

**ORGANIZATION, MANAGEMENT
AND CONTROL MODEL
PURSUANT TO LEGISLATIVE DECREE
231/2001
of
DoveVivo S.p.A.
(Abstract)**



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History of the Model 231

REVISION	DATE	DESCRIPTION OF MAIN CHANGES
1	November 2019	First Issue
2	June 2020	Tax Offences Update
3	October 2020	Update of new offences: 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 offences and new offences

INDEX

1. Legislative Decree no. 231 of 8 June 2001	4
2. General Company Information	11
2.1. The Company	11
3. The Organization, Control and Management Model	12
3.1. Objectives and purposes pursued in the adoption of the Model	12
4. Characteristics and structure of the internal control system	13
4.1. The principles of the Internal Control System	13
4.2. The sources of the Internal Control System	13
5. Risk exposure	15
5.1. Methodological premise	15
6. The Supervisory and Control Body	16
6.1. Generality	16
6.2. Nomination and composition	16
6.3. The requirements of the Supervisory and Control Body	17
6.4. Duties and powers	17
6.5. Reports and communications to the SB	18
7. Whistleblowing	20
8. The disciplinary system	20
8.1. Purpose of the disciplinary system	22

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 disbursements, computer fraud to the detriment of the State or a public body and fraud in public supplies', which links the administrative liability of the entity to the commission of offences such as embezzlement to the detriment of the State, 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 supplies and fraud against the European Agricultural Guarantee Fund and the European Agricultural Fund for Rural Development have been introduced in Article 24 of the Decree implementing the PIF Directive (Legislative Decree no. 75/2020);
- Article 24-bis: "Computer crimes and unlawful processing of data", which relates the administrative liability of the entity to the commission of crimes such as the crime of unauthorized 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 installation of equipment, devices or computer programs aimed at damaging or interrupting a computer or telematic system, the crime of unlawful interception, obstruction or interruption of computer or telematic communications, the crime of computer falsifications and the crime of damage to information, data and computer programs, even if used by the State or by other public bodies or in any case of public utility, of 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 offences 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 the relevant data or information.

- Article 24-ter: "Crimes of organized crime" which correlates responsibility in particular to cases of mafia facilitation;
- Article 25: "Embezzlement, extortion, undue inducement to give or promise benefits, corruption and abuse of office", which relates 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 office, for an act contrary to official duties or in judicial acts and trafficking in illicit influence (Law no. 3/2019 so-called "Criminal Conduct"). Corrupt Sweepers). Further offences such as embezzlement, embezzlement by profiting from the mistake of others and abuse of office have been introduced in art. 25 by the Decree implementing the PIF Directive (Legislative Decree no. 75/2020);
- Article 25-bis: "Forgery of coins, public credit cards, revenue stamps and instruments or signs of identification" which relates 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" that relate the liability of the entity to the commission of crimes such as disturbing the freedom of industry or commerce, unlawful competition with threat or violence or even offenses committed in fraud in commerce;
- Article 25-ter: "Corporate crimes", 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, falsity of reports or communications from auditing firms, rigging and illegal distribution of profits and reserves, unlawful transactions on shares or quotas of the company or 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 relate 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 Criminal Code and in special laws;
- Article 25-quarter-1: "Practices of mutilation of the female genital organs";

- Article 25 quinquies: "Crimes against the individual's personality", which relate the administrative liability of the entity to the commission of offences such as reduction or maintenance in slavery or servitude, possession of pornographic material (produced through the sexual exploitation of minors), child prostitution and tourism initiatives aimed at the exploitation of child prostitution. To these, Law 199/2016 added the crime of illegal hiring;
- Article 25 sexies: "Market abuse offences", which relate the administrative liability of the entity to the commission of the offences of insider dealing and market manipulation;
- Article 25-septies: "Offences of manslaughter and serious or very serious negligent injuries, committed in violation of accident prevention regulations and on the protection of hygiene and health at work";
- Article 25-octies: "Receiving stolen goods, money laundering and use of money, goods or utilities of illicit origin, as well as self-laundering", which relates the administrative liability of the entity to operations of transfer, concealment, substitution or use of goods of illegal origin (even where the subject has committed or contributed to committing the predicate crime);
- Article 25-novies: "Offences relating to copyright infringement", i.e. aimed at the unlawful use of copyrighted material;
- Article 25-decies: "Inducement not to make statements or to make false statements to the judicial authority";
- Article 25-undecies: "Environmental crimes", in the new wording after Law 68/2015 which correlates the liability of the entity to the commission of crimes such as environmental pollution, environmental disaster, illegal waste disposal, 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 reformed by Law 161/2017;
- Article 25-terdecies: "Xenophobia and racism" introduced by the European Law 2017 with express reference to the offence referred to in art. 3, paragraph 3-bis, of Law no. 654 of 13 October 1975, now repealed by art. 7 of Legislative Decree 21/2018 which, at the same time, introduced the new criminal offence referred to in art. 604 bis of the Criminal Code;
- Article 25-quaterdecies: "Fraud in sports competitions, abusive exercise of gaming or betting and games of chance carried out 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, done in Magglingen on 18 September 2014;

- Article 25-quinquiesdecies: "Tax offences" 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 declarations 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. No. 74/2000), the concealment or destruction of accounting documents (art. 10 D.lgs. No. 74/2000) and fraudulent evasion of the payment of taxes (art. 11 D.lgs. No. 74/2000). The Decree implementing the PIF Directive (Legislative Decree no. 75/2020) expanded the range of tax offences, also including unfaithful declarations (art. 4 of Legislative Decree 74/2000), failure to declare (art. 5 of Legislative Decree 74/2000) and undue compensation (art. 10 quarter of Legislative Decree no. 74/2000)
- Article 25 sexiesdecies: "Smuggling" introduced by the implementing decree of the PIF Directive (Legislative Decree no. 75/2020), as governed by Presidential Decree no. 43 of 23 January 1973
- "Transnational crimes" (introduced by Law No. 146 of 16 March 2006) correlate the administrative liability of the entity to crimes such as money laundering and criminal association when committed on an international scale.

Pursuant to art. 5 of Legislative Decree 231/2001, in order for administrative liability to be contested 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: the entity's) 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 persons in a subordinate position. More precisely, again pursuant to art. 5, 'An entity shall be liable for offences committed in its interest or to its advantage:

- a) by persons who hold functions of representation, administration or management of the entity or of one of its organizational 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 managers);
- b) by persons under the direction or supervision of one of the persons referred to in point (a) (so-called subordinates).

According to a well-established jurisprudential orientation, administrative liability deriving from a crime also applies in the presence of a Group, albeit with some significant limitations and conditions, when, for example, it is one of the subsidiaries that commits an offence that is a prerequisite for the liability itself (so-called liability escalation).

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

With reference to the pecuniary penalty, a system of calculation by quotas has been established, to be determined by quantity and value, in order to better adapt the amount of the sanction 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 quotas not less than one hundred (100) nor more than one thousand (1000) may be applied. Therefore, the financial penalties range from a minimum of €25,823.00 to a maximum of approximately €1,549,360.00.

According to Art. 11 of the Decree, the judge, preliminarily, will have to determine the number of quotas taking into account certain 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 proceed to determine the amount of the fee 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 Public Administration, except to obtain the performance of a public service; exclusion from concessions, loans, contributions or subsidies and the possible revocation of those already granted; the prohibition of advertising goods or services.

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

Disqualification sanctions shall last for a period 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 offence, 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 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 proof that:

- the management body adopted and effectively implemented, before the offence was committed, organisational and management models suitable for preventing offences of the kind that occurred;
- the task of supervising the functioning and observance 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 offence by fraudulently circumventing the organisational and management models;
- there has been no omission or insufficient supervision by the body referred to in point (b).

In this sense, the profound objective of Legislative Decree 231/2001 is to encourage 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".

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

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

Arts. Articles 12 and 17 of Legislative Decree 231/2001 also recognize a remedial effectiveness to the organization and management model since 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 trial for the crime already committed, an organization and management model suitable for preventing crimes of the kind that occurred (so-called ex post model).

2. General Company Information

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 investment, enhancement and property 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 off-site life.

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 having an internal control system suitable for preventing the commission of unlawful conduct by its directors, employees, collaborators and business partners. The Company adopts the organization and management model with the awareness that an efficient and balanced organization of the company, suitable for preventing the commission of crimes, is pursued by intervening, mainly, on the processes of formation and implementation of the Company's decisions, on controls, preventive and subsequent, 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:

- sensitize all those who operate in the name and on behalf of the Company to a business culture based on legality and make them aware that in the event of violation of the provisions contained therein, they may incur the commission of offences punishable by criminal sanctions that may be imposed on them and administrative sanctions that may be imposed on the Company;
- reiterate that such 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;
- 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 the 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 field 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 is defined as the set of tools aimed at providing a reasonable guarantee of 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 offences.

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 timing of the activities relating to the controls themselves, as well as the performance of controls, including supervisory ones;
- traceability in order to make it possible to document and verify the performance of the controls certifying the characteristics and reasons of the individual operations and in order to allow, moreover, to clearly identify who authorized, carried out, registered, 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 autonomously by a single person;
- attribution of authorization powers (proxies and powers of attorney), where it is possible and appropriate to distribute them in a manner consistent with the company organization in order to avoid the attribution of unlimited powers and, above all, the clear knowledge of powers and responsibilities inside and outside the organization.

4.2 The sources of the Internal Control System

The Company's Internal Control System has its sources in:

- Code of Ethics: a document that illustrates the Company's guiding values by recommending, promoting or prohibiting certain behaviours and, if necessary, dictating specific prohibitions and prescriptions in relation to the offences considered; it must be considered as the essential foundation of the Model, since the provisions contained in the second presuppose compliance with the provisions of the first, together forming a systematic body of internal rules aimed at spreading a culture of ethics and corporate transparency;

- DoveVivo's organisation and management model, which describes the prevention and control measures aimed at preventing the offences provided for by Legislative Decree 231/01 and its regulatory principles;
- Internal operational documentation, in particular the set of organizational procedures, as well as contractual documentation that defines the general principles of reference in the management of business processes

5. Risk exposure

5.1 Methodological premise

The processes defined within DoveVivo for the 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 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 official duties 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. The Supervisory and Control Body

6.1 Generality

Article 6 of the Legislative Decree includes among the conditions under which the Entity is not liable for any predicate offences committed within it, the task of entrusting a Body of the Entity with autonomous powers of initiative and control with the task of supervising the functioning and observance of the organisation and management model prepared, as well as ensuring that it is updated¹.

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

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

6.2 Nomination and composition

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

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

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

- Multi-subjective composition,
- Internal and external professional resources,
- Competencies of individual members.

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

¹ From 1/1/2012, the task of supervising the functioning and observance of the models and of taking care of their updating (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 appointment resolution shall be communicated promptly by appropriate means of communication.

6.3 The requirements of the Supervisory and Control Body

Autonomy and independence

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

- its members are deprived, 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 do not have the possibility of interfering 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 as well as the determination of its activity are final.

Professionality

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

Integrity and absence of conflict of interest

This requirement should be understood as follows:

- the members of the SB are chosen from among qualified and highly professional individuals in possession of the requisites of integrity to be understood as referred to in Article 4, Decree no. 516 of 30 December 1998.
- the SB must protect the business from any situation that may generate a 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.

6.4 Duties and powers of the Supervisory Body

In accordance with the provisions of art. 6, paragraph 1 of the Decree, which entrusts it with the task of supervising the functioning and observance of the Model and of taking care of its updating, the Company's SB is responsible for the following tasks:

- verify the adequacy of the Model, i.e. its suitability to prevent the occurrence of unlawful conduct, and to highlight any commission or attempt;
- supervise the effectiveness of the control of the model;
 - planning the audit activity, and reviewing the results of previous audits;
 - carrying out checks on the activities or operations identified in the areas at risk (e.g. updating of procedures, system of delegations in terms of consistency between powers conferred and activities carried out, knowledge of the Model);
 - holding periodic meetings with DoveVivo's top management and with the Board of Statutory Auditors, in order to discuss, verify and report on the progress of the organisation and management model;
 - promoting meetings with the administrative body, whenever it deems it appropriate to examine or intervene to discuss matters relating to the functioning and effectiveness of the organization and management model;
- verify the effectiveness of the model, i.e. the correspondence between the concrete behaviors and those formally provided for by the Model itself;
- set up an effective and efficient internal communication system in order to obtain the reporting of relevant information pursuant to the decree (reporting of possible violations and/or non-compliance with the model);
- carry out a complete, timely, accurate, accessible and continuous training and information activity aimed at the Company's employees and collaborators, in particular by promoting and defining initiatives for the dissemination of knowledge about the decree and the consequences deriving from its application (organization and management model, risk analysis, etc.);

- Supervise the updating of the model:
 - evaluating, with the collaboration of the competent departments, the initiatives, including operational ones, to be taken, necessary to update the model,
 - evaluating organizational/managerial changes and legislative adjustments to mandatory regulations, in terms of their impact on the organization and management model,
 - proposing to the administrative body the changes to the model, made necessary by significant violations of the provisions, by changes in the organization, by legislative interventions that require its adaptation or by the actual commission of crimes;
- ensure a flow of information to the Company's top management.

It should be noted that, as regards the updating of the model, the adoption of any changes to the same is the responsibility of the administrative body, which has direct responsibility for the adoption and effective implementation of the model itself.

The supervisory function is also extended to the Code of Ethics on which the Supervisory Body carries out monitoring activities.

In carrying out its duties, the SB is always required to:

- document, also through the compilation and keeping of appropriate registers, all the activities carried out and the measures adopted;
- document the reports and information received, in order to ensure the traceability of the interventions;
- Record and retain all documentation.

In order to carry out the tasks assigned to it, the Body is granted all the powers necessary to ensure timely and efficient supervision, in particular:

- carry out, even without prior notice, all inspections deemed appropriate;
- free access to the areas of all the Company's functions, archives and documents;
- avail itself, under its direct supervision and responsibility, of the assistance of all the Company's structures or external consultants;
- directly access the financial resources allocated for this purpose.

6.5 Reports and communications to the SB

Communications to the SB relating to Legislative Decree 231/2001 may be made through the internal channel referred to in point 7 (Whistleblowing), namely:

- by ordinary mail to be addressed to DoveVivo S.p.A., Viale Monte Nero 6, 20135 Milan, reserved for the attention of the DoveVivo Supervisory Body;
- by sending it to the mailbox managed by the SB odv@dovevivo.it.

Given the SB's commitment to ensuring the confidentiality of communications, communications made through the two methods indicated above do not enjoy the protections provided for in point 7 (Whistleblowing).

7. Whistleblowing

In compliance with the provisions of Legislative Decree 24/2023, DoveVivo has set up an internal whistleblowing channel 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 from DoveVivo employees, self-employed workers who carry out activities in favour of 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 entails the implementation of the conditions provided 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) relegation in grade or failure to promote;
- (c) a change of duties, a change of place of work, a reduction in salary, a change in working hours;
- (d) suspension of training or any restriction of access to it;
- (e) negative merit notes or negative references;

- (f) the adoption of disciplinary measures or other sanctions, including financial sanctions;
- (g) coercion, intimidation, harassment or ostracism;
- (h) discrimination or otherwise 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 opportunities and loss of income;
- (n) improper listing on the basis of a formal or informal sectoral or industrial agreement, which may result in the person not being able to find employment in the sector or industry in the future;
- (o) the early termination or cancellation of the contract for the supply of goods or services;
- (p) the cancellation of a licence or permit;
- (q) a request to undergo psychiatric or medical examinations.

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

8. The disciplinary system

8.1 Purpose of the disciplinary system

DoveVivo considers compliance with the Model 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 set out in 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 crime that any conduct may cause.

Under no circumstances shall any conduct that is unlawful, illegitimate or in any case in violation of the Model be justified or considered less serious, even if carried out in the interest or to the advantage of DoveVivo. even if the action does not take place or the event does not occur for any reason.