no. 231 of 8 June 2001

Legislative Decree no. 231 of 8 June 2001 introduced into the Italian legal system the "administrative liability of legal persons, companies and associations, including those without legal personality" following the commission of an offence.

The decree is applicable following the commission of the following crimes:

- Article 24: 'Undue receipt of disbursements, fraud to the detriment of the State, a public body or the European Union or to obtain public funds, computer fraud to the detriment of the State or a public body and fraud in public supplies', which correlates the administrative liability of the entity to the commission of offences such as embezzlement to the detriment of the State, the undue receipt of disbursements to the detriment of the State (or of another public body, or of the European Communities), fraud (to the detriment of the State or another public body or aggravated for the achievement of public disbursements), computer fraud (if committed to the detriment of the State or other public body). Further offences such as fraud in public procurement and fraud against the European Agricultural Guarantee Fund and the European Agricultural Fund for Rural Development have been introduced in art. 24 by the Implementing Decree of the PIF Directive (Legislative Decree no. 75/2020);
- Article 24-bis: "Computer crimes and unlawful processing of data", which correlates the administrative liability of the entity to the commission of crimes such as the crime of abusive access to a computer or telematic system, the crime of illegal possession and dissemination of access codes to computer or telematic systems, the crime of installing equipment, devices or computer programs aimed at damaging or interrupting an IT or telematic system, the crime of unlawful interception, impediment or interruption of computer or telematic communications, the crime of computer falsification and the crime of damage to information, data and computer programs, even if used by the State or by another public body or in any case of public utility, damage to information or telematic systems, even if of public utility. Law no. 133 of 18 November 2019 ("Cybersecurity Law"), introduced new offences in Article 24 bis. The crimes in question are provided for by Article 1, paragraph 11 of Legislative Decree no. 105/2019 ("Cybersecurity Decree") and refer to the hypothesis of falsity in relevant data or information;
- Article 24-ter: "Crimes of organized crime" which correlates responsibility to crimes of criminal association, including mafia association;
- Article 25: "Embezzlement, bribery, undue inducement to give or promise benefits, corruption", which correlates the administrative liability of the entity to the commission of crimes such as bribery, undue inducement to give or promise benefits, corruption for the exercise of the function, for an act contrary to the duties of office or in judicial acts and trafficking in illicit influence (Law no. 3/2019 so-called "Criminal Code"). Spazzacorrotti). Further crimes such as embezzlement, embezzlement by profiting from the mistake of others and abuse of office have been introduced in art. 25 by the Implementing Decree of the PIF Directive (Legislative Decree no. 75/2020);
- Article 25-bis: "Counterfeiting of coins, public credit cards, revenue stamps and instruments or signs of recognition" which correlates the administrative liability of the entity to the commission

of the crimes of false number, use of counterfeit values, counterfeiting and use of distinctive signs and patents as well as the introduction into the State and trade of products with false signs;

- Article 25-bis 1: "Crimes against industry and commerce" which correlate the liability of the entity to the commission of crimes such as the disturbance of the freedom of industry or commerce, illegal competition with threat or violence or even the offences committed in fraud in commerce;
- Article 25-ter: "Corporate offences", which relate the administrative liability of the entity to the commission of offences such as false corporate communications in the new wording after Law 69/2015, the falsity of reports or communications of auditing firms, rigging, illegal distribution of profits and reserves, illegal transactions on company shares or quotas or those of the parent company, transactions to the detriment of creditors, unlawful influence on the shareholders' meeting, failure to disclose conflicts of interest, obstruction of the exercise of the functions of public supervisory authorities. To these, Law 190/2012 also added the crime of corruption between private individuals, recently reformed by Legislative Decree 38/2017, as well as by Law no. 3 of 9 January 2019;
- Article 25 quarter: "Crimes with the purpose of terrorism or subversion of the democratic order", which correlate the administrative liability of the entity to the commission of crimes with the purpose of terrorism or subversion of the democratic order provided for both in the penal code and in special laws;
- Article 25-quarter-1: "Practices of mutilation of the female genital organs";
- Article 25 quinquies: "Crimes against the individual personality", which correlate the administrative liability of the entity to the commission of offences such as the reduction or maintenance in slavery or servitude, the possession of pornographic material (produced through the sexual exploitation of minors), child prostitution and tourist initiatives aimed at the exploitation of child prostitution. To these, Law 199/2016 added the crime of caporalato;
- Article 25 sexies: "Offences of market abuse", which relate the administrative liability of the entity to the commission of insider dealing and market manipulation offences;
- Article 25-septies: "Crimes of manslaughter and serious or very serious culpable injuries, committed in violation of accident prevention regulations and on the protection of hygiene and health at work";
- Article 25-octies: "Receiving stolen goods, laundering and use of money, goods or utilities of illegal origin, as well as self-laundering", which correlates the administrative liability of the entity to operations of transfer, concealment, replacement or use of goods of illegal origin (even if the subject has committed or contributed to committing the predicate crime);
- Article 25-octies 1: "Offences relating to payment instruments other than cash and fraudulent transfer of valuables" which correlates administrative liability to transactions of undue use and falsification of payment instruments;
- art. 25-novies: "Offences relating to copyright infringement", i.e. aimed at the unlawful use of copyrighted material;
- Article 25-decies: "Inducement not to make declarations or to make false declarations to the judicial authority";
- Article 25-undecies: "Environmental crimes", in the wording after Law 68/2015 which correlates the liability of the entity to the commission of crimes such as environmental pollution,

environmental disaster, illegal disposal of waste, discharge on the ground, underground and groundwater in violation of the T.U.A.;

- Article 25-duodecies: "Employment of illegally staying third-country nationals", aimed at the exploitation of labour in illegal conditions, recently amended by Law 161/2017;
- Article 25-terdecies: "Xenophobia and racism" introduced by European Law 2017 with express reference to the crime referred to in Article 3, paragraph 3-bis, of Law No. 654 of 13 October 1975, now repealed by Article 7 of Legislative Decree No. 21/2018 which, at the same time, introduced the new criminal offence referred to in Article 604 bis of the Criminal Code;
- Article 25-quaterdecies: "Fraud in sports competitions, abusive exercise of gaming or betting and games of chance exercised by means of prohibited machines" introduced by Law No. 39 of 3 May 2019 which implemented, in our legal system, the Council of Europe Convention on the Manipulation of Sports Competitions, made in Magglingen on 18 September 2014;
- Article 25-quinquiesdecies: "Tax crimes" introduced by Article 39, paragraph 2, of Legislative Decree No. 124 of 26 October 2019, converted, with amendments, by Law No. 157 of 19 December 2019, including fraudulent declaration through the use of invoices or other documents for non-existent transactions (Article 2, paragraph 1 and paragraph 2-bis of Legislative Decree No. 74/2000,) fraudulent declaration by means of other artifices (art. 3 of Legislative Decree no. 74/2000), the issuance of invoices or other documents for non-existent transactions (art. 8 paragraph 1 and paragraph 2-bis of Legislative Decree no. n. 74/2000), the concealment or destruction of accounting documents (art. 10 D.lgs. n. 74/2000) and fraudulent evasion of the payment of taxes (art. 11 Legislative Decree no. n. 74/2000). The Implementing Decree of the PIF Directive (Legislative Decree no. 75/2020) has expanded the range of tax crimes, also including the unfaithful declaration (art. 4 of Legislative Decree 74/2000), the omitted declaration (art. 5 of Legislative Decree 74/2000) and the undue compensation (art. 10 quarter of Legislative Decree no. 74/2000);
- art. 25 sexiesdecies: "Smuggling" introduced by the implementing decree of the PIF Directive (Legislative Decree no. 75/2020);
- Art. 25 septiesdecies "Crimes against cultural heritage", such as the offences of embezzlement, import or export of cultural property, destruction and counterfeiting of cultural property;
- Art. 25 duodevicies "Laundering of cultural property and devastation and looting of cultural and environmental property";
- "Transnational crimes" (introduced by Law no. 146 of 16 March 2006) relate the administrative liability of the entity to crimes such as money laundering and criminal conspiracy when committed on an international scale.

For a more complete and detailed examination of the so-called predicate offences, please refer expressly to the Regulatory Appendix to be considered an integral part of this Organisation, Management and Control Model (attached).

Pursuant to art. 5 of Legislative Decree 231/2001, in order for administrative liability to be challenged and imputed to an entity, it is necessary that a natural person functionally connected to the entity itself has committed (or attempted to commit) one of the crimes just mentioned (so-called predicate crimes) and that the crime has been committed "in his (editor's note: of the entity) interest or to its

advantage", providing as an exemption the hypothesis that the perpetrator has "acted in his own exclusive interest or in the interest of third parties".

In order for the administrative liability of the entity to arise, in parallel with the criminal liability of the offender (natural person), it is also necessary that the crime has been committed by persons who hold a top position within the entity or by subjects in a subordinate position. More precisely, again pursuant to art. 5, 'the entity shall be liable for offences committed in its interest or to its advantage:

- a) by persons who hold representation, administration or management functions of the entity or of one of its organisational units with financial and functional autonomy as well as by persons who exercise, even de facto, the management and control of the same (so-called top management);
- b) by persons subject to the direction or supervision of one of the subjects referred to in letter a) (so-called subordinates).

In the event of ascertained liability, the Company incurs one of the following sanctions: financial penalties, disqualification sanctions, confiscation (always ordered with the sentence condemning the entity) and publication of the sentence.

With reference to the financial penalty, a system of calculation by quotas has been established, to be determined by quantity and value, this in order to better adapt the amount of the penalty to the reality of the case. Each share ranges from a minimum value of about 258.00 euros, to a maximum of about 1,550.00 euros; a total number of shares of less than one hundred (100) or more than one thousand (1000) may not be applied. Therefore, the financial penalties range from a minimum of 25,823.00 euros to a maximum of about 1,549,360.00 euros.

According to art. 11 of the Decree, the judge, preliminarily, will have to determine the number of shares taking into account some elements: the seriousness of the fact; the degree of responsibility of the entity; the activities carried out to eliminate or mitigate the consequences of the fact; the activities carried out to prevent the commission of further offences. Subsequently, the judge will move on to determine the amount of the share taking into account the economic and financial conditions of the entity, in order to ensure the effectiveness of the sanction.

The disqualification sanctions, on the other hand, are: disqualification from carrying out the activity; the suspension or revocation of authorisations, licences or concessions functional to the commission of the offence; the prohibition of contracting with the PA, except to obtain the performance of a public service; the exclusion from facilitations, financing, contributions or subsidies and the possible revocation of those already granted; the prohibition of advertising goods or services.

Unlike the financial penalty, which always applies, disqualification sanctions are applied as expressly provided for by law and provided that at least one of the conditions referred to in art. 13, i.e.: the entity has made a significant profit from the crime and the crime has been committed by persons who are in a top position or by subjects subject to the direction of others when the commission of the crime has been determined or facilitated by serious organizational deficiencies; or in the event of repetition of offences.

Disqualification sanctions have a duration of not less than three months and not more than two years.

In determining the type of sanction and the duration, the judge must take into account: the seriousness of the fact, the liability of the entity, the activity aimed at preventing or mitigating the consequences, as well as the suitability of the individual sanctions to prevent the offences of the type committed.

Art. Article 6 of the Decree therefore provides that where the crime has been committed by persons in a top position, the entity is not administratively liable if it provides evidence that:

- the management body has adopted and effectively implemented, before the commission of the act, organizational and management models suitable for preventing crimes of the kind that occurred;
- the task of supervising the functioning and compliance of the models and of ensuring that they are updated has been entrusted to a body of the entity with autonomous powers of initiative and control;
- the persons committed the crime by fraudulently circumventing the organizational and management models;
- there has been no omission or insufficient supervision by the body referred to in letter b).

In this sense, the profound objective of Legislative Decree 231/2001 is to push companies to adopt an organizational, management and control model that, in harmony with the "culture of prevention", aims at the pursuit of a "new culture of doing business".

To be effective, the organization and management model must meet the need to:

- identify the activities in the context of which crimes may be committed;
- provide for specific protocols aimed at planning the formation and implementation of the decisions of the entity in relation to the crimes to be prevented;
- identify the methods of managing financial resources suitable for preventing the commission of crimes;
- provide for information obligations towards the body responsible for supervising the operation and compliance with the models;
- introduce a disciplinary system suitable for sanctioning non-compliance with the measures indicated in the model.

Arts. 12 and 17 of Legislative Decree 231/2001 also recognise the remedial effectiveness of the organisation and management model as they provide for a reduction in financial penalties and exemption from disqualification sanctions when the entity has adopted and made operational, before the declaration of the opening of the first instance hearing for the offence already committed, an organisation and management model suitable for preventing offences of the kind that occurred (the so-called ex post model).

2. General information about the company

2.1 The Company

DoveVivo S.p.A., founded in 2007, manages a portfolio of thousands of homes and residences. It offers owners a service for real estate investment, enhancement and management that maximizes value in the long term. At the same time, it guarantees end customers, who make up a community of thousands of students and young workers, a professional, transparent and safe response to their need for life away from home.

The Company is particularly attentive to the dissemination of the culture of legality and it is in this regard that it has decided to comply with the provisions of Legislative Decree 231/2001 and, therefore, to implement a system for the prevention of the risk of crime.

(...)

3. The Organization, Control and Management Model

3.1 Objectives and purposes pursued in the adoption of the Model

DoveVivo is sensitive to the need to ensure conditions of fairness and transparency in the conduct of business and corporate activities, to protect its position and image, the work of its employees and the expectations of stakeholders and is aware of the importance of adopting an internal control system suitable for preventing the commission of illegal conduct by its directors, employees, collaborators and business partners. The Company adopts the organisation and management model with the awareness that an efficient and balanced organisation of the company, suitable for preventing the commission of offences, is pursued by intervening, mainly, in the processes of formation and implementation of the Company's decisions, on preventive and subsequent controls, as well as on the flows of information, both internal and external.

Through the adoption of the Model, DoveVivo aims to pursue the following main objectives:

- to raise awareness among all those who work in the name and on behalf of the Company of a corporate culture based on legality and to determine in them the awareness that in the event of violation of the provisions contained therein they may incur the commission of offences punishable by criminal sanctions that can be imposed on them and administrative sanctions that can be imposed on the Company;
- reiterate that these forms of unlawful conduct are strongly condemned by the Company, as they (even if the Company were apparently in a position to take advantage of them) are in any case contrary not only to the provisions of the law, but also to the ethical principles to which the Company intends to comply in the implementation of its corporate mission;
- to allow the Company to intervene promptly to prevent or combat the commission of the crimes themselves through the dissemination of a culture of control aimed at governing all decision-

making and operational phases of the company's activities and the provision of monitoring action on the areas of activity at risk.

The Model and the principles contained therein apply to corporate bodies, employees, collaborators, consultants, suppliers, partners and, more generally, to all those who, in any capacity, operate in the context of sensitive activities on behalf of or in the interest of DoveVivo (hereinafter "Recipients").

(...)

4. Characteristics and structure of the internal control system

4.1 The principles of the Internal Control System

The internal control system qualifies as the set of tools aimed at providing a reasonable guarantee regarding the achievement of the objectives of operational efficiency and effectiveness, reliability of information, compliance with laws and regulations, as well as safeguarding assets also against possible fraud or wrongdoing.

As defined by the Confindustria Guidelines, the elements characterizing the control system are:

- formalization of the control system in specific company documentation aimed at defining and regulating the methods and times of the activities relating to the controls themselves as well as the performance of controls, including supervisory ones;
- traceability in order to make the performance of the checks certifying the characteristics and motivations of the individual transactions documentable and verifiable and in order to also make it possible to clearly identify who authorised, carried out, recorded and verified the operation itself;
- segregation in order to ensure the separation of functions, i.e. avoiding that the management of the entire process is carried out independently by a single person;
- attribution of authorisation powers (proxies and powers of attorney), where it is possible and appropriate to distribute them consistently with the company organisation in order to avoid the attribution of unlimited powers and, above all, clear knowledge within and outside the organisation of powers and responsibilities.

(...)

5. Risk exposure

5.1 Methodological premise

The processes defined within DoveVivo for an effective and efficient provision of the service may be exposed to the risk of committing the offences provided for by Legislative Decree 231/2001 in three distinct ways:

- **direct exposure**, if the execution of the activities within the process is in itself exposed to the risk of committing an offence. For example, the request for permits, authorizations and/or qualifications, involving direct contact with the Public Administration, exposes the personnel in charge directly to the crimes of fraud, corruption or undue receipt of funds;
- **instrumental exposure**, if the process itself is not exposed to the risk of committing an offence but its result is. Think, for example, of the hiring of employees linked to officials of the Public Administration which can constitute the "donation" through which the crime of corruption is perfected for the exercise of the function or for an act contrary to the duties of office or, again, the stipulation of consultancy contracts which, if carried out without particular attention or caution, can constitute the way through which to constitute funds to be used for purposes of an illegal nature;
- **no exposure**, if the activity or process does not present a significant exposure to the risk of committing any of the so-called predicate crimes.

(...)

6. Measures to contain the risk of crime

(...)

7. The Supervisory and Control Body

7.1 Generality

The legislative decree includes in art. 6, among the conditions for which the Entity is not liable for any predicate crimes committed within it, the fact that it has entrusted a body of the entity with autonomous powers of initiative and control with the task of supervising the functioning and compliance with the organization and management model prepared, as well as taking care of its updating¹.

In accordance with this requirement, the Company has a Supervisory Body of a collegial nature and appointed directly by the administrative body.

¹ From 1/1/2012, the task of supervising the operation and compliance of the models and of updating them (functions previously entrusted to the SB) may also be carried out, in joint-stock companies, by the board of statutory auditors, the supervisory board or the management control committee. This is established by art. 14, paragraph 12 of Law 183/2011 (2012 Stability Law) which introduces paragraph 4-bis to art. 6 of Legislative Decree 231/01.

The complete execution of its duties by the SB is an essential element for the exemption provided for by the Decree.

7.2 Appointment and composition

The SB is a collegial body and is composed of three standing members, one of whom acts as President.

The members of the SB are chosen from among qualified individuals with a strong professionalism and in possession of the requisites of integrity to be understood as referred to in Article 4, Decree 30 December 1998, no. 516.

The criteria that inspire the Company for the establishment of the SB are:

- Multi-subject composition,
- Internal and external professional resources,
- Individual member skills.

The members of the SB are appointed by the Board of Directors with a resolution indicating the tasks and powers of the SB, the duration of the office and the remuneration due to each member, as well as the budget allocated to the appointed body.

The appointment resolution is promptly communicated to employees by means of appropriate means of communication.

7.3 Term of office, replacement and revocation of the members of the SB

In order to guarantee its full autonomy and independence, the SB remains in office until the expiry of the mandate determined by the Board of Directors or upon revocation and, in any case, until the appointment of the new SB. The failure of the subjective requirements of integrity for a member of the SB determines the immediate forfeiture of the office. In the event of forfeiture, death, resignation or revocation, the administrative body shall promptly replace the ceased member.

Any revocation of the members of the SB may only take place for just cause, by resolution of the Board of Directors, where "just cause" means serious negligence in the performance of the tasks related to the office such as, among other things:

- failure to draw up information reports on the activities carried out to the Board of Directors;
- the failure to draw up the SB's Verification Plan;
- the failure to verify the reports received by the SB, regarding the commission or alleged commission of crimes referred to in the Decree, as well as the violation or alleged violation of the Model or the procedures established in implementation of the same;
- the failure to convene and hold meetings of the SB during a six-month period;
- failure to attend meetings without justification by a member;
- failure to carry out routine/ad hoc verification activities on the sensitive activities referred to in the SB's Audit Plan.

7.4 The requirements of the Supervisory and Control Body

Autonomy and independence

DoveVivo is committed to guaranteeing the SB full autonomy of initiative and to preserving it from any form of interference or conditioning. To this end, it is provided that:

- its members are devoid, if possible, of directly operational tasks, taking into account the degree of exposure to the risk of crime in the function in which they operate and have no possibility of interference in the Company's operations, or that the heterogeneous multi-subject composition is able to guarantee the aforementioned non-interference, although there is also an internal resource;
- the Body, in the performance of its function, is not subject to the hierarchical and disciplinary power of any corporate body or function;
- reports directly to the administrative body;
- the adoption of its decisions and the determination of its activity are final.

Professionality

To ensure the correct performance of its tasks, it is essential that the Body guarantees adequate professionalism. In this respect, the following are relevant:

- knowledge of legal matters (in particular the structure and methods of committing predicate crimes, as well as the Decree as a whole);
- an in-depth knowledge of the Company's organisational structure;
- adequate competence in auditing and control (risk analysis and assessment techniques).

Good repute and absence of conflict of interest

This requirement must be understood in the following terms:

- the members of the SB are chosen from among qualified individuals with a strong professionalism and in possession of the requisites of integrity to be understood as referred to in Article 4, Decree 30 December 1998, no. 516.
- the SB must preserve the activity from any situation that could generate a concrete conflict of interest.

Continuity of action

The continuity of the SB's action is guaranteed through the duration and the possibility of revocation only for just cause in the terms described above.

(...)

8. Whistleblowing

In compliance with the provisions of Legislative Decree 24/2023, DoveVivo has set up an internal channel for reporting wrongdoings governed by the *"Whistleblowing Policy. Management of reports*

of unlawful conduct and irregularities" which is an integral part of this Model. The aforementioned channel is reserved for reports of DoveVivo employees, self-employed workers who carry out activities for DoveVivo, collaborators, freelancers, consultants and suppliers who work for the Company, volunteers, trainees (paid and unpaid), shareholders and persons with administrative, management, control, supervisory or representation functions at the Company.

The use of this channel involves the implementation of the conditions provided for by law for the protection of the reporting person, including protection from acts of retaliation. In fact, no form of retaliation is allowed against the whistleblower such as:

- (a) dismissal, suspension or equivalent measures;
- b) demotion in rank or non-promotion;
- c) the change of functions, the change of the place of work, the reduction of salary, the modification of working hours;
- d) the suspension of training or any restriction of access to it;
- e) negative notes of merit or negative references;
- f) the adoption of disciplinary measures or other sanctions, including financial sanctions;
- (g) coercion, intimidation, harassment or ostracism;
- h) discrimination or in any case unfavourable treatment;
- (i) the failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the worker had a legitimate expectation of such conversion;
- l) the non-renewal or early termination of a fixed-term employment contract;
- (m) damage, including to the person's reputation, in particular on social media, or economic or financial harm, including loss of economic opportunity and loss of income;
- (n) improper listing on the basis of a formal or informal sectoral or industry agreement, which may result in the person not being able to find employment in the sector or industry in the future;
- o) the early conclusion or cancellation of the contract for the supply of goods or services;
- (p) the cancellation of a licence or permit;
- q) the request for psychiatric or medical examinations.

The same protection against acts of retaliation is provided for under the Legislative Decree in question also in the case of reporting to the external channel prepared by Anac, disclosure through the press or other media or reporting to the judicial authority.

9. The disciplinary system

9.1 Purpose of the disciplinary system

DoveVivo considers compliance with the Model to be essential and, therefore, in compliance with art. 6, paragraph 2, letter e), and 7, paragraph 4, letter b) of Decree 231/01, has adopted an adequate sanctioning system to be applied in the event of non-compliance with the rules provided for by the Model itself, since the violation of these rules and measures, imposed by DoveVivo for the purpose of preventing the crimes provided for by Decree 231, damages the relationship of trust established with the Company.

For the purposes of DoveVivo's application of the disciplinary sanctions provided for therein, the initiation of any criminal proceedings and their outcome are not necessary, since the rules and measures provided for in the Model are adopted by DoveVivo in full autonomy, regardless of the offence that any conduct may cause.

Under no circumstances may unlawful, illegitimate conduct or conduct in violation of the Model be justified or considered less serious, even if carried out in the interest or to the advantage of DoveVivo. Attempts and, in particular, unequivocal acts or omissions aimed at violating the rules and regulations established by DoveVivo are also sanctioned. even if the action is not performed or the event does not occur for any reason.

(...)

10. Training and information

(...)