



# INNOVA CODE OF ETHICS

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Innova S.r.l, Innova Engineering S.r.l.,  
Sinergia S.r.l. and Katana S.r.l., subject to the management  
and coordination activity of Ribot S.r.l.,  
intend to jointly define the fundamental ethical  
and behavioral rules, which constitute the internal reference  
base to be followed for all their activities.  
To this purpose, we formally adopt and  
disseminate this Code of Ethics.



The Code of Ethics defines the fundamental ethical and behavioral rules, which constitute the reference basis to be followed for all the group companies conduct and activities.

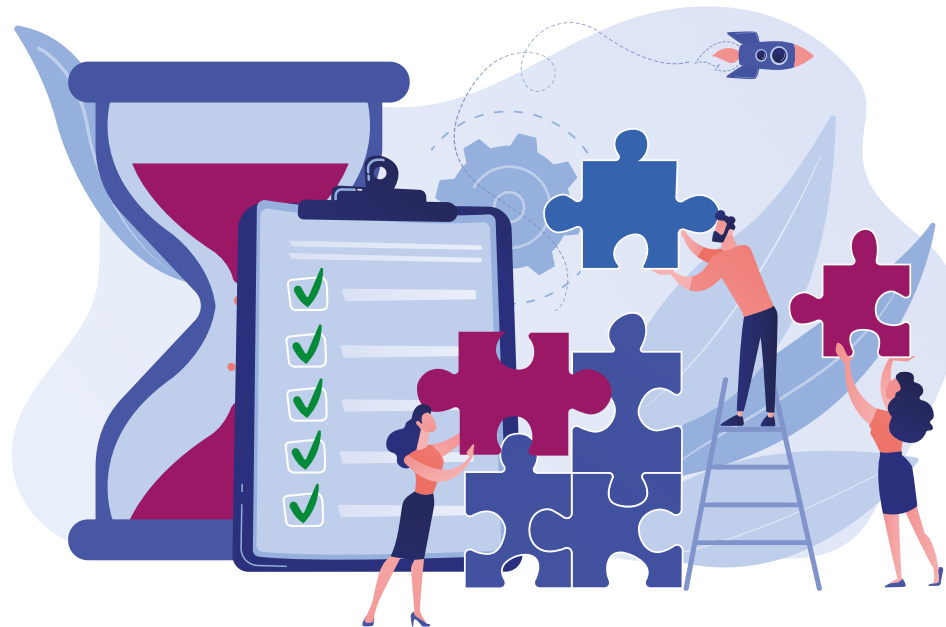
The Code therefore identifies the conditions aimed at guaranteeing that business activity is inspired by the principles of correctness, transparency, diligence, honesty, mutual respect, loyalty and good faith, in order to safeguard the interests of members and stakeholders and ensure an efficient, reliable, correct working method, set up in compliance with current legislation and ethical principles deemed adequate, necessary and essential to operate within the Italian and international market and the resulting relationships with operators, companies and institutions.

The Code of Ethics applies to all those who operate, internally or externally, for the Company (hereinafter "the Recipients") for example: Board of Directors, Board of Statutory Auditor and Oversight Committee, managers, employees, external collaborators, suppliers and business partners.

The Code of Ethics contents are specifications of the diligence, loyalty and impartiality obligations, which qualify the correct fulfillment of the work performance and the behavior of all Recipients.

Each Recipient, in his/her own role, must provide the highest level of professionalism and carry out the assigned tasks with commitment, contributing to the achievement of company objectives. The Company's interest pursuit can never justify incorrect behaviors and therefore the Recipients are not authorized to act in violation of this Code of Ethics specific rules, to obtain an advantage or to favor a interest of the group companies. In case of the Code of Ethics provisions should conflict with internal procedures or internal regulations, the Code of Ethics will prevail.

*“A mission that has always been developed through the combination of technical expertise and creativity, technology and design, Italian passion and international vision, to achieve the highest standards in energy efficiency and performance quality.”*



## Our mission

Our mission is dedicated to design, development and production of heating, ventilation and air conditioning solutions that take the well-being of people and the environment a step forward, in a healthy economic context based on the concepts of beauty, harmony and innovation.

A mission that has always been developed through the union of technical skills and creativity, technology and design, Italian passion and international vision, to achieve the best standards in terms of energy efficiency and quality of performance.

Our activities are based on cleanliness, harmony, environmental quality, creating products that do not pollute and paying the utmost attention to compliance with ESG parameters.

We want to get people to think of our products as a mean that leads to greater well-being and sustainability.

# Our ethical principles

“Environmental protection”

“Transparency”

“Confidentiality”

“Loyalty”

“Security”

“Correctness”

“Honesty”

“Quality”

“Respect”

“Privacy Protection”



## **5.1 Honesty, correctness, loyalty and respect for the rules**

In our Company everyone is required to behave with correctness and loyalty, guaranteeing maximum honesty in enterprise management.

We aim to operate in strict compliance with the law and we work to ensure that all our staff act in this direction. This commitment is also extended to our consultants, partners, suppliers and anyone who has relationships with us.

We cannot start or continue any relationship with anyone who does not intend to align with these principles.

## 5.2 Quality, professionalism and responsibility

Everyone must give the utmost professionalism to achieve the company objectives, within the responsibilities connected to his/her own role.

Anyone who holds top positions must set an example of leadership for subordinates, in compliance with the Code of Ethics principles.

Responsibility value respect implies that all our activities shall be carried out:

- by inspiring to the principles of prudent management and characterizing ourselves as solid, reliable, transparent, open to innovation, interpreters of the ever-changing needs of customers, attentive to partners and stakeholders' needs, interested in the best development and use of human resources and the most efficient company organisation;
- by pursuing company interests in compliance with laws and regulations, as well as in compliance with the principles of correctness and loyalty; consequently, we ensure that our commercial behavior is informed by compliance with these principles, recognizing the fundamental role of competition as a positive stimulus to the constant quality improvement;
- by protecting the company's reputation and assets;
- by contributing to the social and economic growth of the territories where our Company is based

### 5.3 Respect for the person

We consider the human factor as a fundamental and indispensable for company development and therefore we believe it is important to establish and maintain relationships with employees and collaborators based on mutual trust and respect.

We guarantee the right to working conditions that respect the dignity of the person and therefore we do not allow acts of psychological violence, discriminatory or harmful behaviors towards the person, their beliefs or conditions, in internal and external working relationships.

This vision also means guaranteeing uniformity of treatment and equal opportunities in a work environment capable of enhancing the contribution and potential of the

In managing contractual relationships that imply the establishment of hierarchical relationships, we are committed to ensuring that authority is exercised with fairness and correctness without any form of abuse to undermine the dignity and autonomy of the person.

We consider the protection of safety, freedom and personality as an essential value and therefore:

- we condemn any discrimination/harrasment based on age, sex, race or ethnicity, skin colour, religion or belief, philosophical or political opinion, trade union membership, marital or social status, nationality, sexual orientation or gender identity and expression, pregnancy, state of health or disability;
- we condemn any form of racism and xenophobia and therefore we repudiate any activity that may involve the propaganda of ideas based on superiority, racial or ethnic hatred, discrimination, harrasment and violence conducts, or even just their incitement because racial, ethnic or religious reasons
- we repudiate any activity which could cause harm to individual safety, such as the trafficking of organs and weapons and any possible individual exploitation or reduction to a state of subjection or slavery;
- we condemn any behavior aimed at encouraging the work exploitation, illegal immigration, narcotic or psychotropic drugs illicit trafficking and smuggling;
- we attribute primary importance to the minor's protection and to the repression of every exploitative behavior against them, including child pornography.

We undertake to verify in advance that all our investment, purchase or sale activities do not finance or otherwise favor the activities listed above.

## 5.4 Privacy and confidentiality

Our activity is based on respect for privacy by design, privacy by default and confidentiality; therefore, we are committed to adopting all appropriate technical and organizational measures to protect the confidentiality of data and information. It is expressly forbidden to communicate, disseminate or make improper use of confidential data, information or news regarding the group companies and their activities, as well regarding customers or third parties with which we have, or are about to have, business relationships.

Any disclosure of Company's confidential information must require necessary approvals. Any information disseminated unlawfully or unauthorized, may lead to consequences whatever the management deems most appropriate.

In compliance with this principle, the Recipients are required to strictly observe the duty of confidentiality, even after the termination of their respective relationships, for any reason.

## 5.5 Intellectual property protection

We pay constant attention to the technological evolution of our products and services, which represents the basis for achieving the highest quality standards.

All our industrial and intellectual property rights (e.g. patents, trademarks, design, utility models, materials covered by copyright, inventions, computer programs, trade secrets or other confidential internal information, including plans industrial and strategic projects, marketing, pricing and sales data, etc.) constitute an extremely valuable asset that bases our competitive strength and therefore we direct all our efforts to protect them.

At the same time, we pay the utmost attention not to violate the industrial property rights of third parties.

The Recipients are therefore required to:

- avoid any behavior that could represent infringement of industrial property rights, alteration or counterfeiting of distinctive signs or patents, industrial designs or models, both national and foreign, or violation of intellectual works protected by law author's;
- to import, sell or use products bearing counterfeit, false or altered trademarks or made by usurping third parties' rights;
- refrain from using in an illicit and/or improper manner, in the interests of the company or third parties, patents, designs, models or other intellectual works, or parts thereof, protected by industrial property and/or copyright law;
- not allow third parties to use distinctive signs, designs, patents or other intellectual property rights of the group companies, unless the necessary authorization;
- safeguard the Company's intellectual property with the utmost care and confidentiality, aware that some innovations may constitute industrial secrets and, in any case, obtaining previously the signing of appropriate confidentiality agreements, if it is necessary to proceed with any disclosure and limiting it only to strictly necessary.

## 5.6 Conflict of interest

Every decision relating to Company's operations and activities must be based on objective and demonstrable evaluations, without being influenced by the expectation of direct or indirect personal benefits.

We require our employees, collaborators, consultants and members of Company Boards to be impartial and independent and to make decisions with the sole purpose of legitimately pursuing the Company objectives, avoiding situations of conflict of interest and situations that may prejudice, or even merely affect, the ability to decide and/or judge in an impartial and autonomous way.

During their working hours, staff cannot carry out other activities not consistent with their organizational duties and responsibilities

Situations that may create a potential conflict of interest include:

- to have economic interests with a competitor of our group or connected Company;
- to do an outside employment and/or moonlighting;
- to run your own business
- to be a shareholder, Director or manager of a competitor with our group or connected Company.

In case of potential conflict of interest, the Oversight Committee must be informed, which will evaluate the situation and provide the relevant indications.

## 5.7 Accounting transparency

Our administrative and management activity must comply with the principle of accounting transparency.

Therefore, also to prevent the commission of tax crimes, we are committed to:

- verify in advance the existence of third-party companies with which it intends to establish any relationship, through a preventive due diligence;
- maintain transparent and correct behaviour, ensuring compliance with law, regulations and internal company procedures, in every activity concerning drafting declarations about income or value added taxes, drafting financial statements, reports or corporate communications required by law and, more generally, any legally relevant document concerning economic, equity and financial elements of the Company;
- keep and preserve the accounting, administrative and fiscal records with precision and diligence, allowing their complete accessibility by the competent functions, internal control Boards and public authorities during any checks and/or inspections;
- maintain transparent and correct behavior, ensuring compliance with the law and regulations, in the preparation of extraordinary operations relating company assets;
- transparent and correct behavior, ensuring compliance with legal and regulatory provisions in the management of tax transactions.

Furthermore, it is expressly forbidden to:

- issue, account for and consequently include in the accounting records and in the declarations relating to income or value added taxes, invoices addressed to, or received from, subjects other than the actual recipients or issuers, or for amounts not corresponding to what is indicated in the document itself;
- pay, account for and consequently include in the declarations relating to income or value added taxes, invoices or other documents for non-existent transactions, even partially;
- carry out simulated operations or use false documents or other fraudulent means capable of hindering the investigation and misleading the Financial Administration;
- hide, in whole or in part, the accounting records or documents whose conservation is mandatory;
- carry out simulated disposal operations or any other fraudulent act on the Company's assets, aimed at making totally or partially ineffective the compulsory collection procedure;
- provide false information, in particular, active elements for an amount lower than the actual one or fictitious passive elements in the context of transactions and in tax-relevant operations;

- display in the financial statements, reports or other corporate communications required by law, addressed to shareholders or the public, untrue facts, even subject of evaluations, or to omit information, on the economic, patrimonial or financial situation, when this communication is required by law, so as to mislead on the aforementioned situation and in order to possibly cause financial damage to the shareholders or creditors, in order to obtain an unfair profit for themselves or others;
- falsely certify or conceal information regarding our economic, patrimonial or financial situation in reports or other communications, aware about these falsehoods and with the intent to misleads the recipients, in order to obtain an unfair profit for themselves or others;
- conceal documents or, with artifice, prevent or otherwise hinder the control or audit activities by corporate Boards or shareholders;
- distribute profits or advances on profits not actually achieved or allocated by law to reserves, or distribute reserves, even if not constituted with profits, which cannot be distributed by law;
- carry out operations on the share capital in violation of the law provisions or to the detriment of the Company's creditors.

## 5.8 Contrast against money laundering and self-laundering crimes

We undertake to comply with all rules and provisions, both national and international, regarding anti-money laundering and self-laundering.

To guarantee maximum transparency in the Company's economic and financial management, the Recipients must not replace or transfer money, goods or other benefits deriving from illicit activities, or carry out other operations in relation to them, to hinder the identification of their origin.

In relation to all commercial relationships undertaken on behalf of the Company, the Recipients must ensure that partners, customers, suppliers or third parties give adequate guarantees of reputation and reliability.

The Company does not purchase goods that give doubts about the lawfulness of their origin, based on the conditions of the offer, and does not have economic relationships with subjects that give reasonable suspicion that they are carrying out illicit activities.

## 5.9 Repudiation of all forms of terrorism and organized crime

We repudiate any form of criminal organization, as mafia-connected or terroristic, both national and international.

We undertake not to establish any working or business relationship with subjects directly or indirectly involved in criminal organisations, or in any case linked by ties of kinship or affinity with their exponents.

We also undertake to adopt every measure necessary to prevent the danger of our involvement, avoiding any working or business relationship that could facilitate or finance, even indirectly, such activities.

## 5.10 Contrast against racism and xenophobia

We condemn all forms and expressions of racism and xenophobia; therefore, we repudiate any activity that may involve the propaganda of ideas based on racial superiority or hatred and the commission of discrimination and violence acts for racial, ethnic, national or religious reasons, or even just their incitement.

## 5.11 Contrast against bribery

We pursue the objective of maximum integrity and correctness in relationships with public institutions, including contracts and what concerns the request and/or management of public funding.

We do not tolerate bribery, favouritism, collusive behaviour, direct or indirect solicitation, including through promises of personal benefits towards:

- public officers or public service employees or any other party connected or linked to the Public Administration;
- representatives, members or officials of national institutions, international courts, bodies of the European Union or foreign states;
- political representatives or their family members or people closely linked to them;
- subjects linked to the Company by business relationships or any other relationship, as well as their relatives or in-laws.

## Our ethical principles

Courtesy acts, such as gifts, are permitted only when they are of modest value and in any case such as not to compromise the integrity or reputation of one of the parties and in any case when they are such that they cannot be interpreted by an impartial observer as aimed at acquiring advantages improperly, as established by our specific internal policy regarding gifts, sponsorships and donations.

We believe it is essential that even relationships with private parties are based on the principles of loyalty, integrity, correctness and good faith.

In relations with private parties, it is prohibited to promise, offer or grant, directly or through intermediaries, an undue advantage of any nature to individuals who carry out managerial or working functions on behalf of the private counterpart, so that they perform or omit acts in violation of one's duties.

## 5.12 Safety in the workplace

We want to guarantee the best health and safety conditions in the workplace, and we are committed to promoting and spreading responsible behavior among our employees, implementing the necessary preventive actions, in order to preserve the health, safety and security of all staff as well as third parties who visit our workplace.

We are UNI EN ISO 45001:2018 certified, a certification that we are committed to keeping active, valid and effective over time.

Employees are required to observe the instructions and directives given by the delegates to ensure the fulfillment of obligations regarding health and safety in the workplace.

We are committed to allocating all adequate organisational, instrumental and economic resources to guarantee full compliance with current accident prevention regulations and the continuous improvement of workers' health and safety prevention measures.

### **5.13 Environmental protection**

We consider environmental protection to be fundamental in a view to sustainable development of the territory in which we operate, in consideration of the rights of the community and future generations. For this reason, we are committed to spreading a culture of respect for the environment by promoting responsible behavior and practices to reduce the direct and indirect impacts connected to our activities.

In every activity, the operational solution must be sought that allows the air, water or soil pollution to be reduced as much as possible and for this purpose, we pay particular attention to the following aspects:

- promotion of processes and activities as safe and respectful of the environment as possible, using advanced criteria and technologies about environmental protection, energy efficiency and sustainable use of resources;
- use of energy most from renewable sources;
- implementation of initiatives aimed at improving the energy efficiency of the Company buildings;
- construction of eco-sustainable buildings and promotion of recycled and recyclable materials use;
- assessment of the environmental impacts of Company processes and activities and minimization of environmental risks;
- collaboration with stakeholders to optimize the environmental issues management;
- reduction of waste production and use of adequate waste disposal systems;
- achievement of high standard environmental protection by implementing adequate management and monitoring systems.

*Internal relationships are the foundation of a peaceful and productive work environment. Principles guide our daily interactions, promoting respect, collaboration and transparency among all team members.*



## 6.1 Tone at the Top

The Company Boards, aware of their responsibility and respecting the statutory, legislative and regulatory provisions in force, are required to implement and observe the principles and rules set out in this Code of Ethics, being the first to set a good example for all Recipients.

It is required:

- always act consistently with the Company Mission and the Code of Ethics;
- to establish, implement and maintain suitable systems and procedures to ensure compliance and to monitor its maintenance;
- to behave inspired by autonomy, independence, correctness, integrity, loyalty and a sense of responsibility;
- to guarantee continuous and informed participation in the meetings and activities of the Board of which they are part;
- to verify the possible existence of conflict of interest or tasks and positions incompatibility, within and outside the group Companies, avoiding acts in conflict of interest situations;
- to keep the information confidential, avoiding using their role to obtain personal advantages, both direct and indirect;
- to comply with the requests for information from other Company control, supervisory or audit Boards;
- to ensure that only true, complete and unaltered records are presented to the Shareholder Meeting in relation to a specific agenda;
- not carry out acts or actions to the detriment of creditors;
- do not engage in retaliatory behavior or other actions to disadvantage or discriminate the whistleblowers.

## 6.2 Rules for Employees and collaborators

Employees and collaborators must carry out the tasks and activities entrusted to them with loyalty, diligence, professionalism and commitment.

Each employee and collaborator must comply with the following behavioral rules:

- to avoid discriminatory conduct based on age, sex, race or ethnicity, skin colour, religion or belief, philosophical or political opinion, trade union membership, marital or social status, nationality, sexual orientation or identity and expression gender, pregnancy, health or disability;
- do not smoke and use alcohol, drugs or psychotropic substances in the workplace;
- to create a positive and collaborative working environment, respecting different opinions, do not use inappropriate, offensive or aggressive language towards others nor act mobbing, harassment or violence;
- to avoid any situation or act that could lead to a conflict of interest, even potential, with the Company and avoid any situation able of undermining independence and objectivity in its own role;

- do not accept, even through a third party, money, goods or other benefits from whom one has come into contact because job, or with whom the Company has a relationship, especially if there is reason to believe (or even just suspect) that said benefits are intended to influence decisions, with a view to more favorable treatments or undue services;
- to comply the duty of confidentiality;
- to use with care the Company's resources, avoiding improper uses that could cause damage or reduce efficiency or that conflict with the company's internal procedures and policies;
- to collaborate with the Judicial Authority in the context of investigations and trials, as well as with other Authorities, including the Oversight Committee, during checks and/or controls, when requested or needed;
- to report any conduct that may constitute a violation of this Code of Ethics or laws, instructions or procedures adopted by the Company;
- do not engage in retaliatory behavior or other actions to disadvantage or discriminate the whistleblowers.

*Integrity, professionalism and transparency  
in order to build strong and lasting relationships.*



## 7.1 Customer relationships

It is our priority to promote business relationships inspired by correctness, honesty, efficiency and professionalism, in compliance with law and therefore we are committed to:

- to provide accurate, truthful and comprehensive information about products and services, avoiding any misleading, elusive and/or incorrect practices, in order to allow customers to make informed decisions;
- to promote and maintain loyal and correct behaviour, avoiding any possible crime against industry or trade, as well as any act of illicit competition, fraud, counterfeiting or industrial property breach;
- to monitor the customer satisfaction and loyalty achievement, so as to spread and enhance the relationship culture;
- do not finance activities aimed at the production or marketing of highly polluting or dangerous products for the environment or health;
- do not to have financial relationships with counterparts that, even indirectly, contribute to violating the person fundamental rights;
- not to maintain any business relationship with counterparties whose involvement in criminal, terrorist or otherwise illicit activities is known, or even suspected.

## 7.2 Suppliers relationships

Suppliers are selected and qualified according to adequate and objective criteria, balancing the need to obtain favorable economic conditions with the need not to derogate from the parameters of quality and professionalism in the supply of goods and services. The choice of consultants is oriented towards individuals with adequate professionalism, seriousness and reliability. They are bound to confidentiality with respect to the information they acquire in their role, and they can only use such information for reasons inherent to the mandate; in business relationships with third parties, they are also required to behave ethically and respectful of the law.

In the evaluations of suppliers, we must verify, as far as possible, their non-involvement with mafia or criminal organizations. Suppliers must declare to comply with this Code of Ethics before entering the contractual relationship and not to adopt behaviors that may lead to violating its rules.

Any indicators of supplier's poor transparency must be promptly investigated and to keep every evidence; if there are doubts about the the supplier's reputation, the business relationship must not be undertaken or must be interrupted.

Relationships with suppliers is under constant monitoring. The supplier is required to communicate without delay any situation and/or circumstance that may affect the maintenance of the selection requirements. In this regard, the untrue or incomplete declaration may lead to the contract termination.

We cannot accept or receive gifts from suppliers that exceed normal courtesy and business practices.

Complaints and reports of defects or inconsistencies in supplies must be truthful and not instrumental to unduly advantage the Company. The outcome of the control activities carried out on the goods, services and performances are shared with suppliers, with the aim of encouraging their progressive improvement in the common interest.

The fees paid to Suppliers must be in line with normal market conditions, adequately documented and commensurate exclusively with the performance and contractual conditions. Under no circumstances, the fee must be paid for non-existent services, in whole or in part.

Payments cannot be made to parties other than those indicated and verified in the contract.

### 7.3 Public Institutions and Administration relationships

Public Administration and Institutions relationships (both national and foreign) are managed directly by the Directors or by specifically delegates and must be based on principles of correctness and transparency, maintaining records of the meeting. Relationships are based on maximum collaboration so as not to hinder institutional activity; in relations with public officers or public service employees, mutual independence must be preserved, paying attention not to adopting actions or attitudes that could be interpreted as attempts to improperly influence decisions.

It is expressly prohibited:

- give or promise money or any other benefit to a public officers or public service employees;
- to offer gifts to public officers or public service employees, even on the occasion of holidays, with the exception of symbolic value gifts, directly and unequivocally attributable to normal courtesy practices and, in any case, such that they cannot generate in the other party, or in an extraneous and impartial third party, the impression that they are aimed at making the Company acquire undue advantages, or, more generally, giving suspicion that they may be characterized by illegality or immorality;

- to instrumentally propose employment opportunities to public officers or public service employees (or their relatives and in-laws) or offer commercial opportunities of any other kind that could unduly benefit them;
- to favor, in the purchasing processes, suppliers and sub-suppliers only because they are indicated by Public Administration employees as a condition for the subsequent carrying out of their activities;
- to knowingly exhibit and/or use false documents or documents containing false or altered data, steal or omit documents, provide false information or omit due information, to unduly obtain contributions, loans or such other disbursements from the State, the European Community or other public entity or, more generally, in order to unduly guide the Public Administration decisions;
- to engage in misleading conduct that could unduly influence the Public Administration decision;
- make unjustified or unforeseen entertainment expenses, other than the mere promotion of the Company image;
- to provide or promise to provide, request or obtain confidential information and/or documents or otherwise likely to compromise the integrity or reputation of a third party.

Anyone who receives explicit or implicit requests for any kind of benefits by public officers or public service employees, must immediately stop all relationships with them and report to their direct manager and the Oversight Committee.

Inspection or audits by the Control Authorities must be managed by specifically authorized representatives and conducted with a spirit of collaboration, correctness and transparency, with an absolute prohibition on hindering the regular carrying out of the audit activity through the concealment or destruction of documentation.

## 7.4 Political and trade union organizations relationships

Political and trade union organizations relationships are reserved for the authorized top functions and must be based on transparency, independence and integrity in order to encourage correct dialectics, without any discrimination or difference in treatment between parties or trade unions.

The Recipients personal membership in any political organization and participation in its initiatives, must take place outside working hours and have no connection with the role in the company, nor influence its operation.

The Company cannot support events or initiatives that have an exclusively political purpose; it must also refrain from applying any direct or indirect pressure on political representatives and cannot make direct or indirect contributions, in money or in any other form, to political parties, movements, committees, trade union organizations, including their representatives and the attributable associations, with which a conflict of interest may arise, except in cases provided by law.

## 7.5 Competitors relationships

We consider fair competition as driving factor for improve our products and services. Compliance with competitive law constitutes a fundamental requirement of our activity, with a view to preserving the correct functioning of the market dynamics, economic efficiency and, consequently, virtuous processes of innovation, production and sales. For this reason, we prohibit all behaviors that may prevent or hinder the competitive process in the market, reducing competitive pressure through concentration operations, abuses of a dominant position or cartels.

## 7.6 Mass Media relationships

Communications to any media must be truthful, clear and transparent; they must also comply with company communication policies.

Relations with the press and other mass media are reserved to the specifically designated Company delegates.

Advertising must be based on full compliance with this Code of Ethics and in any case must never translate into misleading, vulgar or offensive messages.

We care of the information published on our institutional website to guarantee its completeness and communicative effectiveness.

# Final provisions



## 8.1 Code of Ethics application and dissemination

The Board of Directors is responsible for this Code of Ethics application, control and compliance, with support of the Oversight Committee, appointed pursuant to articles 6 and 7 of Legislative Decree 231/01.

This Code of Ethics can be changed, modified or amended at any time by the Board of Directors.

The Code of Ethics and its updates are brought to the attention of all Recipients through adequate communication and dissemination.

In particular, the Code of Ethics in its most updated version:

- must be published on the Company's website and made accessible to everyone;
- must be delivered, in paper or digital copy, to each Recipient upon starting the relationship with the Company;
- be the subject of specific disclosure campaigns to customers, suppliers or other Recipients, including potential ones, in the most appropriate ways.

## 8.2 Whistleblowing

Any breach of the law, the organizational model adopted by the Company and this Code of Ethics must be reported to the Whistleblowing Manager, even anonymously, following the specific procedure on the site link <https://innovaenergie.segnalazioni.net/>

The reporting of illicit conduct must be appropriately detailed and based as much as possible on precise and consistent factual elements.

We guarantee the confidentiality of the whistleblower identity and the absence of retaliatory or discriminatory acts, direct or indirect, against him/her, for reasons related to the reporting.

The Whistleblowing Manager collects the report, verifies its validity and evaluates the opportunity to proceed with further investigation. The Whistleblowing Manager undertakes to maintain the confidentiality of the whistleblower, except in the case of public authorities' involvement. In any case, all requests will be answered to promptly without risk to suffer any form, even indirect, of retaliation.

Sanctions will be applied against those who violate the whistleblower's protection measures, as well as those who intentionally or grossly negligently make reports that prove to be unfounded.

Omitting or not reporting violations constitutes a breach of this Code of Ethics.

### 8.3 Disciplinary actions

Violation of this Code of Ethics or internal policies may result, depending on the case:

- disciplinary actions, including dismissal, in accordance with the rules on labor law and individual contracts;
- until the revocation of the office, in the case of Company's Bodies members;
- criminal and administrative sanctions against the people involved and the Company, including economic sanctions, prison sentences and other measures;
- termination of the business relationship and further economic sanctions;
- compensation for damages



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